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**TRANSMITTAL**

**TO:** Contact Person: **Ms. Donna Drogos**

Company: Alameda County Health Care Services Agency

Date: May 16, 2002 (1:59PM)

**FROM:** David Siegel

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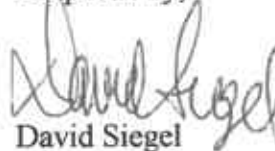
**MESSAGE:**

Hi Donna, I thought it would be best if you saw the letter directly pertaining to the fuel leak case (now closed) at 905 West Grand. I have also requested a comfort letter for this one but have initiated the request through Mr. Hernan Gomez of City of Oakland Fire Department.

Pertaining to the Pacific Street site in Hayward, you should realize that comparable levels of petroleum hydrocarbons were found approximately 100 feet down-gradient of floating product on the Duncan Petroleum site **in four borings that extended over an area of approximately 300 feet!**

Please call if you have any questions regarding either of these requests.

Respectfully,

  
David Siegel

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cc:

MAY 21 2002

May 8, 2002

Inspector Herman Gomez  
City of Oakland Fire Services  
1605 Martin Luther King Jr. Drive  
Oakland, CA 94612

MAY 21 2002

Re: **Request for "Comfort Letter" for Property at  
925-949 West Grand Avenue, Oakland, California  
ERAS Project Number 02034**

Dear Inspector Gomez:

With the permission of and at the request of the owner of the subject property (the "Property") located at 925-949 West Grand Avenue, this letter is to request a "comfort letter" stating that the current and future owners of the Property will not be held responsible for the future costs of investigation and cleanup as a result of contamination found on the Property from the adjacent former gasoline service station at 905 West Grand Avenue. **It appears this former fuel leak site has been inadvertently closed.**

**Introduction**

A Phase 1 Environmental Site Assessment was performed for the Property by AEI Consultants (AEI) and the results were presented in a report dated June 6, 2000. In the report AEI indicated two possible environmental concerns that could cause contamination to the Property as follows:

- 1) The former existence of underground fuel tanks at the Foster and Kleiser Company adjacent to Market Street (the occupant of the Property before the current shopping center building was constructed, see copy of 1952 Sanborn Fire Insurance Map in **Attachment 1**) may have caused contamination by petroleum hydrocarbons.
- 2) The former presence of a dry cleaning operation near the northwest end of the shopping center building was likely to have caused contamination to the subsurface by solvents.

**Soil and Groundwater Investigation**

AEI drilled five soil borings at the Property on March 7, 2002, three in the estimated location

of the former gasoline station and two inside the building in the location of the former dry cleaning operation. Soil and groundwater samples were collected for laboratory analysis. All the soil samples were reportedly collected from a depth of approximately 8 feet below ground surface (bgs). Groundwater was observed to be located at a depth of approximately 10 feet bgs.

The results of the investigation were presented in the report by AEI, dated March 21, 2002. A copy of the report is included with this letter.

The results of the soil samples collected from three borings in the probable area of the former underground fuel tanks (SB-1, SB-2 and SB-3) indicated only a trace (2.4 milligrams per kilogram (mg/Kg)) of total petroleum hydrocarbons as gasoline (TPH-g) in one boring. The groundwater samples contained TPH-g at a maximum concentration of 460 micrograms per liter ( $\mu\text{g/L}$ ), TPH as diesel (TPH-d) at a maximum concentration of 380  $\mu\text{g/L}$ . Only xylenes at a concentration of 1.3  $\mu\text{g/L}$  was detected in one groundwater sample.

The results of the soil samples from soil borings drilled inside the building near the most likely location of the former dry cleaning equipment (SB-4 and SB-5) contained trichloroethene (TCE) at a maximum concentration of 5.1 micrograms per kilogram ( $\mu\text{g/Kg}$ ), perchloroethene (tetrachloroethene or PCE) at a maximum concentration of 22  $\mu\text{g/Kg}$ , c-1,2 dichloroethene (c-1,2 DCE) at a maximum concentration of 140  $\mu\text{g/Kg}$  and vinyl chloride at a maximum concentration of 12  $\mu\text{g/Kg}$ .

