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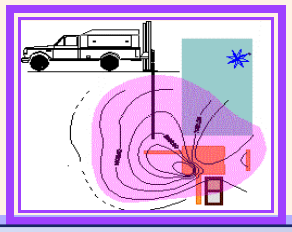


RECEIVED
By dehloptoxic at 3:52 pm, Oct 10, 2006

October 06, 2006

Jerry Wickham
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-9335

Telephone: (510) 567-6791
FAX: (510) 337-9335

SUBJECT: RESPONSE TO COMMENTS BY ACEHSD DATED JULY 05, 2006 RELATED TO SUBSURFACE HYDROGEOLOGIC INVESTIGATION AND GROUNDWATER MONITORING OF HYDROCARBONS AT THE FORMER DIESEL UST SITE AT THE MBM CORPORATION PROPERTY @ 5675 SUNOL BLVD., PLEASANTON, CA

Dear Mr. Wickham:

This technical report has been submitted in response to the ACHCS-EHS correspondence dated July 05, 2006. A phased approach was employed to determine the existing levels of dissolved hydrocarbon constituents by installing one additional groundwater monitoring well and the sampling and evaluation of data collected from four (4) groundwater monitoring wells.

Enclosed are the responses to the "Technical Comments," in an item-by-item format.

Sincerely,

Franklin J. Goldman
Certified Hydrogeologist No. 466

REGISTERED GEOLOGIST
FRANKLIN J. GOLDMAN
CERTIFIED HYDROGEOLOGIST
NO. 466
STATE OF CALIFORNIA

Technical Comment #1 (Response)

REMOVAL OF WASTE OIL AND MOTOR OIL UNDERGROUND STORAGE TANKS

As of May 30, 1990, a 500 gallon motor oil UST and one 600 gallon waste motor oil UST were identified onsite by Exceltech during the installation of vapor monitoring wells onsite (See Attachment A for Exceltech Soil Investigation Report, June 29, 1990 - Specifically, see SITE/Figure 2 & Appendix A/Boring Logs).

The Geraghty & Miller (G&M), "Results of Subsurface Investigation report," dated August 30, 1995, references a "Phase One Environmental Site Assessment"(ESA) report dated June 1995 by Garrett Consulting, Inc. (GCI). The GCI ESA stated that the two USTs were removed in November 1990 and that the project received a no-further-corrective action status from the "regulatory," agency, assumed to be the City of Pleasanton Fire Department (See Attachment B1& B2 for Geraghty & Miller (G&M) Results of Subsurface Investigation report dated August 30, 1995 - Specifically, see Page 2). (See Attachment B3 for GCI ESA)

Technical Comment #2 (Response)

VAPOR MONITORING WELL SUBSURFACE INVESTIGATION

Five (5) soil samples were collected at a depth of 15 feet below ground surface (bgs) in vapor monitoring wells VW-2, VW-3, VW-4A, VW-5, & VW-6. Diesel Ranged Organics (TPHd) were identified in VW-3@15' at 1.3 PPM and in VW-5@15' at 1.4 PPM, only. No Gasoline ranged organics (TPHg) or benzene was identified in any of the five soil samples collected (See Figure 1 for map location of Vapor wells with soil lab results). (See Attachment B1& B2 for Geraghty & Miller (G&M) Results of Subsurface Investigation report dated August 30, 1995). Vapor monitoring well soil borings VW-1, VW-1A, and VW-4 were terminated and abandoned immediately after they were excavated due to subsurface concrete obstructions encountered at a depth of 15 feet bgs.

Technical Comment #3 (Response)

PURPOSE OF INSTALLATION OF GROUNDWATER MONITORING WELLS MW-1, MW-2 & MW-3

On August 14, 1995 six (6) soil samples were collected at depths of five (5) and ten (10) feet bgs in each of three excavations drilled for MW-1, MW-2, and MW-3 and analyzed for the presence of hydrocarbons. Diesel Ranged Organics (TPHd) were identified in MW-1@5' at 3.0 PPM and in MW-3@5' at 5.2 PPM. Motor Oil Ranged Organics (TPHMo) were identified in MW-1@5' at 25 PPM and in MW-3@5' at 35 PPM. No Volatile Organic Compounds (VOCs), analyzed by EPA Method 8240, were identified in the six soil samples (See Figure 2 for map location of the three groundwater monitoring wells along with soil lab results)(See Attachment B1& B2 for Geraghty & Miller (G&M) Results of Subsurface Investigation report dated August 30, 1995).

On August 16, 1995 three (3) water samples were collected from MW-1, MW-2, and MW-3. No TPHd, TPHg, TPHMo, or benzene was identified the three water samples. Volatile Organic Compounds (VOCs), analyzed by EPA Method 8240, were identified as acetone (16 ppb) and chloroform (3.2 ppb) in MW-2 and as PCE (8.6 ppb) in MW-3 (See Figure 3 for map location of the three groundwater monitoring wells along with water sample lab results). (See Attachment B1& B2 for Geraghty & Miller (G&M) Results of Subsurface Investigation report dated August 30, 1995).

Eleven (11) years later, on April 08, 2006, the three (3) existing groundwater monitoring wells, as well as a new down gradient well, MW-4, were sampled and analyzed for TPHd, TPHg, BTEX, five oxygenates, two lead scavengers, and VOCs by EPA Method 8260b. All constituents analyzed were non-detectable (ND) in all four (4) wells. Included in the analytical list for VOCs was napthalene which was also ND. Since napthalene is used as

an indicator chemical utilized by the San Francisco Regional Water Control Board's (SFRWQCB) Environmental Screening Levels (ESLs) to determine if the presence of diesel ranged organics are a threat to sensitive receptors, the absence of napthalene in MW-4 implies that any low levels of diesel that may exist are not a significant threat to down gradient receptors (See Figure 3 for map location of the four groundwater monitoring wells along with water sample lab results).

Technical Comment #4 (Response)

GROUNDWATER MONITORING WELL CONSTRUCTION FOR MW-1, MW-2 & MW-3

Groundwater monitoring wells MW-1, MW-2, and MW-3 were adequately developed, purged, and sampled to provide representative analytical results for the hydrocarbons analyzed in groundwater (See Attachment B1& B2 for Geraghty & Miller (G&M) Results of Subsurface Investigation report dated August 30, 1995). The G&M report provides a detailed summary of well construction, development, purging, and sampling procedures as well as a map of well locations, soil boring logs, and well construction details. The purging of three well volumes and the associated field practices employed, except in reference to MW-2 which had low well yields as might be expected in the dry season, was standard engineering practice at the time of the field work and was acceptable to most UST regulatory agencies including Alameda County. Confimation of well locations and well screened intervals is verified by the Zone 7 Water Agency (See Figure 4 for air photo of well locations and table of screened intervals).

