

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL PROTECTION
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February 22, 2008

Sydney & Barbara Borsuk Trust, Shiela Siegel Trust
C/o Mr. Mark Borsuk
1626 Vallejo Street
San Francisco, CA 94123-5116

Mr. Leland Douglas
Douglas Parking Company
1721 Webster Street
Oakland, CA 94612

Subject: Fuel Leak Case No. RO0000266 and Geotracker Global ID T0600100682, A Bacharach Trust & B Borsuk, 1432 Harrison Street, Oakland, CA 94612

Dear Mr. Borsuk and Mr. Douglas:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the documents entitled, "*Risk Assessment, Allright Parking, 1432 Harrison Street, Oakland, California,*" dated August 6, 2006, "*Soil Gas Characterization Work Plan,*" dated March 9, 2007, and "*Status Report and Recommendations,*" dated July 23, 2007. Based upon our review of the case file, we have several comments that require further information and/or revisions to the work plan. Therefore, we request that you prepare a Revised Work Plan that addresses the technical comments below.

TECHNICAL COMMENTS

1. **Site History and Request for Information.** The site history prior to 1988 is only briefly discussed in the reports currently in ACEH files. Therefore, we request that you submit any other available documents which provide information on site history, such as historic aerial photographs, Sanborn maps, or compilations of information from environmental data bases. Specifically, we request that you submit a copy of a Phase I report which is referenced on page 1 of the RGA Environmental, Inc. report entitled, "*Preliminary Site Assessment Report,*" and dated April 2, 1992. In addition, we request that you include a summary of the site history prior to 1988 in the Revised Work Plan requested below. If the review of site history identifies potential sources of soil and groundwater contamination in addition to the former gasoline tanks adjacent to Harrison Street, the waste oil tank adjacent to Alice Street, and the hydraulic lift area, please update the site conceptual model and propose additional site characterization activities accordingly.
2. **Reference to Former Chevron Service Station.** Page 1 of the RGA Environmental, Inc. report entitled, "*Preliminary Site Assessment Report,*" and dated April 2, 1992 refers to a former Chevron service station on site. As part of the expanded review of site history discussed in technical comment 1, please confirm whether a Chevron service station was

located on site and identify on a site plan, the locations of former UST system components associated with the former service station.

3. **Elevated Concentrations of TPH and Benzene East of Former Gasoline Tanks and Dispensers.** We note that elevated concentrations of benzene were detected in boring B-8 (2.3 mg/kg in soil sample from 22.5 feet bgs) and boring SB-K (9,600 µg/L in grab groundwater sample), which are located east (cross gradient) from the identified sources of gasoline contamination at the site. Boring SB-K is approximately 80 feet east (cross gradient) from the former gasoline tanks and 65 feet east of the former dispensers. Boring SB-8 is approximately 70 feet east of the former gasoline tanks and 45 feet east of the former dispensers. Please review these data and the site history to evaluate whether elevated concentrations of benzene in soil and groundwater extend east from the gasoline tanks and dispensers or whether there may be additional sources of gasoline contamination in the eastern portion of the 1432 Harrison Street property. Please update the site conceptual model and propose additional characterization to address data gaps as necessary.
4. **Proposed On-Site Soil Gas Sampling.** We concur conceptually with the proposal to conduct soil vapor sampling to evaluate the potential for vapor intrusion to indoor air. However, upon review of site history and the items discussed in technical comments 1 through 3, revision of the proposed scope of work and sampling locations for soil gas sampling may be necessary in the Revised Work Plan requested below.
5. **Sensitive Receptors and Off-site Soil Gas Sampling.** During the groundwater sampling event on June 23, 2006, benzene was detected in off-site wells MW-2, MW-4, and MW-5 at concentrations ranging from 1,600 to 3,400 µg/L. The Environmental Screening Levels (ESLs) [San Francisco Bay Regional Water Quality Control Board 2007] for potential vapor intrusion of benzene to indoor air for residential and commercial receptors are 540 and 1,800 µg/L, respectively. Based on the potential for vapor intrusion to indoor air within the off-site plume, we request that you conduct a sensitive receptor survey for all areas currently and potentially affected by the plume in the future. We also request that you propose soil gas sampling in the off-site area of the plume to evaluate the potential for vapor intrusion to indoor air due to volatilization from groundwater. Please include these plans in the revised Work Plan requested below.
6. **Elevated Metals in Soil.** Elevated concentrations of mercury, nickel, antimony, arsenic, and selenium were detected in soil samples collected in the hydraulic lift and waste oil tank area (borings B-1 through B-10 and B13 through B-16 advanced in January 1992). Of particular concern are the elevated concentrations of mercury detected in numerous shallow soil samples. As noted in the ESL document (San Francisco Bay Regional Water Quality Control Board 2007), soil vapor sampling is recommended for mercury to evaluate the potential for vapor intrusion to indoor air. The source of the elevated concentrations of metals in soil is currently unknown. We request that you review the metals data for soils, update your site conceptual model, and propose additional characterization activities as necessary to address the elevated concentrations of metals detected in soil.
7. **Waste Oil Tank at 1432 Alice Street.** During sampling of the waste oil tank contents on October 30, 1990, elevated concentrations of tetrachloroethene (PCE), trichloroethene, PCBs, and lead were detected. Monitoring well MW-3 is located in Alice Street approximately 20 feet northeast of the former waste oil tank. Two grab groundwater samples