During drilling, the presence of hydrocarbon odor and staining was observed by AEI in the soil from borings SB-4 and SB-5, drilled in the former dry cleaning facility. Samples of soil and groundwater from boring SB-4 were therefore submitted for analysis for petroleum hydrocarbons. The soil sample contained TPH-g at 2.5 mg/Kg and concentrations of benzene, toluene, ethylbenzene and xylenes (BTEX), see table below. The groundwater samples contained elevated concentrations of TPH-g and BTEX (TPH-g 140,000  $\mu\text{g/L}$ , benzene 810  $\mu\text{g/L}$ , toluene 1,900  $\mu\text{g/L}$ , ethylbenzene 470  $\mu\text{g/L}$  and xylenes 14,000  $\mu\text{g/L}$ ).

Whether the concentrations of contaminants found are subject to further investigation can be established by comparison of the maximum concentration found in the samples with the current Regional Water Quality Control Board (RWQCB) Risk Based Screening Levels (RBSLs) as follows.

**Note the groundwater table does not include the groundwater sample from boring SB-4 because the groundwater contamination is considered to have migrated from the former gasoline station located up-gradient and adjacent as described in more detail below.**

### SOIL RBSLs

<u>Constituent</u>	<u>Maximum Concentration (mg/Kg)</u>	<u>RBSL*</u>
TPH-d	2.4	500
TPH-g	2.5	400
Benzene	0.017	0.39
Toluene	0.21	8.4
Ethylbenzene	0.12	24
Xylenes	0.011	1.0
Trichloroethene	0.0051	3.7 <sup>#</sup>
Tetrachloroethene	0.022	2.1 <sup>#</sup>
c-1,2 dichloroethene	0.140	18 <sup>#</sup>
Vinyl chloride	0.012	0.040

\* RBSL values from Table D (Subsurface Soil <3 meters and groundwater is not a current or potential source of drinking water), San Francisco Bay Regional Water Quality Control Board, December 2001 for Industrial /Commercial Land Use.

# Value based on presence of contaminant in clayey soil

### GROUNDWATER RBSLs (NOT including SB-4)

<u>Constituent</u>	<u>Maximum Concentration (µg/L)</u>	<u>RBSL*</u>
TPH-d	380	640
TPH-g	460	500
Benzene	<0.5	46
Toluene	<0.5	130
Ethylbenzene	0.73	290
Xylenes	1.3	13
Trichloroethene	<5	360
Tetrachloroethene	<5	120
c-1,2 dichloroethene	550	590
Vinyl chloride	60	782 <sup>#</sup>

\* RBSL values from Table D (Subsurface Soil <3 meters and groundwater is not a current or potential source of drinking water), San Francisco Bay Regional Water Quality Control Board, December 2001 for Industrial /Commercial Land Use.

# Value based on presence of contaminant in clayey soil

**Summary of Adjacent Fuel Leak Site**

Four underground fuel tanks (USTs) were removed from the adjacent site at 905 West Grand Avenue in 1999. The results of the UST removal and sampling were presented in report dated June 9, 1999 by Delta Environmental Laboratories (Delta), entitled Final Laboratory Report, Auto Mechanic/Car Wash, 905 West Grand Avenue.

A map from the Delta report showing the location of the former USTs is included in the **Attachments**. The results of soil samples collected from beneath the USTs did not indicate the presence of contamination. A groundwater sample collected from beneath the middle fuel tank contained elevated concentrations of petroleum hydrocarbons (comparable to those detected in groundwater from down-gradient boring SB-4 on the Property), see table in **Attachments**.

As a result of the high concentrations of hydrocarbons in groundwater beneath the former USTs, Delta conducted an additional soil and groundwater investigation. The results of the drilling and sampling from three soil borings are presented in the report by Delta entitled Soil and Groundwater Investigation Report at 905 West Grand Avenue, Oakland, CA, dated October 1, 1999.

Three soil borings were drilled in the estimated down-gradient direction of the former USTs. Note however, the north arrow is placed incorrectly on the map (included in **Attachments**), therefore none of the borings were actually drilled down-gradient of the location of contamination previously found in groundwater beneath the USTs. This is the likely reason that only low concentrations of hydrocarbons were detected in soil and groundwater samples collected from the three borings (see table in **Attachments**)

**CONCLUSIONS**

A soil and groundwater investigation was conducted at the Property to assess whether contamination was present from the former uses for fueling and dry cleaning. The investigation indicated there was no significant contribution from the Property to contaminants in soil and groundwater. An elevated concentration of petroleum hydrocarbons found in groundwater (but not in the shallow overlying soil) appears to be from the adjacent closed fuel leak site. The evidence for this conclusion is as follows. NO