In addition, it is clear that the water samples collected from groundwater monitoring wells MW-1, MW-2, and MW-3 are representative of actual groundwater conditions. In MW-1, groundwater was first encountered at a depth of 15 feet bgs at 9:00 am on August 14, 1995 and stabliized at 10 feet bgs by 12:00 pm. This indicates that this monitoring well could have been under confining conditions, however, no distinct relatively fine grained confining layer was noted in any of the available soil boring logs. Conversely, water was reported to be first encountered in MW-2 at approximately 9 ½ feet bgs and later stabilized at a depth of 15 feet bgs. This is not representative of confining conditions. Groundwater was first encountered in MW-3, at a depth of 15 feet bgs at 9:00 am on August 15, 1995 and stabilized at 9 ½ feet bgs by 12:00 pm, again possibly indicative of confining conditions. Considering that the subsurface investigation area is underlain by variable coarse grained fill soils with clay and concrete rubble, surrounded by fine grained natural soils, hydrogeologic characteristics cannot be verified.

Technical Comment #5 (Response)

EXTENT OF DIESEL CONTAMINATION IN SOIL IN THE VICINITY OF THE FORMER DIESEL UST

A compilation of hydrocarbons in soil data has been collected in the immediate vicinity of the former diesel USTs and has been presented in map view and cross section (See Figure 1 for distribution of hydrocarbons in soil). The soil data is comprised of soil samples collected during the installation of vapor monitoring wells VW-2, VW-3, VW-4A, VW-5, & VW-6 by Exceltech in 1990, of soil samples collected during the installation of groundwater monitoring wells MW-1 and MW-2 by Geraghty and Miller in 1995, and UST pit excavation samples collected by W.A. Craig in 2004.

Over the past 11 years, soil samples have been collected from between 3 and 15 feet bgs and have yield diesel and motor oil at levels well below the 100 ppm environmental screening levels recommended by the San Francisco Regional Water Quality Control Board. In addition, hydrocarbon contaminated soil was identified on all sides and bottoms of the open UST excavation to be non-detectable prior to removal to a depth of 11.5 feet bgs by W.A.Craig, Inc. The estimated limits of the W.A. Craig UST removal pit are presented (See Figures 5a, 5b, & 5c for subsurface cross sections) based upon interpretation of soil descriptions in available soil boring logs produced by G&M and GCI. Although the exact limits of the former UST backfill soils cannot be defined, it appears that these coarse grained soils with concrete, fiberglass, and indicators observed in the field by past

consultants are contrasted by the fine grained natural soils surrounding the former UST investigation area. Since the W. A. Craig UST excavation only reached 11 ½ to 12 feet bgs and the diesel contamination identified at 15 feet bgs in VW-3 (1.3 ppm TPHd) and VW-5 (1.4 ppm TPHd), this contamination identified in 1995 could still be in place. Considering the low levels encountered, however, it should not be considered to be significant.

A discrepancy between non-detectable hydrocarbons in soil beneath the former 6,000 gallon diesel UST and the 5,500 ppb of diesel identified in the ponded water, at the bottom of the tank pit, in the same location, was identified by Jerry Wickham of ACEHSD in his July 05, 2006 correspondence. This can be explained by the fact that the 6,000 gallon UST was inadvertently damaged during its removal from the UST pit excavation (See Attachment C for W. A. Craig, Inc. (WACI) Final Closure Report for UST removal report dated July 13, 2004 - Specifically, see the bottom of Page 4). Since the three USTs contained approximately 100 gallons of diesel fuel, the 6,000 gallon UST held some portion of that volume (See Attachment C page 3, Rinse Water Disposal). Typically, fuel leaking from a damaged UST during its extraction from the pit tends to cling to the outside of the tank wall and drip off the bottom of the tank invert into the bottom of the tank pit where water will pond from infiltration of groundwater from the sidewalls of the tank pit. Taking this rationale into consideration, this demonstrates that the diesel identified in the ponded water beneath the 6,000 gallon UST was contaminated after it entered the tank pit after the introduction of fugitive diesel fuel inadvertently leaked into the ponded water. The 5,500 ppb of diesel identified in the ponded water is therefore not representative of the dissolved hydrocarbons which could exist beneath the former UST site.

Based upon this scenario, the water grab samples collected from the other two pools of ponded water, WS-1 MBM (220 ppb) and WS-2 MBM (150ppb) are also not representative of groundwater quality conditions at the site. All that these samples demonstrate is that there was diesel present in artificially ponded water at the bottom of the temporary UST excavation and that the diesel was likely introduced during the UST removal process. The only water samples that are representative are the ones collected from properly constructed wells. No diesel ranged organics have been identified in groundwater in the wells onsite.

Technical Comment #6 (Response)

Revision of Figure 2 Water Supply Well Locations and Construction Map

The water supply well map Figure 2 has been revised to include locations of domestic supply well locations obtained from State of California Department of Water Resources (DWR) Well completion reports for wells located within a ½ mile radius in addition to the supply well locations previously provided by the Zone 7 Water Agency (See Figure 6 for revised Figure 2 Supply well locations). All supply and monitoring well, well completion reports withing a one half mile radius were collected, reviewed, and evaluated. The well completion reports compiled and presented in Figure 6 of this report only include supply wells within quadrants A, B, C, G, and H of Section 29, T3S, R1E; as these are the only wells in the vicinity of the site which have the likelihood of being impacted by the contamination at the site (See Attachment D for DWR Well Completion reports).

A limited evaluation of some representative water wells located within approximately 1000 feet of the site revealed that the area is underlain predominantly by clays with isolated permeable aquifers within thick clay sequences. Groundwater is generally shallow and confined. See Table below:

3S/1E29A1 **No.239302A** **Destroyed** **June 24, 1983** **0 to 30' neat cement** **30 to 75' pea gravel** **75-95' neat cement**	**3S/1E29B1** **No.24357** **Municipal** **30 to 35' perfs** **58 to 64' perfs** **4 to 58' clay** **58 to 64' sand/gravel** **64 to 68' clay** **water @ 12'**	**3S/1E29CB5** **No.1889** **Domestic** **Installed 1912** **40 to 54' perfs** **2 to 25 clay** **25 to 46 gravel** **46 to 48 clay**	**3S/1E29H** **No.542** **Domestic** **March 21, 1955** **Cleanout to 100'** **100 -117' Gravel** **117 to 122' Clay** **122 -137' Gravel** **137 to 140' Clay** **water @ 42'**
3S/1E29A2 **No.61654** **September 12, 1960** **Domestic** **20 to 60' perf** **8 to 120 Clay** **water @ 24'**	**3S/1E29H11** **No.33066** **Domestic** **Installed Sept 1977** **Seal at 44 feet bgs** **Gravel pack 50-240** **5 to 125' clay** **125 to 160' sand** **160 to 240' clay** **Water @ 60 feet bgs**	**3S/1E29C** **No.1890** **Irrigation** **8 to 76 clay** **Installed 8-16-51** **76 to 91'gravel** **91 to 120' clay** **30 gal/minute** **water @ 44 feet**	**3S/1E29H** **No.544** **Domestic** **April 14, 1955** **Redrill 90-146'** **90 to 110' Sand** **110 to 132' Clay** **132 -140' Gravel** **140 to 146' Clay** **Water @ 30'**

