

3/20/95 spoke w/R. Pilat: re mtg. Total site recharge rate is 0.1 gpm. 2 gpm is minimum pumping rate, 7 gpm is max pump rate. Estimated HC mass is 27 gal. Overall concern that Fund won't reimburse them bec equipmt not effective. Told him to call C. Stevens of the Fund. SAVE not operating in Feb. He thinks it has not been operating since 12/94. Ask JR. Kevin Kolacky is engineer w/RSI who operates the system (O&M).

5/9/95 mess fm R. Pilat: he wants to schedule a mtg

Reviewed 3/3/95 QR by RSI. It was received here on 3/22/95. GW sampled on 2/8/95 flowed SW at 0.057 ft/ft. HC concs increased in RS1, 2, and 4, and slightly decreased in UG well RS3 since last Q. GWes increased between 0.07ft and 5.01ft this Q. **There sure is a lot of benzene in RS2, and the ratio of benzene to TPH has historically been high in this well.**

Spoke w/Rick Pilat: JR shied away from NAA, bec he thought they could do better than putting it into a 5-yr loop and then the Agency might require more work. They just want NFA. We'll see: mtg for 5/18 9:30 am. He DOES realize that the soil levels left in place are > their own proposed cleanup levels (pg 2-8 and 2-9).

Let's compare the concs left in place w/ASTM screening levels: soil: 3,300 ppm TPHg cannot be compared. 6.2 ppm benzene at 10'bgs via "soil-vapor intrusion fm soil to bldgs" pathway for commercial/industrial is >0.0169ppm for cancer risk of 1 x 10 to the 6th. **Looks like this is a problem.** GW: in our most recent sampling event: highest hit of benzene is 228 ppb, which is < 256 ppb ("gw-vapor intrusion fm gw to bldgs" pathway for commercial/industrial). **This is no problem for the most recent sampling event.** But is this the right value to use w/ASTM?

*NO -
need to use
CST slope
factor*

5/18/95 mtg w/John Rutherford, Rick Pilat, and Kevin Graves (and JE): JR: USTs are original. Lines were replaced. Soil was excavated. Primarily clays. RP: we want to do long term monitoring only, no SVE. KG: ok, just include MTBE w/BTEX analysis. If concs increase again, maybe do bio (air injection or socks w/magnesium which oxidize water). Well see.

6/5/95 spoke w/C. Gordon: She had them out of compliance bec she never saw the CAP or 3/95 QR during her April file review. Shell put them back in compliance and will fax ltr to me. LOC not before 7/15. Theyll get LOC this yr. They claimed \$100K in 1992.

3/8/95

Reviewed 2/3/95 "Corrective Action Plan" by RSI. **Their recommendation is for no further corrective action.** So it should be called a **"no further corrective action plan."** They did a **qualitative risk assessment.** This includes the need for **deed notifications** (pg 2-7). *don't work.*

They came up w/**cleanup levels** based on protection of worker's health, and assuming continued commercial/industrial land use (pg 2-8). . . **for soil:** 1,000 ppm TPHg (C4 to C12), 0.1 ppm benzene, 10 ppm toluene, 68 ppm ethylbenzene, and 175 ppm xylenes. . . and **for gw:** 10 ppb benzene, 1,500 ppb toluene, 7,000 ppb ethylbenzene, and 17,500 ppb xylenes (BTEX is 10X the MCLs) (**what about TPHg?**). *←*

They did a **Feasibility Study** (page 3-1) for 6 options: no action, containment, insitu treatment, soil excavation, exsitu treatment, and disposal. They factored in "cost effectiveness," and came up with No Action. They conclude on page 4-1 that the SAVE system should be removed, and gw continue to be sampled for a "reasonable period."

Questions: 1) Fig 6: concs? COCs? *soil*
2) Have they estimated the HC Mass?
3) What are the highest soil hits left in place? see Table 1, which includes excavation results and also SB results: **looks like highest hits left in place were 3,300 ppm TPhg, and 6.2 ppm benzene, both at 10' bgs** *These concs exceed their own proposed cleanup levels*
*** (compare these hits w/Fig 6)
4) Did they shut off SAVE system? or has it been running since 12/94? see TABLE 4 What about the period from 3/92 to 1/94? There's no data in Table 4
5) did they do QS in 2/95?
6) Note the "soil screening levels" in App C are from the Los Angeles RWQCB. Why didn't they use ASTM (nationwide) standards? They probably were not aware of these standards. See pg 2-8

left mess Rick Pilat

3/15/95 **Phoned Rick Pilat:** They wanted to comply w/23CCR. 4) he doesn't know. Kevin Kolacki is their new SAVE person; he knows about the operation of the system. . . . They did another QS in Feb, but I have not received the report. Maybe this report will answer some of my questions. Concs went way up that Q. There may be contam in the smear zone. 2) they **could** do it . . . he'll check into the QR and get back to me.

Site Summary STID 851
Desert Petroleum
2844 Mountain Blvd.
Oakland Ca 94602

continued. . .

12/14/94 Reviewed 6/3/94 QR by RSI. GW sampled 5/23/94 flowed SW, towards Mountain Blvd. Up to 120,000 ppb TPH (RS-2 big increase) and 3,300 ppb benzene (decrease in RS-2). Don't understand if GWE increased or decreased (Table 1).

Reviewed 9/9/94 QR by RSI. GW sampled on 8/25/94 flowed generally towards Mountain Blvd (see Fig 3). **Strangely, GWE decreased by 15.71' in RS-2 (see Table 1).** The concs in RS-2 correspondingly decreased dramatically (only 510 ppb TPHg and 7 ppb benzene).

Phoned Rick Pilat of RSI. left mess.

returned mess to Laura Degnon of Signa Co. (818) 712-6339.

12/15/94 spoke w/H. Davis of RSI. The current QR is going out to me 12/16. Rick out til Jan (in Ecuador). Does the SAVE system also extract gw? If so, when did it restart? which wells?

1/3/95 Spoke w/Rick Pilat of RSI: SAVE unit has been working fine. Some problems on equipment, maybe down for a week, but is ok. Decrease in RS2 due to what?? Recharge rate is very low, and gw may be perched. Not a lot of water there to begin with. But GWE decreased by about 16'!

Reviewed 12/16/94 QR by RSI. Gw sampled 11/20/94 flowed W-NW, generally towards Mountain Blvd. Up to 620 ppb TPH-g and up to 6.6 ppb benzene (RS2). GWE in RS2 increased by approx 12' this quarter. "The steep gradient suggests influence by SAVE, pumping fm extraction wells RS1 and RS2." "SAVE was restarted in 2/94 for vapor extraction; gw extraction resumed in 5/94.

1/13/95 Reviewed 1/3/95 ltr fm RSI. Attributes the anomalous GWEs in RS1 and RS2 in 8/94 to the fact that the treatment system had not been shut down long enough for gw to recharge to its normal static level before GWE measurements were made. Future GWE measurements will be made after system is shut down to allow recharge.