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Alameda County Environmental Health 5900 Hollis Street, Suite A, Emeryville, California 94608 Telephone: 510 420 0700 Facsimile: 510 420 9170 www.CRAworld.com

May 31, 2007

Mr. Steven Plunkett Hazardous Materials Specialist Alameda County Environmental Health Department 1311 Harbor Bay Parkway, Suite 250 Alameda, California 94502-6577

Re: Site Assessment Workplan Addendum

Former Olympic Service Station 1436 Grant Avenue San Lorenzo, California Fuel Leak Case No. RO00000373

Dear Mr. Plunkett:

Conestoga-Rovers & Associates, Inc. (CRA) formerly Cambria Environmental Technology, Inc. (Cambria) prepared this *Site Assessment Workplan Addendum* (Addendum) on behalf of Encinal Properties. The Addendum was requested in the May 7, 2007 Alameda County Environmental Health Department (ACEHD) letter (Attachment A). In addition, this Addendum is based on the May 21, 2007 phone conversation between CRA and ACEHD's Hazardous Materials Specialist, Mr. Steven Plunkett.

RESPONSE TO ACHEHD'S TECHNICAL COMMENTS

The revisions to Cambria's March 2, 2007 Site Assessment and Preferential Pathway Study Workplan (Workplan) are summarized below.

Soil Gas Sampling

In the May 7, 2007 letter, the ACEHD requested a soil gas sampling plan along the southwest property boundary to evaluate the potential vapor intrusion pathways for the residence located nearby. Based on the low groundwater concentrations detected onsite in the first and second quarters of 2007, CRA recommends completing the proposed investigation to determine the horizontal and vertical extent of petroleum hydrocarbons. With the additional data we will evaluate the need for offsite vapor intrusion assessment and we will make the appropriate recommendations in the site assessment report.



SOIL BORING LOCATIONS

In the May 7, 2007 letter, the ACEHD proposed revised boring locations. On May 21, 2007 CRA and ACEHD discussed the revised boring locations during a phone conversation. The agreed upon proposed boring locations are presented on Figure 1.

SCHEDULE

In the May 7, 2007 letter, the ACEHD proposed revised boring locations and one boring has been moved to the Grant Avenue right-of-way. Since an encroachment permit will be required before field work can begin and the initial deadline did not provide sufficient time to complete the scope of work, CRA requests that a deadline extension be granted for the site assessment report. We propose submitting the site assessment report by August 31, 2007. Please let us know if this deadline extension request is acceptable.



CLOSING

CRA appreciates your assistance and cooperation with this project. Please call Ms. Celina Hernandez at (510) 420-3313 with any questions or comments.

Conestoga-Rovers & Associates, Inc. (CRA) prepared this document for use by our client and appropriate regulatory agencies. It is based partially on information available to CRA from outside sources and/or in the public domain, and partially on information supplied by CRA and its subcontractors. CRA makes no warranty or guarantee, expressed or implied, included or intended in this document, with respect to the accuracy of information obtained from these outside sources or the public domain, or any conclusions or recommendations based on information that was not independently verified by CRA. This document represents the best professional judgment of CRA. None of the work performed hereunder constitutes or shall be represented as a legal opinion of any kind or nature.

Sincerely,

Conestoga-Rovers & Associates, Inc.

Celina Hernandez

Senior Staff Geologist

Brandon S. Wilken, P.G.

Buda At Wike

Senior Project Geologist

1 – Revised Boring Locations

Tables:

Figures:

1 - Groundwater Analytical Data

Attachments:

A - Regulatory Correspondence

Cc:

Mr. George Jaber, Encinal Properties, 2801 Encinal Avenue, Alameda, CA 94501

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Revised Boring Locations

Olympic Service Station 1436 Grant Avenue San Lorenzo, California

Table 1, Groundwater Analytical Data - Encinal Properties, Former Olympic Service Station, 1436 Grant Avenue, San Lorenzo, California

