

**From:** Phillips, Hollis  
**To:** [Khatri, Paresh, Env. Health](#)  
**Cc:** [Peterson, Jamey](#)  
**Subject:** RO0000427 - BP11109 request extension on CAP  
**Date:** Monday, September 18, 2017 9:59:43 AM  
**Attachments:** [image001.png](#)

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Paresh:

Arcadis requests an extension for the *Draft Corrective Action Plan Addendum and Updated SCM* (Draft CAP/SCM) submittal for the Former BP Service Station No. 11109 located at 4280 Foothill Boulevard in Oakland, California (the Site). Your directive letter dated July 21, 2017 requests the Draft CAP/SCM by September 22, 2017. After assessing the impediments to low-treat closure noted in your letter, it appears that further assessment of utility corridors near the Site are warranted to satisfactorily draft the requested deliverable. This assessment will involve a field mobilization as recent correspondence with utility service providers and GHD (environmental consultant for ACDEH Case No.: RO0000427) have revealed inconclusive information regarding the locations and depths of utilities near the Site in Foothill Boulevard and High Street.

Several of the Site's impediments to Low-Threat Closure listed in the ACDEH July 2017 letter and subsequent corrective actions are related to potential preferential pathways created by utilities near the Site. The exact depths and locations of these utilities will provide the necessary data to adequately assess potential corrective actions in the Draft CAP/SCM.

Arcadis requested depths of the sewers and storm drains from a City of Oakland (City) Right-of-Way Management Construction Supervisor, who replied that depths of all City owned utilities are not available. Pacific Gas & Electric Company (PG&E) would not provide a depth of their utilities either, but communicated that their trenches typically do not exceed 3 feet bgs. In exploring this matter further, Arcadis contacted GHD (formerly Conestoga-Rovers & Associates [CRA]) to confirm the findings of their preferential pathway study for Chevron Service Station 90076 (4265 Foothill Boulevard, Oakland) in August 2012, and updated it in a GHD report dated June 3, 2016. The GHD preferential pathway study concluded that water, electrical, natural gas, and telecommunication utilities would not likely have been installed deeper than 10 feet bgs and therefore are unlikely to serve as preferential pathways since depth to groundwater typically ranges from 10 to 20 feet bgs. The GHD study further states sanitary sewers and storm drains are likely installed at depths greater than 10 feet bgs and it is possible that these utilities may act as a preferential pathway during high groundwater conditions. When asked how these depths and locations were determined and how they were verified, GHD personnel were either unwilling to provide this information to Arcadis or did not know how it was obtained.

Arcadis believes that several potential corrective actions can be eliminated with a more thorough

understanding of utilities near the Site. This would also facilitate a more complete SCM and a more successful CAP.

To fully verify utility depths and locations Arcadis proposes to measure the utility depths by direct access through manhole covers located in City right-of-ways in conjunction with a geophysical survey. Work of this nature would require a minor encroachment or obstruction permit from the City based on their assessment of the proposed scope. Previous efforts to successfully permit work in a public City right-of-way has resulted in significant delays. Submittal of the September 2015 CPT/UVOST report was delayed by approximately one year due to City permitting to advance B-6 through B-8.

Arcadis proposes to close the existing preferential pathway data gap by directly measuring utility depths via manhole access prior to addressing new data gaps in the most recent ACDEH directive. Arcadis again anticipates potential delays associated with City permitting and respectfully requests at a minimum, a 3-month extension to the Draft CAP/SCM.

Hollis

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