BLYMYER
ENGINEERS, INC.

September 23, 1999
BEI Job No. 88288

Ms. Eva Chew
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, 2nd Floor
Alameda, CA 94502-6577

Subject: **MTBE Analysis and Closure Request**
G.I. Trucking Facility
1750 Adams Avenue
San Leandro, California
STID 1373

Dear Ms. Chew:

Based on our telephone conversation of August 20, 1999, Blymyer Engineers, Inc. is pleased to provide the enclosed additional data relevant to the site (Figure 1). On July 19, 1999, Blymyer Engineers had visited the site in order to determine if free product had returned to the underground storage tank (UST) basin (Figure 2) after the removal of the four 12,000-gallon diesel USTs and several feet of basin margin impacted soil from the site on June 9, 1999. Our field observations revealed that free product had not returned to the former UST basin and that the hydrocarbon skimming operation undertaken at the time of UST removal had been successful in removing the free product from the former UST basin.

In our telephone conversation we also discussed the need for laboratory analysis for methyl *tert*-butyl ether (MTBE) per recent State Water Resources Control Board regulatory guidance. As a consequence of our conversation, Blymyer Engineers requested a review of the chromatograms generated by the analytical laboratory as the result of analysis for benzene, toluene, ethylbenzene, and total xylenes by EPA Method 8020 during the most recent annual groundwater monitoring event. The groundwater samples were collected on March 12, 1999, and the data were reported in the Blymyer Engineers report entitled *1999 Annual Groundwater Monitoring*, dated April 13, 1999. MTBE was not detected in the groundwater sample collected from downgradient well MW-2 and from recovery well RW-2; however, the detection limit in RW-2 was elevated due to higher concentrations of Total Petroleum Hydrocarbons (TPH) as diesel in the groundwater sample. MTBE was detected in groundwater well MW-3 at a concentration of 17 micrograms per liter (μg/L). MTBE was not confirmed by gas chromatograph/mass spectrometer (GC/MS) analysis as the groundwater sample was past the hold period. The detection of MTBE by EPA Method 8020 must be secondarily confirmed by GC/MS as 3-methyl-pentane coelutes with MTBE, and thus has the same peak as MTBE with the EPA 8020 detection method. The lack of detection of MTBE inside the former UST basin strongly suggests that MTBE was not a significant component of the diesel delivered to this facility. A copy of the revised laboratory report is attached.

99 SEP 24 PM 2:35

1829 CLEMENT AVENUE ALAMEDA, CA 94501•1395 PHONE 510•521•3773 FAX 510•865•9594
3475 LENOX ROAD N.E. SUITE 400 ATLANTA, GA 30326 PHONE 404•467•1374 FAX 404•467•1374

Blymyer Engineers, on behalf of G.I. Trucking Company, again requests site closure based on the data. As summarized in the referenced groundwater monitoring report, completed prior to removal of the USTs and several feet of impacted UST basin sidewall, the detectable concentrations of TPH as diesel remain consistent, or are declining, outside the UST basin. Concentrations of BTEX have continuously remained nondetectable in wells within 2 feet downgradient of the edge of the UST basin approximately 33 months after the June 1996 release and within months of the UST system failure in 1999. No detectable concentrations of BTEX were present within the UST basin 33 months after the largest release. Further, no detectable concentrations of PNAs, including the carcinogenic benzo(a)- compounds, are present in the UST basin nor are they present as close as 2 feet outside the UST basin after the releases. From the data, no health risk is apparent to site personnel, or for potential downgradient receptors when a comparison is made to the Tier I Look-up Table in the ASTM RBCA document, as modified for California MCLs. The concentrations of TPH as diesel are either consistent or rapidly decreasing in wells within 2 feet of the UST basin. There are no apparent water supply wells or groundwater monitoring wells within approximately 1,300 and 400 feet, respectively, of the subject site. In consideration of these factors Blymyer Engineers recommends case closure for this site after well destruction.

Please call Mark Detterman at (510) 521-3773 with any questions or comments.

Sincerely,

Blymyer Engineers, Inc.

REGISTERED GEOLOGIST
MARK E. DETTERMAN
No. 1788
CERTIFIED ENGINEERING GEOLOGIST
9/01
STATE OF CALIFORNIA

By: _____
Mark Detterman, C.E.G. 1788
Senior Geologist

And: _____
Michael S. Lewis
Vice President, Technical Services

Enclosures: Figure 1 Site Location Map
Figure 2 Site Plan & Groundwater Elevation Contours, March 4, 1999
Entech Analytical Labs, Inc. Analytical Report, August 25, 1999

c: Mr. Mike Rogers, Arkansas Best Corporation
Mr. Mike Bakaldin, San Leandro Fire Department
Mr. Stan Lovell, G.I. Trucking Company
Mr. Joseph Meyers G.I. Trucking Company

mdr\8828\8828ltr.01

UNITED STATES GEOLOGICAL SURVEY 7.5' QUAD. "SAN LEANDRO, CA", ED. 1959, PHOTOREVISED 1980.

