

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

ALEX BRISCOE, Director



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January 5, 2012

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)

Robert Trommer
State Water Resources Control Board
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1001 I Street
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(Sent via E-mail to
RTrommer@waterboards.ca.gov)

Subject: Response to UST Cleanup Fund Five Year Review for Fuel Leak Case No. RO0000280 and GeoTracker Global ID T0600102113, Scooter Wilson, 3600 MacArthur Blvd., Oakland, CA 94619

Dear Mr. Cullen & Mr. Trommer:

Alameda County Environmental Health (ACEH) has received the Preliminary 5-Year Review Summary Reports dated October 20, 2010 from the Underground Storage Tank Cleanup Fund (Fund) for the site listed below. This letter is an effort to document our response. The Summary Report represents the Preliminary 5-year review of ACEH Local Oversight Program cases by the Fund. The Fund correspondence requests that ACEH respond to the Fund correspondence within 45 days of the date of the letter. Responses to the Fund recommendations for the site, are presented below. ACEH staff has reviewed the contents of the correspondence in the context of the appropriateness of recommendations. However, ACEH staff has not reviewed the reports for accuracy of all information presented.

ACEH disagrees with USTCF review and respectfully requests changes:

ACEH Case: RO0000280

USTCF Claim: 11842

Global ID: T0600102113

Site Name: Scooter Wilson

Site Address: 3600 MacArthur Blvd., Oakland, CA

USTCF Recommendations from October 21, 2010 Review Summary:

- The UST Fund staff concurs with the claimant's consultant recommendation for low risk Site closure made in 2002.

Updated November 2011, based on the hydrology, geology, and other factors at and in the vicinity of the Site, the residual petroleum hydrocarbons that remain in soil and groundwater pose a low risk to the public health, safety and the environment. The remaining mass of residual petroleum hydrocarbons is limited to the immediate vicinity of the former USTs, the dissolved petroleum constituents in the source area are degrading and the plume in groundwater is decreasing. Affected groundwater is not currently

used as a source for beneficial uses and it is highly unlikely that it will be used for beneficial uses in the foreseeable future. Again the Fund recommends the LOP consider this Site for closure.

ACEH Response: ACEH disagrees with the Fund recommendations and respectfully requests changes. A work plan was submitted in 2004 to delineate the horizontal and vertical extent of contamination and the investigation was reportedly completed in March 2006. However, neither the data or the report were ever submitted. ACEH awaits this report to determine the extent of contamination. Also, more recent groundwater data than 2005 should be obtained before the site is closed. Groundwater depths are up to 1.44 feet below grade and the well screens are generally submerged. In addition, a conduit study has not been performed.. ACEH requests modifications as follows:

- UST Fund staff recommends the results of the March 2006 investigation be submitted. An NOV should be issued to the RP requesting the results of the March 2006 investigation. Groundwater monitoring should be performed to identify current concentrations and a conduit survey should be performed to determine if hydrocarbons are migrating along preferential pathways. Depending on the results of these investigations, low risk closure could be considered.

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,

Barbara J. Jakub, P.G.
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)
Barbara Jakub (sent via electronic mail to barbara.jakub@acgov.org)
eFile, GeoTracker