



**CONESTOGA-ROVERS
& ASSOCIATES**

5900 Hollis Street, Suite A
Emeryville, California 94608
Telephone: (510) 420-0700 Fax: (510) 420-9170
www.CRAworld.com

TRANSMITTAL

DATE: May 29, 2009 REFERENCE NO.: 633100

TO: Mr. Steven Plunkett PROJECT NAME: 1750 Adams Avenue, San Leandro

Hazardous Materials Specialist
Alameda County Environmental Health Services
(ACEHS)
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502-6577

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QUANTITY	DESCRIPTION
1	Workplan for Additional Site Characterization

As Requested For Review and Comment
 For Your Use _____

COMMENTS:

If you have any questions regarding the contents of this document, please contact Robert Foss at (510) 420-3348.

Copy to: Mr. Bruce Hickman,
Hart & Hickman, PC
Ms. Angela Maidment,
Estes Express Lines

Completed by: Robert C. Foss
[Please Print]

Signed: *Robert Foss*

Filing: **Correspondence File**



WORKPLAN FOR ADDITIONAL SITE CHARACTERIZATION

**FORMER GI TRUCKING COMPANY (ESTES EXPRESS LINES)
1750 ADAMS AVENUE
SAN LEANDRO, CALIFORNIA**

AGENCY CASE NO. RO# 00000442

MAY 28, 2009

REF. NO. 631000 (2)

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**Prepared by:
Conestoga-Rovers
& Associates**

5900 Hollis Street, Suite A
Emeryville, California
U.S.A. 94608

Office: (510) 420-0700
Fax: (510) 420-9170

web: <http://www.CRAworld.com>

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1.0 INTRODUCTION

On behalf of Estes Express Lines, Inc. (Estes), Conestoga-Rovers & Associates (CRA) is submitting this *Workplan for Additional Site Characterization* for the site referenced above (Figure 1). This workplan was prepared in response to Alameda County Environmental Health Department letters dated January 22, 2009 and April 21, 2009 (Appendix A) requesting additional delineation of hydrocarbon impacts at the site. To meet this objective, CRA proposes advancing five soil borings to the north and east of the former UST field. The proposed locations of these borings are shown on Figure 2. Summarized below are a site background, investigation history, proposed scope of work and closing.

1.1 SITE BACKGROUND

Site Description: The property is located on the southwest corner of the intersection of Adams Avenue and Bigge Street, in a mixed commercial/industrial area of San Leandro, California (Figure 1). Development on the site consists of a warehouse building used for freight storage and loading, a maintenance shop and an office. A set of five underground storage tanks (USTs) (four 12,000-gallon diesel and one 800-gallon used oil) were once operated at the site and were removed and properly disposed of. The 800-gallon used oil UST was removed in December 1986 and the four remaining USTs were removed in June 1999. The surrounding properties consist of light industrial and commercial businesses, with residential development located in the cross-gradient direction, approximately 850 feet northeast of the site.

Site Ownership and Leasing: The property is owned by Estes Terminals California LLC and operated by Estes Express Lines of Richmond, Virginia.

Current Site Use: The site is used as an operating freight storage and transfer facility.

1.2 PREVIOUS INVESTIGATIONS

Environmental activities have been conducted at this site since July 1986 and are summarized below. Due to the transfer of property ownership, the current property owner was not able to provide copies of all previous reports. Therefore, although a review ACEH files were completed, CRA was unable to locate all the previous reports from the client and during a file review at ACEH. Present groundwater analytical data are presented in Table 1. Available soil analytical data are presented in Table 2. Figure 2 illustrates the former tankpit, excavation limits and well locations.

1986 Used-Oil UST Removal and Monitoring Well Installation: On July 29, 1986, Blymyer Engineers, Inc. (Blymyer) attempted a tank tightness test on the five USTs at the site. The 800-gallon fiberglass used-oil UST would not maintain a constant product level. On September 29, 1986 Xerxes Fiberglass Inc, the UST manufacturer, inspected the tank and determined that the bottom had ruptured and could not be repaired. On December 4, 1986, the used-oil UST was removed from the site and light non-aqueous phase liquid (LNAPL) and petroleum hydrocarbon saturated soil were observed in the excavation area. Approximately 45 cubic yards of petroleum hydrocarbon impacted soil was excavated and disposed of at a Class 1 disposal facility. LNAPL and groundwater were purged from the excavation multiple times until only a sheen of petroleum hydrocarbons was observed. No estimates of the amount of LNAPL or groundwater were provided. Due to the discovery of the petroleum hydrocarbon impact, recovery well MW-1/RW-1 and monitoring wells MW-2 through MW-5 were installed around the UST cavity. Waste oil was detected (EPA Method 3550) in soil samples from borings MW-2 through MW-5 at concentrations ranging from 71 milligrams per kilogram (mg/kg) to 210 mg/kg. No petroleum hydrocarbons were detected in groundwater after the installation of wells MW-2 through MW-5.

1993 Passive Skimmer Installation: In October 1993, Blymyer installed a passive LNAPL recovery skimmer in well MW-1/RW-1.

1996 Recovery Well Installation: In June 1996, Blymyer installed recovery well RW-2 near the four existing 12,000-gallon diesel USTs. A passive LNAPL recovery skimmer was installed in well RW-2 to accelerate recovery of free phase diesel product. According to Blymyer, a second diesel release had occurred at the site from a leaking gasket in the diesel fuel pump. Blymyer estimated the volume of the release to be approximately 250-gallons of diesel. In November 1996, site personnel estimated the inventory loss as approximately 165-gallons. Since 1996, approximately 178-gallons of diesel have been recovered from the site.

1999 UST Removal: In June 1999, Blymyer removed the four 12,000-gallon USTs from the site. Confirmation soil samples EX-1 through EX-10 were collected from the sidewalls of the excavation at the approximate soil-groundwater interface. During a period of several days LNAPL was pumped from the UST excavation, drummed onsite, and properly disposed of. Due to elevated petroleum hydrocarbon concentrations detected in soil confirmation samples, the UST excavation was over-excavated by 2 linear feet in the northern and southern corners, and also along the southeastern and northeastern sidewalls. Over-excavation soil confirmation samples EX-11 through EX-15 were collected, again, at the approximate soil-groundwater interface to verify remaining

concentrations of petroleum hydrocarbons. Residual concentrations of total petroleum hydrocarbons as diesel (TPHd) in confirmation samples ranged from <1 to 2,400 mg/kg. Well MW-4 was destroyed as a result of the over-excavation. Approximately 427 tons of impacted soil was excavated and properly disposed of during these field activities.

Groundwater Monitoring and Sampling: Depth to water measurements and groundwater samples were collected from each of the wells quarterly from November 1988 through February 1996. These samples were analyzed for TPHd only through May 1993. Beginning in August 1993, the samples were also analyzed for benzene, toluene, ethylbenzene and xylenes (BTEX). In November 1994, samples collected from wells MW-2 and MW-3 were analyzed for TPH as gasoline (TPHg), and in February 1995 samples from these two wells were also analyzed for TPHg and TPH as motor oil (TPHmo). In August 1993, well MW-2 was also analyzed for MTBE. Beginning in August 1996, monitoring and sampling frequency was reduced to semi-annually through March 1999. Sampling then ceased until annual sampling occurred from 2002 through 2005. Another monitoring and sampling event occurred in March 2007. The most recent sampling event occurred on April 21, 2009. Semi-annual sampling had been requested by ACEH in the January 22, 2009 letter, and as a result, another event is scheduled to occur in October 2009.

