

JAN 3 1 2003

Environmental Health

January 30, 2003

Mr. Don Hwang Alameda County Environmental Health Services Environmental Protection 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577

Subject:

Former Exxon Station, 5175 Broadway St., Oakland, CA; Fuel Leak Case No.

RO0000139.

Dear Mr. Hwang,

In response to your memorandum of December 17, 2002, I am providing the attached report for your review. In your memo, you requested the following items:

1. November 30, 1990 report by Tank Protect Engineering;

2. Monitoring well diagrams;

3. Historical Hydraulic Gradient;

- Revised Groundwater Analytical Results for Fuel Oxygenates by EPA Method 8260 Table;
- Contaminant Concentrations and "Depth To Water" Graphs with Monitoring Well Screen Depths.

The following sections present my response to your requests:

1. November 30, 1990 report by Tank Protect Engineering.

As we discussed in our phone conversation on January 10, 2003, neither I nor the property owners currently has a copy of the requested report. The referenced report would certainly be useful for determining the extent and effectiveness of the remedial actions that were performed during 1990 by Tank Protect Engineering. Dr. Fred Choobineh (a colleague here at UNL, who is brother-in-law of the property owners) unsuccessfully tried to track down the company that performed the work and submitted the report (the company no longer exists) and the registered geologist listed on some of the early reports.

2. Monitoring well diagrams.

The site currently has five monitoring wells: MW-1, MW-2, MW-3, STMW-4, and STMW-5. Well completion diagrams for each of these wells are included with this report as Attachment A. Well completion diagrams for the five wells were obtained from the following reports:

 Well construction details for MW-1, MW-2, and MW-3 are all from Appendix D of "Preliminary Site Assessment, 5175 Broadway, San Jose [sic], California," submitted by:

Tank Protect Engineering of Northern California, June 13, 1990.

Well construction details for STMW-4 and STMW-5 (originally referred to as STMW-1 and STMW-2, respectively) are from Appendices C and D of "Additional Investigation and Groundwater Sampling for the Site Located at 5175 Broadway Street, Oakland, California," June 23, 1991, by Soil Tech Engineering, Inc. of Santa Clara, CA.

All five of the monitoring wells are constructed of 4-inch diameter Schedule 40 PVC; screened sections in each of the wells have 0.020-inch slots. The following table summarizes available information about the five monitoring wells.

Summary of Monitoring Wells

						
	MW-1	MW-2	MW-3	STMW-4	STMW-5	
Total depth (ft)	23	23	27.0	19.5	24	
Depth to top of screened interval (ft)	13.0	8.0	7.0	8.0	8.0	
Perforated Length (ft)	10.0	15.0	20.0	11.5	16.0	
Top of casing elevation (ft)	155.03 ^a 161.03 ^b	154.97° 160.98°	155.93 ^a 161.43 ^b	162.31 ^b	161.65 ^b	
Completion Date	4/17/90	4/24/90	4/17/90	6/21/91	6/21/91	

Notes:

^a – From initial well completion reports, "Preliminary Site Assessment", Tank Protect Engineering, June 13, 1990.

^b – From Quarterly Monitoring Report, July 2002; all wells were apparently re-surveyed during this sampling event.

Note: Historical groundwater elevation data in the quarterly groundwater monitoring reports are erroneous. The consultants apparently re-surveyed the top-of-casing elevations in July 2002, but failed to update their data tables to account for this. Thus, all of the groundwater elevations prior to July 2002 are 60-70 feet lower than those reported in July and October 2002 (see groundwater elevations in Table 1 of previous monitoring reports completed by Enviro Soil Tech Consultants). From these tables, it appears that the groundwater elevations suddenly rose by this amount between January and July 2002. According to a USGS topographic map of the vicinity, the 160' contour passes through the site. Thus, the most recent survey data (July 2002) is probably the most accurate of the several different sets of survey data for top-of-casing elevations.

