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2:11 pm, Oct 17, 2008

Alameda County
Environmental Health

November 15, 2005

Ms. Shelby Lathrop
Shaw Environmental, Inc.
4005 Port Chicago Highway
Concord, CA 94520-1120

Dear Ms. Lathrop:

Subject: Fuel Leak Case RO0000067, 76 Station # 3737, 1400 Powell St., Emeryville, CA, 94608

Alameda County Environmental Health (ACEH) staff has recently reviewed the case file for the subject and adjacent sites including the August 30, 2005 *Soil and Groundwater Investigation Workplan* prepared by TRC. We have the following technical comments, we request you address when performing the proposed work. In addition, please submit the technical reports requested below.

TECHNICAL COMMENTS

1. Historical Site Use- Little to no information was given regarding the historical site usage. Our office obtained additional information by reviewing the files for the neighboring property, aka 5885 Hollis St., where a new development is being considered. The entire block, bordered by Hollis, Powell, Peladeau and 59th Streets, was at one time, occupied by Union Oil of California. Union Oil used the property as a distribution facility, which contained above ground and underground storage tanks, a garage along Hollis St. and an auto repair shop along Peladeau St. These facilities are noted in historical Sanborn maps for the entire block. On the western portion of your site, it appears that 4000 and 2000 gallon fuel tanks and oil ASTs were located in the 1950s. In 1967, gas and oil (tanks) were noted on the eastern half of the site. No information is given regarding the removal of any of these underground tanks. In 1990 a 10,000 gallon gasoline tank was removed from 5805 Hollis St., just north of your site from the S. B. Thomas property. Though contamination was observed no other details of the removal have been found. Because the neighboring property is proposing development, additional soil and groundwater sampling was done on the site. Of particular interest to your site are samples taken north of your site, which reflect releases of uncertain origin. Groundwater samples taken by Treadwell and Rollo in 2005 have detected up to 150,000 ppb TPHg, 9900 ppb TRPH, 700 ppb TPHd and 2500, 3600, 1100 ppb, benzene, ethyl benzene and xylenes, respectively, in groundwater samples.

The Site Background in the TRC report begins by stating an oil/water separator was removed on August 11, 1993. A soil gas survey was performed in 1997, product piping was removed and over-excavated in May 1999 as was the removal of a 550 gallon waste oil tank. A grab groundwater sample from the tank cavity of the existing fuel tanks was also taken at this time, which detected a release of TPHg, TPHd, BTEX and MTBE. Because of the additional information known about your site and the adjacent site, we recommend a more comprehensive investigation be performed.

2. Additional areas of concern- We believe that in addition to the nine borings proposed in the TRC work plan these additional areas/concerns warrant investigation:
- Please provide a copy or description of the PEG 9/97 Soil Gas Survey as requested below.
 - Please indicate the location of the former oil/water separator removed in 1993.
 - Please provide specific information on the USTs at the site. What are their size, and contents and when were they installed?
 - In order to investigate the potential releases from former Union Oil USTs and ASTs, we request that you add TPHmo to your analysis. In addition, your analytical laboratory should look at the chromatograms from the samples to see if there are differences, which could indicate releases from different sources.
 - In order to investigate the "gas and oil" noted on the eastern portion of the site on Sanborn maps, several additional borings should be added between the four proposed easterly borings.
 - To clarify the source of elevated TPH constituents detected in the borings just north of your site, we recommend additional samples north of the existing vacant building, station building and dry cleaner. If the dry cleaner uses/used chlorinated solvents, we recommend that HVOCs be added to the analysis of samples collected near this business. Sampling along sanitary sewer lines would be reasonable locations. Please provide a work plan addendum as requested below.

TECHNICAL REPORT REQUEST

- December 30, 2005- Soil Gas Survey information, oil/water separator information, current UST information.
- December 30, 2005- Work plan addendum indicating additional sampling locations and analyses to investigate the "gas and oil" and the area adjacent to the vacant building, station building and dry cleaner.
- January 30, 2006- Soil and Groundwater Investigation Report

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water

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Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this case meet this requirement.

If you have any questions, please call me at (510) 567-6765.

Sincerely,

Barney M. Chan
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: files, D. Drogos

Mr. Najmeddin Revan, Emeryville Chevron, 1400 Powell St., Emeryville, CA 94608

Mr. Keith Woodburne, TRC, 1590 Solano Way, Suite A, Concord, CA 94520

Mr. Fillmore Marks, Marks Management Company, 505 Sansome St., Ste 1400
San Francisco, CA 94111-3118

Mr. Geoff Sears, Wareham Development, 1120 Nye St., Ste 400, San Rafael,
CA 94901

Mr. Ignacio Dayrit, City of Emeryville, 1333 Park Ave., Emeryville, CA 94608

Mr. Glenn Leong, Treadwell & Rollo, 501 14th ST., 3rd Floor, Oakland, CA 94612

11_15_05 1400 Powell St.