

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY

ALEX BRISCOE, Director



ENVIRONMENTAL HEALTH DEPARTMENT  
ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

October 27, 2010

Pat Cullen  
State Water Resources Control Board  
Division of Financial Assistance  
1001 I Street  
Sacramento, CA 95814  
(Sent via E-mail to:  
[PCullen@waterboards.ca.gov](mailto:PCullen@waterboards.ca.gov))

Robert Trommer  
State Water Resources Control Board  
Division of Financial Assistance  
1001 I Street  
Sacramento, CA 95814  
(Sent via E-mail to  
[RTrommer@waterboards.ca.gov](mailto:RTrommer@waterboards.ca.gov))

Subject: Response to UST Cleanup Fund Five Year Review for Fuel Leak Case No. RO0000186 and GeoTracker Global ID T0600102117, Fidelity Roof Company, 1075 40<sup>th</sup> Street, Oakland, CA 94608

Dear Mr. Cullen & Mr. Trommer:

ACEH has received the Preliminary 5-Year Review Summary Report from the Underground Storage Tank Cleanup Fund (USTCF) for the site listed below. The Summary Report is one of several initial five year reviews of ACEH Local Oversight Program cases by the Fund. My intent was to respond on a case by case basis to help future record keeping. The Fund correspondence requests that ACEH respond to the Fund correspondence within 45 days of the date of the letter. ACEH has reviewed the contents of the correspondence in the context of the appropriateness of recommendations. However, we have not reviewed the reports for accuracy of all information presented.

**ACEH Case: RO0000186**  
**USTCF Claim: 13833**  
**Global ID: T0600102117**  
**Site Name: Fidelity Roof Company**  
**Site Address: 1075 40<sup>th</sup> Street, Oakland**

USTCF Recommendations from September 27, 2010 Review Summary:

- The UST Fund staff concurs with the Claimants 2010 Request for Closure. It appears the majority of the petroleum hydrocarbon mass in soil has been excavated and removed from the Site. The remaining absorbed and dissolved mass is limited to the Site and naturally degrading. No evidence of off-Site migration has ever been presented at this Site.

ACEH Response: ACEH is not in agreement with the UST Fund staff recommendations. ACEH believes the site is a mature site, and is in agreement that several attempts to remove petroleum impacted soil and groundwater have been undertaken in several excavations at the site; however, apparently significant residual remains in the area of the former USTs and the area of the first enlarged excavation (SB-1, SB-3, B-2, B-3, B-4, and DP-5; i.e. beneath the depth of the excavations, and perhaps elsewhere?). Four questions remain outstanding and were the topic of the most recent directive letter: 1) Definition of the downgradient extent of a gasoline plume, including significant MTBE and TBA. 2) Investigation of soil gas concerns adjacent to the building; 3) If the area of the second excavation was effective in mitigating FP impacts at MW-3; and 4) Vertical definition of soil in the UST source area.

Taking each of these four points consecutively:

- 1) While not intending to limit the focus to MTBE or TBA, the most recent groundwater data at well MW-2, approximately 12 ft downgradient of the UST source area is 1,500 ug/l, and for TBA is 4,700 ug/L; each significantly over ESLs. While MW-6 is somewhat downgradient and contains significantly lower concentrations (220 MTBE, ND TBA), concern exists that the plume may migrate between wells MW-5 and MW-6 (separated by approximately 50 ft.) as it is somewhat unusual for these contaminants to decrease so significantly over a downgradient distance of only approximately 50 ft. Because the site sits near (at the edge of) a known area of buried stream channels which have acted at a series of nearby sites as preferential conduits and which appear to have laterally transmitted contaminants significant distances, the issue has been raised as a concern at this site.
- 2) The mix of low concentration and elevated soil concentration analytical within the UST source and the first excavation area suggests a hit and miss excavation removal effort (max removal depth was 9 ft.). The more recent excavation found the smear zone extended to a depth of approximately 12 ft. This can imply additional hits and misses, including closer to the site building. It is for this reason soil gas intrusion concerns were requested to be investigated.
- 3) Verification sampling in the vicinity of the second (recent) excavation has not been conducted in order to determine the effectiveness of FP removal (formerly in MW-3). MTBE concentrations in well MW-6 spiked in the most recent groundwater data, and could suggest a contaminant pulse; however, additional measurements are required to evaluate the issue. A direct measurement with the installation of either a well or probe bore in the vicinity of the former FP well MW-3 would quickly address the issue.
- 4) Early soil bores with PID detects below groundwater at a depth of 15 ft, and the removal effort hits and misses just discussed, each in the former UST source area, suggest a vertical extent of soil impacts not investigated. The installation of several bores in the UST source area at the same time as an investigation of the groundwater plume extent would quickly address this issue.

ACEH suggests the following alternative language:

- The UST Fund staff concurs with the recent LOP directive letter and based upon the results of the work the site should be reevaluated for potential closure.

Thank you for providing ACEH with the opportunity to comment on the subject sites. Please contact me if you have any questions regarding the above responses.

Sincerely,

Mark E. Detterman, P.G., C.E.G.  
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations  
Electronic Report Upload (ftp) Instructions

cc: Donna Drogos (sent via electronic mail to [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org))  
Mark Detterman (sent via electronic mail to [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))  
Electronic File, GeoTracker