

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



ENVIRONMENTAL HEALTH SERVICES

1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
(510) 337-9335 (FAX)

February 01, 1999

Mr. John Schovanec
Bank of America Environmental Services
4000 MacArthur Blvd., Ste 1000
Newport Beach, CA 92660

STID 3570

Re: Addendum to workplan for investigations at 2585 Nicholson Street, San Leandro, CA

Dear Mr. Schovanec,

Per our conference call today, the following is a summary of our conclusions on the issues outlined in Alameda County's January 4, 1999 letter to your office:

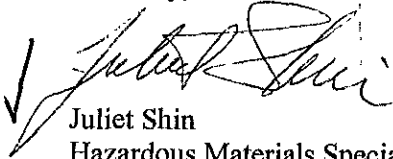
- It was decided that the locations of the four proposed wells, MW-2, MW-3, MW4, and MW-5 are acceptable for the purposes of delineating the extent of the observed contaminant plume. However, as we discussed, additional sampling locations within the plume *may* be required in the future for risk assessment purposes.
- In response to concerns about utility line trenches potentially diverting the plume, it was determined that a preliminary survey for utility lines would be conducted on site as part of the well installation work. If utility lines are located that may be diverting the plume, additional plan reviews will be conducted to collect information on the depth, diameter, backfill materials, slope, etc. of these utility lines.
- The comparison of non-purge and purge data stipulated in RWQCB's guidelines is requested by RWQCB to obtain the most accurate and conservative data for site assessments. Per our conference call, you requested a copy of these guidelines for your review and deliberation. Your consultant, Scott Allin, also stated that he will be discussing these requirements further with Chuck Headlee, RWQCB, before coming to any final conclusions about the need to implement this work.
- Scott Allin has contacted a certified laboratory that can conduct analysis using lower detection limits, as requested by this office.
- The requested well survey will be conducted after this phase of well installation work.

Per our discussions, the workplan will be implemented after obtaining access agreements for well installation from the neighboring sites. Please notify this office at least one week in advance of field work.

Mr. John Schovanec
Re: 2585 Nicholson St.
February 01, 1999
Page 2 of 2

If you have any questions or comments, please contact me at (510) 567-6763.

Sincerely,



Juliet Shin
Hazardous Materials Specialist

ATTACHMENT

Cc: Scott Allin
Versar, Inc.
7844 Madison Avenue, Ste 167
Fair Oaks, CA 95628

Mike Bakaldin
City of San Leandro
835 East 14th St.
San Leandro, CA 94577

Files-JMS



Cal/EPA

San Francisco Bay
Regional Water
Quality Control
Board

2101 Webster Street
Suite 300
Oakland, CA 94612
(510) 286-1235
FAX (510) 286-1380

Post-It* Fax Note	7671	Date	1/4/99	# of pages	3
To	Julieta Shon	From	Chuck Headlee		
Co./Dept.		Co.			
Phone #		Phone #			
Fax #	337-9335	Fax #			



Pete Wilson
Governor

To: Interested Parties

January 31, 1997

File: 1123.64

SUBJECT: Utilization of Non-Purge Approach for Sampling of Monitoring Wells Impacted by Petroleum Hydrocarbons, BTEX, and MTBE

REFERENCE: "The California Groundwater Purging Study for Petroleum Hydrocarbons", Report for Western States Petroleum Association by SECOR International Incorporated, Dated October 28, 1996

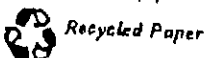
Finding and Recommendation

The WSPA study concludes that selection of a non-purge sampling methodology will not affect the overall variability of analytic data, and will provide a comparable, and in many cases, conservative estimate of petroleum hydrocarbons in groundwater. Based upon our review of the study, we conclude that for monitoring wells at fuel UST sites purging is not required providing the conditions we have outlined below are met. Our rationale is provided below.

Rationale

Since the release of the Western States Petroleum Association (WSPA) study on the effects of purging or not purging gasoline impacted monitoring wells prior to sampling there have been questions posed as to the validity and applicability of the study. Board staff acknowledge the concerns of some towards the possible bias in the study because of variations in data quality due to differing purging and sampling techniques utilized in the study, the lack of specific well design information or water quality parameter information, and the questions of statistical bias introduced into the study by the inclusion of non-detect data. However, we believe that these concerns are mitigated by the overall environmental and economic benefits discussed below.

Section 13267 (b) of the Water Code states that for technical or monitoring program reports the board may specify that ... "The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports". From an environmental perspective, there is an advantage in reducing the environmental burden by virtue of reducing the volumes of purge water for treatment and disposal, which in turn reduces secondary impacts to air and water quality from waste handling, transport, and treatment of the purge water. In



Interested Parties

Page 2 of 3

January 31, 1997

addition, there is a positive cost savings and, consequently, a potential savings to the State's limited Clean Up Fund resources. We therefore believe that this approach is consistent with Section 13267.

We recognize at least one disadvantage from not purging is that, if true, higher analytic readings from non-purged samples may result in unnecessarily prolonging remediation and monitoring. In the worst case, some minor changes in water quality may be missed on a timely basis, such as those due to changes resulting from utilizing effective remediation techniques or, conversely, missing the detection of a new release from on or off site. Also, if further refinement of the WSPA study provides new information in conflict to the present study, we are prepared to modify our requirements accordingly.

Conditions on Using the Non-Purging Approach

In consideration of the above, we will now require the following for any Responsible Party or consultant proposing to utilize the non-purging approach:

1. The non-purging approach shall be used only for monitoring wells where groundwater has been impacted by Petroleum Hydrocarbons, BTEX, and MTBE.
2. Non-purge sampling shall be utilized for unconfined aquifers only.
3. The monitoring well shall be properly permitted, constructed (in this case, screened across the water table), and developed.
4. The well is not presently in use for groundwater or soil vapor extraction.
5. The well does not have free product.
6. For new wells or wells brought into monitoring for the first time, the first round of groundwater sampling performed at a site shall be with both non-purged and purged samples. The purging and sampling method used shall be documented. This shall include the rate of purge and sampling details. For these wells we require measurements of dissolved oxygen, specific conductance, pH, and temperature whether purged or not purged. Also, if biodegradation is being tracked at the well, our requirements do not preclude the measurement of other parameters.

Interested Parties

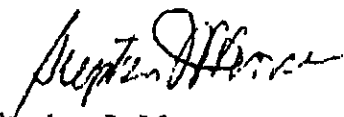
Page 3 of 3

January 31, 1997

7. Existing wells which have already been routinely purged in previous sampling events immediate to being switched to a non-purging mode do not require an initial duplicate non-purged and purged sample.
8. Monitoring data frequency shall be as required by the appropriate regulatory oversight agency.
9. Should a Responsible Party request site-closure where the non-purged approach has been used, the final confirmation sampling event shall include both non-purged and purged samples from each well or as agreed upon with the appropriate regulatory oversight agency.

Prior to implementing the non-purge approach, the appropriate regulatory oversight agency shall be contacted, with an information copy to this office. Please call John Kaiser (510 - 286 - 0803) or me (510 - 286 - 0304) if you have any questions regarding this letter.

Loretta K. Barsamian
Executive Officer



Stephen I. Morse, P.E.
Chief,
Toxics Cleanup Division

cc: SWRCB - CWP (Alan Patton and Dave Deaner)
Regional Boards 1,3-9 UST Program Managers
RWQCB Region 2 UST Staff
USEPA, Region 9 (Matt Small)
Region 2 Local Agency UST Managers

Note: A synopsis of the WSPA Report including information on how to obtain the complete report may be found on the Internet at
<http://www.secor.com/purge.html>