

Wickham, Jerry, Env. Health

From: Dennis Parfitt [dparfitt@waterboards.ca.gov]
Sent: Tuesday, April 21, 2009 9:54 AM
To: Firth, Daniel, Env. Health; David Dement; Mary Schroeder; Tracy Roshangah; Cherie McCaulou; George Lockwood
Cc: Drogos, Donna, Env. Health; Wickham, Jerry, Env. Health; Kevin Graves
Subject: RE: 300 Hegenberger Road, Oakland, April 15 Meeting with ACEH,SWRCB, RWQCB

I think the meeting went well and all who attended now have a deeper understanding of the reality of the situation.

I think we have a sound site conceptual model: a reducing environment, water and contamination at 4' to 6' bgs discharges to the atmosphere (ET), and residual NAPL from the 20+ year old release is highly weathered.

Given that the area of the release will likely be under landscaping and/or parking lot when the site is developed, vapor intrusion is not a likely scenario and excavation to a landfill doesn't seem cost effective.

To be protective of the public health and safety, all that need be done is to document the lateral extent of contamination in the interval from 4' to 6' bgs and include that document in a risk management plan.

That plan will be fully evaluated by anyone who seriously considers developing the site.

>>> "Firth, Daniel, Env. Health" <Daniel.Firth@acgov.org> 4/20/2009
1:28 PM >>>
Hi all,

Thank you, David, for preparing these summary comments. I would also like to thank all that attended. We appreciated the participation of Dennis from the State Water Resources Board and Cherie from the Regional Board. It was educational, at least for me, to have the three agencies present to discuss their perspective. Tracy and Mary, thank you for joining us as well.

I'd like to suggest one minor change to David's notes. I believe that we discussed several options regarding the order and extent of soil removal and a soil vapor survey and that the consensus was that David and his clients would evaluate and propose the approach they felt best suited their needs and addressed the concerns expressed by the agency representatives at the meeting. We did not set a date for a submittal but I assume that will be worked out between David, his clients, and Jerry.

Please direct questions and submittals to Jerry. Donna is our Local Oversight Program Manager so she can assist you if Jerry is unavailable.

You can also contact me but I will defer to Jerry and Donna for any case specific technical issues.

Thank you again,

Dan

Dan Firth
Chief, Environmental Health
Alameda County Environmental Health

510-567-6746

-----Original Message-----

From: David Dement [mailto:ddement@erscorp.us]

Sent: Monday, April 20, 2009 12:41 PM

To: George Lockwood; Drogos, Donna, Env. Health; Dennis Parfitt

Cc: Tracy Roshangah; Mary Schroeder; Kevin Graves; Cherie McCaulou; Wickham, Jerry, Env. Health; Firth, Daniel, Env. Health

Subject: RE: 300 Hegenberger Road, Oakland, April 15 Meeting with ACEH, SWRCB, RWQCB

Hello,

Following are notes, observations, and the primary action items discussed in a meeting conducted with Alameda County Environmental Health (ACEH), State Water Resources Control Board (SWRCB), the Regional Water Quality Control Board (RWQCB), McMorgan & Company, and Environmental Risk Services

(ERS) regarding the LUST site at 300 Hegenberger Road, Oakland. These items are not intended to be inclusive of everything discussed at the meeting; rather, briefly summarize the main issues and introduce the mostly likely path moving forward to address regulatory concerns.

Attendees were:

Mary Schroeder and Tracy Roshangah (McMorgan & Company), Dennis Parfitt (SWRCB), Cherie McCaulou (RWQCB), Dan Firth, Donna Drogos, and Jerry Wickham (ACEH), Dave DeMent (ERS), & a representative of CB Richard Ellis (Real Estate Broker).

A large portion of the meeting summarized past investigation efforts, the general quality and accuracy of grab groundwater and monitoring well sample analytical results, and ACEH concerns summarized in its March 11, 2008 comment letter. ACEH was particularly concerned with potential soil vapor impacts and repeated its request that potential vapor intrusion be evaluated before remedial soil excavation is performed.

Dennis Parfitt summed up much of the discussion with these bullet items:

- * Abandon the existing groundwater (GW) monitoring wells;
- * Soil Vapor Survey;
- * Preferential Pathway Investigation/Evaluation; and
- * GW confirmation.

Bullet Item 1 - Wells. Most of the monitoring wells appear to have been

constructed improperly. GW is confined and rises to 2-4 feet below ground surface (bgs), wells MW-2,3,4,5 are screened to 5 feet bgs, and reported TPHg and BTEX in the wells fluctuate dramatically. Well MW-6 is screened from 10-20 feet bgs and does not report fluctuating concentrations, and in fact, reports very low to non-detect levels, and offsite wells MW-7 and

MW-8 reported very low to non-detectable concentrations of TPHg and BTEX. The general concensus was that data from wells MW-2 through MW-5 is suspect at quantifying actual impacts in groundwater.

Bullet Item 2 - Soil Vapor Survey. In its comment letter, ACEH requested that the potential for vapor intrusion be evaluated. In the meeting, ACEH asked that potential impacts in soil gas be evaluated prior to remedial soil excavation in the event other impacted soil existed that warranted removal.

Limitations of collecting and evaluating soil gas data were discussed.

Bullet Item 3 - Preferential Pathways. ACEH requested that potential preferential pathways be evaluated and/or investigated.

Bullet Item 4 - GW confirmation. No consensus. Generally, GW has not been significantly impacted and SWRCB and RWQCB did not have concerns.

Historical

GW monitoring data from wells MW-6 through MW-8 supports the conclusion that petroleum hydrocarbon impacts are primarily confined in fine grain soils from 6-10 feet bgs in the area of the former USTs and 2-6 feet bgs in the area of the former dispensers.

ERS will prepare a Work Plan to address bullet items 1-4 and obtain additional data based on identified concerns. The goal of additional investigation will be to fill apparent "data gaps" prior to remedial soil removal to help ensure cost effective remediation / investigation leading to commercial closure. The Work Plan will incorporate issues discussed in the April 15 meeting.

David DeMent, PG, REA II
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