2.0 PROPOSED SCOPE OF WORK

The January 22, 2009 ACEHS letter requests additional site characterization to further define the extent of hydrocarbon impacts in the vicinity of the former source area. To meet this objective, CRA proposes to advance five direct push soil borings. The objective for advancing these soil borings is to complete lateral delineation to the north, east and southeast of the excavation. Proposed boring locations are presented on Figure 2. The boring locations were chosen based on analytical results of confirmation sidewall soil samples collected during tank removal and over-excavation activities conducted in 1999.

2.1 HEALTH AND SAFETY PLAN

To protect the public and site personnel during the fieldwork, a site-specific Health and Safety Plan (HASP) will be developed and distributed to all members of the project team. The HASP addresses physical health threats posed by drilling and potential health threats posed by contact with petroleum hydrocarbons. The HASP also prescribes appropriate personal protective equipment (PPE) to protect site workers.

2.2 PERMITS

Prior to initiating field activities, CRA will obtain the appropriate soil boring permits from Alameda County Public Works Agency (ACPWA).

2.3 UTILITY LOCATION

The proposed borings will be marked and Underground Service Alert (USA) will be notified of planned site activities to identify utilities in the site vicinity. Prior to drilling, the soil borings will be hand cleared to a depth of 8 fbg, if possible based on depth to groundwater, to reduce the potential for damaging unidentified underground utilities.

2.4 SOIL BORINGS

CRA proposes to advance soil borings B-1 through B-5 to approximately 15 fbg using direct push drilling technology. The anticipated depth to groundwater is between 6 to 8 fbg. Sediments encountered in the samples and drill cuttings will be recorded in a

boring log using the Unified Soil Classification System (USCS). CRA's *Standard Field Procedures for Geoprobe Soil Borings* are presented in Appendix B.

2.5 SOIL SAMPLING

Soil cores will be collected continuously in 4 foot acetate cores from approximately 8 fbg to the total estimated depth of 15 fbg. Historical hydrocarbon impacts in soil have been observed at 5-6 fbg. A soil sample from this range will be collected from the hand auger cuttings of each boring and retained for chemical analysis. This sample will be identified as a "disturbed" sample. However, due to the non-volatile nature of previously identified diesel and motor oil range hydrocarbons in this zone, these samples and their analyses will be considered to yield valid analytic results. Deeper samples will be retained from the cores as determined by field staff, based on obvious changes in lithology, visual evidence of hydrocarbon impacts and at depths previously identified as petroleum hydrocarbon-bearing. Selected 6-inch sections of the acetate core will be cut and capped, and handled in the following manner. The samples will be labeled, stored in a cooler on ice, and transported under proper chain of custody to McCampbell Analytical, a state certified laboratory. Based on previous data, it is anticipated that soil samples will be collected at approximate depths of 5, 10 and 15 fbg.

2.6 GROUNDWATER SAMPLING

The collection of grab groundwater samples will be attempted from each of the five proposed borings. The fine grained nature of site soils may inhibit the flow of groundwater. It should also be noted that analytic results of these samples may yield concentrations greater than equilibrated levels due to the disruptive nature of the drilling technology. Grab groundwater samples will be collected using a clean disposable bailer and temporary PVC casing. The groundwater will be decanted into the appropriate glassware provided by the laboratory. The samples will be labeled, entered onto a chain of custody form, stored in a cooler on ice and transported to McCampbell Analytical, a state certified laboratory. Some purging of the boreholes may occur to reduce sediment prior to sample collection. Prior to sample preparation and analyses, the samples will be centrifuged to remove suspended soil particles, thus yielding a true dissolved fraction analytic result.

2.7 CHEMICAL ANALYSES

Grab groundwater and selected soil samples will be submitted for analysis. Sample selection will be based on visual field inspection and at depths of previously identified residual hydrocarbon impacts. Selected samples will be analyzed for TPHd, TPHg and TPHmo by a full range EPA Method 8015B analysis. TPHd is the primary constituent of concern and reported concentrations in the TPHg and TPHmo range analyses have been interpreted as diesel overlap into these ranges. A silica gel treatment will be performed on all samples prior to analysis to insure only petroleum derived hydrocarbons are being detected and reported. As requested, these samples will also be analyzed for naphthalene by EPA Method 8260B. BTEX and oxygenates are being excluded as records have indicated only diesel was dispensed at the site and no previous sample analyses have shown BTEX or oxygenates present above standard method detection limits. CRA will request EDFs be created for the laboratory analytical data and will upload these data to the State's Geotracker database.

2.8 WASTE MANAGEMENT/DISPOSAL

Soil generated from hand clearance of boreholes and minor drill cuttings will be temporarily stored onsite in DOT-approved drums, as necessary. If any purging of boreholes occurs prior to collection of grab groundwater samples, that minor amount of water will be added to and absorbed within the drummed soil. CRA will characterize the soil and will have it transported by licensed waste haulers to the appropriate disposal facilities. CRA's *Standard Procedures for Waste Handling and Disposal* is included in Appendix B.

2.9 REPORTING

After the analytical results are received, a technical report will be prepared that will include the following:

- A summary of the site background and history,
- Description of drilling and sampling methods,
- Lithologic boring logs,
- Tabulated results,
- A site map showing the boring locations,
- Analytical reports and chain-of-custody documentation,

- A discussion of hydrocarbon distribution at the site,
- Waste management/disposal methods, and
- Conclusions and recommendations.

2.10 SCHEDULE

Upon agency approval of the scope of work presented in this document, CRA will begin acquiring the appropriate permits and will schedule the drilling. CRA will submit a report documenting these proposed activities within 90 days after the completion of field work.

