Chan, Barney, Env. Health

From: Betty Graham [BG@rb2.swrcb.ca.gov]
Sent: Friday, April 09, 2004 9:27 AM
To: barney.chan@acgov.org; Roger Brewer
Subject: Re: Nestle site, 1310 14th St., Oakland, RO0000018

While I have not reviewed the data on which their closure request is based, I don't think closure is warranted. When I last reviewed this file, it seemed that investigation was incomplete and that the deed restriction was premature. ie. the deed restriction assumed a remedial strategy in advance of complete investigation and served to "piecemeal" any future remediation. In the event the property is sold and developed for mixed use, additional contamination will likely be discovered and the partial site closure which Nestle requests could create an institutional logjam.

Betty

>>> "Chan, Barney, Env. Health" <barney.chan@acgov.org> 04/08/04 03:49PM
>>> >>>
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 that BTEX or the other VOCs? I noted that the consultant's conclusion, that MW100 is stable and therefore no offsite migration is occuring, 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 in6/01. Up to65% LEL was detected in the later sampling date. Is this a problem?

Barney M. Chan
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Alameda County Environmental Health
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Chan, Barney, Env. Health

From: Roger Brewer [Rdb@rb2.swrcb.ca.gov]
Sent: Friday, April 09, 2004 11:28 AM
To: barney.chan@acgov.org
Cc: Betty Graham
Subject: Re: Nestle site, 1310 14th St., Oakland, RO0000018

We should all meet sometime next week to discuss this site.

Roger

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