- There is no significant source of petroleum hydrocarbons discovered on the Property during the Phase 1 and Phase 2 investigations NO
- The concentrations of petroleum hydrocarbons detected in the groundwater sample from soil boring SB-4 drilled on the Property are comparable to that found in the groundwater sample collected from beneath the USTs removed in 1999 from 905 West Grand Avenue. No significant concentrations of petroleum hydrocarbons were detected in overlying soil at 8 feet in that boring NO

925-949 West Grand Avenue

May 8, 2002

Page 5

- Review of the United States Geological Survey topographic map that includes the Property indicates the groundwater flow should be westerly. Therefore the former gasoline station at 905 West Grand Avenue is located up-gradient of the location of the former dry cleaners and boring SB-4.
- Delta indicated in the report of the soil and groundwater investigation at 905 West Grand Avenue, that dominantly fine grained silty clay, sandy clay and clayey sand was underlain by loose, saturated poorly graded (well sorted or SP) sand. This soil type would allow easy migration of petroleum hydrocarbons the estimated 100-150 feet from the former UST location at 905 West Grand Avenue to the location of boring SB-4 at the Property. NO
- The soil borings drilled at 905 West Grand Avenue were not drilled down-gradient of the location of the former USTs because the maps were drawn with the wrong north arrow. Therefore, the borings were not drilled in a location suitable to detect off-site migration of petroleum hydrocarbons. It appears the leak case should not have been closed by the local oversight agencies, based on the investigation work performed by Delta.

There is no evidence that activities conducted on the Property at 925-949 West Grand Avenue have caused contamination to the subsurface. As such, ERAS recommends no further investigation be performed by the owner pertaining to the contamination found on the Property. NO

ERAS respectfully requests, on behalf of the owner, Mr. Steve Burke, that you provide a letter to that effect in a timely manner so that the Property can be sold. The letter should be addressed to the following individual.

Mr. Steve Burke  
Burke Commercial Real Estate  
300 Lakeside Drive, Suite 1980  
Oakland, CA 94612

ERAS thanks you for your attention to this request. Please call if you have any questions.

Respectfully,  
ERAS Environmental, Inc.