All of Which is Respectfully Submitted,
CONESTOGA-ROVERS & ASSOCIATES



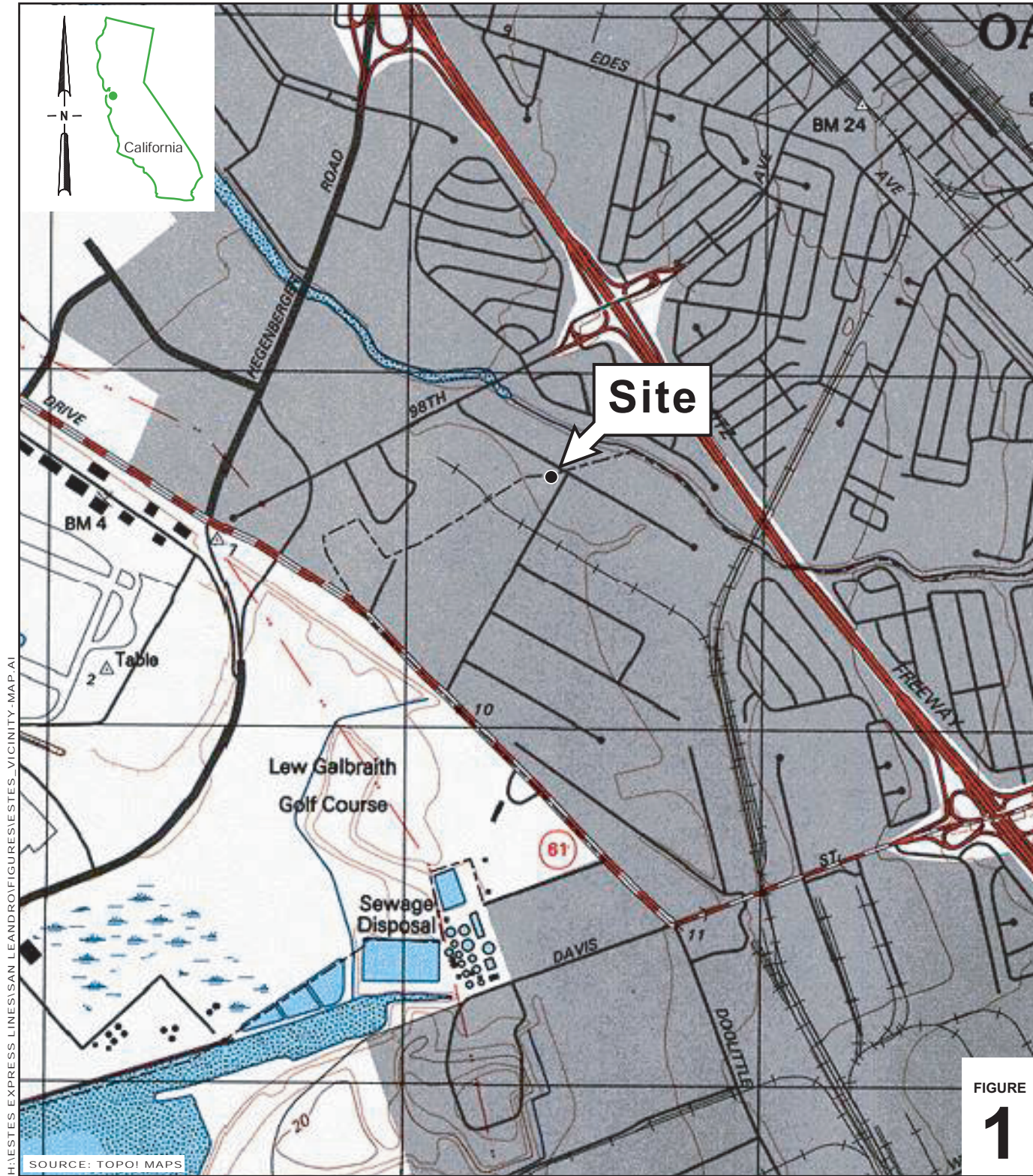
Christine Orłowski



Robert Foss, PG #7445



FIGURES



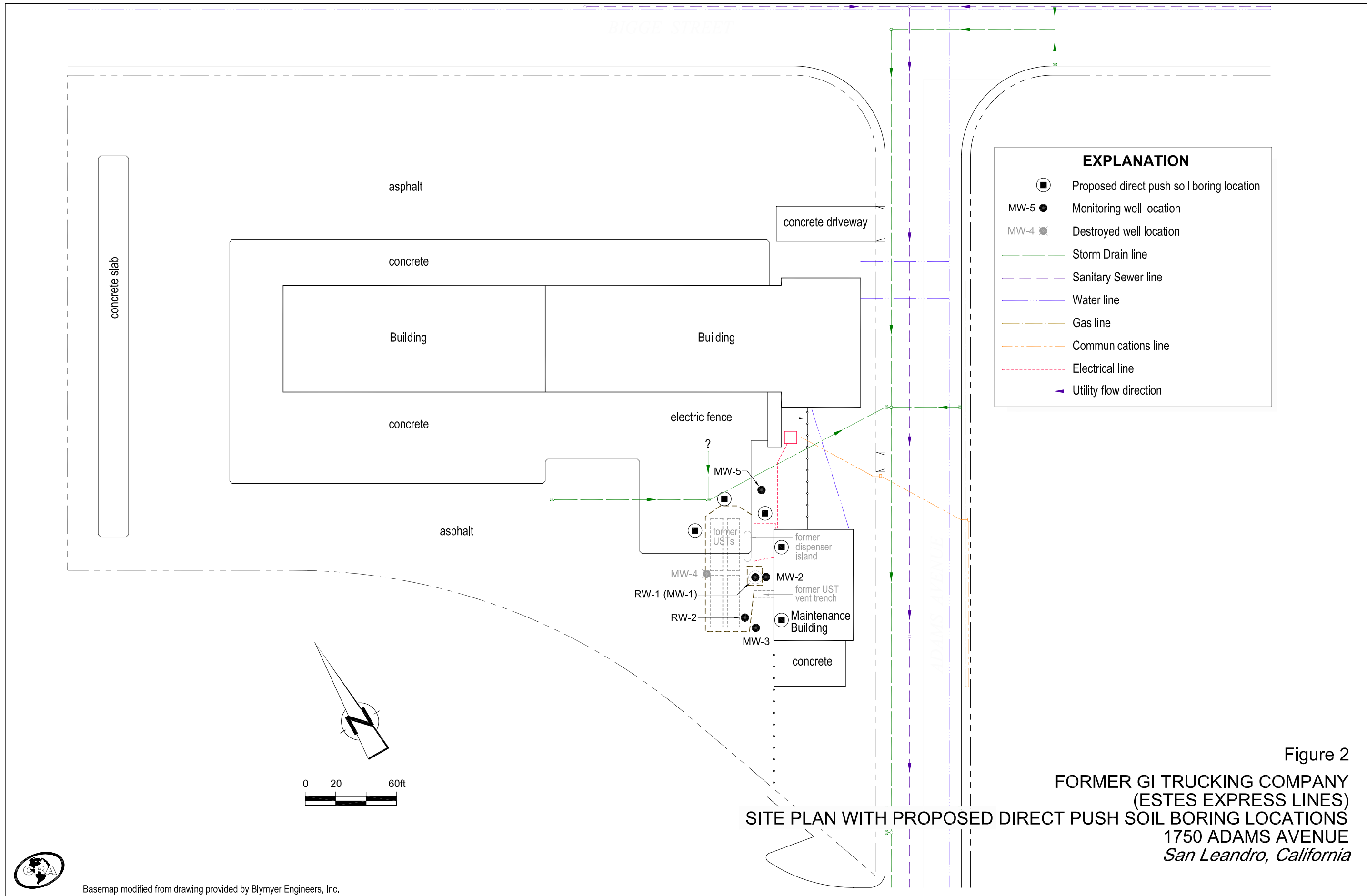
**Former GI Trucking Company
(Estes Express Lines)**

1750 Adams Avenue
San Leandro, California



**CONESTOGA-ROVERS
& ASSOCIATES**

Vicinity Map



Basemap modified from drawing provided by Blymyer Engineers, Inc.