3. Historical hydraulic gradient.

Using 27 sets of water level measurements from the past 11 ½ years, the groundwater flow directions and gradients over time were calculated using the methodology of Heath (1995), Basic Ground-Water Hydrology, U.S. Geological Survey, Water Supply paper 2200, 7th printing, Denver, CO. This methodology uses three wells with different relative water table elevations (high, intermediate, and low). The wells selected for this analysis were wells MW-1 (high), MW-3 (intermediate), and STMW-5 (consistently lowest groundwater elevation). A total of 27 sets of groundwater elevations (starting with July 1991 data and going through October 2002) were included in these calculations. Groundwater elevations are based on the most recent survey data for top-of-casing elevations (July 2002). Hydraulic gradient and flow direction calculations are included in Attachment B.

The following table summarizes the results of these calculations. Over the period for which data are available, the average hydraulic gradient at the site was 0.0320 ft/ft, and groundwater flow was generally to the southwest. The highest hydraulic gradient occurred in August 2000; the minimum gradient occurred in January 2002. Attachment B also includes a diagram of the groundwater flow directions and relative magnitudes of the hydraulic gradient for each of the 27 data points. This diagram shows the relative magnitude of the hydraulic gradient (distance from the origin) as well as the relative direction of groundwater flow. Because of assumptions and approximations made for locations of the monitoring wells, the groundwater flow directions are

not exact. However, the calculations consistently show that the groundwater beneath the site flows generally to the southwest.

Summary of Calculated Hydraulic Gradients and Flow Directions

	Hydraulic Gradient (ft/ft)	Flow Direction ^a
Average	0.03202	219.5
Standard Deviation	0.00381	7.56
Maximum	0.04176	228.8
Minimum	0.02679	193.4
Data Points	27	27

Notes:

4. Revised Groundwater Analytical Results for Fuel Oxygenates by EPA Method 8260. Attachment C includes summary tables of the analytical results for analysis of fuel oxygenates by EPA Method 8260. These data were taken directly from the most recent quarterly monitoring report (October 2002) that was prepared by Enviro Soil Tech Consultants, with additional data from the July 2002 groundwater monitoring report. These data cover the period from May 1999 – October 2002. Numerical concentrations are only provided for specific contaminants that were detected. In the summary tables, concentrations with an asterisk (*) are estimated values for tentatively identified compounds or if the result is below the Practical Quantitation limit but above the Method Detection Limit.

Note that in July 2002, two sets of groundwater samples were taken (samples taken on July 1 and July 18), and separate sets of analytical results are available for these two sampling events. The main difference between these two sampling events is that the Reporting Limits for each compound were significantly lower for analysis of the latter samples; thus, several additional analytes were detected and reported for the July 18 sampling event. These findings do not alter the overall conclusion of which contaminants are most prevalent in groundwater at the site. As expected, the major contaminants at the site are the BTEX compounds, which have been consistently detected in all five monitoring wells.

It is interesting to note that MTBE has been detected in samples from the site only once using EPA Method 8260 (7.9 μ g/L in MW-1, January 2002), although it has been sporadically detected in samples from several wells using Method 8020. I think that any detections of MTBE at the site should be suspect. MTBE detections may be due to invalid Method 8020 analyses, contamination of samples, or possibly an off-site source of MTBE. First, Method 8020 does not identify specific contaminants using mass spectrometry, but only uses gas chromatography retention times to identify peaks. The second reason is that MTBE was detected in MW-1 at 110 μ g/L during the January 2002 sampling event, suggesting sample contamination. MTBE has not been detected in STMW-4, upgradient of MW-1. MTBE had not been previously detected in MW-1; MW-1 samples were first analyzed for MTBE in November 1996, and there were no MTBE detections prior to January 2002.

Furthermore, the site has not been operated as a gasoline station since 1978 (and most likely several years prior to 1978). MTBE was not used in gasoline formulations until 1979, when its usage began as an gasoline octane enhancer as leaded gasoline was phased out (Happel, *et al.*, 1998. An Evaluation of MTBE Impacts to California Groundwater Resources. Report

^a – Flow direction is the angle of the groundwater flow direction counterclockwise from due East (=0°). Thus, the average flow direction of 219.5° corresponds to a flow direction of 39.5° south of due west.

