

Khatri, Paresh, Env. Health

From: Khatri, Paresh, Env. Health
Sent: Friday, October 28, 2011 10:31 AM
To: 'Leonard Niles'
Cc: Drogos, Donna, Env. Health; Nancy Gillis; Tom Gillis; Dominick Lee; marc cunningham
Subject: RE: Former Mandela Trucking, 1225 Mandela Parkway, Oakland, CA; ACEH Case # RO0000041

Hello Leonard,

Thank you for the e-mail. We look forward to your work plan.

Sincerely,

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From: Leonard Niles [<mailto:leonard@allwest1.com>]
Sent: Friday, October 14, 2011 11:31 AM
To: Khatri, Paresh, Env. Health
Cc: Drogos, Donna, Env. Health; Nancy Gillis; Tom Gillis; Dominick Lee; marc cunningham
Subject: Former Mandela Trucking, 1225 Mandela Parkway, Oakland, CA; ACEH Case # RO0000041

Paresh,

I just wanted to document what we discussed in our telephone conversation this morning, in addition to what was discussed at our meeting one year ago on October 7, 2010 regarding the former Mandela Trucking site at 1225 Mandela Parkway in Oakland, ACEH case # RO0000041 and Geotracker Global ID # T0600102246. AllWest is now once again representing the property owners, Tom and Nancy Gillis, who wish to proceed with the additional subsurface investigation we discussed in our October 2010 meeting. You had requested preparation of a Feasibility Study and Corrective Action Plan (FS/CAP) in your letter of September 17, 2009, which AllWest was then in the process of preparing. At the meeting, AllWest had proposed a limited additional subsurface investigation to verify elevated petroleum hydrocarbon concentrations in soil and groundwater analytical results from two historical borings in (SB-2 and SB-7) the release source area, prior to completing the FS/CAP. The purpose of the additional investigation was to evaluate whether the groundwater sampling methodology previously used (obtaining samples from temporary PVC casing in open boreholes) may have biased groundwater analytical results upward due to caving of contaminated soil from the source area into the open boreholes. AllWest proposed advancing a Geoprobe DPT

continuous core soil boring and separate Hydropunch groundwater sampler adjacent to each of the previous source area borings SB-2 and SB-7 (a total of 2 soil borings and 2 Hydropunches), with analysis of soil and groundwater samples for TPH-g, d & mo and BTEX. Our proposed scope of work was described in our draft meeting agenda dated October 5, 2010, which I have attached.

At the meeting, you requested that we add naphthalene and total lead to the proposed lab analyses. You also requested that we perform an additional sub-slab soil vapor investigation inside the building. You said that if analytical results from the soil, groundwater and soil vapor investigation were within acceptable limits, you would consider a case closure evaluation within a year, possibly with a commercial deed restriction. You also gave approval to reduce the groundwater monitoring frequency from quarterly to semiannual, and requested we add naphthalene and total lead to the current groundwater analyses. You requested a brief letter workplan with the proposed scope of work for the subsurface investigation. AllWest proposed performing the soil and groundwater borings first and the soil vapor sampling later. The last work performed by AllWest at the subject site was the 4th Quarter 2010 groundwater monitoring event in November 2010, during which TPH-d concentrations continued to decline to slightly above RWQCB ESLs in source area well MW-1, while not detected in the other two wells.

In our telephone conversation today we reviewed what was discussed at the meeting a year ago. In addition to the two source area soil boring/Hydropunches adjacent to historical borings SB-2 and SB-7, you requested soil vapor samples be collected from at least two locations inside the subject site building, each from immediately below the floor slab and at 5 feet below ground surface. You requested that a brief letter workplan be submitted prior to performing the investigation. You also requested that semiannual groundwater monitoring be resumed immediately. I would appreciate it if you could please acknowledge receipt of this e-mail. Also since you may shortly be replaced as the ACEH case worker for this site, as you told me, I would appreciate it if you could brief the new caseworker on our discussions and agreements since nothing has been documented in any formal ACEH letter. Please call me if you have any questions or comments.

Thank You,

Len

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**DRAFT AGENDA FOR MEETING WITH ALAMEDA COUNTY ENVIRONMENTAL
HEALTH DEPARTMENT, OCTOBER 7, 2010**

Former Mandela Trucking, 1225 Mandela Parkway, Oakland, CA

ACEH Fuel Leak Case No. RO0000041

GeoTracker Global ID T0600102246

AllWest Project No. 10032.36

Expected Participants: Marc Cunningham and Leonard Niles, AllWest Environmental, Inc.;
Tom Gillis, property owner; Dominick Lee, VA Transportation; Paresh
Khatri and Donna Drogos, Alameda County Environmental Health
Services Agency

Meeting Purpose

AllWest has requested a meeting with Alameda County Environmental Health (ACEH) on behalf of our clients to discuss case closure requirements and request additional limited subsurface investigation to verify current site conditions, since we have reason to question the validity of some data from previous investigations. It is our opinion that a request for further investigation prior to committing to costly remediation activities is reasonable in view of our clients' limited financial resources.