TABLES

TABLE 1

GROUNDWATER ELEVATION AND ANALYTICAL DATA
 ESTES-GI TRUCKING COMPANY
 1750 ADAMS AVENUE, SAN LEANDRO, CALIFORNIA

Sample ID	Date	Depth to Water	SPH Thickness	Groundwater Elevation	TPHd	TPHmo	TPHg	Benzene	Toluene	Ethylbenzene	Xylenes	MTBE	ETBE	TAME	DIPE	TBA	1,2-DCA	EDB	Ethanol	Napthalene
TOC	Sampled	(ft btoe)	(ft)	(arbitrary)	←-----→															
MW-1 100.00	11/15/1988	--	0.22	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	2/16/1989	6.03	0.20	94.13	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	5/19/1989	6.31	0.20	93.85	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/22/1989	6.72	0.18	93.42	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	11/21/1989	6.51	Sheen	93.49	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	2/23/1990	5.74	Sheen	94.26	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	5/23/1990	6.34	0.15	93.78	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/27/1990	6.27	Sheen	93.73	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	12/3/1990	6.49	Sheen	93.51	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	3/13/1991	4.94	Sheen	95.06	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	5/29/1991	9.46	Sheen	90.54	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/28/1991	6.31	0.09	93.76	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	12/9/1991	6.49	0.20	93.67	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	2/18/1992	4.19	0.10	95.89	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	5/15/1992	5.72	0.17	94.42	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/13/1992	6.12	0.19	94.03	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	12/3/1992	5.65	0.10	94.43	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	3/25/1993	4.60	Sheen	95.40	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	5/21/1993	5.56	0.09	94.51	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/17/1993	6.07	0.13	94.03	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	12/13/1993	--	Sheen	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	2/24/1994	4.97	Sheen	95.63	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	5/11/1994	5.20	Sheen	94.80	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/23/1994	6.06	0.08	94.00	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	11/29/1994	5.98	Sheen	94.02	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	2/15/1995	4.93	Sheen	95.07	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	5/18/1995	4.99	Sheen	95.01	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/16/1995	6.46	Sheen	93.54	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	11/16/1995	5.21	Sheen	94.79	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	2/15/1996	4.68	Sheen	95.32	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
July 1996	←----- Well MW-1 Reconstructed as well RW-1 -----→																			
RW-1 100.00	8/5/1996	6.05	0.35	94.23	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
	2/6/1997	4.40	Sheen	95.60	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
	8/22/1997	4.90	Sheen	95.10	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
	2/12/1998	3.18	0.00	96.82	89,000	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
	8/27/1998	5.95	Sheen	94.05	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
	3/4/1999*	4.98	Sheen	95.02	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
	5/30/2001	--	Sheen	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
	6/18/2002	6.28	0.00	93.72	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
	3/13/2003	6.15	0.00	93.85	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
	3/17/2004	5.60	0.00	94.40	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
3/17/2005	5.39	0.00	94.61	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--		
3/2/2007	5.22	Sheen	94.78	16,000 c	9,300	140 g	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5.0	<0.5	<0.5	<50		
4/21/2009	5.91	Sheen	94.09	50,000 b,c	23,000	160 b,g	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	<0.5 b	
MW-2 100.24	11/15/1988	--	--	--	<200	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
	2/16/1989	6.13	0.00	94.11	<90	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
	5/19/1989	6.24	0.00	94.00	<80	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
	8/22/1989	6.68	0.00	93.56	<30	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
	11/21/1989	6.64	0.00	93.60	<30	--	--	--	--	--	--	--	--	--	--	--	--	--	--	
2/23/1990	6.04	0.00	94.20	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--		

TABLE 1

**GROUNDWATER ELEVATION AND ANALYTICAL DATA
ESTES-GI TRUCKING COMPANY
1750 ADAMS AVENUE, SAN LEANDRO, CALIFORNIA**

Sample ID	Date	Depth to	SPH	Groundwater	TPHd	TPHmo	TPHg	Benzene	Toluene	Ethylbenzene	Xylenes	MTBE	ETBE	TAME	DIPE	TBA	1,2-DCA	EDB	Ethanol	Napthalene
TOC	Sampled	(ft btoe)	Thickness (ft)	Elevation (arbitrary)									µg/L							
	5/23/1990	6.40	0.00	93.84	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/27/1990	6.70	0.00	93.54	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	12/3/1990	6.83	0.00	93.41	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	3/13/1991	5.64	0.00	94.60	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	5/29/1991	6.31	0.00	93.93	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/28/1991	6.68	0.00	93.56	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	12/9/1991	6.69	0.00	93.55	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	2/18/1992	4.96	0.00	95.28	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	5/15/1992	6.07	0.00	94.17	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/13/1992	6.42	0.00	93.82	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	12/3/1992	6.25	0.00	93.99	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	3/25/1993	5.40	0.00	94.84	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	5/21/1993	6.04	0.00	94.20	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/17/1993	6.42	0.00	93.82	<50	--	--	<0.5	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--
	12/13/1993	6.09	0.00	94.15	<50	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	2/24/1994	5.57	0.00	94.67	<50	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	5/11/1994	5.94	0.00	94.30	<50	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	8/23/1994	6.44	0.00	93.80	<50	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	11/29/1994	5.82	0.00	94.42	90	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	2/15/1995	5.68	0.00	94.56	100	<500	<50	<0.5	1.2	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	5/18/1995	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/16/1995	6.19	0.00	94.05	63	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	11/16/1995	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	2/15/1996	5.62	0.00	94.62	79	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	8/5/1996	6.22	0.00	94.02	100	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	2/6/1997	5.50	0.00	94.74	140	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	8/22/1997	6.57	0.00	93.67	<100	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	2/12/1998	4.88	0.00	95.36	<100	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	8/27/1998	6.42	0.00	93.82	93	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	3/4/1999*	6.39	0.00	93.85	<50	--	--	<0.5	<0.5	<0.5	<0.5	<5	--	--	--	--	--	--	--	--
	5/30/2001	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	6/18/2002	7.14	0.00	93.10	<50	--	--	<0.5	<0.5	<0.5	<0.5	<2.5	--	--	--	--	--	--	--	--
	3/13/2003	6.64	0.00	93.60	<48	--	--	<0.5	<0.5	<0.5	<0.5	<2.0	--	--	--	--	--	--	--	--
	3/17/2004	6.63	0.00	93.61	<500	--	--	<0.5	<0.5	<0.5	<0.5	<2.5	--	--	--	--	--	--	--	--
	3/17/2005	6.76	0.00	93.48	<50	--	--	<0.5	<0.5	<0.5	<0.5	<5	--	--	--	--	--	--	--	--
	3/2/2007	5.77	0.00	94.47	<50	<250	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5.0	<0.5	<0.5	<50	--
	4/21/2009	6.38	0.00	93.86	<50	<250	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	<0.5
MW-3	11/15/1988	--	--	--	<200	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
100.22	2/16/1989	6.00	0.00	94.22	<90	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	5/19/1989	6.20	0.00	94.02	<80	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/22/1989	6.60	0.00	93.62	<30	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	11/21/1989	6.55	0.00	93.67	<30	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	2/23/1990	5.83	0.00	94.39	340	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	5/23/1990	6.38	0.00	93.84	640	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/27/1990	6.67	0.00	93.55	410	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	12/3/1990	6.75	0.00	93.47	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	3/13/1991	5.42	0.00	94.80	1,300	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	5/29/1991	6.28	0.00	93.94	540	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/28/1991	6.62	0.00	93.60	240	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	12/9/1991	6.65	0.00	93.57	200	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