David Siegel, R.E.A. II 20200, Project Manager

2086 W. 12th St  
#4

LT 94546

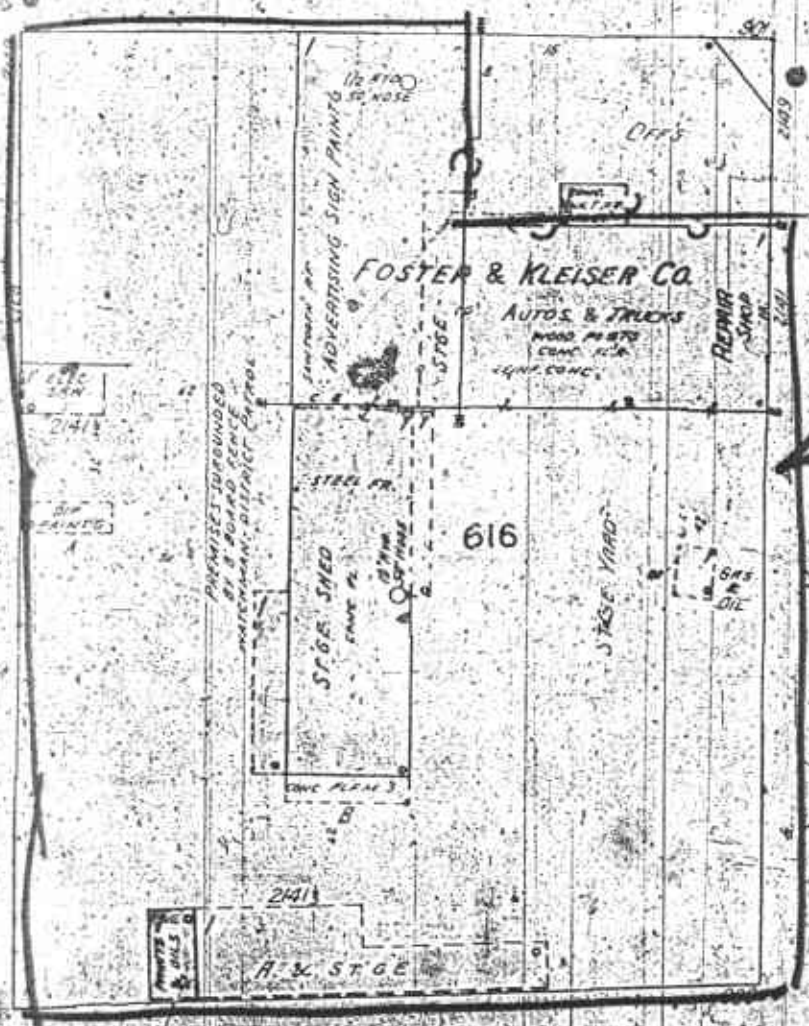
W. GRAND AVE

OFF. RIND. CAL. No. 1

48

1952

Property

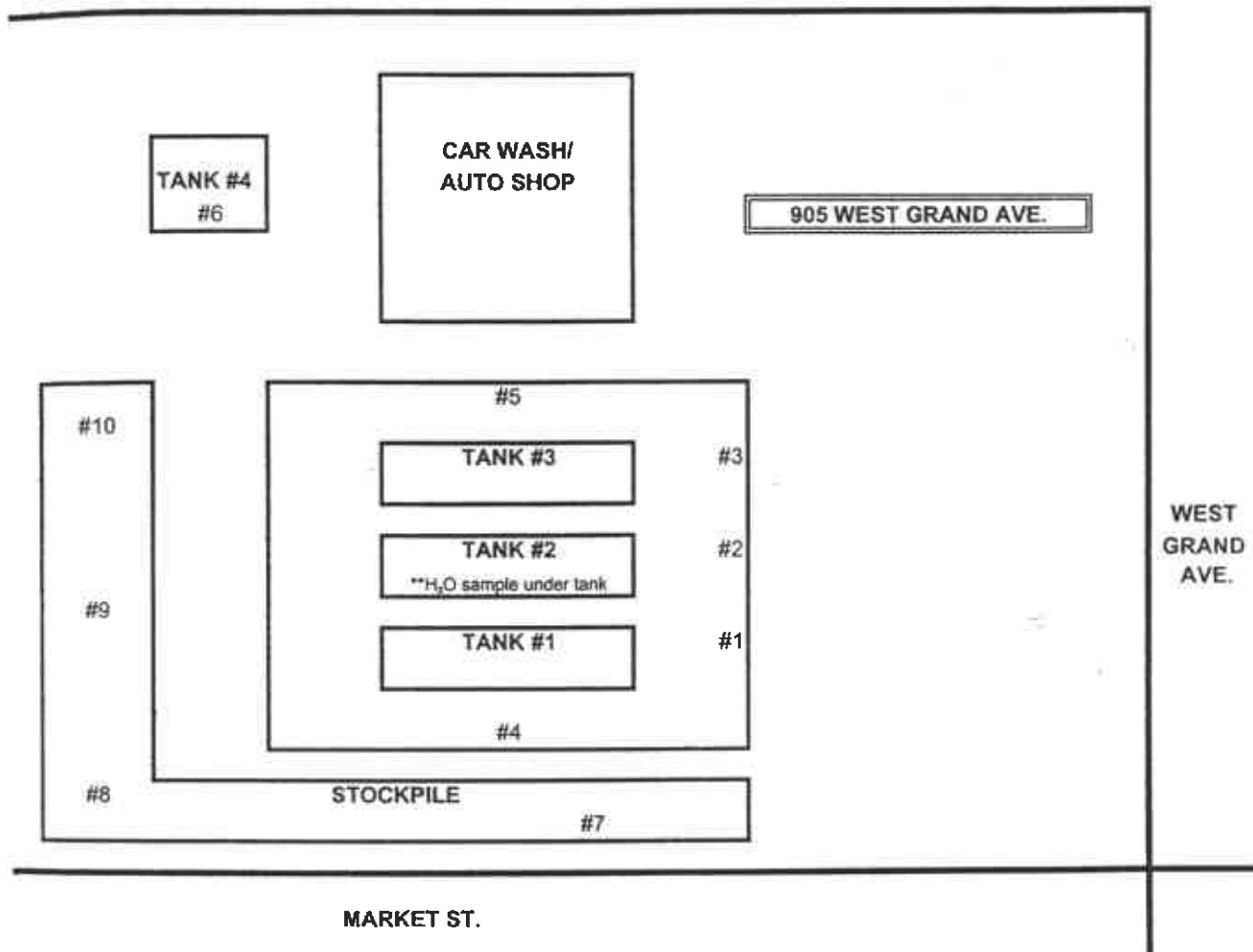


21st St

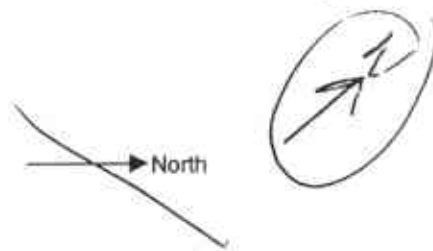
Market



FIGURE NO. 1



Soil samples are listed in numerical order according to the chain of custody.  
One water sample was collected under the middle of tank #2.