UCRL-AR-130897, Lawrence Livermore National Laboratory, University of California, Livermore, CA). The State of California did not require MTBE in gasoline until 1992 (Happel, et al., 1998). This history of MTBE usage in gasoline strongly suggests that the USTs at 5175 Broadway were an improbable source of the current MTBE contamination at the site.

5. Contaminant Concentrations and "Depth to Water" Graphs.

Graphs of contaminant concentrations with depth to water and monitoring well screen depths are included as Attachment D for each of the five monitoring wells. Only the two most prevalent contaminants (TPHg and benzene) are included in these graphs. In most of the wells, there are no clear concentration trends, but I would like to point out that in well STMW-4, the increase in TPHg and benzene concentrations since 1997 are highly unlikely to be due to contamination at the site. Because STMW-4 is at the upgradient side of the site, and about 50 feet from the former tank pit (the supposed source of contamination), it is unlikely that contamination observed in STMW-4 is originally from the 5175 Broadway. Several other monitoring wells provide additional evidence for a possible off-site source. According to the State of California Geotracker database, there are other possible sources (both known LUFT sites and other sites with USTs of unknown condition) upgradient of 5175 Broadway. There is obviously significant contamination in the area, but I do not believe that 5175 Broadway is the sole source of this contamination.

Closing

I was asked by the property owners to review the reports provided by previous consultants and to respond to your letter dated December 17, 2002. After almost 10 years of making no real progress towards site closure, the property owners are eager to accelerate this process and move the site towards proper closure. Due to my location in Nebraska and time demand of my academic job at University of Nebraska, I have recommended to the property owners to retain a competent local consultant to work with Alameda County and move toward properly closing the site.

If you wish, I can provide you with electronic versions of the spreadsheets that I have prepared. Please let me know if you have additional questions about the site or if I can provide additional comments on the data.

Sincerely,

Matthew C. Morley, Ph.O., P.E.

Matth C. My

Assistant Professor, Environmental Engineering

University of Nebraska - Lincoln

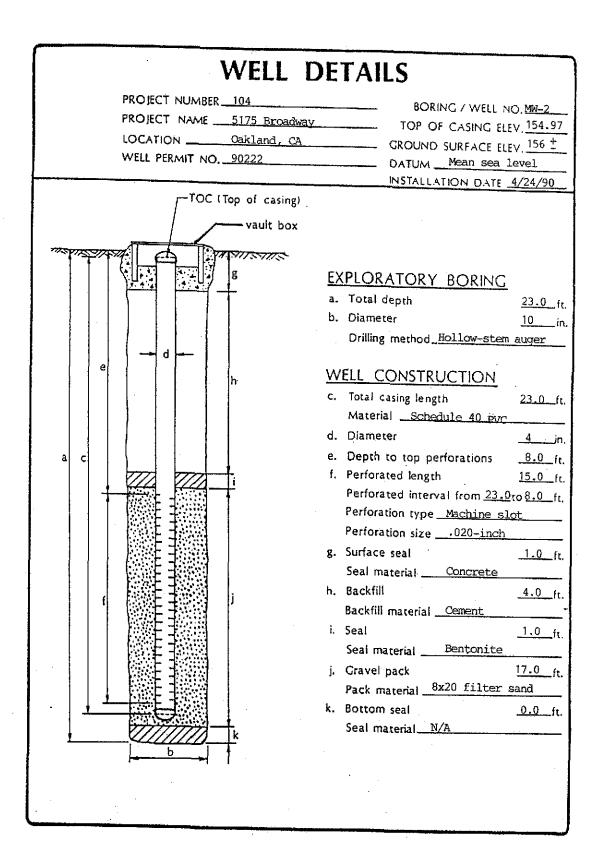
Disclaimer:

The findings that are included in this letter and the attachments are based solely on the data contained in previous reports that are currently available. Several different consulting firms generated those reports, and findings provided in this letter are only as good as the data obtained from those reports.