Conclusions

The extent of diesel contamination in soil has been defined in the immediate vicinity of the former UST system through evaluation of all past subsurface investigation data identified in this technical report. All diesel and waste oil ranged organics identified, which remains in soil, are at concentrations well below the SFRWQCB ESLs for diesel and waste oil of 100 ppm. In addition, there were no diesel ranges organics identified in groundwater monitoring wells during past sampling events. Although the concentrations of diesel ranged organics in groundwater was 5,500ppb, 220 ppb, and 150 ppb from groundwater grab samples collected from the bottom of the UST removal excavation are well above the 100 ppb ESLs, these samples were not representative of groundwater conditions at the site. Napthalene was not identified in the down gradient well MW-4. Although other PAHs were not analyzed, it is very rare that these measurable levels of carcinogenic or toxic PAH constituents are found to be present at most former diesel UST sites. Given that the ESL for napthalene (i.e. a common component of diesel) in groundwater is 17 ppb, it is not likely that, if any residual dissolved diesel were to reach down gradient well MW-4, and beyond, there would be any indications that the diesel would be a threat to human health, drinking water, or the environment. The trace levels of chloroform (3.2 ppb) and acetone (16 ppb) identified in MW-2, adjacent to the former waste oil UST, in 1995, are below the ESLs for chloroform and acetone of 7 ppb and 1,500 ppb, respectively. Since then, recent sampling an analyses revealed ND for these constituents. PCE was also identified in MW-3, in 1995 at 8.6 ppb, slightly above the ESL for PCE of 5 ppb. Since then, recent sampling an analyses of a water sample from MW-3 revealed ND for PCE. These trace levels of VOCs are common in waste oil tanks and are not typically indicative of a wider dissolved plume of solvents.

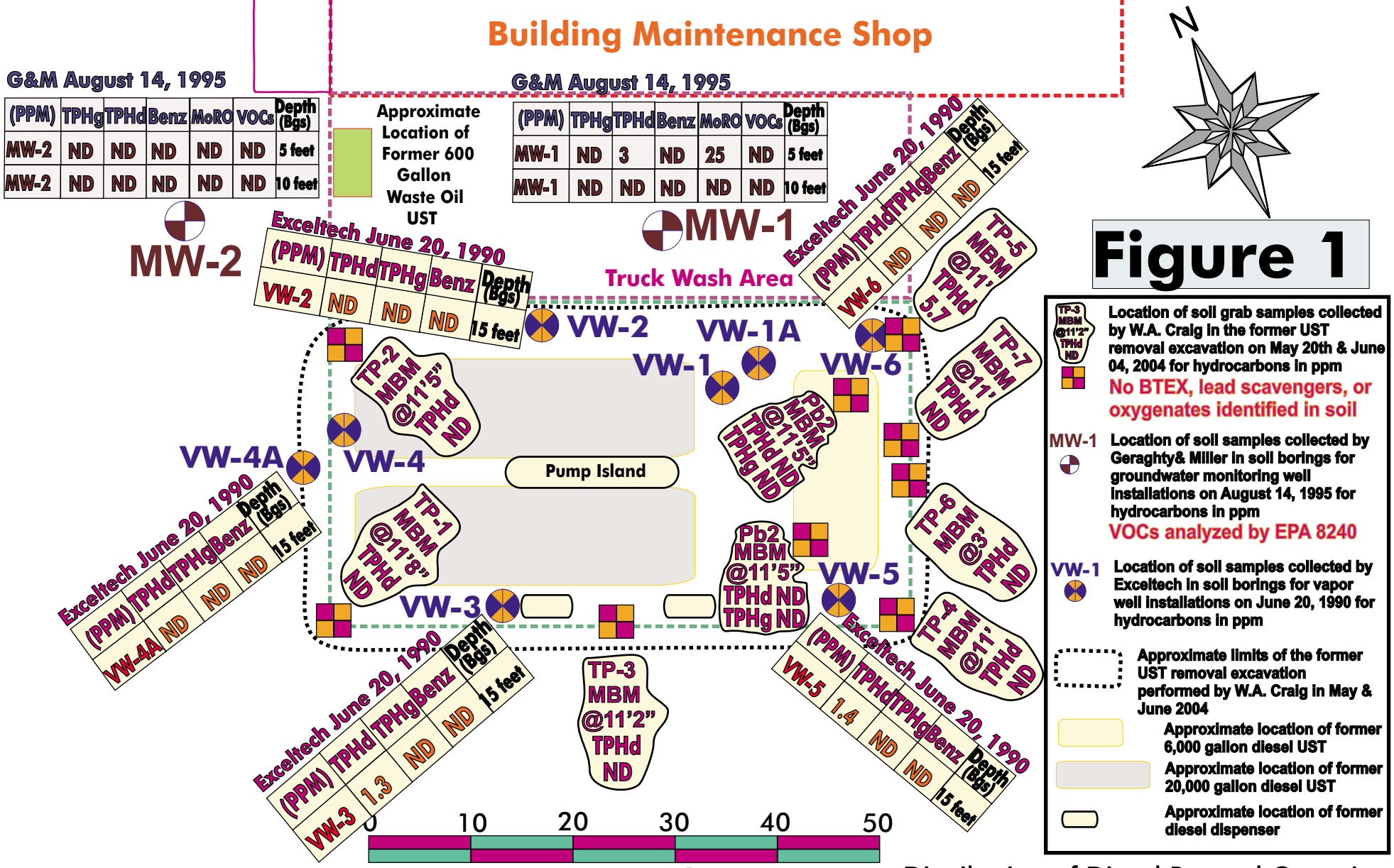
Recommendations

Close the site and properly abandon the groundwater monitoring wells.

Limitations

This report has been prepared in accordance with generally accepted environmental, geological and engineering practices. No warranty, either expressed or implied, is made as to the professional advice presented herein. The analyses, conclusions and recommendations contained in this report are based upon site conditions as they existed at the time of the investigation and they are subject to change.