American Construction &  
Environmental Services/  
905 West Grand  
Oakland, CA

ENVIRONMENTAL LABORATORIES, Ltd

Ref.: R3958400w  
Method: 5030 GCFID/  
8020

Client Project ID:  
905 West Grand  
CAR WASH

Sampled: 2/4/99  
Received: 2/4/99  
Matrix: Water  
Analyzed: 2/5/99  
Reported: 2/5/99  
Units: ug/L (ppb)

Attention: Bailey Neff

24h

**Laboratory Results for BTEX , MTBE & TPH-G Analysis**

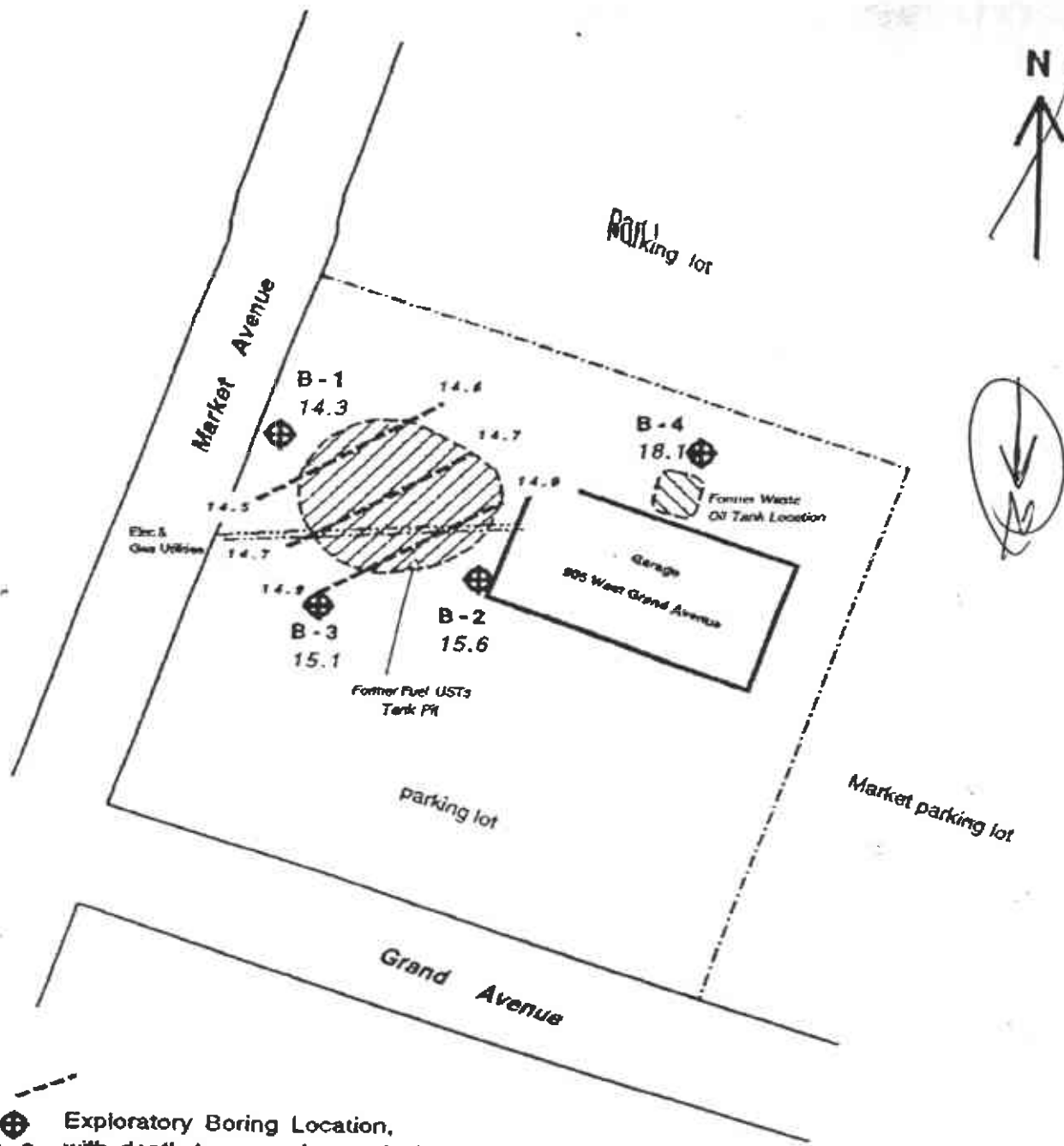
Analyte	Detection Limit ug/L (ppb)	Results
		Sample ID
		Tank #2 H2O Sample
<b>BTEX</b>		
Benzene	5	1280
Toluene	5	3360
Ethylbenzene	5	1180
Total-Xylene	5	8470
MTBE	10	ND
TPH-Gas	50	46,000