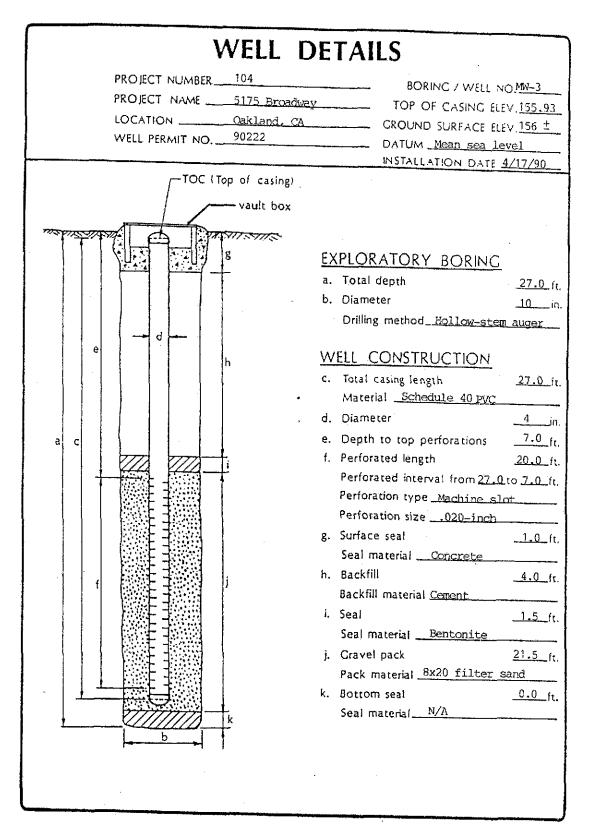
CC: Property owners

WELL DETAILS PROJECT NUMBER__ 104 BORING / WELL NO. MW-1 PROJECT NAME _ 5175 Broadway TOP OF CASING ELEV. 155.03 Oakland, CA LOCATION _ GROUND SURFACE ELEV. 156 ± 90222 WELL PERMIT NO._ DATUM <u>Mean</u> sea level INSTALLATION DATE 4/17/90 TOC (Top of casing) -vault box 11151115 EXPLORATORY BORING a. Total depth 23 ft. b. Diameter _10__in. Drilling method Hollow-stem auger WELL CONSTRUCTION c. Total casing length Material Schedule 40 PVC d. Diameter <u>4</u>_in, e. Depth to top perforations _13_0_ft. ¢ f. Perforated length _10_0_ft. Perforated interval from 23.0 to 13.0 ft. Perforation type Machine slot Perforation size __.020-inch g. Surface seal Seal material ____Concrete h. Backfill 8.5 ft. Backfill material Cement 1.0 ft. i. Seal Seal material _ j. Gravel pack 12.5 ft. Pack material 8x20 filter sand k. Bottom seal 0.0 ft. Seal material N/A

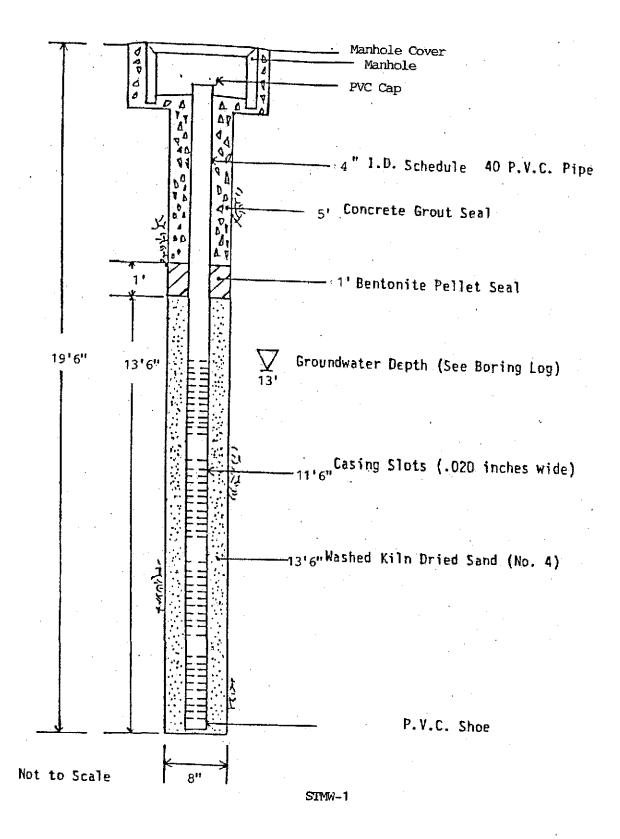
Completion diagram for MW-1.



