

Detterman, Mark, Env. Health

From: Trevor Hartwell [thartwell@stratusinc.net]
Sent: Wednesday, November 13, 2013 11:38 AM
To: Detterman, Mark, Env. Health
Cc: Roe, Dilan, Env. Health
Subject: German Autocraft, 301 E. 14th St., San Leandro

Good Morning Mark,

We've drafted up a technical memo and before I submit it to you, I wanted to send you a quick summary of what I took away from the meeting to make sure that we're on the same page.

See my notes below:

Stratus Environmental, Inc. (Stratus) has prepared this meeting review letter, on behalf of Mr. Seung Lee, for the German Autocraft Facility (the Site), located at 301 East 14th Street, San Leandro, California. On October 29, 2013, Stratus met with you, Dilan Roe, and Mr. Lee at the Alameda County Environmental Health Services offices in Alameda to discuss a pathway to closure for the German Autocraft Facility. Also present at this meeting was Gowri Kowtha and Tom Price (friend of Mr. Lee). This meeting was prompted by correspondence requesting a Corrective Action Plan/Feasibility Study (CAP/FS) implementation work plan.

During the meeting, implementation of onsite ozone injection was discussed, in accordance with the submitted CAP/FS. Further discussion led to satisfying specific criteria of the Low-Threat Closure Policy (LTCP) and determining which specific criteria was lacking. Discussion led to the Farely domestic well down-gradient from the Site (<1,000 feet) and that the existence of the well changes which LTCP criteria would have to be met in order to close the Site. It was agreed that if the well owner would be willing to have his well destroyed, the site may be eligible for closure under different LTCP criteria, thus eliminating the need for onsite remediation.

If the Farely well were to be destroyed, other criteria would have to be met such as delineating the petroleum hydrocarbon plume in groundwater west-southwest of the Site. It was agreed that soil borings with hydropunch groundwater sampling would be sufficient in helping delineate the plume to the west-southwest. Placing soil borings in between the two adjacent apartment buildings (near former borings ETM-6 and ETM-16) would be prudent. If the Farely well were to be destroyed, additional wells or boring downgradient would be warranted as the Farely well currently provides downgradient delineation of the petroleum hydrocarbon plume in groundwater.

The elevated concentrations of petroleum hydrocarbons in groundwater west-south west of the Site (namely in well MW-2) raised some concern that a second, unknown source may be present. After further evaluation in the meeting, it was agreed upon that variable and historic groundwater flow direction could be responsible for the elevated concentrations in the well MW-2, flowing from the source area towards well MW-2. Pumping from the Farely well may be responsible for groundwater flow variation offsite and hence the shape of the petroleum hydrocarbon plume.

After review of soil analytical data, it was determined that soil samples were never collected from the 0 to 10-foot intervals. Soil samples from this interval are necessary to determine the risk from dermal contact from residual hydrocarbons in soil and determination of the existence of a bioattenuation zone beneath the Site.

Previously submitted soil vapor data collected at the Site (in 2009) indicated elevated concentrations of total petroleum hydrocarbons as gasoline (TPHg) above environmental screening levels (ESLs) in samples collected from soil vapor points SV-1 thru SV-3 and SV-8. Soil vapor sampling point SV-7 also reported elevated concentrations of TPHg. In 2011, Stratus supervised the over-excavation of the former underground storage tank basin. Stratus stated that the soil vapor concentrations are most likely lower due to the removal of the previously impacted soil. As such, Stratus and the ACEHS agreed that a limited soil vapor sampling survey should be conducted to evaluate the effectiveness the over-excavation

and also analyze for naphthalene per the LTCP. It was determined that Stratus should propose which soil vapor point locations should be sampled and provide rationale for the locations. Locations should be centered over the benzene plume to assess the potential risk to indoor air of neighboring properties.

During the over-excavation at the Site, monitoring wells MW-1 and MW-4 were destroyed to accommodate corrective action. Well MW-1 and MW-4 have historically reported elevated concentrations of TPHg and benzene. With the removal of these wells a data gap exists. It was agreed upon at the meeting that a replacement well should be installed directly within the former tank basin to evaluate if elevated concentrations of petroleum hydrocarbons persist in groundwater below the excavation area.

At the end of the meeting, the ACEHS requested that a draft Technical Memo with a focused site conceptual model (SCM) be submitted via email for review. The ACEHS stated that data for the SCM could be tabulated on one table, eliminating the need for superfluous tables unnecessary for the main area of focus.

If this is in line with what we're shooting for, please let me know I'll we'll finalize the Technical Memo and get that out ASAP.

Thanks,

Best Regards,

Trevor Hartwell, P.G.
Stratus Environmental, Inc.
Ph. 530-313-9966
www.stratusinc.net