(GW-1 and GW-2) were also collected in Alice Street but the groundwater samples were only analyzed for TPHg and BTEX (Levine Fricke 1994). These locations are either cross gradient or upgradient from the former waste oil tank. No groundwater samples appear to have been collected downgradient from the former waste oil tank. PCE was detected at a concentration of 2 µg/L and TPH as oil was detected at a concentration of 300 µg/L in a groundwater sample collected from MW-3 on August 7, 1994; no VOCs other than PCE were detected. In order to confirm that groundwater has not been significantly affected in the area of the former waste oil tank, we request that a minimum of one soil boring be advanced downgradient from the former waste oil tank to collect a grab groundwater sample. Please include plans to evaluate water quality downgradient from the waste oil tank.

8. **Risk Assessment Report.** The report entitled, "*Risk Assessment, Allright Parking, 1432 Harrison Street, Oakland, California,*" dated April 4, 2001 includes a Tier 1 assessment of the site and a Tier 2 assessment using risk-based corrective action (RBCA) modeling of the vapor inhalation pathway for benzene. The Tier 1 assessment concludes that the concentrations of TPHg, BTEX, TPHd, and oil & grease exceed ESLs for groundwater protection. The concentration of benzene in soil also exceeds the residential ESL for vapor intrusion. The Tier 2 risk assessment concludes that there is no significant risk from indoor or outdoor vapor inhalation due to benzene in soil and/or groundwater. The Tier 2 risk assessment also concludes that elevated concentrations of benzene in soil may result in risk to a hypothetical residential receptor. Collection of soil gas samples is recommended in the risk assessment to provide a more representative characterization of potential risk from vapor intrusion. We concur with the recommendation to conduct soil vapor sampling to evaluate potential vapor intrusion to indoor air.
9. **Closed in Place USTs at 1424 Harrison Street.** As discussed during our February 6, 2008 meeting, the closed-in-place USTs at 1424 Harrison Street have been identified during previous investigations as a potential source of fuel hydrocarbon contamination in the area of the site. Additional information regarding the closed-in-place USTs was provided in correspondence prepared by Conestoga-Rovers & Associates, entitled, "*Status Report and Recommendations,*" dated July 23, 2007. ACEH is in the process of determining the most appropriate regulatory actions for the closed-in-place USTs at 1424 Harrison Street.
10. **Confirmation Soil Sampling.** The July 23, 2007 correspondence entitled, "*Status Report and Recommendations,*" recommends soil sampling to confirm the effectiveness of remediation through operation of a soil vapor extraction/air sparging system from 2001 to 2005. In general, we do not object to post-remediation confirmation soil sampling. However, we recommend implementing confirmation soil sampling after the items discussed in technical comments 1 through 3 are further evaluated and issues related to the closed-in-place USTs at 1424 Harrison Street are further resolved.
11. **Off-Site Source.** During our meeting on February 26, 2008, a service station at 301 14th Street was discussed as a possible contributor to groundwater contamination in the area of the site. We have reviewed the relevant groundwater monitoring data and find no indications that the service station at 301 14th Street is contributing to the groundwater plume originating from 1432 and possibly 1424 Harrison Street. Although groundwater contamination is present at the 301 14th Street site, the groundwater contamination does not appear to extend to 1432 Harrison Street. Two wells were located in Harrison Street between the service station at 301 14th Street and 1432 Harrison Street. Well MW-6 is on the east side of

Harrison Street and well C-9 was previously located on the west side of Harrison Street. Well C-9 was decommissioned in 2005. The most recent groundwater samples from both wells did not contain detectable fuel hydrocarbons.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **Revised Work Plan** – April 25, 2008

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.

Mr. Mark Borsuk
RO0000266
February 22, 2008
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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

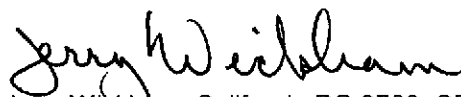
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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.

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Mark Jonas
Conestoga-Rovers & Associates
5900 Hollis Street, Suite A
Emeryville, CA 94608

Donna Drogos, ACEH
Jerry Wickham, ACEH
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