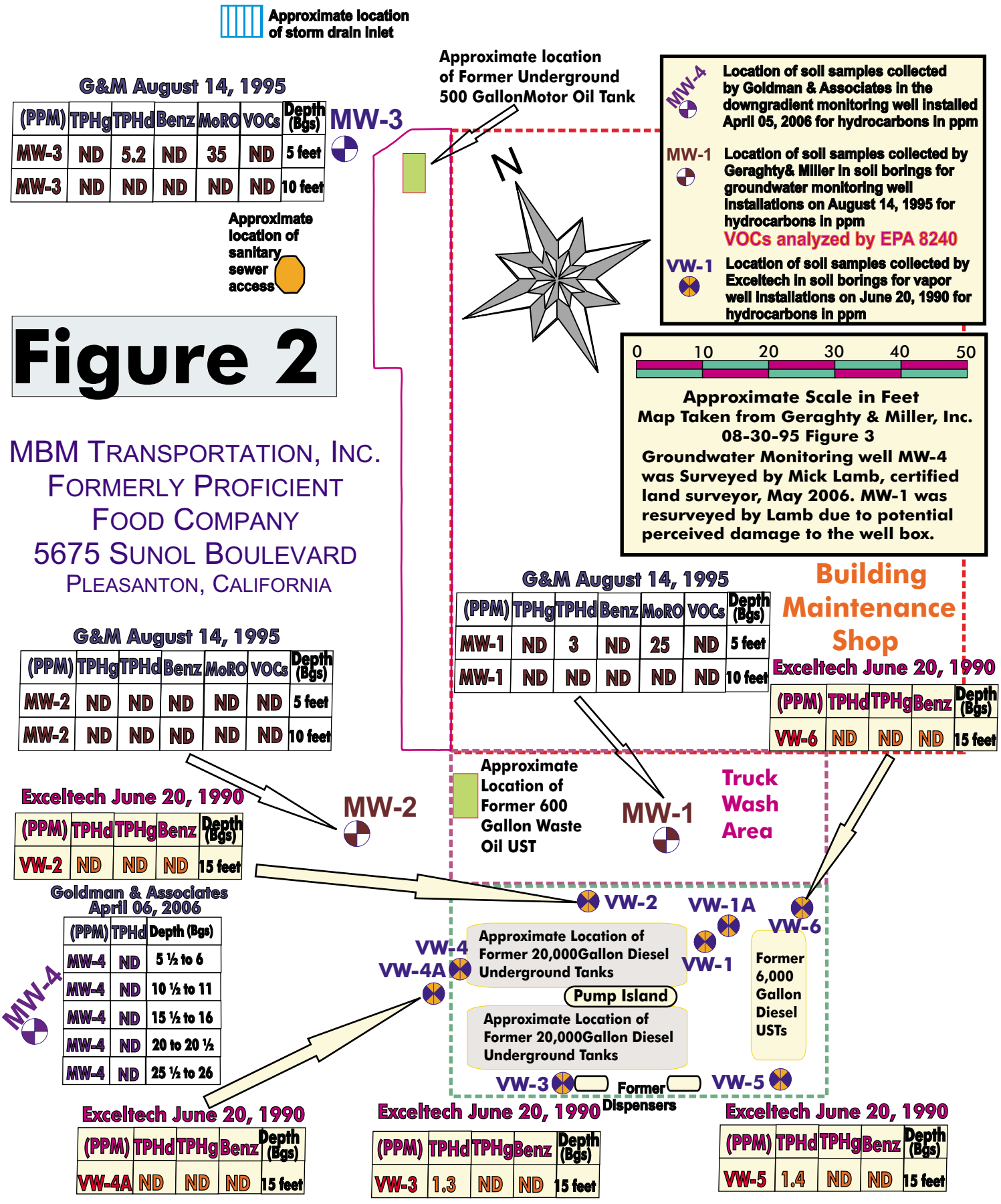
The conclusions presented in this report are professional opinions based solely upon visual observations of the site and vicinity, and interpretation of available information as described in this report. Franklin J. Goldman, recognizes that the limited scope of services performed in execution of this investigation may not be appropriate to satisfy the needs, or requirements of other state agencies, or of other users. Any use or reuse of this document or its findings, conclusions or recommendations presented herein, is done so at the sole risk of the said user.



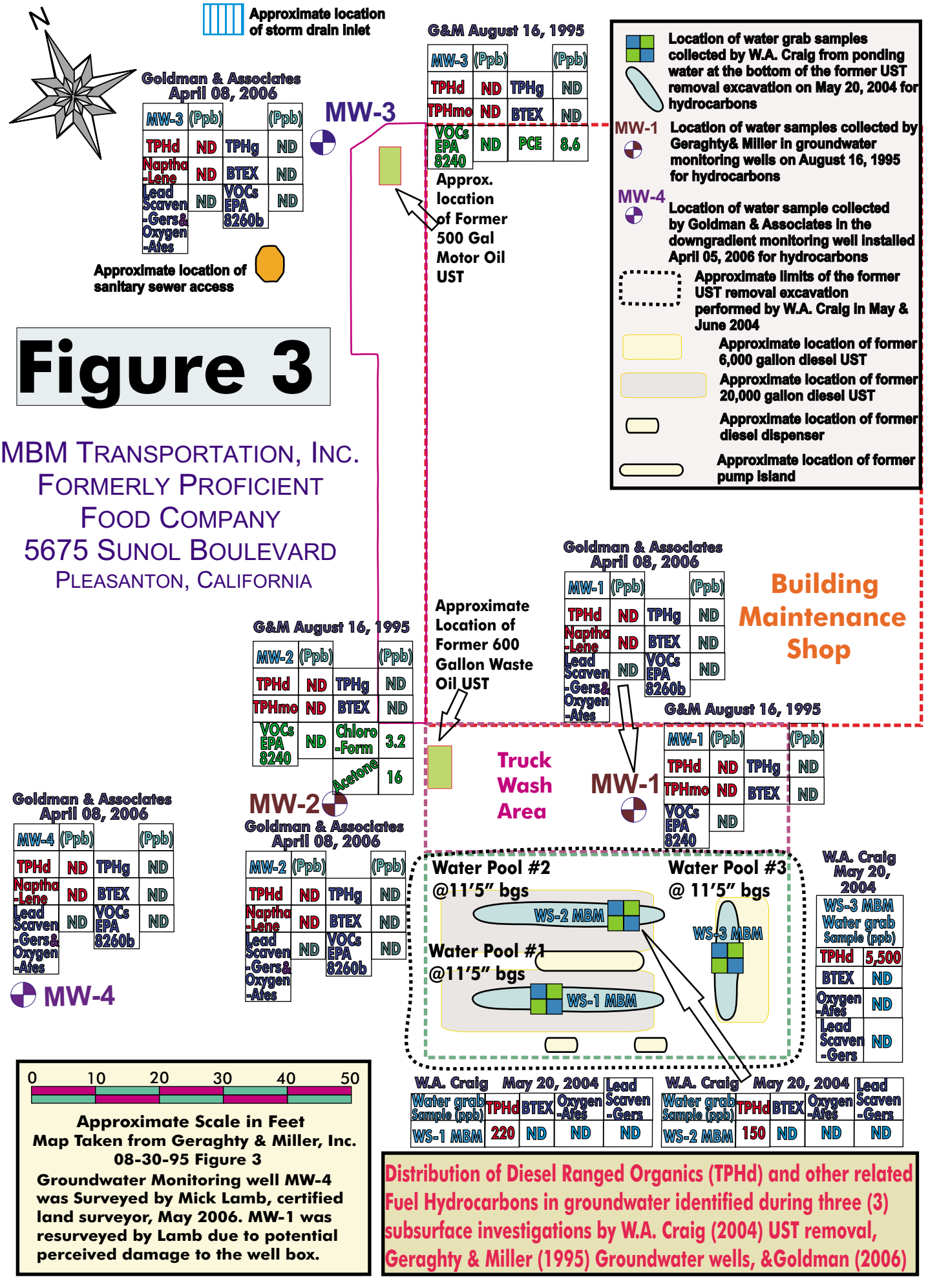
MBM Transportation, Inc.
Formerly Proficient Food Company
5675 Sunol Boulevard
Pleasanton, California

