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ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

P02672

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION (LOP)
1131 Harbor Bay Parkway, Suite 250
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February 16, 2000

Mr. Charles A. Sumner II
Vice President – Development & Asset Management
Prentiss Properties (Property owner of 1750 Webster Street)
2485 Natomas Park Drive, Suite 350
Sacramento, CA 95833

Mr. Leland Douglas
Douglas Parking LLC (Property owner of 1721 Webster Street)
1721 Webster Street
Oakland, CA 94612-3411

RE: STID 4617, 1750 Webster Street, Oakland, CA 94612

Dear Messrs. Sumner & Douglas:

I have reviewed the site file for the above address for the purpose of determining whether the subsurface contamination at the above site is from an on-site or off-site source. In summary, the following information is contained in the County's file. The site and site vicinity have generally been developed since at least 1899. The site was used for residential purposes until at least 1936 based on the Reverse Business Directory. Since 1936, the site has been used for a parking lot.

A geophysical survey and groundwater investigation was performed at the site in March 1993. No underground storage tank (UGT) were identified by the geophysical survey, but the two groundwater samples collected (HP-1 and HP-2) had concentrations of total petroleum hydrocarbons as gasoline (TPH-g), and the gasoline related compounds benzene, toluene, ethylbenzene, and total xylenes (BTEX).

In May 1993, a geophysical survey and a follow-up investigation was performed which included advancing four soil borings to depths of approximately 20 feet below ground surface (bgs). Two samples were analyzed from each boring. No significant concentrations of TPH(g) or BTEX were detected in any of the soil samples. No USTs were identified by the geophysical survey.

A subsurface investigation that involved the advancement of twelve soil borings and ground penetrating radar (GPR) survey was performed in February 1998. Groundwater was detected at a depth of approximately 20 feet bgs. None of the soil samples collected from above that depth had detectable concentrations of TPH(g), BTEX or MTBE. All of the ground water samples did have detectable concentrations of TPH(g), BTEX and MTBE, and three had detectable concentrations of HVOCs. Groundwater had up to 760,000 ppb TPH(g), 10,000 ppb benzene, 29,000 ppb toluene, 5,800 ppb ethylbenzene, 17,500 ppb total xylenes.

In order to determine the groundwater gradient at the site, and to perform regular groundwater monitoring, three groundwater monitoring wells (A-1, A-2 and A-3) were installed at the site on April 26, 1998. The soil samples collected during the drilling of the monitoring wells were non-detect for TPH(g), BTEX and MTBE. Groundwater samples collected on April 28, 1998 contained up to 84,000 ppb TPH(g), 12,000 ppb benzene, 20,000 ppb toluene, 1,700 ppb ethylbenzene and 8,400 ppb total xylenes. MTBE was not detected in the groundwater samples.

Groundwater samples were collected for four quarters from April 1998 to February 1999. The most recent groundwater sampling on February 26, 1999 detected up to 89,000 ppb TPH(g), 14,000 ppb benzene, 22,000 ppb toluene, 2,000 ppb ethylbenzene, 9,300 ppb total xylenes. In addition, halogenated volatile organic compounds (HVOC) were detected in the samples. These results are consistent with historical results.

The first quarter 1999 groundwater monitoring event completes a full year of quarterly groundwater monitoring at the site. The groundwater gradient has been consistent northeasterly at the site. None of the contaminants have been detected in the vadose zone soils in any of the 18 soil borings completed.

Based on information currently available to this office and the Regional Water Quality Control Board, San Francisco Bay Region (RWQCB), we conclude that groundwater pollution detected beneath the subject property is likely the result of the migration of pollutants in groundwater from upgradient sites. In general, this office and RWQCB does not pursue enforcement action against a property owner whose land overlies contaminated groundwater if that contamination is solely the result of the migration of groundwater contaminants from an off-site source (possibly1721 Webster Street) or sources. Accordingly, this office and RWQCB will not name current and future owners of the subject property as dischargers with respect to groundwater pollution from off-site

sources. However, this office and RWQCB may hold such a property owner responsible for investigation or cleanup tasks if he or she refuses to provide reasonable access to an upgradient discharger attempting to investigate and cleanup off-site groundwater pollution.

The site is currently a parking lot, and the proposed development plan is to erect an aboveground, non-enclosed parking structure. The groundwater beneath the site has been impacted with petroleum constituents. The soil has not been significantly impacted. Versar, Inc. prepared a risk based corrective action assessment (February 23, 1998) only evaluating groundwater. This office concurs with Versar's conclusion that the presence of petroleum constituents within the shallow groundwater does not represent a health concern that will restrict the development of the site as a parking (non-enclosed) structure. However, it is anticipated that any parking structure built on the site would contain some environments which will be more representative of indoor exposures (i.e.- toll booth, maintenance closets). The site specific target levels derived for benzene in groundwater under the indoor exposure scenario was determined to be 1.1 ppm. Currently the highest concentration of benzene in the site groundwater is 14 ppm.

A risk assessment evaluating the "indoor exposure pathway" must be submitted to the local implementing agency for review and approval if any enclosed structure is proposed for the site.

A deed restriction on the site needs to be recorded to ensure the site is re-evaluated if site use changes.

The three monitoring wells on-site, A-1, A- 2 and A-3 should not be destroyed. The monitoring well covers must be locked at all times to prevent vandalism. The responsible party for the plume beneath your property can use these wells for future monitoring.

If you have any questions, please contact this office at (510) 567-6774.

Sincerely,

Larry Seto
Sr. Hazardous Materials Specialist

Cc: Chuck Headlee, Regional Water Control Board, 1515 Clay Street, Suite 1400, Oakland, CA 94612
Leroy Griffin, 1605 Martin Luther King, Oakland, CA 94612
William Wick, Crosby, Heafey, Roach, & May, 1999 Harrison Street, Oakland, CA 94612-3573
Ariu Levi, Chief, Alameda County Environmental Health, Hazardous Materials Division
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