TABLE 1

**GROUNDWATER ELEVATION AND ANALYTICAL DATA
ESTES-GI TRUCKING COMPANY
1750 ADAMS AVENUE, SAN LEANDRO, CALIFORNIA**

Sample ID	Date	Depth to	SPH	Groundwater	TPHd	TPHmo	TPHg	Benzene	Toluene	Ethylbenzene	Xylenes	MTBE	ETBE	TAME	DIPE	TBA	1,2-DCA	EDB	Ethanol	Napthalene
TOC	Sampled	(ft btoC)	Thickness (ft)	Elevation (arbitrary)									µg/L							
	2/18/1992	4.73	0.00	95.49	890	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	5/15/1992	5.99	0.00	94.23	380	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/13/1992	6.32	0.00	93.90	200	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	12/3/1992	6.23	0.00	93.99	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	3/25/1993	5.27	0.00	94.95	1,600	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	5/21/1993	5.97	0.00	94.25	720	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/17/1993	6.59	0.00	93.63	480	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	12/13/1993	6.33	0.00	93.89	190	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	2/24/1994	5.76	0.00	94.46	380	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
100.18	5/11/1994	5.84	0.00	94.34	580	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	8/23/1994	6.38	0.00	93.80	450	--	--	<0.5	0.6	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	11/29/1994	5.76	0.00	94.42	960	--	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	2/15/1995	5.60	0.00	94.58	1,700	<500	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	5/18/1995	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/16/1995	6.11	0.00	94.07	1,100	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	11/16/1995	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	2/15/1996	5.48	0.00	94.70	1,300	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	8/5/1996	6.16	0.00	94.02	1,000	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	2/6/1997	5.36	0.00	94.82	2,400	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	8/22/1997	5.85	0.00	94.33	2,000	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	2/12/1998	4.81	0.00	95.37	1,500	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	8/27/1998	6.25	0.00	93.93	410	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	3/4/1999*	6.14	0.00	94.04	330	--	--	<0.5	<0.5	<0.5	<0.5	17	--	--	--	--	--	--	--	--
	5/30/2001	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	6/18/2002	7.07	0.00	93.11	1,100	--	--	<0.5	<0.5	<0.5	<0.5	3.6/3.1	--	--	--	--	--	--	--	--
	3/13/2003	6.45	0.00	93.73	680	--	--	<0.5	<0.5	<0.5	<0.5	2.9	--	--	--	--	--	--	--	--
	3/17/2004	5.98	0.00	94.20	450	--	--	<0.5	<0.5	<0.5	<0.5	<2.5	--	--	--	--	--	--	--	--
	3/17/2005	5.72	0.00	94.46	160	--	--	<0.5	<0.5	<0.5	<0.5	<5.0	--	--	--	--	--	--	--	--
	3/2/2007	5.68	0.00	94.50	<50	<250	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5.0	<0.5	<0.5	<50	--
	4/21/2009	6.26	0.00	93.92	<50	<250	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	<0.5
MW-4	11/15/1988	--	--	--	<200	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
99.48	2/16/1989	5.92	0.00	93.56	<90	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	5/19/1989	5.25	0.00	94.23	<80	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/22/1989	6.76	0.00	92.72	<30	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	11/21/1989	5.72	0.00	93.76	<30	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	2/23/1990	4.92	0.00	94.56	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	5/23/1990	5.39	0.00	94.09	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/27/1990	5.66	0.00	93.82	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	12/3/1990	5.95	0.00	93.53	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	3/13/1991	4.39	0.00	95.09	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	5/29/1991	5.27	0.00	94.21	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/28/1991	5.70	0.00	93.78	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	12/9/1991	5.78	0.00	93.70	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	2/18/1992	3.60	0.00	95.88	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	5/15/1992	5.03	0.00	94.45	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/13/1992	5.40	0.00	94.08	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	12/3/1992	5.14	0.00	94.34	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	3/25/1993	4.14	0.00	95.34	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	5/21/1993	4.95	0.00	94.53	<50	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/17/1993	5.40	0.00	94.08	<50	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--

TABLE 1

**GROUNDWATER ELEVATION AND ANALYTICAL DATA
ESTES-GI TRUCKING COMPANY
1750 ADAMS AVENUE, SAN LEANDRO, CALIFORNIA**

Sample ID	Date	Depth to Water	SPH Thickness	Groundwater Elevation	TPHd	TPHmo	TPHg	Benzene	Toluene	Ethylbenzene	Xylenes	MTBE	ETBE	TAME	DIPE	TBA	1,2-DCA	EDB	Ethanol	Napthalene
TOC	Sampled	(ft btoc)	(ft)	(arbitrary)	←								μg/L							→
	2/12/1998	4.32	0.00	95.28	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/27/1998	5.77	0.00	93.83	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	3/4/1999*	5.88	0.00	93.72	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	6/18/2002	5.97	0.00	93.63	61	--	--	<0.5	<0.5	<0.5	<0.5	<2.5	--	--	--	--	--	--	--	--
	3/13/2003	5.77	0.00	93.83	<47	--	--	<0.5	<0.5	<0.5	<0.5	<2.0	--	--	--	--	--	--	--	--
	3/17/2004	5.37	0.00	94.23	<50	--	--	<0.5	<0.5	<0.5	<0.5	<2.5	--	--	--	--	--	--	--	--
	3/17/2005	5.23	0.00	94.37	<50	--	--	<0.5	<0.5	<0.5	<0.5	<5.0	--	--	--	--	--	--	--	--
	3/2/2007	5.12	0.00	94.48	<50	<250	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5.0	<0.5	<0.5	<50	--
	4/21/2009	5.65	0.00	93.95	<50	<250	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	<0.5 b
RW-2	8/5/1996	6.02	0.31	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
<i>not surveyed</i>	2/6/1997	4.41	0.00	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	8/22/1997	4.88	0.00	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	2/12/1998	3.21	0.00	--	100,000	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	8/27/1998	5.92	0.00	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	3/4/1999*	4.95	0.00	--	74,000	--	--	<1.0	<1.0	<1.0	<1.0	<10	--	--	--	--	--	--	--	--
	5/30/2001	--	0.00	--	9,000	--	--	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	--
	6/18/2002	6.30	0.00	--	280,000	--	--	<10	<10	<10	<10	<50	--	--	--	--	--	--	--	--
	3/13/2003	6.11	0.00	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	3/17/2004	5.58	0.00	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	3/17/2005	5.30	0.00	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
	3/2/2007	5.21	0.00	--	5,500 c	2,500	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<5.0	<0.5	<0.5	<50	--
	4/21/2009	5.88	Sheen	--	6,000 b,c	3,000	<50 b	<0.5	<0.5	<0.5	<0.5	--	--	--	--	--	--	--	--	<0.5 b

Notes:

TOC = elevation of the top of casing relative to an arbitrary elevation from well RW-1's TOC (100.00 ft)

ft btoc = measured in feet below top of casing

SPH = separate phase hydrocarbons or non-aqueous phase liquid (NAPL)

μg/L = micrograms per liter

Sheen = non-measurable SPH sheen observed

-- = Not measured, not analyzed, not applicable

TPHd = total petroleum hydrocarbons as diesel analyzed by modified EPA Method 8015; beginning 3/2/2007 analyzed by EPA Method 8015C with silica gel cleanup

TPHmo = total petroleum hydrocarbons as motor oil analyzed by EPA Method 8015C with silica gel cleanup

TPHg = total petroleum hydrocarbons as gasoline analyzed by EPA Method 8015C

BTEX = benzene, toluene, ethylbenzene, xylenes analyzed by EPA Method 8020/8021B; beginning 3/2/2007 analyzed by EPA Method 8260B

MTBE = methyl tertiary-butyl ether analyzed by EPA Method 8020/8021B; beginning 3/2/2007 analyzed by EPA Method 8260B

