

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

ALEX BRISCOE, Director



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March 29, 2012

Pat Cullen
State Water Resources Control Board
Division of Financial Assistance
1001 I Street
Sacramento, CA 95814
(Sent via E-mail to:
PCullen@waterboards.ca.gov)

Robert Trommer
State Water Resources Control Board
Division of Financial Assistance
1001 I Street
Sacramento, CA 95814
(Sent via E-mail to:
RTrommer@waterboards.ca.gov)

Subject: Response to UST Cleanup Fund Second Five Year Review for Fuel Leak Case No. RO0000483; (Global ID # T0600100977); Alameda Gateway Ltd., 2900 Main Street, Alameda, CA

Dear Mr. Cullen and Mr. Trommer:

ACEH received the second 5-Year Review Summary Report dated July 5, 2011 from the Underground Storage Tank Cleanup Fund (USTCF) for the site listed below. The Summary Report represents the second five year review of this site managed by the ACEH Local Oversight Program by the Fund. ACEH responded on August 11, 2011 to the Fund, within 45 days of the date of the USTCF's letter, and because the case was placed on the LOP Director's list, the case was revisited. We have reviewed the contents of the correspondence in the context of the appropriateness of recommendations. However, we have not reviewed the reports for accuracy of all information presented.

ACEH Case: RO0000483
USTCF Claim: 2367
Global ID: T0600100977
Site Name: Alameda Gateway Ltd.
Site Address: 2900 Main St, #100, Alameda, CA

USTCF Recommendations from July 5, 2011 Review Summary:

The UST Fund staff recommends the LOP consider this Site for Low Risk Closure. The Fund staff will confirm compliance with the LOP prior to processing future reimbursements that may involve the properly abandoned Site wells.

ACEH Response: ACEH is not in agreement with this recommendation.

ACEH does not agree with USTCF closure recommendation because of the following reasons:

1. The units are incorrect for the Latest TPH-g and TPH (Extractable) on USTCF's "Maximum Documented Contaminant Concentrations" Table of the July 5, 2011 letter; the TPH-g is 23,000 ug/L (not 23 ug/L) and TPH Extractable is 130,000 ug/L (not 130 ug/L); therefore, site groundwater may pose an ecological threat due to proximity to the estuary;

2. A quarter of an inch (0.25") of free-product was found in MW-2 located approximately 60' from the estuary 2001; MW-2 was destroyed but not properly decommissioned during nearby construction in 2005-2006;
3. Elevated lead (360 ppb) found in MW-3 located ~300' from estuary in 1992; additionally, MW-3 was destroyed but not properly decommissioned.

Thank you for providing ACEH with the opportunity to comment on the subject site. Should you have any questions regarding the responses above, please contact me at (510) 567-6708 or send me an e-mail at karel.detterman@acgov.org.

Sincerely,

Karel L. Detterman, P.G.
Hazardous Materials Specialist

cc: Donna Drogos (sent via electronic mail to donna.drogos@acgov.org)
Karel Detterman (sent via electronic mail to karel.detterman@acgov.org)
Electronic File, GeoTracker