

Wickham, Jerry, Env. Health

From: Wickham, Jerry, Env. Health
Sent: Tuesday, November 30, 2010 6:26 PM
To: 'Foss, Bob (Robert)'; lgriffin@oaklandnet.com
Cc: Drogos, Donna, Env. Health; Mark Borsuk
Subject: RE: ACEH Correspondence for RO266

Bob:

The May 6, 2010 Sensitive Receptor Survey Report prepared by CRA included the following section entitled, "Conduit Study:"

4.4 CONDUIT STUDY

Depth to water, as measured in site wells, has historically ranged between approximately 18.5 and 22.5 feet below grade (fbg). Groundwater averages approximately 19-20 fbg. No identified utility conduits exist at those depths in the area. Therefore, no preferential groundwater migration pathways exist and no utilities have been identified that could be subject to hydrocarbon vapor accumulations in the vicinity of the subject site, either.

Our directive letters provide a general description of the proposed work but typically do not itemize the scope of work presented in the plan. Therefore, under normal circumstances, revision of the November 22, 2010 directive letter would not be necessary. However, after reviewing your message and the Work Plan again, I will revise the November 22, 2010 directive letter to include a technical comment on the proposed conduit survey. The comment will indicate that conducting a limited conduit survey in the area of the former USTs and well MW-2 is acceptable. A larger conduit survey along Harrison and 15th Streets does not appear to be warranted. You can expect a revised letter by the end of the week.

With regard to the light non-aqueous phase liquid (LNAPL) observed in well MW-2, it is not all that unusual for fuel from older releases to be described as "unmodified or weakly modified," depending upon the site-specific conditions. We do not agree that the LANPL must be from another source.

Regards,
Jerry Wickham
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From: Foss, Bob (Robert) [<mailto:bfoss@croworld.com>]
Sent: Tuesday, November 23, 2010 3:34 PM
To: Wickham, Jerry, Env. Health; lgriffin@oaklandnet.com
Cc: Drogos, Donna, Env. Health; Mark Borsuk
Subject: RE: ACEH Correspondence for RO266

Jerry:

We received your November 22, 2010 letter in reference to proposed work associated with 1432 Harrison Street in Oakland (RO0000266). While we are pleased to receive your approval for the proposed scope of work, it appears incomplete. The second to last sentence of the first paragraph reads, "The Work Plan proposes soil, groundwater, and

soil vapor sampling from several soil borings along Harrison Street.” In addition to that scope we also proposed to conduct a comprehensive conduit study of the area. In a review of our files and an overview of Geotracker, I have not seen any reference to a previous conduit study. The second paragraph says, “The Work Plan is generally acceptable and may be implemented as proposed.”

Our client’s site is in the CA USTCF as a category B site. As I am sure you are aware, all RPs are concerned about reimbursement for expenses they incur for investigation and remediation of their UST sites. As such, I am asking you to revise your approval letter to include a reference to the proposed conduit study to insure that the Fund will view this work as reimbursable.

This seems very logical to us since “free product” observed in well MW-2 was fingerprinted by the lab as “unmodified or weakly modified gasoline.” We believe that there must be some other source of “fresh gasoline” for what is observed in MW-2. Due to the sparging technology used from 2003 to 2005 and the length of time it has been since gasoline sales/storage occurred at the site, it seems very unlikely that the occurrence of “fresh” gasoline in MW-2 some 18-22 years after the fact is a result of the former USTs at 1432 Harrison.

Please provide a revision to your November 22, 2010 letter that includes a reference to your approval of the proposed conduit study. Thank you in advance for your attention to this matter.

Bob Foss

Robert C. Foss, P.G.
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From: dehloptoxic, Env. Health [<mailto:deh.loptoxic@acgov.org>]
Sent: Tuesday, November 23, 2010 11:28 AM
To: 'lgriffin@oaklandnet.com'; Foss, Bob (Robert)
Cc: Drogos, Donna, Env. Health
Subject: ACEH Correspondence for RO266

Dear Interested Parties,

Attached is Alameda County Environmental Health’s (ACEH) correspondence for your case, RO0000266.

Please add our e-mail address to your address book to prevent future e-mails from being filtered as spam.

Sincerely,

ACEH