

Nowell, Keith, Env. Health

To: Dennis Dettloff
Cc: Roe, Dilan, Env. Health
Subject: Fuel Leak Case RO229, UNOCAL #5325, 3220 LAKESHORE AVE., OAKLAND , CA

Dear Mr. Dettloff,

Thank you and Mr. Ed Weyrens of Antea™Group (Antea) for participating in the conference call this morning regarding fuel leak case for UNOCAL #5325, 3220 Lakeshore Drive, Oakland, Alameda County Environmental Health (ACEH) case number RO0000229. ACEH staff has reviewed the case files including the *Case Closure Request (RFC)*, dated November 12, 2013, prepared by Antea for the subject Site. ACEH denied the RFC in a letter dated December 24, 2013 based on data gaps perceived by ACEH which questioned the completeness of the Site Conceptual Model (SCM) as it relates to the groundwater contaminant plume delineation and requested a meeting to discuss the Site with you.

Items which ACEH discussed during today's teleconference and wished to have addressed include:

Plume stability:

- Relationship of depth-to-water (DTW), direct and indirect free product observations, and concentrations of total petroleum hydrocarbons as gasoline (TPHg), methyl tertiary butyl ether (MTBE), and tertiary butyl alcohol (TBA) for groundwater monitoring wells U-1, U-2, U-5, and U-6;
- Review of the historic groundwater flow directions, radial outward flow, and the offsite migration of the contaminant plumes for TPHg, MTBE, and TBA;
- Concentrations plots for TPHg, MTBE, and TBA since 2005 using monitoring wells U-1, U-2, U-5, and U-6. As the data trend graphs for TPHg as plotted from Geotracker are misleading based in part on the lack of data in the time interval between 2010 and 2012, ACEH requests you do not use Geotracker as the source of the data trend plots.

Preferential Pathways:

- Identification of depth to- and location of- sanitary sewer and storm drains due to the shallow DTW at the Site. Please review the ACEH case file, including information contained in MISC_R_1997-02-28. PDF copies of case files can be reviewed at <http://www.acgov.org/aceh/lop/ust.htm>;
- Location(s) of storm drain discharge outlet(s).

Reporting:

- Preparation of a draft focused SCM addressing the above mentioned data gaps;
- Preparation of a figure on an aerial overlay showing locations of beneficial use wells within one mile of the Site, the location of Lake Merritt, and depicting the estimated plume boundaries for TPHg, MTBE, and TBA.

As discussed in our conference call, please provide ACEH (Attention: Keith Nowell) the information identified above in a draft document via email by February 14, 2014. Following ACEH's review, a follow up meeting will be scheduled to address how best to move the project toward closure in an expeditious manner. Please provide ACEH with contact information for Mr. Ed Weyrens if he continues to be involved with this project.

Thank you for your cooperation. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Regards,
Keith Nowell

Keith Nowell PG, CHG
Hazardous Materials Specialist

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