

12018

Chan, Barney, Env. Health

From: Chan, Barney, Env. Health
Sent: Friday, October 11, 2002 11:49 AM
To: 'Roger Brewer'
Subject: RE: Nestles Oakland

Roger:

Nestle is amenable to going along with whatever long term monitoring requirements we have, but they have not proposed any specific monitoring frequency or term. They feel it is our call. I recall in one of the meetings at the Water Board, Nestle asked how long it would take to obtain closure for the VOCs and petroleum releases and Chuck's response was approximately 1-2 years.

Nestle performed soil gas sampling in areas within the highest impacted areas and their risk assessment from Javerian Consulting, Inc. concluded that no human health risk exists. This is their rationale why they did not consider keeping any wells within the heart of the plume.

Other questions are: Will the site be closed and a no further action letter sent or will some other type of letter be sent and by whom? The Oakland Fire Dept appears to be the ones responsible for enforcing the deed restriction. Would you concur with closure with on-going monitoring? Would the Board consider issuing an order to insure compliance with monitoring requirements?

Nestle would like me to at least concur with their well closure proposal. I will write a letter concurring. They will begin by destroying the perimeter wells. Let me know if you think any interior (high impact) wells should be kept.

Thanks,

Barney Chan
ACEH 510-567-6765

-----Original Message-----

From: Roger Brewer [mailto:Rdb@rb2.swrcb.ca.gov]
Sent: Thursday, October 10, 2002 4:17 PM
To: bchan@co.alameda.ca.us
Cc: Chuck Headlee
Subject: Nestles Oakland

Barney,

Have they put together a long-term monitoring plan for the Nestles Oakland site? If not, they should. The selection of wells to be included on the plan should be based on intent of the monitoring. If the intent is to ensure that the plume does not migrate offsite at significant levels of concern then the proposed locations should be OK. If the intent is to monitor onsite concentrations of VOCs for potential indoor-air concerns, etc. then the proposed wells are not adequate. It should probably be some combination of both.

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Chan, Barney, Env. Health

To: Roger Brewer (E-mail); Betty Graham (E-mail)

Subject: Nestle site, 1310 14th St., Oakland, RO0000018

Roger and Betty:

As you are aware, Binayak Acharya of Env. Cost Management, in his 2nd Annual 2003 Semi annual report, is recommending meeting with you guys & perhaps the County, to discuss the closure of this site. In this report, a Mann Kendall analysis of the perimeter wells is presented supporting their claim that the plume is not migrating and closure should be recommended. They already have recorded a deed restriction for the northwest corner of the site. You might have heard that the current owner is looking to sell the site to someone who will build a mixed commercial (1st floor) residential (upper floors) building. I'm not sure what your opinion on this site is but I have a few comments and questions.

- They chose to evaluate statistically 5 of the 11 perimeter wells. I'm not an authority on statistics, but the R2, correlation coefficient of the conc vs time plots do not suggest a linear correlation ie ~1.0 Is showing the perimeter well concentrations are stable enough for closure? What analytes should be evaluated in the statistical analysis? Is TPHg more important than BTEX or the other VOCs? I noted that the consultant's conclusion, that MW100 is stable and therefore no offsite migration is occurring, is incorrect because MW100 is really up gradient to the major source areas.
- Is the site closeable with concentrations of HVOCs present above MCLs? are they required to keep on monitoring until concs below MCLs are established?
- Onsite there remains elevated TPHg and BTEX in localized areas, in fact there are probably localized areas of fp, albeit not much greater than can be measured. Is this an issue?
- Their shallow vapor air samples identified hot spots in 1999 and additional vapor samples were collected from wells in 6/01. Up to 65% LEL was detected in the later sampling date. Is this a problem?

Barney M. Chan
 Hazardous Materials Specialist
 Alameda County Environmental Health
 510-567-6765

*current status report including
 TPHd*

- current isocone map for TPHg, BTEX and HVOCs on site
- extent of fp in wells + thickness
- status of wells decommissioned vs. viable

left message ~ 220pm 4/16/04 with Binayak Acharya

*Q - need to review report?
 what about monitoring fp?*

*B Acharya@ecost
 Manage.com*

Is future use of site consistent w/ RMP?

- I don't know