ND: Not Detected (<MDL)

Delta Environmental Laboratories

Hossein Khosh Khoo, Ph.D.





 Exploratory Boring Location,  
**B-3** with depth to groundwater *In Italics*,  
 15.1 Reconnaissance water elevations,  
 arbitrary datum, Sept. 7, 1999.

- Notes:**
1. Depth to groundwater taken in temporarily cased boreholes; groundwater levels may not have been completed stabilized, and represent reconnaissance data only. B-4 data not used in groundwater elevation plot. see report text.
  2. Field revised 9/7/99.

**DELTA**   
 ENVIRONMENTAL LABORATORIES, Ltd.  
 Benecla, CA

<b>Exploratory Boring Locations</b>  Garage Site 905 Grand Avenue Oakland, CA	Project No. Grand Scale: 1" = 50' Date: Sept., 1999  <b>Figure 1</b>
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Table # 2

Summary of Soil Laboratory Results  
BTEX, MTBE and TPH

905 West Grand Avenue

Sample ID	Sample	Benzene	Toluene	Ethylbenzene	Total Xylene	MTBE	TPH-Gas	TPH-Diesel	TPH-MO
ID	Depth								
B-1	16.5	ND	ND	ND	ND	ND	ND	6.1	ND
B-2	16.5	ND	ND	ND	ND	ND	ND	5.5	ND
B-3	16.5	ND	ND	ND	ND	ND	ND	6.0	ND
B-4	11.5	ND	ND	ND	ND	ND	ND	6.5	ND
B-5	*								
Det. Limits	mg/kg	0.005	0.005	0.005	0.005	0.005	0.05	5	5
Method		EPA8020	EPA8020	EPA8020	EPA8020	EPA 8260	5030/FID	8015M	8015M

Units: mg/kg

\* With the County's approval drilling for this location stopped. Because of thick concrete layer in the area.

**Table # 1**

**Summary of Water Laboratory Results**

**BTEX, MTBE and TPH**

**905 West Grand Avenue**

Sample ID	Sample Date	Benzene	Toluene	Ethylbenzene	Total-Xylene	MTBE	TPH-Gas	TPH-D	TPH-M
B-1	9/7/99	ND	10	34	ND	ND	380	378	ND
B-2	9/7/99	ND	ND	27	ND	ND	290	180	ND
B-3	9/7/99	3.1	6	16	18	54	720	138	ND
B-4	9/7/99	ND	ND	ND	ND	ND	ND	ND	ND
Trip blank	9/7/99	ND	ND	ND	ND	ND	ND	-	-
Det. Limits	9/7/99	0.5	0.5	0.5	0.5	5	50	100	200
Method	9/7/99	8020	8020	8020	8020	8260	5030/GCFID	8015M	8015M

Units : Ug/L

**Table # 1**

**Summary of Water Laboratory Results**

**BTEX, MTBE and TPH**

**905 West Grand Avenue**

Sample ID	Sample Date	Benzene	Toluene	Ethylbenzene	Total-Xylene	MTBE	TPH-Gas	TPH-D	TPH-M
B-1	9/7/99	ND	10	34	ND	ND	380	378	ND
B-2	9/7/99	ND	ND	27	ND	ND	290	180	ND
B-3	9/7/99	3.1	6	16	18	54	720	138	ND
B-4	9/7/99	ND	ND	ND	ND	ND	ND	ND	ND
Trip blank	9/7/99	ND	ND	ND	ND	ND	ND	-	-
Det.Limits	9/7/99	0.5	0.5	0.5	0.5	5	50	100	200
Method	9/7/99	8020	8020	8020	8020	8260	5030/GCFID	8015M	8015M

Units : Ug/L