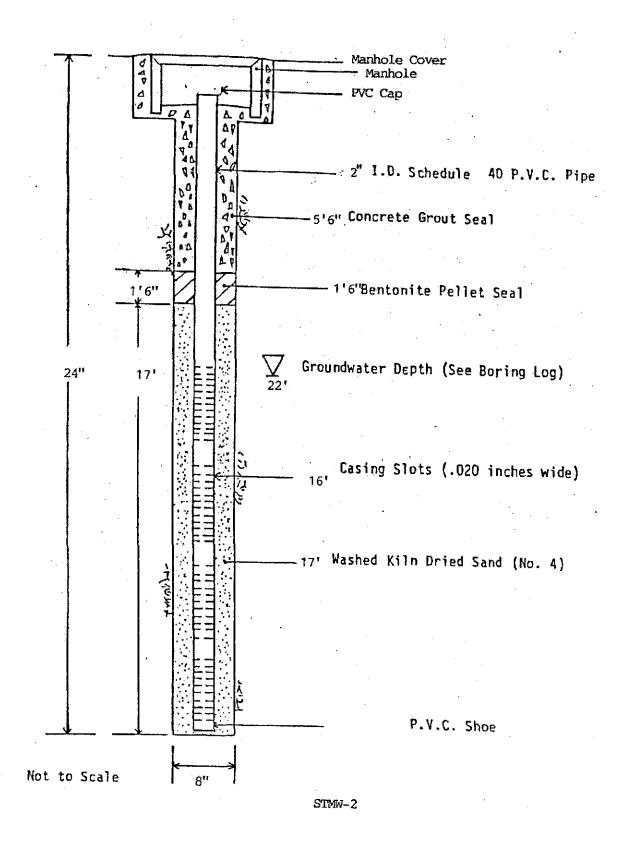
Completion diagram for MW-2.



Completion diagram for MW-3.



Completion diagram for STMW-4 (originally designated STMW-1).

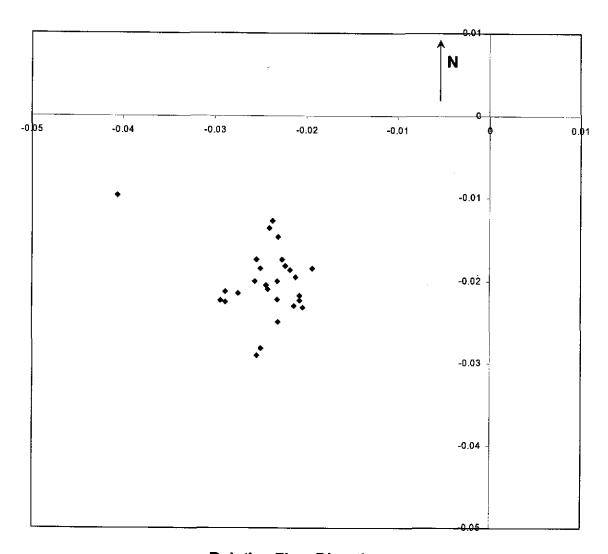


Completion diagram for STMW-5 (originally designated STMW-2)