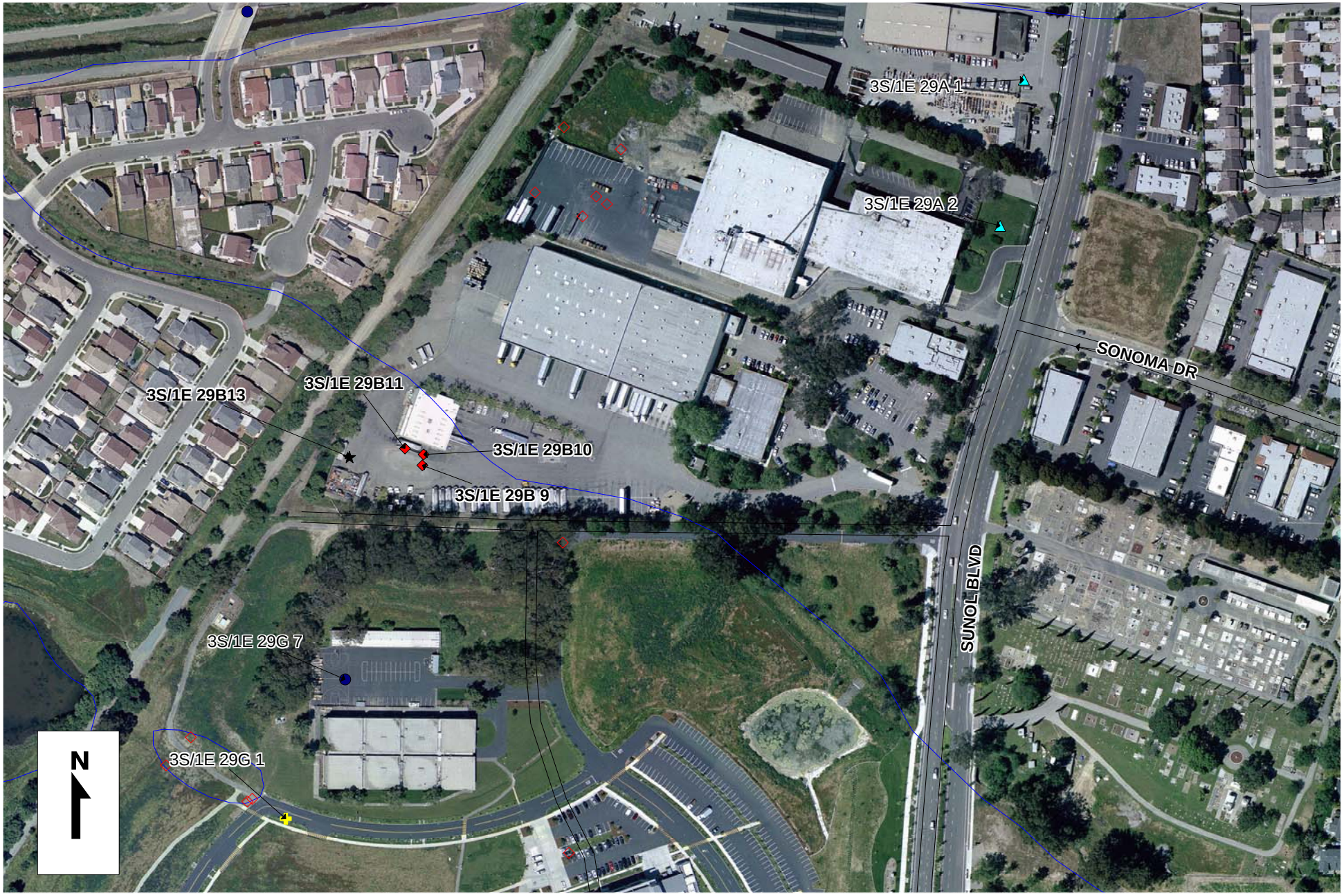
Map Taken from Geraghty & Miller, Inc. 08-30-95 Figure 3
Groundwater Monitoring well MW-4 was Surveyed by Mick Lamb, certified land surveyor, May 2006. MW-1 was resurveyed by Lamb due to potential perceived damage to the well box.

Distribution of Diesel Ranged Organics (TPHd) & other related fuel hydrocarbons identified in soil over three (3) subsurface investigations by Exceltech (1990)[Vapor Wells], Geraghty & Miller (1995)[Groundwater Wells], & W.A. Craig (2004)[UST Pit]