In their letter of September 17, 2009, responding to AllWest's *Groundwater Monitoring Well Installation Report* dated August 4, 2009, ACEH did not agree with our opinion that the six Regional Water Quality Control Board Case Closure Criteria for Low Risk Groundwater Sites had been met. Specifically ACEH listed historical analytical results indicating elevated total petroleum hydrocarbon (TPH) concentrations and the presence of free product in soil and groundwater near the former fuel dispenser island. The ACEH concluded that "it does not appear that ongoing sources, including free product, have been removed or remediated".

The ACEH required the submittal of a *Feasibility Study and Corrective Action Plan (FS/CAP)* proposing at least three alternatives for remediating petroleum hydrocarbon impact to soil and groundwater at the Mandela site (not including monitored natural attenuation). The ACEH also required performing a quarterly groundwater monitoring program of the onsite wells. AllWest submitted the *2nd Quarter 2010 Groundwater Monitoring Report* to ACEH on May 28, 2010. The results of the 2nd Quarter 2010 monitoring are consistent with conclusions of our previous subsurface investigation, indicating that the dissolved TPH plume is not migrating offsite and that TPH concentrations in groundwater are relatively low in the southern pump island vicinity.

Main Discussion Points

1. Free Product

- According to the ACEH 9/17/09 letter and previous discussions with Paresh Khatri, Donna Drogos and Jerry Wickham of ACEH, free product (or LNAPL) is one of the main obstacles to obtaining case closure. According to a previous subsurface investigation conducted by Golden Gate Tank Removal (GGTR) in 2006, 2 feet of free product was measured in boring SB-2 at the former pump island location. Subsequent boring SB-7 and monitoring well MW-1 by AllWest, located within several feet of SB-2, have not indicated any measurable free product other than sheen and small droplets in groundwater.
- According to the six Regional Water Quality Control Board case closure criteria, free product must be removed for case closure.
- Key Question for ACEH at meeting: If free product were to be eliminated as an issue, would the site then be considered for either closure or monitored natural attenuation instead of active source remediation?

2. Groundwater Contamination

- The TPH concentrations in groundwater samples from borings SB-2 and SB-7 near the pump island were stated as a major impediment to closing the site by ACEH in their 9/17/09 letter and in discussions. However, TPH concentrations in the nearby permanent groundwater monitoring well MW-1 are several orders of magnitude lower (only marginally above RWQCB ESLs), even though this well is located within about 5 feet of the other borings.
- AllWest suspects that the high TPH concentrations in groundwater samples from SB-2 and SB-7 may have been caused by biased Geoprobe sampling techniques, allowing contaminated soil from above to cave into the open borehole when the groundwater samples were collected. More precise groundwater sampling techniques, such as the "Hydropunch" method, can reduce or eliminate this problem. A properly constructed monitoring well, like MW-1, also minimizes this problem, which may explain the lower TPH concentrations in groundwater samples from MW-1.
- Key Question for ACEH at meeting: If followup investigation demonstrated that actual TPH concentrations in groundwater at the SB-2 and SB-7 locations were much lower than historically measured (comparable to those detected in MW-1), would the site be considered for closure or monitored natural attenuation instead of active source remediation?

3. Soil Contamination

- High TPH concentrations were detected in soil samples collected down to the groundwater table in all the borings in the pump island area, including MW-1; however concentrations of the BTEX constituents have been virtually non-detectable.

- The high TPH concentrations in upper unsaturated soil caving into the open boreholes were likely the source of the high TPH concentrations in groundwater samples from SB-2 and SB-7.
- The Mandela site is industrial use, has no permanent occupants or full time workers, and is paved or covered with buildings. Therefore direct contact with contaminated soil is unlikely. Since virtually no volatile TPH constituents such as BTEX have been detected in soil samples, the human health risk from vapor intrusion inhalation is minimal.
- It is AllWest's opinion that if impact of TPH soil contamination to groundwater and human health can be demonstrated as minimal, monitored natural attenuation may be warranted instead of active remediation.

4. Proposed Subsurface Investigation

- Proposal for ACEH: AllWest proposes a limited subsurface investigation in the vicinity of previous borings SB-2 and SB-7 and the former pump island as a reasonable and cost-effective verification of possibly suspect previous data prior to committing to costly remediation activities.
- Scope of Work: We propose advancing additional Geoprobe borings as close as possible to the previous SB-2 and SB-7 locations. We propose 2 adjacent borings at each location: 1 continuous soil core to verify presence of free product in soil, then 1 adjacent Hydropunch boring for undisturbed discrete groundwater sample. The Hydropunch retractable screen point sampler tool will prevent contaminated soil caving from above, and provide a more representative groundwater sample. We will analyze soil and water samples for TPH-g, d & mo, & BTEX by EPA 8015/8260 with silica gel cleanup.
- Further Work: If no free product is present in borings, and groundwater sample analytical TPH results are comparable to those in well MW-1, we will propose conducting a semi-annual groundwater natural attenuation monitoring program with existing wells pending case closure by ACEH. If free product and/or high groundwater TPH concentrations are detected, AllWest will proceed with the FS/CAP for site remediation pending client authorization.