

## **Detterman, Mark, Env. Health**

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**From:** Detterman, Mark, Env. Health  
**Sent:** Monday, June 11, 2018 3:08 PM  
**To:** 'Sam Johnson'  
**Cc:** 'Scott Ballard (Scott.Ballard@INVESCO.com)'; Pamela Andes (pandes@allenmatkins.com); Gayle Marshall; Roe, Dilan, Env. Health  
**Subject:** RE: Request for Access with Former ARCO Service Station No. 11126  
**Attachments:** DIR\_L\_2018-04-05.pdf

Mr. Johnson,

Thank you for your detailed email. I thought I'd start by addressing of your questions.

While the subject site was placed through a public notice some time ago, a more detailed review of data generated at a site is always conducted prior to closure. The internal review by this agency found data that had not been fully addressed while the highest priority portion of the fuel release at the site investigation was investigated (delineation to the southwest and east). This review found that the fuel release, as well as the waste oil UST release, in the NW corner of the site, had not been sufficiently defined north and northwest of the parcel due to multiple flow directions documented at the site (somewhat radial, but not centered on the UST pit).

In regards to your four bullet points:

- The specific contaminants are those released from the fuel system and the waste oil USTs as referenced in the attached directive letter (Technical Comments 1c and potentially 1d). Other contaminants potentially associated with Emeryville will not be included.
- Satisfactory delineation would be defined by adequately declining concentrations; thus my request for flexibility in plume delineation contained in the attached letter (Technical Comment 1b). Generally these are Water Quality Objectives, but considering this is Emeryville, that may not be possible.
- In that the contaminants have not been defined by data from existing bores and due to the proximity to the property line, offsite sampling appears a reasonable next step (as it has been done previously at this site in other areas).
- ACDEH does not require delineation by a specific method, but direct push bores were selected and recommended by the professionals at Arcadis as preferred to groundwater monitoring wells, which generally require a longer period of monitoring. ACDEH recognizes that this methodology may induce turbidity. The method is a bit of a gamble, but may produce acceptable results with cautious sampling.

In regards to a good time to speak, this is the last several weeks of our fiscal year, and there are a number of contract metrics that have us fairly busy. I should include one of my Supervisors (Dilan Roe) in any conversation, and the earliest both of us are available is July 19<sup>th</sup> at 10 – 12am (Pacific time). The following day, July 20<sup>th</sup> at 1 to 5 (for up to a 2 hour spot) is also available. Generally conference calls are about an hour. I have copied her with this email. These times will be occupied by other cases if not claimed quickly.

Should you have any questions, please let me know.

*Mark Detterman  
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Senior Hazardous Materials Specialist  
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PDF Copies of case files can be downloaded at:  
<http://www.acgov.org/aceh/lop/ust.htm>

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**From:** Sam Johnson [mailto:SJohnson@targusassociates.com]  
**Sent:** Monday, June 11, 2018 8:38 AM  
**To:** Detterman, Mark, Env. Health <Mark.Detterman@acgov.org>  
**Cc:** 'Scott Ballard (Scott.Ballard@INVESCO.com)' <Scott.Ballard@INVESCO.com>; Pamela Andes (pandes@allenmatkins.com) <pandes@allenmatkins.com>; Gayle Marshall <GMarshall@targusassociates.com>  
**Subject:** FW: Request for Access with Former ARCO Service Station No. 11126

Mr. Detterman,

My name is Sam Johnson, an environmental consultant. The owner of the property located at 5801 Christie Avenue, Emeryville, CA has asked that I reach out to gain a better understanding of the nature of the requests previously made by Arcadis and your May 24, 2018 letter to the property owner through their manager. The decision-makers have only last week become aware of your May 24<sup>th</sup> letter and though access has not been rejected out of hand, we have received neither a proper access agreement nor a sound technical justification for the necessity of the requested work.

We have reviewed the information provided in the ARCO request, and assessment documents retrieved from Geotracker; we also spoke with Hollis Phillips of Arcadis in an effort to better understand the objectives of and basis for the access request.

It is our understanding that the petroleum release case for the service station at 1700 Powell Street was reviewed and accepted for low threat closure and even completed the public notice and comment period some time back based on considerable prior assessment under County oversight over a period of several years. Mr. Phillips reports that thereafter, the County requested additional delineation for reasons that are unclear to him.

According to Mr. Phillips, Arcadis' workplan was based solely on specific requirements of the agency and was not driven by them or their client. Thus, we would like to request the opportunity to discuss the matter directly with you in hopes of coming to an understanding of your specific objectives and requirements.

The specific questions we seek to understand include, but are not limited to, the following:

1. Which specific constituents are driving the delineation requirement?
2. For each specific constituent, what are the target results that would conclude satisfactory delineation?
3. Is off-site sampling and analysis a specific requirement if the delineation criteria are met on the service station property? If not, what is the basis for the off-site sampling requirement?
4. It seems apparent that elevated concentrations of non-volatile petroleum constituents in groundwater are attributable to turbidity. With that in mind, what is the basis for requiring groundwater sampling by way of direct push probes rather than from properly-constructed monitoring wells?

We ask that you advise us of some dates and times that we can discuss this matter by telephone.

I thank you in advance for your consideration and timely response.

Sincerely,  
Sam Johnson



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