

November 23, 2011

Alameda County

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Environmental Health

Jerry Wickham
Alameda County Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Subject: Comments on Corrective Action Plan submitted by Conestoga-Rovers & Associates, 4212 First Street, Pleasanton, California.

Dear Mr. Wickham:

Tamalpais Environmental Consultants (TEC) has prepared this letter on behalf of the property owners of 4212 First Street in Pleasanton. The purpose of this letter is to provide comments and additional information to the Alameda County Environmental Health (ACEH) agency related to the Corrective Action Plan (CAP) submitted by Conestoga-Rovers & Associates (CRA), dated October 24, 2011. We encourage the ACEH to consider the following comments and require additional investigation and remediation activities for the property (Site).

Comment 1: Property Development Restrictions

The gas station on the Site has historically been operated as a Shell service station. The operation rights for the station were recently sold to a new operator who has elected to discontinue ongoing operation of the property as a service station. The property owners are now evaluating potential development options, including a potential extension of the lease with the new operator, but (i) those negotiations have not been finalized and (ii) even if finalized, will commit the operator to the Site for only another 5 years. The CAP erroneously indicates that the "contract" with the owners includes "specific restrictions on site development to commercial uses excluding child day care, elder care, or other similar sensitive uses." The existing lease is limited to the period of operation of the service station and does not limit the long-term development of the property as described in the CAP. The owners are under no such restrictions. The assumption that this property could not be used for any sensitive uses is inappropriate.

Comment 2: Evaluation of Remediation Feasibility

The CAP ignores previous CRA conclusions that there are feasible remediation options for the Site. The CAP summarizes previous investigation and remediation activities and indicates that the mass of hydrocarbons removed during the dual phase extraction (DPE) pilot test was over 286 pounds in a 5-day pilot test. This amount was removed from the

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vadose zone by soil vapor extraction (SVE) during a limited test in three wells. The removal of this mass of hydrocarbons from only a few wells within a short time frame likely indicates that significantly more hydrocarbon mass is present in the vadose zone above the groundwater table. At the time, CRA concluded that SVE could be a viable remediation alternative. Furthermore, vadose zone impacts lead directly to elevated soil gas concentrations, which can directly affect the long-term risks associated with different types of development of the property.

Comment 3: Vapor Intrusion

The CAP specifies that "since the site use remains an active gas station, an assessment of on-site vapor intrusion is not considered necessary. If the site use changes in the future, an assessment may be necessary depending on the proposed development plan." An assessment of soil gas at the site should be conducted as soon as possible to evaluate existing and potential risks. The presence of a residual mass of hydrocarbons in the vadose zone was confirmed in the DPE pilot test. This can be evaluated with soil gas sampling, which can also be used to evaluate the effectiveness of any potential remediation option engineered to address soil gas impacts like SVE.

Comment 4: Groundwater Remediation

The groundwater modeling described in the CAP indicates that groundwater will be impacted with methyl tertiary-butyl ether (MTBE) above the Environmental Screening Level for a period in excess of 50 years (Figure 5 for Well MW-1). However, only two years of additional groundwater monitoring are proposed. The low rate of MTBE degradation and high potential for migration in groundwater would seem to indicate that some type of additional groundwater remediation or monitoring is warranted.

We appreciate your consideration of these comments as you prepare your response to the CAP submitted for the property. The owners of the property believe that the operators of the service station have a responsibility to ensure that the Site has not been significantly impacted by the historical operation of the service station. If you have any questions regarding the information provided, please contact Aaron O'Brien at (415) 456-5084.

Sincerely,



Aaron O'Brien, PE, CHMM
President

cc: Douglas & Mary Safreno
Jim Frassetto, Miller, Starr & Regalia