BLYMYER ENGINEERS, INC.

0 1000 2000

SCALE IN FEET

N

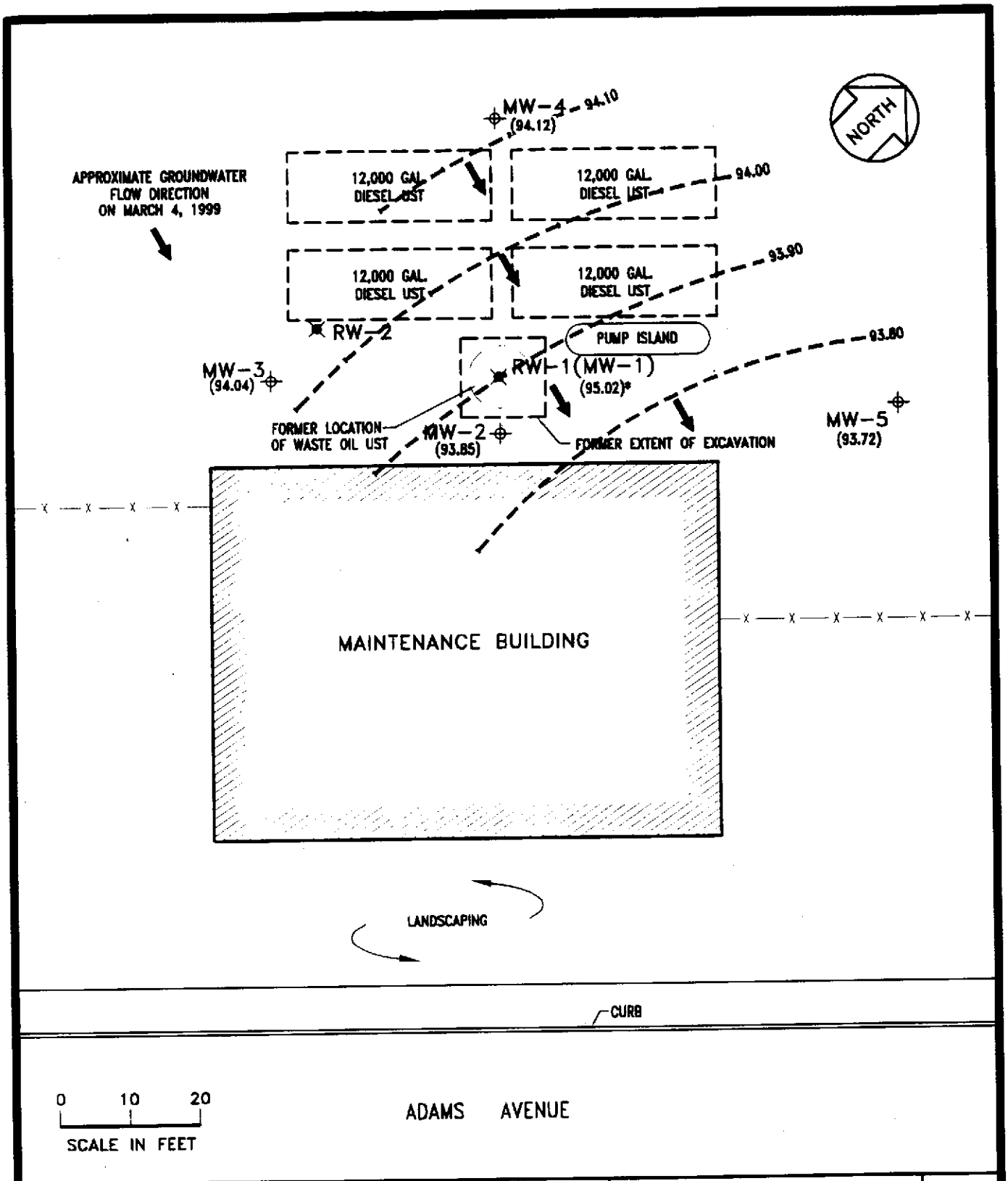
SITE LOCATION MAP

G.I. TRUCKING FACILITY
1750 ADAMS AVE.
SAN LEANDRO, CA

FIGURE 1

BEI JOB NO. 88288

DATE 9/19/95



BLYMYER ENGINEERS, INC.