CALCULATION OF HYDRAULIC GRADIENT AND GROUNDWATER FLOW DIRECTION

	MW-1	MW-2	STMW-5								
X (ft)	85.0	105.7	0								
Y (ft)	74.3	10.0	0								
	MW-1	MW-2	STMW-5								
	С	В	Α	Head	d differe	ences		Dis	stances	Gradient	Direction
	GW Elev.	GW Elev.	GW Elev.								degrees South of due
Date	(ft)	(ft)	(ft)	CA	CB	BA	AB	BC	AC	(ft/ft)	West
7/3/1991	151.61	150.9	148.36	3.25	0.71	2.54	106.1	67.5	112.8	0.02882	39.3
11/11/1991	151.58	150.77	147.65	3.93	0.81	3.12	106.1	67.5	112.8	0.03488	38.0
3/4/1992	153.1	152.28	149.85	3.25	0.82	2.43	106.1	67.5	112.8	0.02881	42.8
6/2/1992	152.05	151.46	148.59	3.46	0.59	2.87	106.1	67.5	112.8	0.03088	34.3
9/28/1992	151.74	150.89	147.61	4.13	0.85	3.28	106.1	67.5	112.8	0.03666	37.9
1/11/1993	153.47	152.46	150.04	3.43	1.01	2.42	106.1	67.5	112.8	0.03056	47.2
8/15/1994	151.84	151.07	147.8	4.04	0.77	3.27	106.1	67.5	112.8	0.03593	36.4
11/7/1996	152.3	150.9 6	147.98	4.32	1.34	2.98	106.1	67.5	112.8	0.03863	48.8
2/12/1997	153.11	152.07	149.58	3.53	1.04	2.49	106.1	67.5	112.8	0.03146	47.2
6/16/1997	151.99	151.23	148.32	3.67	0.76	2.91	106.1	67.5	112.8	0.03257	38.1
9/30/1997	153.47	153.09	150.41	3.06	0.38	2.68	106.1	67.5	112.8	0.02768	29.6
1/27/1998	153.07	152.6	150.01	3.06	0.47	2.59	106.1	67.5	112.8	0.02743	32.6
4/24/1998	153.05	152.3	149.81	3.24	0.75	2.49	106.1	67.5	112.8	0.02871	40.6
8/17/1998	152.05	151.24	148.45	3.6	0.81	2.79	106.1	67.5	112.8	0.03191	39.9
11/16/1998	152.13	150.84	147.91	4.22	1.29	2.93	106.1	67.5	112.8	0.03769	48.3
2/16/1999	152.39	152.06	149.43	2.96	0.33	2.63	106.1	67.5	112.8	0.02690	28.3
5/17/1999	152.53	151.72	149.07	3.46	0.81	2.65	106.1	67.5	112.8	0.03066	40.9
8/17/1999	151.79	150.94	148.17	3.62	0.85	2.77	106.1	67.5	112.8	0.03208	41.0
11/17/1999	150.59	149.46	146.77	3.82	1.13	2.69	106.1	67.5	112.8	0.03405	47.3
2/17/2000	152.55	151.48	149.09	3.46	1.07	2.39	106.1	67.5	112.8	0.03093	48.7
5/17/2000	152.79	152.14	149.57	3.22	0.65	2.57	106.1	67.5	112.8	0.02859	37.5
8/17/2000	152.26	152.48	148.09	4.17	-0.22	4.39	106.1	67.5	112.8	0.04176	13.4
11/15/2000	151.99	151.04	148.37	3.62	0.95	2.67	106.1	67.5	112.8	0.03212	43.8
2/16/2001	153.43	152.46	150.05	3.38	0.97	2.41	106.1	67.5	112.8	0.03008	46.4
1/11/2002	152.95	152.16	149.93	3.02	0.79	2.23	106.1	67.5	112.8	0.02679	43.8

	MW-1 C	MW-2 B	STMW-5 A	Head	l Differe	ences		Dist	ances	Gradient	
Date	GW Elev.	GW Elev.	GW Elev.	CA	CB	DΛ	۸D	n.c	40	/£1/£1)	degrees South of due
	(ft)	(ft)	(ft)		СВ	BA	AB	BC	AC	(ft/ft)	West
7/1/2002	152.01	151.34	148.51	3.5	0.67	2.83	106.1	67.5	112.8	0.03112	36.5
10/4/2002	151.29	150.46	147.13	4.16	0.83	3.33	106.1	67.5	112.8	0.03695	37.3
									average standard	0.03202	39.5
									deviation	0.00381	7.6
									data points	27	27
									maximum	0.04176	48.8
									minimum	0.02679	13.4



Relative Flow Directions.