ETBE = ethyl tertiary-butyl ether analyzed by EPA Method 8260B

TAME = tertiary-amyl methyl ether analyzed by EPA Method 8260B

DIPE = di-isopropyl ether analyzed by EPA Method 8260B

TBA = tertiary butyl alcohol analyzed by EPA Method 8260B

1,2-DCA = one, two-dichloroethane analyzed by EPA Method 8260B

EDB = ethylene dibromide analyzed by EPA Method 8260B

Ethanol analyzed by EPA Method 8260B

* = data collected on March 4 & 11, 1999

b = lighter than water immiscible sheen/ product is present

c = aged diesel (?) is significant

g = strongly aged gasoline or diesel range compounds are significant

TABLE 2

HISTORICAL SOIL ANALYTICAL DATA
ESTES-GI TRUCKING COMPANY
1750 ADAMS AVENUE, SAN LEANDRO, CALIFORNIA

Sample ID	Date Sampled	Depth (ft)	Oil & Grease (mg/kg)	TPHd (mg/kg)	TPHg (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Xylenes (mg/kg)	MTBE (mg/kg)		
<i>Final ESL (Table G), Soil Leaching Screening Level (Drinking Water Resource)</i>												
			NE	83	83	0.044	2.9	3.3	2.3	0.023		
<i>Final ESL (Table K-1), Residential Direct Exposure</i>												
			370	110	110	0.12	63	2.3	31	30		
<i>Final ESL (Table K-2), Commercial/Industrial Worker Direct Exposure</i>												
			3,700	450	450	0.27	210	5	100	65		
<i>Final ESL (Table K-3), Construction/Trench Worker Exposure</i>												
			12,000	4,200	4,200	12	650	210	420	2,800		
<i>Tank Removal and Excavation</i>												
<i>Initial Confirmation Samples</i>												
EX-1	6/9/1999	5	--	2,300	b	81	d	<0.5	<0.5	<0.5	<0.5	<5.0
EX-2	6/9/1999	5	--	4,500	a	120	d	<0.5	<0.5	<0.5	<0.5	<5.0
EX-3	6/9/1999	5	--	2,100	a	26	d	<0.5	<0.5	<0.5	<0.5	<5.0
EX-4	6/9/1999	5	--	<1.0		<1.0		<0.5	<0.5	<0.5	<0.5	<5.0
EX-5	6/9/1999	6	--	<1.0		<1.0		<0.5	<0.5	<0.5	<0.5	<5.0
EX-6	6/9/1999	6.5	--	85	b	3.7	d	<0.5	<0.5	<0.5	<0.5	<5.0
EX-7	6/9/1999	6	--	<1.0		<1.0		<0.5	<0.5	<0.5	<0.5	<5.0
EX-8	6/9/1999	6	--	2,000	b	120	d	<0.5	<0.01	<0.5	0.17	<5.0
EX-9	6/9/1999	6	--	2,000	b	120	d	<0.5	0.013	<0.5	0.19	<5.0
EX-10	6/9/1999	6	--	2,900	b,c	390	d,e	<0.03	0.45	0.45	1.5	<0.20
<i>Over-excavation Confirmation Samples</i>												
EX-11	6/11/1999	6	--	2,400	a	--		<0.005	<0.23	<0.005	<0.16	<0.1
EX-12	6/11/1999	6	--	620	b	--		<0.023	<0.005	<0.005	0.032	<0.1
EX-13	6/11/1999	6	--	2,200	a	--		<0.005	0.045	<0.005	<0.005	<0.1
EX-14	6/11/1999	6	--	620	b	--		<0.005	<0.005	<0.005	0.034	<0.21
EX-15	6/11/1999	5.5	--	2,400	a	--		<0.005	<0.005	<0.005	0.096	<0.1

TABLE 2

**HISTORICAL SOIL ANALYTICAL DATA
ESTES-GI TRUCKING COMPANY
1750 ADAMS AVENUE, SAN LEANDRO, CALIFORNIA**

<i>Sample ID</i>	<i>Date Sampled</i>	<i>Depth (ft)</i>	<i>Oil & Grease (mg/kg)</i>	<i>TPHd (mg/kg)</i>	<i>TPHg (mg/kg)</i>	<i>Benzene (mg/kg)</i>	<i>Toluene (mg/kg)</i>	<i>Ethylbenzene (mg/kg)</i>	<i>Xylenes (mg/kg)</i>	<i>MTBE (mg/kg)</i>
<i>Final ESL (Table G), Soil Leaching Screening Level (Drinking Water Resource)</i>										
			NE	83	83	0.044	2.9	3.3	2.3	0.023
<i>Final ESL (Table K-1), Residential Direct Exposure</i>										
			370	110	110	0.12	63	2.3	31	30
<i>Final ESL (Table K-2), Commercial/Industrial Worker Direct Exposure</i>										
			3,700	450	450	0.27	210	5	100	65
<i>Final ESL (Table K-3), Construction/Trench Worker Exposure</i>										
			12,000	4,200	4,200	12	650	210	420	2,800
<i>Monitoring Wells</i>										
<i>M-1/R-1</i>	12/31/1986	4	110	--	--	--	--	--	--	--
	12/31/1986	8	80	--	--	--	--	--	--	--
<i>M-2</i>	12/31/1986	5	210	--	--	--	--	--	--	--
	12/31/1986	9	118	--	--	--	--	--	--	--
<i>M-3</i>	12/31/1986	8	137	--	--	--	--	--	--	--
<i>M-4</i>	12/31/1986	5	91	--	--	--	--	--	--	--
	12/31/1986	10	71	--	--	--	--	--	--	--
<i>Notes:</i>										
<i>mg/kg = milligrams per kilogram</i>										
<i>-- = Not analyzed</i>										
<i>Oil & Grease (Soil/Waste Oil) by EPA Method 3550</i>										
<i>TPHd = total petroleum hydrocarbons as diesel analyzed by modified EPA Method 8015</i>										
<i>TPHg = total petroleum hydrocarbons as gasoline analyzed by EPA Method 8015C</i>										
<i>BTEX = benzene, toluene, ethylbenzene and xylenes analyzed by modified EPA Method 8015/8020</i>										
<i>MTBE = methyl tertiary-butyl ether analyzed by EPA Method 8020</i>										
<i>a = unmodified or weakly modified gasoline is significant</i>										
<i>b = lighter gasoline range compounds (the most mobile fraction) are significant</i>										
<i>c = gasoline range compounds having broad chromatographic peaks are significant; biologically altered gasoline?</i>										
<i>d = strongly aged gasoline or diesel range compounds are significant</i>										
<i>e = no recognizable pattern</i>										

APPENDIX A

ACEH'S LETTERS AS OF JANUARY 22, 2009 AND APRIL 21, 2009

ALAMEDA COUNTY
HEALTH CARE SERVICES

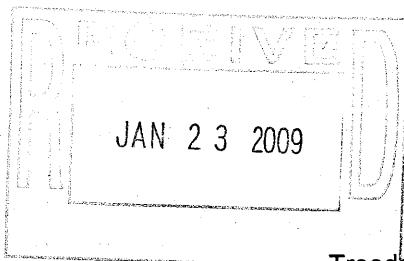
AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

January 22, 2009



Mike Rogers
ABF Freight Systems
P.O. Box 10048
Fort Smith, AR 72917-0048

Treedark Real Estate Corp
3801 Greenwood Road
Fort Smith, AR 72903

Estes Terminals California
3901 W. Broad Street
Richmond, VA 23230

Subject: Fuel Leak Case No. RO0000442 and GeoTracker Global ID T0600100900, GI Trucking Company, 1750 Adams Avenue, San Leandro, CA 94577

Dear Responsible Parties:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "Annual 2007 Monitoring Report and Preferential Pathway Study," dated March 29, 2007, which was prepared by Cambria Environmental Technology, Inc. for the subject site. Cambria conducted groundwater sampling of the existing monitoring well network, a well survey and preferential pathway study to determine whether contaminants may be preferentially migrating off-site. Groundwater sampling analytical results detected sheen in RW-1. Cambria identified the closest well down-gradient to be over 1,000 feet away. Therefore, Cambria concluded that "it is unlikely that any of the wells at site K or any other downgradient site have been or are currently being impacted by the onsite groundwater plume." Cambria subsequently recommended that this case be considered a low risk groundwater case since "no significant migration of LNAPL or diesel plume is or has occurred at the site."