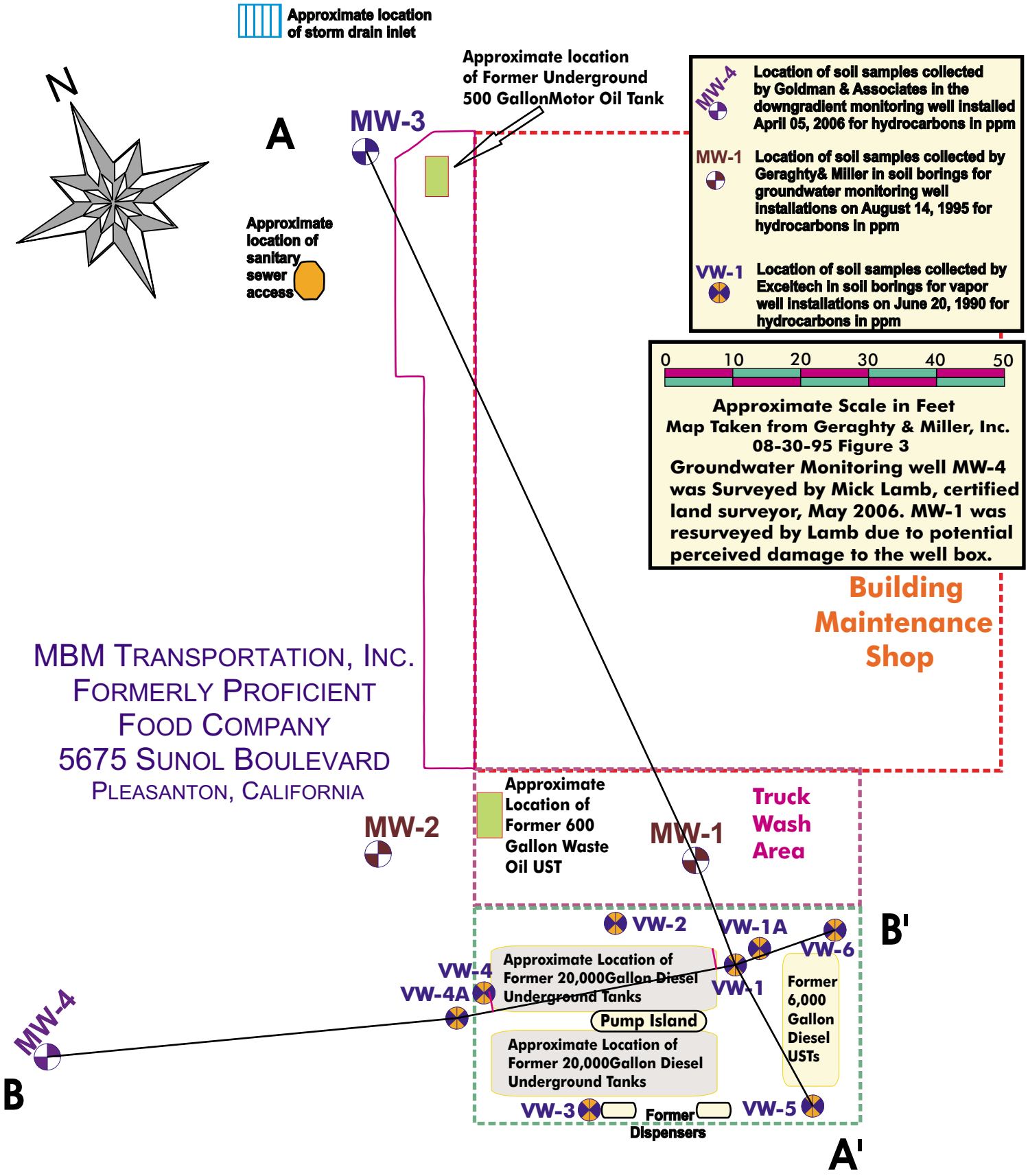
Distribution of Diesel Ranged Organics (TPHd) & other related fuel hydrocarbons identified in soil over three (3) subsurface investigations by Exceltech (1990)[Vapor Wells], Geraghty & Miller (1995)[Groundwater Wells], & Goldman (2006)[One well]


N
Approximate location of storm drain inlet
Goldman & Associates April 08, 2006
MW-3 (Ppb) (Ppb)
TPHd ND TPHg ND
Naptha -Lene ND BTEX ND
Lead Scaven -Gers& Oxygen -Ates ND VOCs EPA 8260b ND
MW-3
Approximate location of sanitary sewer access
G&M August 16, 1995
MW-3 (Ppb) (Ppb)
TPHd ND TPHg ND
TPHmo ND BTEX ND
VOCs EPA 8240 ND PCE 8.6
Approx. location of Former 500 Gal Motor Oil UST
Location of water grab samples collected by W.A. Craig from ponding water at the bottom of the former UST removal excavation on May 20, 2004 for hydrocarbons
MW-1 Location of water samples collected by Geraghty& Miller in groundwater monitoring wells on August 16, 1995 for hydrocarbons
MW-4 Location of water sample collected by Goldman & Associates in the downgradient monitoring well installed April 05, 2006 for hydrocarbons
Approximate limits of the former UST removal excavation performed by W.A. Craig in May & June 2004
Approximate location of former 6,000 gallon diesel UST
Approximate location of former 20,000 gallon diesel UST
Approximate location of former diesel dispenser
Approximate location of former pump island
Figure 3
MBM Transportation, Inc.
Formerly Proficient Food Company
5675 Sunol Boulevard
Pleasanton, California
Goldman & Associates April 08, 2006
MW-1 (Ppb) (Ppb)
TPHd ND TPHg ND
Naptha -Lene ND BTEX ND
Lead Scaven -Gers& Oxygen -Ates ND VOCs EPA 8260b ND
Building Maintenance Shop
Approximate Location of Former 600 Gallon Waste Oil UST
G&M August 16, 1995
MW-2 (Ppb) (Ppb)
TPHd ND TPHg ND
TPHmo ND BTEX ND
VOCs EPA 8240 ND Chloro -Form 3.2
Acetone 16
MW-2
Goldman & Associates April 08, 2006
MW-2 (Ppb) (Ppb)
TPHd ND TPHg ND
Naptha -Lene ND BTEX ND
Lead Scaven -Gers& Oxygen -Ates ND VOCs EPA 8260b ND
G&M August 16, 1995
MW-1 (Ppb) (Ppb)
TPHd ND TPHg ND
TPHmo ND BTEX ND
VOCs EPA 8240 ND
Truck Wash Area
MW-1
Goldman & Associates April 08, 2006
MW-4 (Ppb) (Ppb)
TPHd ND TPHg ND
Naptha -Lene ND BTEX ND
Lead Scaven -Gers& Oxygen -Ates ND VOCs EPA 8260b ND
MW-4
Water Pool #2 @11'5" bgs
Water Pool #1 @11'5" bgs
Water Pool #3 @ 11'5" bgs
WS-2 MBM
WS-1 MBM
WS-3 MBM
W.A. Craig May 20, 2004
WS-3 MBM Water grab Sample (ppb)
TPHd 5,500
BTEX ND
Oxygen -Ates ND
Lead Scaven -Gers ND
W.A. Craig May 20, 2004
Water grab Sample (ppb) TPHd BTEX Oxygen -Ates Lead Scaven -Gers
WS-1 MBM 220 ND ND ND
W.A. Craig May 20, 2004
Water grab Sample (ppb) TPHd BTEX Oxygen -Ates Lead Scaven -Gers
WS-2 MBM 150 ND ND ND
0 10 20 30 40 50
Approximate Scale in Feet
Map Taken from Geraghty & Miller, Inc. 08-30-95 Figure 3
Groundwater Monitoring well MW-4 was Surveyed by Mick Lamb, certified land surveyor, May 2006. MW-1 was resurveyed by Lamb due to potential perceived damage to the well box.
Distribution of Diesel Ranged Organics (TPHd) and other related Fuel Hydrocarbons in groundwater identified during three (3) subsurface investigations by W.A. Craig (2004) UST removal, Geraghty & Miller (1995) Groundwater wells, &Goldman (2006)



