

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

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January 6, 2012

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

Mr. Cullen and Mr. Trommer:

This letter summarizes both ACEH responses to the Underground Storage Tank Cleanup Fund (USTCF) for the second 5-Year Review Summary Report as well as the revised 5-Year Review Summary Report. These are presented chronologically.

Second 5-Year Review:

ACEH has received the second 5-Year Review Summary Report dated October 17, 2011 from the USTCF for the site listed below. The Summary Report represents the second five year review of this site managed by the ACEH Local Oversight Program by the Fund. The Fund correspondence requests that ACEH respond to the Fund correspondence within 45 days of the date of the letters (December 1st). We have 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 40th Street, Oakland, CA

USTCF Recommendations from October 17, 2011 Review Summary:

Monitoring well MW-2 is screened near the source area and has consistently had elevated concentrations of residual hydrocarbons in groundwater but are declining. After 13 years of monitoring, the groundwater plume is limited to the site, specifically the source area. Groundwater within the source area and immediately down gradient (on-site) will likely remain above WQOs for years. The Fund staff recommends that the LOP consider this site for closure.

ACEH Response: **ACEH is not in agreement with this recommendation.** ACEHs position has not changed significantly since the previous 5-year review. While no evidence of off-site contaminant migration has been presented, based on available data it is entirely possible that the existing well network may not be positioned to detect it. Downgradient, the existing well network (two wells) is spaced

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approximately 50 feet apart. The site is in, or on the edge, of a known area of paleochannel conduits that in some cases have transmitted comingled plumes with significant concentrations over 1,000 feet downgradient. The existing approved (with modifications) work plan addresses that gap and could provide the data necessary to close the site; however, the requested report is overdue by nearly 10 months. A Notice to Comply letter may be issued shortly. However, as requested last year, 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

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