BEI JOB NO.	DATE
88288.001	4-8-99

LEGEND

- UST — UNDERGROUND STORAGE TANK
- ⊕ — MONITORING WELL
- ⊠ — RECOVERY WELL
- (94.12) — GROUNDWATER ELEVATION IN FEET
- — — — GROUNDWATER ELEVATION CONTOUR
- * — NOT USED IN GRADIENT MAP

SITE PLAN & GROUNDWATER ELEVATION CONTOURS

MARCH 4, 1999
G.I. TRUCKING FACILITY
1750 ADAMS AVE.
SAN LEANDRO, CA

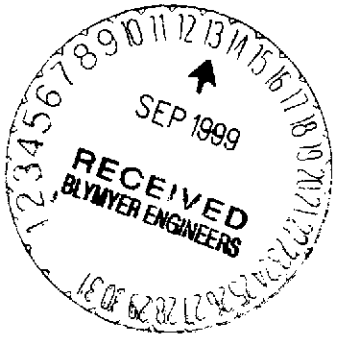
FIGURE 2

\ACADLW\882882M 4-8-98 1:240

Entech Analytical Labs, Inc.

CA ELAP# I-2346

525 Del Rey Avenue, Suite E • Sunnyvale, CA 94086 • (408) 735-1550 • Fax (408) 735-1554



Blymyer Engineers, Inc.
1829 Clement Avenue
Alameda, CA 94501
Attn: Mark Detterman

Date: 8/25/99
Date Received: 3/8/99
Project:
PO #:
Sampled By: Client

Certified Analytical Report

Water Sample Analysis:

Sample ID	RW-2										
Sample Date	3/4/99										
Sample Time	14:47										
Lab #	G5922										
	Result	DF	DLR							PQL	Method
Results in µg/Liter:											
Analysis Date	3/12/99										
TPH-Diesel	**74,000**	20	1000							50	8015M
Analysis Date	3/10/99										
MTBE	**ND**	2.0	10							5.0	8020
Benzene	**ND**	2.0	1.0							0.50	8020
Toluene	**ND**	2.0	1.0							0.50	8020
Ethyl Benzene	**ND**	2.0	1.0							0.50	8020
Xylenes (total)	**ND**	2.0	1.0							0.50	8020

DF=Dilution Factor ND= None Detected above DLR PQL=Practical Quantitation Limit DLR=Detection Reporting Limit

· Report amended 8/25/99

· Analysis performed by Entech Analytical Labs, Inc. (CA ELAP #I-2346)

Michelle L. Anderson, Lab Director

Environmental Analysis Since 1983

Entech Analytical Labs, Inc.

525 Del Rey Avenue, Suite E
Sunnyvale, CA 94086

QUALITY CONTROL RESULTS SUMMARY

METHOD: Gas Chromatography

QC Batch #: GBG4990310
Matrix: Water
Units: µg/L

Date Analyzed: 03/10/99
Quality Control Sample: Blank Spike

PARAMETER	Method #	MB µg/L	SA µg/L	SR µg/L	SP µg/L	**SP % R**	SPD µg/L	**SPD %R**	RPD	QC LIMITS RPD	QC LIMITS %R
Benzene	8020	<0.50	40	ND	38	**94**	35	**87**	8.2	25	83-109
Toluene	8020	<0.50	40	ND	38	**94**	34	**85**	10.1	25	80-111
Ethyl Benzene	8020	<0.50	40	ND	37	**92**	35	**88**	4.4	25	83-110
Xylenes	8020	<0.50	120	ND	112	**93**	106	**89**	5	25	83-110
Gasoline	8015	<50.0	500	ND	487	**97**	504	**101**	3.4	25	74-126

Note: LCS and LCSD results reported for the following Parameters:
All

Definition of Terms:

na: Not Analyzed in QC batch
MB: Method Blank
SA: Spike Added
SR: Sample Result
RPD(%): Duplicate Analysis - Relative Percent Difference
SP: Spike Result
SP (%R): Spike % Recovery
SPD: Spike Duplicate Result
SPD (%R): Spike % Recovery
NC: Not Calculated

BLAINE TECH SERVICES INC.

1680 ROGERS AVENUE
SAN JOSE, CALIFORNIA 95112-1105
FAX (408) 573-7771
PHONE (408) 573-0555

CHAIN OF CUSTODY BTS #990304-P4

CLIENT G.I. TRUCKING

SITE 1750 Adams Ave
San Leandro, CA

C = COMPOSITE ALL CONTAINERS

CONDUCT ANALYSIS TO DETECT

LAB ENTECH DHS #

ALL ANALYSES MUST MEET SPECIFICATIONS AND DETECTION LIMITS SET BY CALIFORNIA DHS AND

☐ EPA ☐ RWQCB REGION
☐ LIA
☐ OTHER

SPECIAL INSTRUCTIONS
INVOICE & REPORT TO
BLAYLOCK ENGR INC
ATTN. MARK DETTERMAN.