	ZONE 7 WATER AGENCY **100 NORTH CANYONS PARKWAY** **LIVERMORE, CA 94551**	**WELL LOCATION MAP**	**SCALE: 1"= 250 ft** **DATE: 8/28/06** **5675 Sunol Blvd** **H:\FLOOD\REFERALLS\REFERALLS.WOR**

Well	PERMIT	DRILLER_NA	DATE_COMPL	PERF_U	PERF_L	DEPTH_
MW-1	95492	GERAGHTY/MILLER	8/14/1995	10.0	25.0	26.0
MW-2	95492	GERAGHTY/MILLER	8/14/1995	9.0	25.0	26.0
MW-3	95492	GERAGHTY/MILLER	8/14/1995	10.0	25.0	26.0

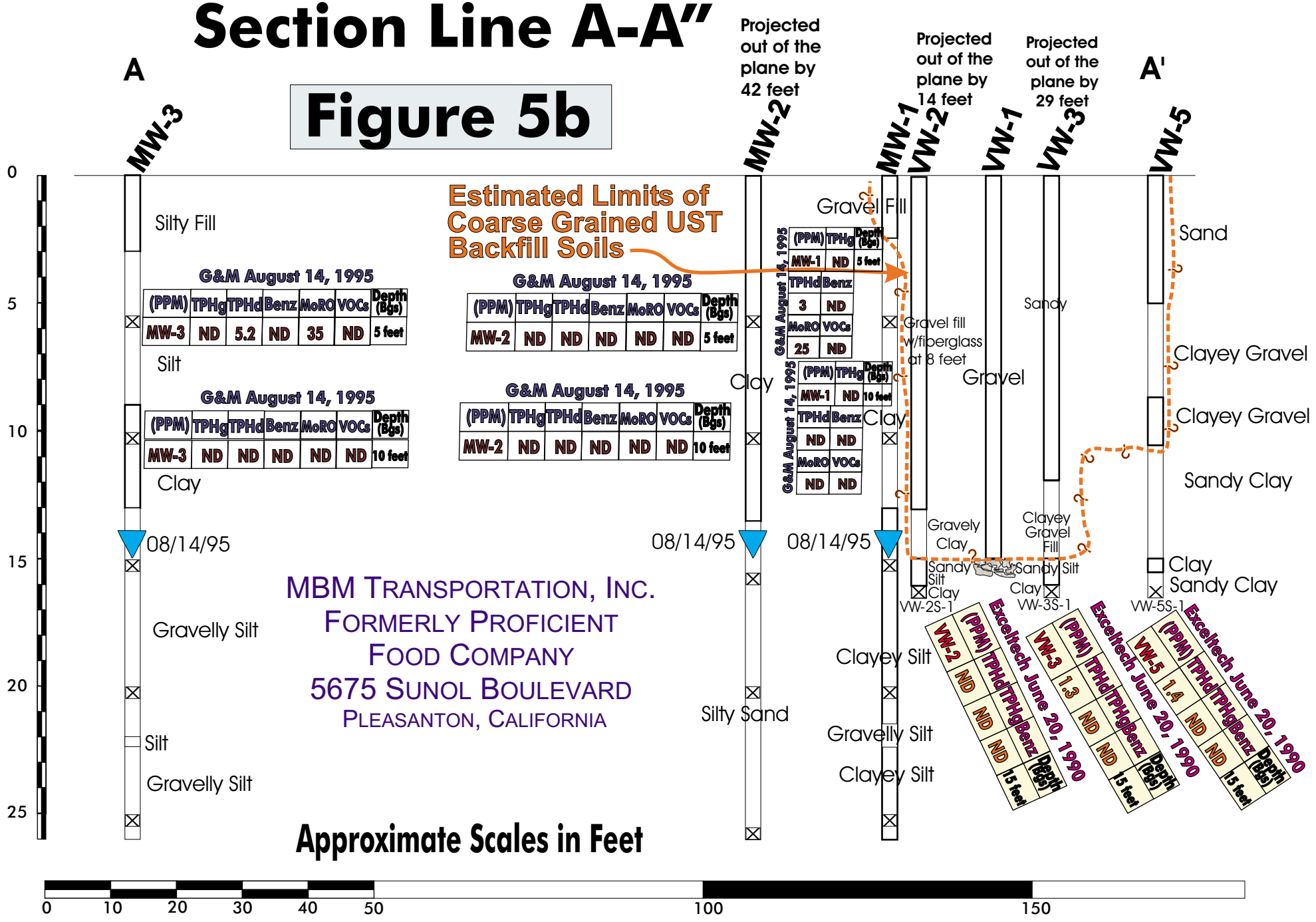


Lines of Section

Figure 5a

Section Line A-A"

Figure 5b



Section Line B-B'