Well ID	Date	DTW	GWE	Oil &	TPHmo	TPHd	TPHg	Benzene	Toluene	Ethylbenzene	Xylenes	MTBE	SVOCs &	DIPE	TAME	ETBE	TBA	Ethanol	EDB	1,2- DCA	Notes
TOC	Sampled	(ft)	(ft above msl)	Grease									HVOCs								
(ft above n	nsl)			4					Concentr	rations in micros	rams per li	ter (µg/L)		·			<u> </u>				
Grab Gro	undwater San	iples																			
Pit Water	9/13/1998					2,100	3,600	350	130	39	380	17,000									
BH-A	4/30/2002	17/8			<100	<100	180	< 0.50	< 0.50	8.8	< 0.50	82		<0.50	< 0.50	< 0.50	<5.0				
вн-в	4/30/2002	16/8			<100	<200	2,300	120	11	60	150	2,000		<5.0	<5.0	<5.0	<50				
вн-с	4/30/2002	16/8	-		<100	<150	1,200	57	0.72	43	87	240		<0.50	1.0	<0.50	<5.0				
Quarterly	Groundwater	Samples																			
MW-1	10/6/1999	8.35	6.65			84	3,900	<25	<25	<25	<25	3,500									*
15.00	1/13/2000	7.90	7,10			<50	<1,300	18	<13	<13	<13	1,700									
	4/12/2000	7.08	7.92			56	<1,000	66	<10	<10	<10	1,600		 ,						-	*
	7/19/2000	7.66	7.34			52	<1,000	<10	<10	<10	<10	1,200									*
	10/25/2000	7.91	7.09			76	4,100	120	<25	<25	<25	6,100									*
	2/16/2007	6.32	8.68																		
	3/1/2007	5.88	9.12		<250	<50	<50	<1.2	<1.2	<1.2	<1.2	78		<1.2	<1.2	<1.2	<12	<120	<1.2	<1.2	*
15.71	5/1/2007	7.24	8.47		<250	<50	<50	<5.0	<5.0	<5.0	<5.0	250		<5.0	<5.0	<5.0	<50	<500	<5.0	<5.0	*
MW-2	10/6/1999	7.87	6.59	<1,000	<500	<50	70	<0.5	<0.5	<0.5	<0.5	11	ND								*
14.46	1/13/2000	7.46	7.00	<1,000	<500	<50	<50	< 0.5	<0.5	< 0.5	< 0.5	6.2	ND								
	4/12/2000	6,67	7.79	1,100	<500	<50	<50	< 0.5	< 0.5	< 0.5	<0.5	39									
	7/19/2000	7.23	7.23	1,300	<500	<50	<1,000	<10	<10	<10	<10	990									
	10/25/2000	7.52	6.94		<500	<50	370	<2.5	<2.5	<2.5	<2.5	690									
	2/16/2007	5.89	8.57																		
	3/1/2007	5.45	9.01		<250	<50	<50	< 0.5	<0.5	< 0.5	< 0.5	9.8		<0.5	<0.5	<0.5	<5.0	<50	<0.5	<0.5	•
15.17	5/1/2007	6.83	8,34		<250	<50	<50	<5.0	<5.0	<5.0	<5.0	120		<5.0	<5.0	<5.0	<50	<500	<5.0	<5.0	*
MW-3	10/6/1999	7.90	6.51			300	3,900	900	89	160	560	790									
14.41	1/13/2000	7.50	6.91	·		210	740	110	4.8	35	18	290			·						
	4/12/2000	6.61	7.80			640	2,200	650	9.7	180	24	140									
	7/19/2000	7.24	7.17			270	2,700	420	<2.5	160	<2.5	99									+
	10/25/2000	7.52	6.89			150	710	180	<2.5	24	<2.5	71									*
	2/16/2007	5.90	8.51																		
	3/1/2007	5.44	8.97		<250	<50	82	20	<1.7	<1.7	<1.7	100		<1.7	<1.7	<1.7	<17	<170	<1.7	<1.7	+
15.13	5/1/2007	6.87	8.26		<250	<50	<50	<5.0	<5.0	<5.0	<5.0	88		<5.0	<5.0	<5.0	< 50	<500	<5.0	<5.0	*

Abbreviations / Notes TOC = Top of casing DTW = Depth to water

GWE = Groundwater elevation in feet above mean sea level

ft above msl = feet above mean sea level

17/8 = Depth to first encountered groundwater/depth of static groundwater

<n = Not detected above laboratory reporting limit

-- = Not sampled, not analyzed, not available

-- = Not sampled, not analyzed, not available
Oil and grease by EPA Method 5520 E&F
TPHd = Total Petroleum Hydrocarbons as diesel range by EPA Method 8015
TPHg = Total Petroleum Hydrocarbons as gasoline range by EPA Method 8015
TPHmo = Total Petroleum Hydrocarbons as motor oil by EPA Method 8015
Benzene, tollenen, ethylbenzene, and xylenes (BTEX) by EPA Method 8020
MTBE = Methyl tertiary butyl ether by EPA Method 8020
Di-isopropyl ether (DIPE), tertiary-amyl methyl ether (TAME), ethyl tertiary-butyl ether (ETBE), tertiary-butyl alcohol (TBA) by EPA Method 8260B
SVICCa = Sunivaletile granie componing by EPA Method 870 refer to corresponding analytical laboratory report for a full list of compounds