SAMPLE I.D.		MATRIX S = SOIL W = H2O	CONTAINERS TOTAL	TPH-Diesel	BTEX	PNA's/PAH's	MTBE by 8020	ADD'L INFORMATION	STATUS	CONDITION	LAB SAMPLE #
RW-1	3/4 14:28	W	7	X	X	X	Cancel per Billy Jones 03/11/99				G5921
RW-2	↓ 14:47	W	7	X	X	X	X				G5922

SAMPLING COMPLETED	DATE	TIME
	3/4	14:30

SAMPLING PERFORMED BY Paul Sanna

RESULTS NEEDED NO LATER THAN STANDARD

RELEASED BY	DATE	TIME	RECEIVED BY	DATE	TIME
	3/8/99	1620	J Meyers	3/8/99	1620
J Meyers	3/8/99	4:45	ngtrazo	03/8/99	4:50

SHIPPED VIA	DATE SENT	TIME SENT	COOLER #

Entech Analytical Labs, Inc.

CA ELAP# I-2346

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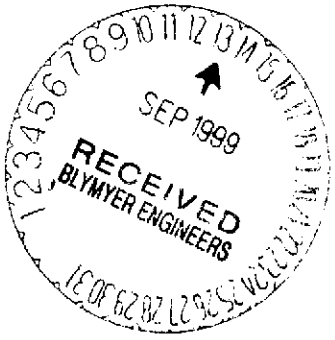

Blymyer Engineers, Inc.
1829 Clement Avenue
Alameda, CA 94501
Attn: Mark Detterman

Date: 8/25/99
Date Received: 3/12/99
Project:
PO #:
Sampled By: Client

Certified Analytical Report

Water Sample Analysis:

Sample ID	MW-2			MW-3							
Sample Date	3/11/99			3/11/99							
Sample Time	12:20			12:45							
Lab #	G6375			G6376							
	Result	DF	DLR	Result	DF	DLR				PQL	Method
Results in µg/Liter:											
Analysis Date	3/16/99			3/16/99							
TPH-Diesel	**ND**	1.0	50	**330** [x]	1.0	50				50	8015M
Analysis Date	3/18/99			3/18/99							
MTBE	**ND**	1.0	5.0	**17**	1.0	5.0				5.0	8020
Benzene	**ND**	1.0	0.50	**ND**	1.0	0.50				0.50	8020
Toluene	**ND**	1.0	0.50	**ND**	1.0	0.50				0.50	8020
Ethyl Benzene	**ND**	1.0	0.50	**ND**	1.0	0.50				0.50	8020
Xylenes (total)	**ND**	1.0	0.50	**ND**	1.0	0.50				0.50	8020

DF=Dilution Factor ND= None Detected above DLR PQL=Practical Quantitation Limit DLR=Detection Reporting Limit

· Report amended 8/25/99

· Analysis performed by Entech Analytical Labs, Inc. (CA ELAP #I-2346)

Michelle L. Anderson, Lab Director

Environmental Analysis Since 1983

Entech Analytical Labs, Inc.

525 Del Rey Avenue, Suite E
Sunnyvale, CA 94086

QUALITY CONTROL RESULTS SUMMARY

METHOD: Gas Chromatography

QC Batch #: GBG4990318
Matrix: Water
Units: µg/L

Date Analyzed: 03/18/99
Quality Control Sample: Blank Spike

PARAMETER	Method #	MB µg/L	SA µg/L	SR µg/L	SP µg/L	**SP % R**	SPD µg/L	**SPD %R**	RPD	QC LIMITS RPD	QC LIMITS %R
Benzene	8020	<0.50	40	ND	39	**97**	39	**97**	0.1	25	83-109
Toluene	8020	<0.50	40	ND	39	**97**	38	**96**	1.2	25	80-111
Ethyl Benzene	8020	<0.50	40	ND	40	**100**	38	**96**	4.4	25	83-110
Xylenes	8020	<0.50	120	ND	121	**101**	117	**98**	3	25	83-110
Gasoline	8015	<50.0	500	ND	461	**92**	463	**93**	0.3	25	74-126

Note: LCS and LCSD results reported for the following Parameters:
All

Definition of Terms:

- na: Not Analyzed in QC batch
- MB: Method Blank
- SA: Spike Added
- SR: Sample Result
- RPD(%): Duplicate Analysis - Relative Percent Difference
- SP: Spike Result
- SP (%R): Spike % Recovery
- SPD: Spike Duplicate Result
- SPD (%R): Spike % Recovery
- NC: Not Calculated