Based on the analytical results to date, which still identifies the presence of sheen on top of the groundwater at the site, ACEH cannot consider case closure for the subject site at this time since sites with sheen (i.e. free product) are not considered low risk groundwater cases. Additionally, the source area is not adequately characterized and the free and dissolved phase contaminant plumes are undefined. This decision to deny closure is subject to appeal to the State Water Resources Control Board (SWRCB), pursuant to Section 25299.39.2(b) of the Health and Safety Code (Thompson-Richter Underground Storage Tank Reform Act - Senate Bill 562). Please contact the SWRCB Underground Storage Tank Program at (916) 341-5851 for information regarding the appeal process.

ACEH requests that you address the following technical comments and send us the technical work plan and reports requested below.

TECHNICAL COMMENTS

1. **Contaminant Source Area Characterization** – In June 1999, four 12,000-gallon fiberglass USTs were removed from the site. Significantly elevated concentrations of total petroleum

hydrocarbons (TPH) as diesel (d) were detected in excavation sidewall soil samples ranging from 85 mg/kg to 4,500 mg/kg. Additional excavation of contaminated soil was conducted to remove the significantly contaminated soil. Confirmation sidewall soil samples detected TPH-d ranging from 620 mg/kg to 2,400 mg/kg. Although naphthalene was not detected at the site, the laboratory detection limit that was reported was significantly elevated ranging from <10 mg/kg to <20 mg/kg. Please note that the Regional Water Quality Control Board's (RWQCB) Environmental Screening Levels (ESLs) for naphthalene and TPH-d are 1.3 mg/kg and 83 mg/kg, respectively, indicating that the site is not adequately characterized and poses a potential risk to human health and the environment. Please propose a scope of work to address the above-mentioned concerns and submit a work plan due by the date specified below.

2. **Site Conceptual Model** – At this time, it may be advantageous to develop a site conceptual model (SCM), which synthesizes all the analytical data and evaluates all potential exposure pathways and potential receptors that may exist at the site, including identifying or developing site cleanup objectives and goals. At a minimum, the SCM should include:

- (1) Local and regional plan view maps that illustrate the location of sources (former facilities, piping, tanks, etc.) extent of contamination, direction and rate of groundwater flow, potential preferential pathways, and locations of receptors;
- (2) Geologic cross section maps that illustrate subsurface features, man-made conduits, and lateral and vertical extent of contamination;
- (3) Plots of chemical concentrations versus time;
- (4) Plots of chemical concentrations versus distance from the source;
- (5) Summary tables of chemical concentrations in different media (i.e. soil, groundwater, and soil vapor); and
- (6) Well logs, boring logs, and well survey maps;
- (7) Discussion of likely contaminant fate and transport.

If data gaps (i.e. potential contaminant volatilization to indoor air or contaminant leaching to groundwater, etc.) are identified in the SCM, please include a proposed scope of work to address those data gaps in the work plan due by the date specified below. Please note that the work plan must address all technical comments presented in this correspondence and all data gaps identified in the SCM.

3. **Groundwater Contaminant Plume Monitoring** – Currently, annual groundwater sampling is being conducted. Since sheen continues to be present at the site, please increase the groundwater monitoring frequency to semi-annual and submit a report due by the dates specified below. Also, include naphthalene to the analytical sampling suite.

NOTIFICATION OF FIELDWORK ACTIVITIES

Please schedule and complete the fieldwork activities by the date specified below and provide ACEH with at least three (3) business days notification prior to conducting the fieldwork, including routine groundwater sampling.

TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH (Attention: Paresh Khatri), according to the following schedule:

- **April 22, 2009** – Site Conceptual Model & Soil and Water Investigation Work Plan
- **April 30, 2009** – Semi-annual Monitoring Report (1st Quarter 2009)
- **October 30, 2009** – Semi-annual Monitoring Report (3rd Quarter 2009)

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) GeoTracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the GeoTracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

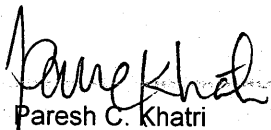
If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

If you have any questions, please call me at (510) 383-1767 or send me an electronic mail message at steven.plunkett@acgov.org.

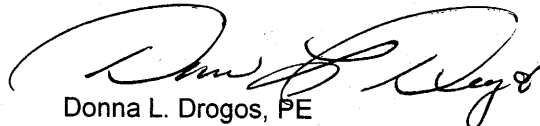
Sincerely,



Steven Plunkett
Hazardous Materials Specialist



Paresh C. Khatri
Hazardous Materials Specialist



Donna L. Drogos, PE
Supervising Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Conestoga Rovers & Associates (formerly Cambria Environmental Technology, Inc.), 5900 Hollis Street, Suite A, Emeryville, CA 94608
Donna Drogos, ACEH
Steven Plunkett, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: December 16, 2005
	PREVIOUS REVISIONS: October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:
RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

Submission Instructions

- 1) Obtain User Name and Password:
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to dehloptoxic@acgov.org
or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
 - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
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 - b) Click on File, then on Login As.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload)

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

April 21, 2009

Mike Rogers
ABF Freight Systems
P.O. Box 10048
Fort Smith, AR 72917-0048

Estes Terminals California
3901 W. Broad Street
Richmond, VA 23230

Treedark Real Estate Corp
3801 Greenwood Road
Fort Smith, AR 72903

Subject: Fuel Leak Case No. RO0000442 and GeoTracker Global ID T0600100900, GI Trucking Company, 1750 Adams Avenue, San Leandro, CA 94577

Dear Responsible Parties:

Alameda County Environmental Health (ACEH) staff has recently received a correspondence entitled, "Request for Time Extension" dated April 15, 2009 and submitted on your behalf by Conestoga-Rovers & Associates. Your April 15, 2009 correspondence requested a time extension to complete a "Site Conceptual Model and Soil and Water Investigation Work Plan" from April 22, 2009 to May 29, 2009. The proposed schedule extension is acceptable. Please submit the SCM and work plan, which was previously requested in a directive letter dated January 22, 2009 correspondence, by May 29, 2009.

Based on ACEHD staff review of the documents referenced above, we request that you address the following technical comments and send us the reports described below.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Steven Plunkett), according to the following schedule:

- **May 29, 2009** – Site Conceptual Model & Soil and Water Investigation Work Plan

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

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AGENCY OVERSIGHT

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Responsible Parties
RO0000442
April 20, 2009
Page 3

If you have any questions, please call me at (510) 383-1767 or send me an electronic mail message at steven.plunkett@acgov.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven Plunkett", with a long horizontal line extending to the right.

Steven Plunkett
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Conestoga Rovers & Associates (formerly Cambria Environmental Technology, Inc.), 5900 Hollis Street, Suite A, Emeryville, CA 94608
Donna Drogos, Steven Plunkett, File

**Alameda County Environmental Cleanup
Oversight Programs
(LOP and SLIC)**

ISSUE DATE: July 5, 2005

REVISION DATE: December 16, 2005

PREVIOUS REVISIONS: October 31, 2005

SECTION: Miscellaneous Administrative Topics & Procedures

SUBJECT: Electronic Report Upload (ftp) Instructions

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 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload)

APPENDIX B

CRA'S STANDARD PROCEDURES FOR
GEOPROBE SOIL BORINGS AND WASTE HANDLING

STANDARD FIELD PROCEDURES FOR GEOPROBE® SAMPLING

This document describes Cambria Environmental Technology's standard field methods for GeoProbe® soil and ground water sampling. These procedures are designed to comply with Federal, State and local regulatory guidelines. Specific field procedures are summarized below.