SVOCs = Semi-volatile organic compounds by EPA Method \$270, refer to corresponding analytical laboratory report for a full list of compounds

HVOCs = Halogenated volatile organic compounds by EPA Method 8010, refer to corresponding analytical laboratory report for a full list of compounds

* = See Analytical Laboratory Report for laboratory sample description and TPH chromatogram interpretation.

TOC elevations were surveyed on March 8, 2007 by Virgil Chavez Land Surveying. Prior to this date, TOC elevation were relative to a project datum determined by Aqua Science Engineers, Inc. in 1998.

ATTACHMENT A Regulatory Correspondence

ALAMEDA COUNTY

HEALTH CARE SERVICES







ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700

FAX (510) 337-9335

2007

May 7, 2007

Mr. George Jaber George H. Jaber Trust 2801 Encinal Avenue Alameda, CA 94501-4726

Subject: Fuel Leak Case No. RO00000373 Olympic Station, 1436 Grant Avenue, San Lorenzo,

CA

Dear Mr. Jaber:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site and the document entitled, "Site Assessment and Preferential Pathway Study," and "First Quarter 2007 Monitoring Report dated March 2, 2007 and April 13, 2007, respectively and prepared by Conestoga Rover and Associates (CRA). The scope of work recommended in the Work Plan proposes a Preferential Pathway Study, including a well survey and utility survey. In addition, the Work Plan proposes eight soil borings advanced to 20 feet bgs., combined with soil and groundwater sampling to evaluate the vertical and horizontal extent of soil and groundwater contamination onsite and immediate downgradinet of the site.

ACEH generally agrees with the proposed scope of work as stated in the Work Plan, provided the following technical comments are addressed prior to the implementation of the Work Plan.

We request that you perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to steven.plunkett@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- 1. Preferential Pathway Study. ACEH agrees with the recommendation as described in the Work Plan by CRA for a preferential pathway including a utility corridor survey and well survey. Please present the results of the preferential pathway survey in the report requested below.
- 2. Soil Gas Sampling. Given that the vapor intrusion pathway has not been evaluated, ACEH request soil gas sampling along the southwest property boundary adjoining the residences to evaluate potential vapor intrusion migration pathways for the adjacent residents. Please present a detailed plan to perform a soil gas investigation in conjunction with the offsite soil and groundwater investigation. Please include your proposal for the soil gas investigation in the Revised Work Plan requested below.

- 3. Soil Boring locations. CRA has proposed the installation of eight onsite and offsite soil borings to further define the extent of soil and groundwater contamination. The soil borings located east of MW-1 and northeast of MW-3 not necessary at this time. Furthermore, the linear separation of two offsite soil borings located between the Arroyo Center Building and parcel # 411-39-8/411-39-7 is approximately 45 feet, which may not adequately constrain the orientation of the petroleum hydrocarbon plume. Therefore, ACEH request a soil boring be installed between these two soil boring adjacent to the Arroyo Center Building. Lastly, the soil boring located near the corner of Grant Avenue and Channel Street should be relocated downgradient of MW-3 near the property boundary in the Grant Avenue right of way. Please update Figure 3 to reflect the location of seven soil borings in the Revised Work Plan requested below.
- 4. **Soil and Groundwater Analysis**. ACEH agrees with the soil and groundwater sample analysis recommended by CRA. Please present the results from the soil and groundwater investigation in the report requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Steven Plunkett), according to the following schedule:

- May 21, 2007 Revised Work Plan —
- July 15, 2007 Soil, Ground Monitoring and Soil Gas Investigation Report

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will 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 (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was

required in Geotracker (in PDF format). Please visit the SWRCB website 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 fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

Should you have any questions, do not hesitate to call me at (510) 383-1767.

Sincerely,

Steven Plunkett

Hazardous Materials Specialist

George Jabber May 5, 2007 Page 4

cc: Brandon Wilken Conestoga Rover Associates 5900 Hollis Street Emeryville, Ca 94608

> Donna Drogos, ACEH Steven Plunkett, ACEH File