Jakub, Barbara, Env. Health

From: Jakub, Barbara, Env. Health
Sent: Tuesday, August 30, 2011 10:12 AM
To: 'Pat Hoban'
Subject: RE: ACEH LOP #: RO-0000271 - Data Gap Workplan for 3055 35th Avenue, Oakland

Pat,
I began review of the work plan and have had some preliminary discussions with my boss for this site. I think I will be able to get a letter out long before we can schedule a meeting so plan on seeing a directive letter in the near future.

From: Pat Hoban [mailto:pat@weber-hayes.com]
Sent: Tuesday, August 30, 2011 9:56 AM
To: Jakub, Barbara, Env. Health
Subject: ACEH LOP #: RO-0000271 - Data Gap Workplan for 3055 35th Avenue, Oakland

Ms. Barbara Jakub
Alameda County Health Care Services Agency
Department of Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Subject: **Request for Authorization to Complete a *Data Gap Workplan* (needed for State Fund reimbursement)**

Site Location: **Former Exxon Station, 3055 35th Avenue, Oakland**
ACEH LOP #: RO-0000271; GeoTracker #: T0600100538

Hello Barbara,

We are coming up on the dry-season, semi-annual monitoring event (sampled last year on Sept 10th), and wanted to check in with you regarding the recommendations presented in the two previous reports for the site *(Updated Site Conceptual Model – Fuel Release Investigation,* dated June 24, 2011, and the *First 2011 Semi-annual GW Monitoring Report,* May 2, 2011).

As we briefly discussed previously, our goal, with your approval, is to expedite the next phase of work before the winter rains so that we can fill in remaining data gaps and lay the groundwork for a potential remedial action this spring. Once these data gaps are closed, we believe a *Corrective Action Plan* can be constructed that more effectively assesses the site-specific feasibility of a short list of remedial alternatives.

Our client has expressed his desire that we push to complete remaining assessment and move onto a second attempt at remediating residual source fuel leak contamination beneath the subject site. **If it would be OK with you, we would like to set up a brief meeting with you, to discuss goals, plans and intentions behind the proposed work.** We can provide a simple PowerPoint overview of the work completed so far, and the subsurface data gaps we believe need to be closed before moving onto the next stage of remediation. We could have an interactive discussion that would help us incorporated ACEH concerns as well.

All the best,
Pat

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Pat Hoban, PG

Senior Geologist

Weber, Hayes & Associates
120 Westgate Drive, Watsonville, CA 95076
(831) 722-3580

For your reference: Recent recommendations include:

Submit a Data Gap Workplan: Given the strong evidence of a secondary, contributing source of gasoline contamination, we recommend submitting a Workplan for Delineation of a Potential Upgradient, Off-site Source. In addition, we believe the proposed mobilization should include the coring of a few extra on-site borings to assess whether residual gasoline mass resides beneath untested source locations (i.e., shallow soils beneath dispensers/piping runs and dispensers, and beneath the former UST tank pit). Only 2 post-remediaton borings were collected on-site (2008) and those 2 borings did not address likely on-site "hot-spot" areas. All remaining on-site soil data is over 17 years old data *This data will assist in choosing the appropriate remedial alternative for the Site cleanup.*

Reduce Groundwater Sampling to Annual Monitoring: Given that there is an extremely long groundwater monitoring record at this site (over 66 monitoring events over a 17 year span) and relatively stable trends of seasonal fluctuations in plume concentrations, we recommend conserving remaining funding for this project by transitioning the Monitoring and Reporting Program from semi-annual to annual.

- In addition, the most recent *Semi-Annual Report* (Conestoga-Rovers & Associates, dated May 5, 2011, copy attached), recommended eliminating the EPA 8260 fuel oxygenate/lead scavenger analysis). Their rationale is in the attached report.