

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Wednesday, May 26, 2010 12:52 PM
To: 'RGMn@pge.com'
Cc: 'apb1@pge.com'; 'BCook@dtsc.ca.gov'; 'ktoth@dtsc.ca.gov'; Drogos, Donna, Env. Health
Subject: FW: PG&E, Emeryville Repair Facility, NOV (RO286)
Attachments: D Drogos letter_draft 4-30 EDN.doc

Hi Ralph,

I wanted to thank you for your letter, received May 6, 2010 and to also respond (a copy of the previous draft is attached). There are two principal issues to resolve. Claiming a site in Geotracker and the potential closure of the case.

First, thanks for claiming the site in Geotracker. This is a state requirement that the lead agency is required to seek. Because the site exists in Geotracker the state requires it to be claimed; it has been a state requirement since mid 2001. It would appear that the submittal of the January 2001 report and the requirement to claim a site in Geotracker may have crossed paths (missed) by a matter of months, but would have been a requirement regardless of the site status at that time. The July 2008 request to claim the site was issued to all non-compliant sites in a "broadcast sweep" and was issued to the PRP address of record for the site, as was the NOV in July 2009. NOVs were issued to all sites that remained non-compliant and are considered a record of the site status at that time. Once a site comes into compliance the NOV is not rescinded but is noted to be in compliance. From appearances this site would now be judged to be in compliance.

Secondly, while ACEH has not fully reviewed the case file again, a quick review of the 500-gallon UST at the southern end of the site finds that up to 6,230 mg/Kg of TPH as kerosene was present in UST removal confirmation samples. It is noted that the sample was removed by overexcavation shortly thereafter and additional confirmation sampling indicates non-detectable concentrations were documented. While near tank field soil appears to have been mitigated, ACEH would additionally require investigation of the extent, if any, of TPH in soil and in groundwater. None appears to have been conducted. ACEH does not close sub-areas in a case file and there are two additional areas of investigation (two 5,000-gallon USTs mid parcel, and a tank farm with PCB issues area at the north end of the parcel) included in the ACEH case file (RO0000286). Because of the recently executed VCA includes the entire ACEH case area in the defining map; references the same contaminants (hydrocarbons, PCBs, and other contaminants); and includes the two additional areas of the ACEH case, ACEH judged it most appropriate for the entire case to be handled by the DTSC. As you are aware this was done recently; the ACEH correspondence to DTSC called attention to the 500-gallon UST as it had not been specifically documented in the VCA.

ACEH hopes that this correspondence will help resolve remaining issues with the status of the site. Should you have questions or comments, please contact me.

Best,

Mark Detterman
Hazardous Materials Specialist, PG, CEG
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
Direct: 510.567.6876
Fax: 510.337.9335
Email: mark.detterman@acgov.org

PDF copies of case files can be downloaded at:

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

From: Drogos, Donna, Env. Health
Sent: Tuesday, May 04, 2010 2:19 PM
To: Detterman, Mark, Env. Health
Subject: FW: PG&E, Emeryville Repair Facility, NOV

Donna L. Drogos, PE
Division Chief
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502

510-567-6721
donna.drogos@acgov.org

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From: McCullers, Ralph [mailto:RGMn@PGE.COM]
Sent: Tuesday, May 04, 2010 1:47 PM
To: Drogos, Donna, Env. Health
Subject: PG&E, Emeryville Repair Facility, NOV

Ms. Drogos,

I have attached a letter for you to this e-mail, a hard copy follows via certified mail. I look forward to discussing the issues detailed regarding the Emeryville Repair Facility at your convenience.

Ralph McCullers
Environmental Operations Supervisor
Shared Facilities-Central
415.695.3217 (ofc)
415.613.1542 (cell)