

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Wednesday, August 28, 2013 5:06 PM
To: 'Hetrick, Eric G'; 'Gilbert, Judy'; 'bbrasher@craworld.com'; 'Wilken, Brandon'
Cc: Roe, Dilan, Env. Health
Subject: Chevron 9-5607 5269 Crow Canyon Rd, Castro Valley, CA (RO350): Conditional Approval of Work Plan

Erik,

Alameda County Environmental Health (ACEH) has reviewed the draft *Work Plan for Soil Vapor Investigation*, dated August 27, 2013 and submitted as a draft work plan by Conestoga-Rovers & Associates (CRA) at the request of ACEH. The work plan was submitted in follow up to a recent meeting regarding the site, and proposed the installation of seven dual completion soil vapor wells. Four were proposed for onsite locations and three were proposed for offsite locations. The onsite wells were proposed to be installed at a depth of 7 and 12 feet below grade surface (bgs), while offsite wells were proposed for installation at 3.5 and 7 feet bgs due to elevation differences. Vapor samples were proposed to be collected in accordance with DTSC guidelines and Chevron soil vapor protocols. At least three disturbed shallow soil samples were proposed for collection in the upper 10 feet of the site (two above five feet, and one below five feet), and at least one disturbed soil sample was proposed to be collected within each screen interval of all soil vapor probes.

Based on ACEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. **Please be aware that the submittal of a revised final work plan, including a professional signature, stamp, and perjury statement is required to incorporate these technical comments.** Should an alternative proposal be considered, the methods should be incorporated into the revised work plan; however, delays will be encountered in obtaining ACEH concurrence prior to the planned September 10 to 12 start date due to schedule conflicts (vacation). ACEH requests expediency in conducting this work as it is being collected to support Monitored Natural Attenuation and as such is a variance from the approved Corrective Action Plan. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Work Plan Clarifications** – The referenced work plan proposes a series of actions with which ACEH is in general agreement of undertaking; however, requests several modifications to the approach. Please submit a report by the date specified below.
 - a. **Soil Sample Selection Protocols** – The work plan proposes to collect and retain for laboratory analysis disturbed soil samples and as such are not appropriate to use to compare to the Direct Contact and Indoor Air Exposure Criteria. Only undisturbed samples are appropriate due to a comparison to volatile (benzene and ethylbenzene) and non-volatile compounds (naphthalene).
 - b. **Soil Vapor Sample Locations** – Due to the limited time available, and in order to address neighborhood concerns at the public meeting that is planned in about one month, it appears warranted to collect sufficient soil and soil vapor analytical data to allay the likely concerns of the residents of the townhomes. Thus it appears appropriate to increase the number of vapor well locations at the townhomes, such that the northern and southern end of the northern building is also sampled for soil and soil vapor. The southern location also addresses elevated vapor samples collected at SV-4 in 1996 (at depth, under earlier pre-DTSC protocols) should it become an issue to the public.
 - c. **Vapor Well Placement** - In conjunction with the placement of the vapor wells, ACEH, CRA, and Chevron also discussed locating utility lines in the neighborhood. This was to address a potential reason for the recent notable upward spike in groundwater concentrations (benzene) at C-9, but is also an important factor for the utility laterals to the townhomes as shallow preferential pathways. Existing sewer lateral data is available in the November 1999 Weiss & Associates report; however, additional utilities were not located (gas, water, etc.), and the offsite vapor wells should be located and documented as located adjacent to these utilities as potential preferential pathways to the townhomes.

- d. Lack of Assessment at the Former Dispenser Locations** - As discussed recently, shallow residual sources such as dispensers have not been investigated previously at the site. Due to the limited time available prior to the planned public meeting, it appears warranted to install similar soil vapor wells and collect soil samples for analytical analysis, to investigate both dispenser locations for Direct Contact and Outdoor Air Exposure in both LTCP depth zones, as well as the potential for Vapor Intrusion at a site that is not an active service station.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below, according to the following schedule:

- **September 27, 2013 – Data Transmittal (tabulated soil and soil vapor analytical, bore and well construction logs, site and vicinity plan, etc.)**
File to be named: RO350_SWI_R_YYYY-mm-dd
- **October 28, 2013 – Soil and Groundwater Investigation**
File to be named: RO350_SWI_R_YYYY-mm-dd

Should you have any questions, please contact me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org. Because I will be out of the office until Wednesday September 4th, please also contact Dilan Roe at (510) 567-6767 or dilan.roe@acgov.org should you have questions in the interim period of time.

cc. Kevin and Julia Hinkley, Kevin Hinkley Service, 5269 Crow Canyon Road, Castro Valley, CA 94552
Geotracker, Electronic File

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PDF copies of case files can be downloaded at:

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