



June 5, 2003

Mr. Don Hwang  
Hazardous Materials Specialist  
Alameda County Environmental Health Services  
1131 Harbor Bay Parkway, Number 250  
Alameda, California 94502

Subject: **Response to Comments and Work Plan Addendum**  
**Former Sears Auto Center #1058B**  
**2600 Telegraph Ave.**  
**Oakland, California**  
**Case I.D. # STID 1082**  
**For Sears, Roebuck & Co.**

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Dear Mr. Hwang:

The following are responses to comments provided in the April 11, 2003 Alameda County Environmental Health Services (ACEHS) correspondence. ACEHS requested that their technical comments be addressed and a Work Plan Addendum be submitted in response to the *2003 Third Quarter Groundwater Monitoring Report and Work Plan for Confirmation Borings* dated January 23, 2003. The ACEHD comments are italicized and the URS responses are provided in regular text below each comment.

### Technical Comments

#### 1. *Proposed Boring Locations –*

- a. *T7 – Location was previously sampled.*
- b. *T5 – The report describing the removal of the tanks did not include T5 as one of those with poor integrity and holes. T6 was noted to have a cracked seam on its southwestern weld and the soil to the north and south of the tank was stained.*
- c. *In the area of the gasoline tanks – We do not have a report describing the removal of these tanks. Please provide so that we can determine the locations previously sampled.*

*Please review the proposed sample locations. Modify and/or explain the choice of locations. Include your proposal in the Workplan Addendum requested below.*

The proposed confirmation boring locations were placed in a grid pattern throughout the former tank locations to collect current data from the former underground storage tank (UST) areas regardless of the historical site data. The proposed boring locations in the areas of removed UST-T5 and UST-T7 will be eliminated if not required by ACEHS. Sears is currently searching archived files for data regarding the removal of the gasoline USTs. The available data will be forwarded to ACEHS shortly.

2. *EW- 1 – This extraction well is located adjacent to MW-3. MW-3 formerly contained SPH. Please indicated if EW- 1 was ever used for extraction and if so, indicate when and details. Please report your results in the Soil and Water Investigation Report (SWI) Report requested below.*

Historical site data indicates that well EW-1 was never utilized as an extraction well. The historical groundwater monitoring data indicates that separate phase product was periodically present in well MW-3 from September 1993 until August 2000, and has not been observed in subsequent quarterly monitoring events. Historical chemical analysis results indicated that the separate phase product observed in well MW-3 consists of TPHg, TPHd, and oil range hydrocarbons (TPHo). This information regarding the separate phase product at the site is provided in the Background section of URS' quarterly groundwater monitoring reports.

3. *Groundwater Analyses – We request that you include analyses for the other fuel oxygenates Tertiary Amyl Methyl Ether (TAME), Ethyl Tertiary Butyl Ether (ETBE), Di-Isopropyl Ether (DIPE), and Tertiary Butyl Alcohol (TBA), Ethanol by EPA Method 8260 and lead scavengers, Ethylene Dibromide (EDB), Ethylene Dichloride (EDC). If any of the latter compounds are detected, and are determined to be of concern (poses a risk to human health, the environment, or water resources) it is to be incorporated into your regular monitoring plan.*

All groundwater samples have been analyzed for ETBE, TBA, TAME, DIPE, and the lead scavengers: EDB and EDC by EPA Method 8260B since the second quarter 2002 sampling event. URS will also analyze all groundwater samples for Ethanol by EPA Method 8260B in future sampling events.

4. *Historical Hydraulic Gradient – Please provide rose diagrams, which include cumulative groundwater gradients in all future reports submitted for this site.*

Comment acknowledged.

5. *Well Survey – List wells within a quarter mile radius of the site. Indicate which of these may be potential receptors. Please report your results in the Soil and Water Investigation Report (SWI) Report requested below.*

Comment acknowledged.

6. *Preferential Pathway Study – We request that you perform a preferential pathway study that details the potential migration pathways and potential conduits (wells, utilities, pipelines, etc.) for horizontal and vertical migration that may be present in the vicinity of the site. Of particular concern is the identification of abandoned wells and improperly-destroyed wells in the vicinity of your site, and manmade conduits for shallow migration.*

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*Discuss your analysis and interpretation of the results of the preferential pathway study (including the detailed well survey and utility survey requested below). Please include an evaluation of the probability of the contaminant plumes encountering preferential pathways and conduits that could spread the contamination, particularly in the vertical direction to deeper water aquifers.*


*An evaluation of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site plume area(s) is required as part of your study. Submittal of map(s) and cross-sections showing the location and depth of all utility lines and trenches within and near the site and plume(s) is required as part of your study. Please report your results in the Soil and Water Investigation Report (SWI) requested below.*

Comment acknowledged.

Feel free to contact Joseph Liles or me at (714) 835-6886 if you have any questions or comments regarding the responses to VCEHD comments and requirements.

Respectfully submitted,  
**URS CORPORATION**

  
J.S. Rowlands, R.G., C.H.G.  
Senior Project Geologist

  
Joseph liles  
Senior Staff Geologist

cc: Mr. Scott DeMuth – Sears, Roebuck & Co.