

From: Roe, Dilan, Env. Health
To: "[Bob Clark - Riddell](#)"
Cc: "ellielange@aol.com"
Subject: RE: ACEH #304 - 7240 Dublin Blvd, Dublin
Date: Wednesday, June 20, 2012 3:05:00 PM

Bob:

I have been reviewing the case files for the subject site and the proposed bioremediation workplan for continued site investigation presented in Pangea's Groundwater Monitoring Report and Bioremediation Workplan – Second Quarter 2011 dated July 19, 2011. In the workplan, Pangea states that the dual phase extraction (DPE) efforts implemented at the site in 2010, apparently contributed to increased and persistent hydrocarbon concentrations in slightly deeper wells MW-3A and MW-6A located further from the source area and near the adjacent sanitary sewer, and proposes to perform low-flow air sparging (AS) as a low-cost remedial alternative.

However, in the evaluation of remedial alternatives presented in the Interim Remediation Report and Corrective Action Plan (CAP) prepared by Pangea and dated December 9, 2008, and approved by ACEH CAP, Pangea concludes that AS is not considered to be a preferred remedial method for this site and could cause lateral migration of contaminants within the thin water-bearing lenses at the site and could also potentially result in increases to indoor air inhalation hazards at building on and adjacent to the site. Therefore, as discussed during our phone conversation this afternoon, in order to facilitate further review and evaluation by Alameda County Environmental Health (ACEH) of the proposed biosparging technique, you will be required to submit an addendum to the CAP to support AS implementation. Additionally, Pangea proposes to augment the biodegradation provided by the biosparging system with a bio-organic catalyst product called NONTOX – TPH Eliminator. Pangea states that they are using this "relatively new and understudied product" at another site, and therefore in order to evaluate the use of the product at the subject site, please include data on the effectiveness of the product in the CAP Addendum.

I will follow this email up with a formal directive letter regarding the submittal of a CAP addendum and associated compliance dates, as well as my technical comments based on my review of recently submitted groundwater monitoring reports and DPE remediation summary reports. Please forward this email to the Responsible Parties, Mr. Hooshang Hadjian and Mr. Mark Inglis (Chevron) and copy me so that I have their addresses in my files for all future correspondence.

Regards,

Dilan Roe, P.E.

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PDF copies of case files can be reviewed/downloaded at:

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

From: Bob Clark-Riddell [mailto:BRiddell@pangeaenv.com]
Sent: Wednesday, May 02, 2012 4:42 PM
To: Roe, Dilan, Env. Health
Cc: Drogos, Donna, Env. Health
Subject: ACEH #304 - 7240 Dublin Blvd, Dublin
Importance: High

Hello Dilan,

I just you a voicemail about the Cleanup Fund budget situation for this site. If you think our previously proposed biosparging work is merited to improve groundwater quality, we have about \$40,000 available until June 30. (Again, that's June 30, less than 60 days away). Next fiscal year's budget may only be \$10,000 for groundwater monitoring.

Please give this consideration very soon! Please call me at your earliest convenience. I have copied Donna to keep her in the loop. Bob

Bob Clark-Riddell, P.E.
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