

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



R0# 2850

ENVIRONMENTAL HEALTH SERVICES

1131 Harbor Bay Parkway, Suite 250

Alameda, CA 94502-6577

(510) 567-6700

(510) 337-9335 (FAX)

April 24, 1997

Claus Engelhardt
Aqua Geosciences, Inc
4440 Grissom Street, Suite 100
Bakersfield, CA - 93313

Ref: S&S Property, (Penske Truck Leasing) 2430 Industrial Parkway West, Hayward, CA

Dear Mr. Engelhardt:

I am in receipt of the documents "Groundwater Assessment Report", dated August, 1996 and Site Closure Report, dated April 10, 1997 prepared by Aqua Geosciences, Inc. for the above referenced property. Based on the information submitted, the following concerns need to be addressed in order for this Department to evaluate the referenced property for site closure:

- On page 10 of the site closure document, it is mentioned that vapor inhalation is one of the pathways that is considered in the risk evaluation. However, no mention has been made as to whether the concentrations used are from the soil or groundwater and whether it is indoor inhalation pathway or the outdoor inhalation pathway. Regardless of whether the site is residential or commercial, if there is a potential for contaminant exposure to people living or working indoors (based on current and future scenario), then indoor inhalation pathway from soils and groundwater should be evaluated. If this pathway has been eliminated in the risk assessment, then adequate reasons should be given.
- In the risk evaluation, only the most recent groundwater concentrations were used. This Department requires that an average of the concentrations obtained in the past four sampling events be used.
- Provide a reference or source for the toxicity value of MTBE used in the risk assessment.
- In the output table 1 in Appendix C, site specific parameters like depth to groundwater have not been considered. As part of RBCA Tier 2 methodology, as far as possible, site specific values should be used for the different parameters needed for the risk evaluation.
- The reports mention that subsequent to the removal of the underground storage tanks, significant amounts of soil were removed. Please provide a map showing the extent of excavation conducted on the property.

- Also no mention has been made as to whether the California EPA's (or the Federal EPA's) toxicity value (cancer potency factor), was used for the risk calculation for benzene. This Department requires that the California EPA's cancer potency factor of 0.1 kg-day/mg be used in the risk evaluation.

Also, please remit \$1500.00 to establish a deposit-refund account. This deposit is authorized by Alameda County ordinance code section 3-141.6 to cover expenses incurred by county personnel for their oversight duties. Records are maintained for the time County employees commit to a project and the deposit will be debited at the rate of \$94.00 per hour for any time dedicated to your project. Any money remaining in your account at the end of the project will be refunded. Please submit a check payable to "Treasurer, County of Alameda" with the words "Site Mitigation" written on the check for proper credit. Also, please make sure to include the complete address of the site for which the deposit- refund account is being established.

If you have any questions, you may reach me at (510) 567-6764.

Sincerely,



Madhulla Logan

Hazardous Material Specialist

C: **Timothy Reed**, 4440 Grissom Street, Suite 100, Bakersfield, CA - 93313
Hugh Murphy, City of Hayward Fire Department, 25151 Clawiter Road
Hayward, CA - 94545

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