Objectives

Soil samples are collected to characterize subsurface lithology, assess whether the soils exhibit obvious hydrocarbon or other compound vapor odor or staining, estimate ground water depth and quality and to submit samples for chemical analysis.

Soil Classification/Logging

All soil samples are classified according to the Unified Soil Classification System by a trained geologist or engineer working under the supervision of a California Registered Geologist (RG) or a Certified Engineering Geologist (CEG). The following soil properties are noted for each soil sample:

- Principal and secondary grain size category (i.e., sand, silt, clay or gravel)
- Approximate percentage of each grain size category,
- Color,
- Approximate water or separate-phase hydrocarbon saturation percentage,
- Observed odor and/or discoloration,
- Other significant observations (i.e., cementation, presence of marker horizons, mineralogy), and
- Estimated permeability.

Soil Sampling

GeoProbe® soil samples are collected from borings driven using hydraulic push technologies. Prior to drilling, the first 8 ft of the boring are cleared using an air or water knife and vacuum extraction. This minimizes the potential for impacting utilities.

A minimum of one and one half ft of the soil column is collected for every five ft of drilled depth. Additional soil samples can be collected near the water table and at lithologic changes. Samples are collected using samplers lined with polyethylene or brass tubes driven into undisturbed sediments at the bottom of the borehole. The ground surface immediately adjacent to the boring is used as a datum to measure sample depth. The horizontal location of each boring is measured in the field relative to a permanent on-site reference using a measuring wheel or tape measure.

Drilling and sampling equipment is steam-cleaned or washed prior to drilling and between borings to prevent cross-contamination. Sampling equipment is washed between samples with trisodium phosphate or an equivalent EPA-approved detergent.

Sample Storage, Handling, and Transport

Sampling tubes chosen for analysis are trimmed of excess soil and capped with Teflon® tape and plastic end caps. Soil samples are labeled and stored at or below 4°C on either crushed or dry ice, depending upon local regulations. Samples are transported under chain-of-custody to a State-certified analytic laboratory.

Field Screening

After a soil sample has been collected, soil from the remaining tubing is placed inside a sealed plastic bag and set aside to allow hydrocarbons to volatilize from the soil. After ten to fifteen minutes, a portable GasTech[®] or photo ionization detector measures volatile hydrocarbon vapor concentrations in the bag's headspace, extracting the vapor through a slit in the plastic bag. The measurements are used along with the field observations, odors, stratigraphy and ground water depth to select soil samples for analysis.

Grab Ground Water Sampling

Ground water samples are collected from the open borehole using bailers, advancing disposable Tygon[®] tubing into the borehole and extracting ground water using a diaphragm pump, or using a hydro-punch style sampler with a bailer or tubing. The ground water samples are decanted into the appropriate containers supplied by the analytic laboratory. Samples are labeled, placed in protective foam sleeves, stored on crushed ice at or below 4° C, and transported under chain-of-custody to the laboratory.

Duplicates and Blanks

Blind duplicate water samples are usually collected only for monitoring well sampling programs, at a rate of one blind sample for every 10 wells sampled. Laboratory-supplied trip blanks accompany samples collected for all sampling programs to check for cross-contamination caused by sample handling and transport. These trip blanks are analyzed if the internal laboratory quality assurance/quality control (QA/QC) blanks contain the suspected field contaminants. An equipment blank may also be analyzed if non-dedicated sampling equipment is used.

Grouting

If the borings are not completed as wells, the borings are filled to the ground surface with cement grout poured or pumped through a tremie pipe.

F:\TEMPLATE\SOPS\GEOPROBE WITH AIR KNIFE CLEARANCE.DOC

Conestoga–Rovers & Associates

STANDARD OPERATING PROCEDURES FOR WASTE MANAGEMENT

This document presents standard operating procedures (SOPs) for managing the disposal of soil and water waste. These procedures are designed to comply with Federal, state and local regulatory guidelines. Specific procedures are summarized below.

SUMMARY

A CRA Waste Services Group (WSG) representative manages the waste with the subcontracted waste transporter and/or Treatment, Storage and Disposal Facility (TSDF). It is the responsibility of the field staff and/or the groundwater quarterly monitoring (QM) manager for the site to coordinate the disposal with CRA's WSG representative. If special storage is needed for the waste (ex. tanks, soil bins, etc.), then the field staff should coordinate with the WSG representative.

Soil waste from investigation activities are stockpiled onsite on and covered by plastic sheeting, stored in 55-gallon drums or stored in a roll-off closed top soil bin. At least four individual soil samples must be collected from the stockpiled soil later compositing at the analytic laboratory. Typically, one four-point composite soil sample is needed for every 50 cubic yards of soil. Purged groundwater generated from QM sampling or other events and/or rinseate generated during investigation decontamination procedures are stored onsite in sealed 55-gallon drums. Each drum must be labeled with the date of generation, contents, generator identification and consultant contact. Soil and water waste is transported by a licensed waste hauler and disposed in secure, licensed Treatment, Storage and Disposal Facility (TSDF) based on the soil composite or groundwater quarterly monitoring, or other profiling analytic data.

CRA field staff will submit a sample for analysis to characterize the waste and coordinate with WSG. WSG works with the subcontracted transporter and/or TSDF to profile the waste and create waste manifests. A description of procedures is presented below.

WASTE CHARACTERIZATION

Characterization is necessary for water and soil (drummed and bulk) waste. Generally, the sample should be analyzed for the onsite chemicals of concern and metals. Confirmation of required analyses for waste characterization should be coordinated with the WSG representative.

Water Characterization

Unless otherwise specified, the most recent groundwater quarterly monitoring analytic data are used to characterize water waste and no additional analysis is needed. If quarterly monitoring has not occurred at the site, you must provide a composite water sample. A composite sample consists of one VOA per drum.

Soil Characterization

One composite sample should be collected for every 50 cubic yards or for every 4 drums of soil and should be submitted to the chosen analytical laboratory to be analyzed for the onsite chemicals of concern (ex. TPHg, TPHd, BTEX, MTBE) and CAM 17 Metals (including STLC and TTLC). If TTLC results yield >10 times the STLC, then the lab will need to run the STLC analysis.

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COORDINATION OF DISPOSAL

After properly storing, labeling and characterizing the waste, you must contact CRA's WSG representative, which is currently Kari Dupler, and provide the following data:

- Generator name, address and phone number
- Site address
- Type of waste storage and volume (drums, roll off bin, stockpile, etc.)
- Type of waste (water or soil)
- Proposed schedule (preferred transportation date)
- A copy of the analytic report for each waste stream
- Any additional site requirements (locked gates, drum location, etc)

PROFILING AND MANIFESTING

The WSG representative will work with the subcontracted waste transporter and/or TSDf to create a profile characterizing the waste. The WSG representative will send the profile to the generator for a signature. Once the signed profile is returned to the WSG representative, the manifest(s) is (are) created. Waste transportation is scheduled after the profile and manifest(s) are complete. Profiles and waste manifests must be signed by the generator. If the generator will be onsite during the scheduled transport, the generator must sign the manifest. However, if the generator will not be available, they must complete an *Agency Agreement for Signing Manifests* which allows the manifest to be signed by a RCRA/DOT trained CRA staff person. The RCRA/DOT trained CRA staff person must sign the waste manifest "on behalf of generator name" (this statement should be written on the waste manifest signature line).