

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Friday, January 24, 2014 10:43 AM
To: MacLeod, Carryl G; 'Flora, Travis'; Fischer, Alexis N
Cc: Roe, Dilan, Env. Health
Subject: Meeting Followup: RO233 / Chevron 94612; 3616 San Leandro Street, Oakland, CA
Attachments: Attachment_1_and_ftpUploadInstructions_2013_09-17.pdf; Attachment A Preferential Pathway and Sensitive Receptor Survey.pdf; Attachment B Site Conceptual Model.pdf

Carryl and Travis,

This email is in followup to our meeting of January 21, 2014, to discuss the subject site and the strategy for addressing data gaps under the Low-Threat Closure Policy. A summary of the main points of our discussion is provided below for incorporation into the focused Site Conceptual Model (SCM) and Data Gap Work Plan that was discussed at the meeting, and is requested below. Items discussed include, but were not limited to the following.

TECHNICAL COMMENTS

- 1. Groundwater Plume Delineation** - The following data gaps were included in the discussion. Additional data gaps may be noted in your case review.
 - a.** Downgradient well VH-1 is consistently submerged and does not define the downgradient extent of the groundwater plume at this location.
 - b.** Geotechnical soil bores B-1 to B-3 each contain notes of a strong gasoline odor at total depth, (approximately 20 feet below grade surface [bgs]), and not in overlaying soils and thus appear to indicate a potential residual source at depth and that the vertical of soil and groundwater contamination extent has not been defined.
 - c.** Downgradient soil bores HA-1 to HA-3, installed to a depth of 9 feet bgs, do not appear to define the downgradient vertical extent of the soil and groundwater plumes.
 - d.** Analytical analysis for EDB and EDC do not appear to have been collected at the site in soil or groundwater. The age of the release suggests these contaminants should be evaluated.
 - e.** The potential for preference pathways (utilities, flow line vs. trench total depth determinations) and vicinity water supply wells (using both DWR and ACPWA data sources) to affect the dissolved phase groundwater plume has not been sufficiently evaluated. Please see Attachment A (Preferential Pathway and Sensitive Receptor Survey) for the requisite detail for these items.
 - f.** The potential for other sensitive receptors (basements, crawl spaces, dewatering sump pumps, etc.) to be present in the downgradient direction has not been evaluated.
 - g.** Existing rose diagrams do not capture the full range of hydrologic flow directions and should be updated to allow an understanding of plume dimensions and delineation.

- 2. Data Gap Investigation Work Plan and Focused Site Conceptual Model** – As discussed in the meeting, please prepare Data Gap Investigation Work Plan to address the discussion points of our recent meeting as listed above, and any other data gaps that you have noted in your reviews. Please support the scope of work in the Data Gap Investigation Work Plan with a focused SCM and Data Quality Objectives (DQOs) that relate the data collection to each LTCP criteria. For example please clarify which scenario within each Media-Specific Criteria a sampling strategy is intended to apply to.

In order to expedite review, ACEH requests the focused SCM be presented in a tabular format that highlights the major SCM elements and associated data gaps, which need to be addressed to progress the site to case closure under the LTCP. Please see Attachment B “Site Conceptual Model Requisite Elements”. Please sequence activities in the proposed revised data gap investigation scope of work to enable efficient data collection in the fewest mobilizations possible.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below, according to the following schedule:

- **February 28, 2014** – Site Conceptual Model and Data Gap Work Plan
File to be named RO233_SCM_WP_R_yyyy-mm-dd

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

I believe this captures the principal points of our discussions, if not all. If you believe I have left something off, please let me know.

Otherwise, should you have questions, please let me know.

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PDF copies of case files can be downloaded at:

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