

## Detterman, Mark, Env. Health

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**From:** Detterman, Mark, Env. Health  
**Sent:** Wednesday, July 03, 2013 3:49 PM  
**To:** 'Espino Devine, Catalina'; Lee, Nathan  
**Subject:** LUFT Case No. RO0000143; Chevron 9-0020; 1633 Harrison St, Oakland

Catalina and Nate,

This email is a followup to our July 2<sup>nd</sup> conference call in regards to this site and what has been characterized as a No Further Action Request (NFAR). It was agreed that an NFAR has not been submitted, only a recommendation that the site be reviewed against the Low-Threat Closure Policy (LTCP).

We discussed several areas where ACEH does not believe the site fits the LTCP including:

- The lack of contaminant stability in well MW-17, including TPH concentrations (up to 24,000 ug/l) that exceed concentrations (20,000 ug/l) cited in the LTCP *Technical Justification for Vapor Intrusion Media-Specific Criteria*, as indirect groundwater evidence for LNAPL;
- Delineation of the downgradient and lateral extent of the offsite groundwater plume;
- The potential for vapor intrusion impacts to the Kaiser-Permanente underground parking structure kitty corner (and directly downgradient) of the site and well MW-17. In part this is related to the unknown configuration of the underground structure, extent of any venting, depth of structure, depth of excavation (or extent of soil removal) of the KP facility upon redevelopment, etc. CRA notes that the KP facility was a former service station; however, has not provided data or justification to link downgradient groundwater concentrations to the former service station at the KP garage site.

As discussed, ACEH is required to review all sites against the LTCP by August 17<sup>th</sup>, but Chevron and CRA will discuss the site and may make a decision to submit a LTCP evaluation that may be useful for ACEH's LTCP site review. If Chevron decides to not submit a formal RFC, please provide additional data to address the items discussed above that may support a closure request, by August 2, 2013. This is expected to assist in ACEH's LTCP decision making process. Thank you,

*Mark Detterman*  
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*<http://www.acgov.org/aceh/lop/ust.htm>*