April 24, 2009 E27297-3

Mr. Jerry Wickham Senior Hazardous Materials Specialist Environmental Health Services 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577

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RE: Soil Gas Survey and Soil Sampling Report 421 23rd Avenue, Oakland, California

Dear Mr. Wickham,

Piease consider this letter a response to yours dated April 14, 2009 regarding the results of a recent soil gas survey conducted at the subject Site. Briefly, your letter requested that Bonkowski & Associates, Inc (B&A): 1) review the site history and present an evaluation of the detection of PCE in SG-8, you particularly wanted to know if any groundwater samples previously collected from the Site have been analyzed for chlorinated solvents, and 2) that (B&A) expand discussion of the soil vapor sampling results to support the conclusion that there is a low risk from vapor intrusion. Our responses are briefly provided below.

With respect to the issue of PCE, B&A discovered that one groundwater sample collected on November 2, 1998 from a collection trench in tank cavity backfill was tested for a full VOC scan using EPA Method 8260. The sample was tested by Sequoia Analytical. PCE was not detected. These results are summarized in the Site Assessment and Correction Action Workplan (B&A, November 16, 1998). We found no reports which would indicate PCE was placed in any UST at the Site, or that it was ever used by Golden Gate Petroleum. Sample SG-8 (the only sample which contained PCE) was collected near the property line, this suggests an off-site source.

With respect to the soil vapor, you recall that all soil gas samples analyzed from this Site were ND to the MDL. B&A evaluated the risk associated with vapor intrusion at this Site following guidance in the Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater (SF BAY RWQCB, May 2008). The RWQCB defers to the City of Oakland "Oakland Urban Land Redevelopment (ULR) Program: Guidance Document" (January 2000). Essentially, the Water Board "agreed that the Oakland look-up tables are appropriate for use at Oakland sites." Using the ULR Program software available at the Oakland Public Works website, B&A calculated Carcinogenic Hazard for Commercial/ Industrial site specific Risk Based Screening Levels (RBSLs) for benzene in sandy silts and clayey silts.

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Using the Site specific parameters provided below:

Foundation Thickness	30 cm
Lower Depth of Surficial Zone	300.0 cm
Depth to Subsurface Soil Source	250 cm
Depth to Groundwater	431 cm
Width of Source Area Parallel to Width or Groundwater	300 cm
Flow Direction	

The calculated RBSLs are:

Soil Gas in	Vapor	Commercial/	Sandy	Carcinogenic	7.5E+3
Subsurface	Intrusion to	Industrial	Silt	Hazard	4.6E+4
Soil	Buildings				
	(µg/l)		Clayey	Carcinogenic	9.5E+3
			Silt	Hazard	5.8E+4

The RBSLs all exceed the laboratory MDL. On this basis, we conclude that there is little risk associated with vapor intrusion to buildings at the Site. We reiterate our recommendation that the Site is a candidate for regulatory underground storage tank closure.

Please feel free to contact either of the undersigned below at (510) 450-0770 if you have any questions or need any additional information.

Sincerely,

BONKOWSKI & ASSOCIATES, INC

Michael S. Bonkowski, PG CEG 1329

Senior Managing Principal

Environmental and Engineering Services

Enclosure

Mr. Mitch Carter, Golden Gate Petroleum

Mr. David Charter, Underground Storage Tank Cleanup Fund

REFERENCES

Bonkowski & Associates, Inc., "Soil Gas Survey and Soil Sampling Report, 421 23rd Avenue, Oakland, California," February 10, 2009.

Bonkowski & Associates, Inc., "Site Closure Report, Golden Gate Petroleum, Oakland Cardlock," January 14, 2008.

Bonkowski & Associates, Inc., "Site Assessment and Correction Action Workplan, Golden Gate Petroleum, 421 23rd Avenue, Oakland, California," November 16, 1998.

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Project Geologist