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7/18/95

Two tanks were removed in 1991, and groundwater was encountered at approximately 6' bgs. Significant petroleum concentrations including free product were encountered at 6' bgs. Hydrocarbon concentrations are centered around the locations of the former underground storage tanks, and that the concentrations have "spread out" toward the south, consistent with the mechanism of longitudinal dispersion in the direction of the shallow groundwater flow. Analytical data indicates a well-defined plume of petroleum concentrations migrating to the south, either floating on top of, or dissolve within the shallow groundwater. Free product migration can be expected to occur within the capillary fringe above the shallow water table. Two inches of free product were encountered during well sampling procedures performed on 4/20/95. In addition, significant benzene concentrations are associated with this site.

Recommendations: Installation of a petroleum recovery unit to capture significant free product in MW-1. In addition, extent of contamination has yet to be defined, since this is a rather large plume and contamination is present wherever sampling was performed. Perform soil-gas vapor surveys to determine correct location of borings/monitoring wells.

8/3/95

Review file and November 7, 1994 HAI proposal for subsequent phase of soil and water investigations (SWI). Draft letter requesting that MW-1 be fitted with an EZY* skimmer or equivalent to capture free product. Called the offices of HAI requesting revised work plan to include free product recovery. In addition, this workplan is to use soil-vapor survey techniques to determine correct locations for proposed monitoring wells.

9/26/95

Review HAI workplan for SWI-dated September 20, 1995. HAI proposes the collection of soil and shallow groundwater samples from five (5) Geoprobe* locations down-gradient of the previous USTs location.

Comments: There is a need for an additional Geoprobe sampling location up-gradient of the former UST excavation. Work plan does not address free product recovery in well MW-1.

Review HAI "Groundwater Sampling Report"-dated September 19, 1995 (sampled September 5, 1995). **1.25" of free product was measured in well MW-1.** This free product remains to be a priority. Results of laboratory analysis for groundwater sample collected from MW-1 detected TPHg-(33 ppm), TPHd-(46 ppm) and BTEX at 140 ppb, 270 ppb, 260 ppb and 1100 ppb, respectively. Stoddard solvent was also present in the groundwater sample at a concentration of 4900 ppb. Will draft letter again requesting free product (FP) removal in well MW-1. Received call from Larry Hobel, Attorney-at-law, legal counsel for Rodding-Cleaning, phone number (415)772-6348. Lengthly conversation with him

concerning future investigations needed in order to request closure from the SWRQB. Informed him that after the hydropunch sampling and analysis, a minimum of three wells will be needed for site monitoring. Informed Mr. Hobel that a realistic time frame for evaluating closure status would be in a best-case scenario of 18 months. This would allow six months for placement of wells and an additional minimum of four quarters (1 year) of monitoring to get to the point where a enough sampling data would be gathered to determine if an additional work would be needed. I told him that after the first two or three sampling events the situation would be re-evaluated with respect to how the free product recovery was affecting the down-gradient contamination. This data would give us a reasonable assumption as to how well the source (especially free product) was being remediated. I also told him that it was in the best interests of his client to install the passive skimming system ASAP, since monitoring has been ineffective.

- 9/27/95 Prepare final draft of letter requesting FP removal for peer review. Sent letter.
- 11/14/95 Review HAI letter-dated November 6, 1995. Received response to my September 27, 1995 letter requesting free product recovery in well MW-1. HAI had a technician bail approximately 1.5 gallons of free product from well MW-1. Absorbent socks were then installed to further mitigate environmental conditions and free product within the well. Only a light sheen remains after the initial bailing and no additional free product has entered the well as of the date of the letter (11/6/95). They will continue to monitor the situation, but obviously do not feel that a passive skimmer needs to be installed. They will report the progress of the free product removal in their quarterly monitoring reports. Call from Brian Griffith with Heller, Ehrman, White and McAuliffe, who are attorneys for the Bank of America request to be copied with any ACHCSA documents. Their address is 333 Bush Street, San Francisco, CA 94104.
- 1/19/96 Call from Donna DiRocco of Bank Of America Enviromental Services (714)260-5810, Fax 260-5803. She stated that the tenant (Rodding Cleaning Services) has vacated the site and that she feels they will no longer follow through with the cleanup of the site. She request a copy of the approved work plan which was dated September 20, 1995 and which I approved 9/26/95. They will be the ones which we continue to follow through with the remediation. Her address is B of A Environmental Services, Unit #24122, 4000 MacArthur Blvd., Suite 100, Newport Beach, CA 92660. Copied document and sent to Donna DiRocco.

*are chlorinated solvents
stopping migration
free product being removed
Risk => residential area (?)
6/29/97 Work performed
Question as to analyze soil and groundwater or just groundwater on
adjacent property*