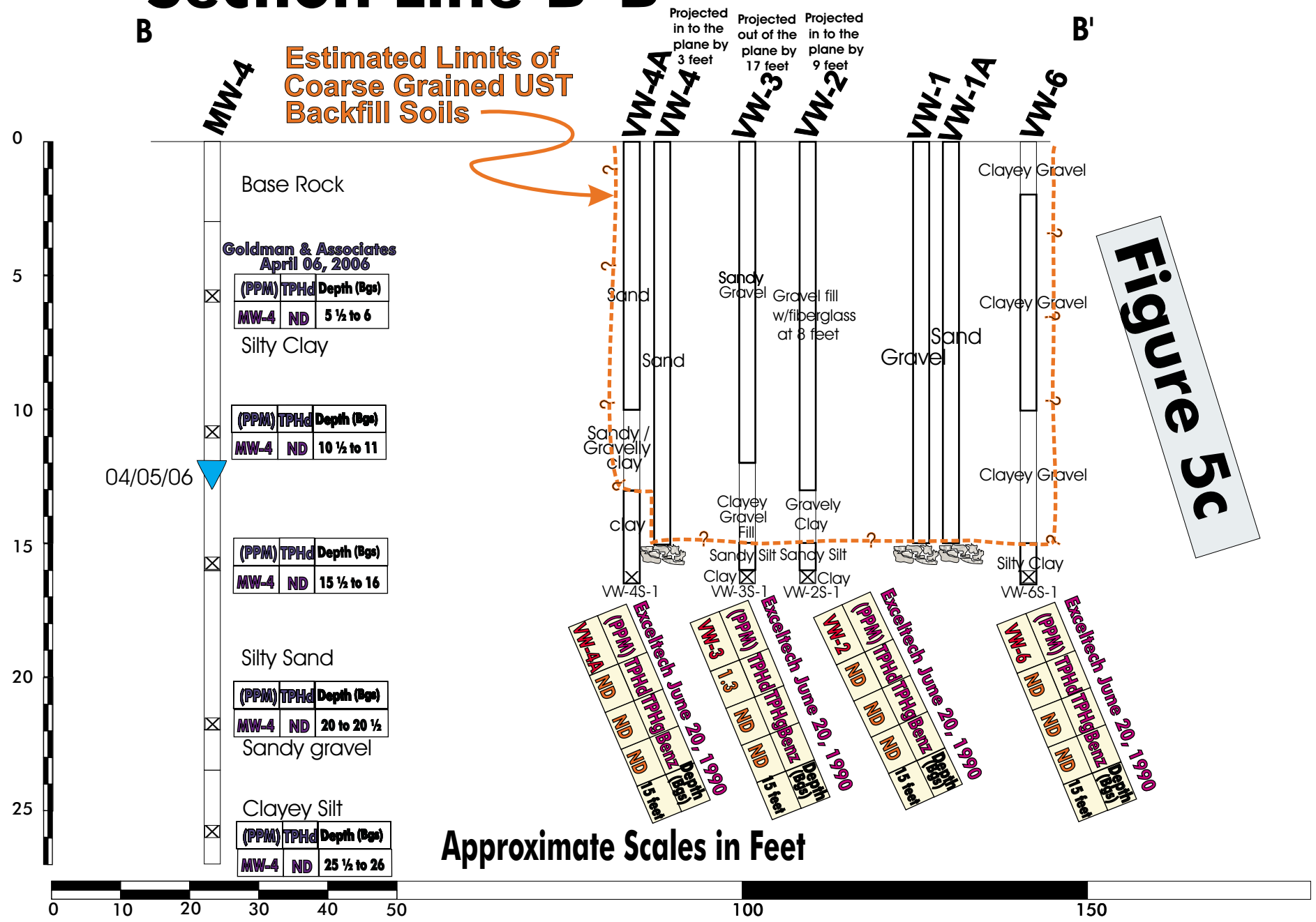
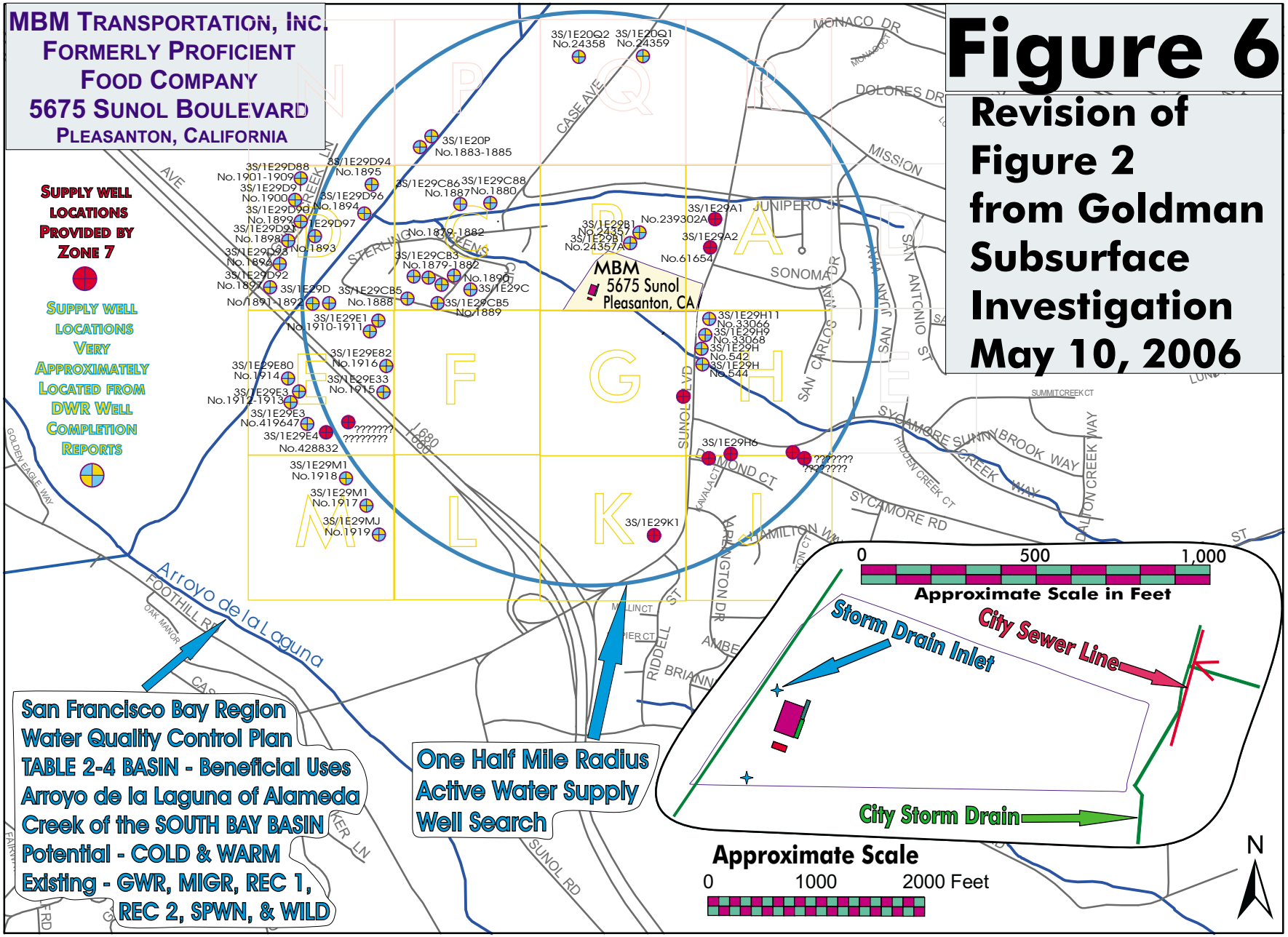


Figure 5c



Data sources: 2004 GDT streets, USGS 1:24000 National Hydrological Dataset
Date: April 20, 2006 Editor: J. Kapellas, SF Bay Reg. Water Quality Control Board

Features added to base map were taken from:
City of Pleasanton Sewer/Storm Drain System Facilities 12/02
Tank Addition Map - Duram & Associates 04/17/04
Well Location Map - Zone 7 Water Agency 04/03/06