For each data point, the flow direction is the direction of the vector from the origin to data point, and the magnitude of the hydraulic gradient is the length of this vector.

Results of Fuel Oxygenate Analysis by EPA Method 8260 -- MW-1

Date 5/47/4000	1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	Benzene	Diisopropyl ether	Ethylbenzene	Hexane	isopropylbenzene	n-Butylbenzene	sec-Butylbenzene	Methyl tert-butyl ether	Naphthalene	Propylbenzene	tert-Butanol	Toluene	o-Xylene	m-Xylene	p-Xylene	Total xylenes
5/17/1999				120														
8/17/1999			5.2												5.4	5.3		
11/17/1999			3.6		2.7									1.9	2.5	1.8	2.3	
2/17/2000			1.1		3.6									2.3	2.1	1.2	1.6	
5/17/2000	9.8		130	130	6.1		5.3				_ - -	5.6		6.8	,			
8/17/2000			160															
11/15/2000				22	_													
2/16/2001			26	110														
1/11/2002	7	10	74	110	13		3.5*		0.6	7.9		5.1		60				 E 1
7/1/2002			25					-				J. 1						54
7/18/2002 ^a	3.1	2.7	12		3.3		3.6	3.6	1.4		2.5	5.6		U 0		4.0		
10/4/2002		9.4	130	60	8.1		5.9	0.0						8.0	0.6	1.9		
,	Notes		,50	00	0.1	- -	5.5				6	8.2		7.8				14

a – In addition to the results in this table, the following compounds were detected by Method 8260B analysis: 1,2-dichloroethane 3.3 μg/L; para-Isopropyl toluene 1.7 μg/L

Results of Fuel Oxygenate Analysis by EPA Method 8260 – MW-2

Date 5/47/4000	1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	Benzene	Diisopropyl ether	Ethylbenzene	Isopropylbenzene	n-Butylbenzene	sec-Butylbenzene	Methyl tert-butyl ether	Naphthalene	Propylbenzene	Toluene	o-Xylene	m-Xylene	p-Xylene	Total xylenes
5/17/1999			400		140											
8/17/1999			19		19							18	14	11	15	
11/17/1999			7		5.3							3.7	4.9	3.6	4.4	
2/17/2000			3.2		11							6.8	5.9	3.4	3.9	
5/17/2000	51		450		110							65				80
8/17/2000			440		78											
11/15/2000	48		320		78							41				64
2/16/2001	22	5.7	110		38					6.6	5.1	20				33
1/11/2002	28	33	220		63	6*	5.6				13*	71				94
7/1/2002			300		45						13	29		27ª		
7/18/2002 ^b	22	18	170		21	1.3		1.0		6.4	1.5	30	34	68ª	24.45	
10/4/2002	52		440		140					35		66				120

Notes:

a -- Result is for sum of m-xylene and p-

xylene

b – In addition to the results in this table, the following compounds were detected by Method 8260B analysis:

2-butanone 20 μg/L; 1,2-dichloroethane 0.9 μg/L; tert-butylbenzene 1.1 μg/L; para-isopropyl toluene 4.0 μg/L

