

June 10, 2013

CLAIM 2343

SUBJECT: Response to Alameda County's Comments for Claim 2343 During the Public Notice Period

COMMENT 1: The Site does not have a complete conceptual site model (CSM).

RESPONSE: After 24 years of investigation and remediation being accepted by the County, the conceptual site model has been adequately developed per Policy definition. "The supporting data and analysis used to develop the CSM are not required to be contained in a single report and may be contained in multiple reports submitted to the regulatory agency over a period of time".

COMMENT 2a: The volume of soil removed (secondary source) during the UST removal activities could not be found in the case records.

RESPONSE: Review of the County and other available records confirmed the County's assessment. However, subsequent remedial actions conducted at the Site to remove contaminants from soil resulted in the removal of 6,550 pounds of total petroleum hydrocarbon vapor.

COMMENT 2b: The plume length has not been defined along 24th Street and, therefore, the Site does not meet the criteria for Class 2.

RESPONSE: The downgradient extent of the plume was estimated using wells MW-1 (Source area), MW-2 (Downgradient), and MW-7 (Downgradient slightly sidegradient) with the following concentrations of <0.5, 2.98, and 1.53 ppb of benzene, respectively, to project the downgradient extent. Wells MW-2 and MW-7 are approximately 80 feet downgradient/sidegradient of the source area. Rather than attempt to assert a plume length of 100 feet which would meet Class 1 criteria, the Fund asserts the plume is less than 250 feet long, and the criteria of Class 2 were used to show the site meets the Policy.

COMMENT 3a: The Site is not an active service station.

RESPONSE: The Review Summary Report does not say the Site is an active service station.

COMMENT 3b: Due to limited soil samples being collected within the top 5 feet the Site does not meet Scenario 3 for soil vapor media specific criteria, and the groundwater depth has been reported as shallow as 3.37 feet below ground surface.

RESPONSE: The surface samples collected within the top five feet all show levels of petroleum constituents that meet the Policy criteria. The shallow groundwater was a one-time event measured following a major storm event. The depth measurement was never replicated, and very shallow groundwater is not a standing condition.

COMMENT 4: Limited pre-remediation soil samples were collected in the upper 5 feet of soil.

RESPONSE: These soil samples, which are in the source area, met the Policy criteria prior to remediation. An adequate number of soil samples were collected to show the Site meets the Direct Contact and Outside Air Exposure Criteria.