

Wickham, Jerry, Env. Health

From: Christine Noma [CNoma@wendel.com]
Sent: Thursday, January 20, 2011 1:53 PM
To: Wickham, Jerry, Env. Health
Cc: Garrett, John (LDZX); Les Hausrath; Massey, Andrew J., County Counsel; Gallardo, Susan
Subject: 76 Conoco Phillips Service Station: Pleasanton Transportation Corridor

Dear Mr. Wickham,

The County has reviewed the Remedial Action Plan (RAP) for the 76 Conoco Phillips Service Station. The County and Conoco have discussed a few discrepancies in the RAP which Conoco has agreed to revise in the final RAP. The following are the County's technical comments about the RAP and Conoco's response in italics:

Proposed Cleanup Goals:

- There is no cleanup goal for TPH-d (middle distillate), however, the ESLs are the same for TPH-d as for TPH-g. *Conoco has agreed to revise to include a targeted clean up goal for TPH-d which will be the same as that set forth for TPH-g.*
- Delete reference to the 210 ug/L on page 2 table of Targeted Cleanup Goals. *Conoco has agreed that the targeted cleanup goal for TPH-residual fuels for groundwater will be changed to 100 ug/L.*
- The target cleanup goal for naphthalene in soil is 2.8 mg/kg for soil at depths of < 3m and 3.4 mg/kg for soil at depths > 3m. If soil impacted with naphthalene is present in shallower soil, the 2.8 mg/kg level should be specified. *Conoco's consultant will add a shallow soil clean up goal.*
- The target cleanup level for tertiary-butyl alcohol in groundwater should be 12 ug/L, not 120 ug/L as shown. *Conoco's consultant will make that correction.*

Implementation Schedule – The text of the report is geared toward an initial evaluation, and possible remediation program completion, after 1 year. *Conoco's consultant will revise the implementation schedule to reflect a range: "1 to 3 years (with annual system performance reviews)"*

Thank you for your consideration of the County's comments and Conoco's response.

Regards, Chris Noma

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