



ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 1131 Harbor Bay Parkway, Suite 250
 Alameda, CA 94502-6577

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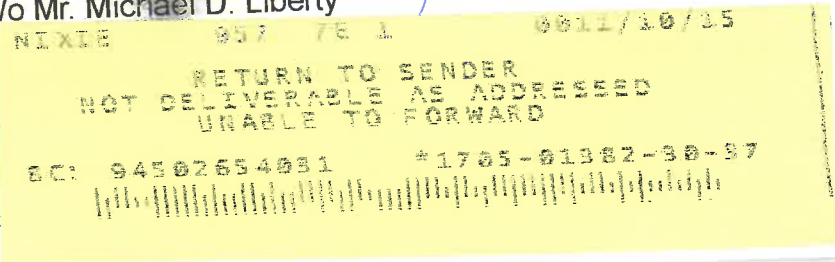


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*NO LONGER AT
 THIS ADDRESS*

000473

Mr. Hamid Khatirine
 c/o Mr. Michael D. Liberty



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ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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October 28, 2015

Mr. Farrokh Hosseinvoun
(Sent via E-mail to: farok@fhone.net)

Mr. Mohammad Pazdel
1770 Pistacia Court
Fairfield, CA 94533

Mr. Hamid Khatirine
c/o Mr. Michael D. Liberty
3713 Century Drive
Campbell, CA 95008-3832

Subject: Request for Work Plan and Additional Modified MPE Events; Fuel Leak Case No. RO0000473 and GeoTracker Global ID T0600191157, ARCO, 15101 Freedom Avenue, San Leandro, CA 94578

Dear Messrs. Hosseinvoun, Pazdel, and Khatirine:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Third Quarter 2015 Groundwater Monitoring and Remediation Progress Report*, dated October 13, 2015. The report was prepared and submitted on your behalf by SOMA Environmental Engineering, Inc. Thank you for submitting the report.

The referenced groundwater monitoring report documented the quarterly sampling and analysis of groundwater. A significantly increasing contaminant trend, which may be partly seasonal, was documented in well MW-10 where concentrations up to 28,000 micrograms per liter ($\mu\text{g/l}$) Total Petroleum Hydrocarbons as gasoline (TPHg), $<10 \mu\text{g/l}$ benzene, $1,200 \mu\text{g/l}$ ethylbenzene, and $<10 \mu\text{g/l}$ methyl tert butyl ether (MTBE) were reported. Concentrations up to $24,000 \mu\text{g/l}$ TPHg (June 2015) have previously been documented at the well; however, concentrations were also recently $3,500 \mu\text{g/l}$ (March 2015). The *Technical Justification for Vapor Intrusion - Media Specific Criteria*, (March 2012), for the Low Threat Closure Policy (LTCP), indicates that concentrations of TPHg in groundwater over $20,000 \mu\text{g/l}$ is indirect evidence of the presence of Liquid Non-Aqueous Phased Liquids (LNAPL) in groundwater.

Figures in the referenced report also appears to indicate the detaching of the TPH plume, and potentially a mobile LNAPL plume, from the site and contamination located beneath the site due to the apparent success of previous Multi-Phase Extraction (MPE) events on and offsite.

Therefore, based on the review of the case file ACEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

1. **Request for Work Plan** – The downgradient extent of the TPH and LNAPL plumes have not been defined at a location (MW-10) approximately 200 feet downgradient from the site. It appears appropriate to define the TPH and LNAPL plumes in accordance with the LTCP. This is anticipated to be protective of an existing downgradient offsite private water supply well previously identified in the vicinity.
2. **Request for Additional MPE Events** – It appears appropriate to conduct additional on- and offsite MPE events. This is requested to include well MW-10 as recommended in the referenced report. If alternative LNAPL extraction methods are required due to the significant distance to well MW-10, ACEH requests the alternative methods be included in the work plan requested in Technical