Results of Fuel Oxygenate Analysis by EPA Method 8260 - MW-3

Date	1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	Benzene	Diisopropyl ether	Ethylbenzene	Isopropylbenzene	sec-Butylbenzene	n-Butylbenzene	Methyl tert-butyl ether	Naphthalene	Propylbenzene	Toluene	o-Xylene	m-Xylene	p-Xylene	Total xylenes
5/17/1999	480	290	190												-	590
8/17/1999			49		63							39	44	39	40	
11/17/1999			39		31							22	31	21	30	
2/17/2000			16		74							39	37	22	31	
5/17/2000	930	290	300		410					160		260				940
8/17/2000	900	290	230		470	51		100		160	100	140				750
11/15/2000	760	240	250		390	34				180	92	210				700
2/16/2001	300	110	40		100			43		41	30	72				250
1/11/2002	400	220	150		250	20*		35*			60*	170				510
7/1/2002	490	180	230		450	35		57		140	120	220	170	72	:0 ^a	
7/18/2002 ^b	750	270	200		400	28	12	79		160	95	140	110	51		
10/4/2002	350	120	280		450	39		44		150	130	170				730

 $[\]frac{\text{Notes:}}{a}$ -- Result is for sum of m-xylene and p-

xylene

b – In addition to the results in this table, the following compounds were detected by Method 8260B analysis:
1,2-dichloroethane 5.1 μg/L; para-isopropyl toluene 15 μg/L;

Results of Fuel Oxygenate Analysis by EPA Method 8260-STMW-4

Date	1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	Benzene	Diisopropyl ether	Ethylbenzene	Hexane	Isopropylbenzene	sec-Butylbenzene	n-Butylbenzene	Methyl tert-butyl ether	Naphthalene	Propylbenzene	tert-Butanol	Toluene	o-Xylene	m-Xylene	p-Xylene	Total xylenes
5/24/1999			1600											-				
8/17/1999			24		31									25	28	21	26	
11/17/1999			21		17									12	15	11	14	
2/17/2000			8.9		38									21	19	14	17	
5/17/2000	170	87	840		61		53		85			84						
8/17/2000	69		680		62													
11/15/2000	31		640	34	26							28	100					27
2/16/2001	48		560	26		140	_					26						
1/11/2002	25*	30*	460		22*		13*		7.6*			20*		48*				63*
7/1/2002	75	41	470		32		20		16		20	31		18		45	ō ^a	
7/18/2002 ^b	110	55	870		54		29	7.3	23		63	45		27	16	67		
10/4/2002	190	66	590	35	65		36				85	61		26			_	110

Notes:

a -- Result is for sum of m-xylene and p-

xylene
^b – In addition to the results in this table, the following compounds were detected by Method 8260B analysis: tert-butylbenzene 4.9 μg/L; para-isopropyl toluene 12 μg/L

Results of Fuel Oxygenate Analysis by EPA Method 8260 - STMW-5

Date	1,2,4-Trimethylbenzene	1,3,5-Trimethylbenzene	. Benzene	Diisopropyl ether	Ethylbenzene	Hexane	Isopropylbenzene	sec-Butylbenzene	n-Butylbenzene	Methyl tert-butyl ether	Naphthalene	Propylbenzene	tert-Butanol	Toluene	o-Xylene	m-Xylene	p-Xylene	Total xylenes
5/17/1999			88															
8/17/1999			19		21									16	14	11	16	
11/17/1999			3.9		3.2									2.3	2.9	2.1	2.5	
2/17/2000			1.5		5.8									3.2	2.5	2.2	2.3	
5/17/2000	59																	
8/17/2000	38		170		100		10		11		20	24		64				250
11/15/2000	26		120		40		6.5		9.4		15	23		24				54
2/16/2001			58		9.4							9.9		9.8				18
1/11/2002	6.8	7.9	87		18		5.1	1.3*	5.6			16		16				32
7/1/2002	15	6.8	71		14		5.9		18		5.6	22		14		3	6ª	
7/18/2002 ^b	25	8.2	110		34		3.4	2.1	16		4.8	13		29	4.1		3 ^a	
10/4/2002	5.2		71		26						9.6	12		17				35

Notes:

a -- Result is for sum of m-xylene and p-

xylene
^b – In addition to the results in this table, the following compounds were detected by Method 8260B analysis: 1,2-dichloroethane 1.1 μg/L; para-isopropyl toluene 2.2 μg/L

