

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Tuesday, June 19, 2012 10:36 AM
To: 'Steve Carter'
Subject: RE: Olympic station, 1436 Grant Avenue, San Lorenzo)ACEHD Case #RO373)

Steven,

I wanted to followup on our phone conversation just now. As we discussed I think what you've proposed as far as the changing remedial goals that the Low-Threat Policy will induce should be adequate for the FS/CAP for the time being. Things will continue to change and we can tweak goals once things have a bit more clarity. Thanks also for the USTCF funding update.

In regards to your request for an extension, 30 days would be fine. I'll update Geotracker shortly using a July 20 date.

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PDF copies of case files can be downloaded at:

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

From: Steve Carter [<mailto:scarter@stratusinc.net>]
Sent: Thursday, June 14, 2012 2:38 PM
To: Detterman, Mark, Env. Health
Subject: Olympic station, 1436 Grant Avenue, San Lorenzo)ACEHD Case #RO373)

Good afternoon, Mark.

This email is a follow-up to my telephone calls of this afternoon and 6/7/12. I have some questions regarding the FA/CAP that is due for this site on June 15, 2012.

1. Per your letter, we are to include in the FA/CAP cleanup goals that are consistent with the Basin Plan. For this site, that means ESLs. However, after the low-threat policy recently adopted by the SWRCB is approved by OAL and starts to be implemented, the criteria for evaluating remediation effectiveness and site closure may be different. I would like to discuss how we should define the endpoint of remediation efforts in the FA/CAP in light of the low threat criteria.
2. Similarly, the low threat policy says that remedial efforts to address the secondary source (in this case the hydrocarbon mass sorbed to soil in the vadose and saturated zones) should be removed to the extent practicable. The policy expects engineered remedial efforts (in most cases) to take no more than a year, but does

not provide guidance on evaluating when the practicable extent has been reached. I would like to discuss this with you also.

3. I am requesting a 30-day extension of the due date for the FA/CAP. This should give us time to discuss these items, complete the document and process it through our internal QC channels, and get it uploaded to the County website and GeoTracker.
4. The 4/13/12 USTCF proposed budget category for this site was Soil and Water Investigation (SWI). However, when the FY2012/2013 budgets were released on 5/30/12, the site had been assigned to the Site Closure (SC) budget category. This is an obvious error, as it is in conflict with the conclusions of the 5 year review. However, we will need to clear this up before proceeding with work in FY12/13. A letter addressing this issue was sent to the Fund Manger on 6/5/12, but to date we have not had a response from the Fund. While this issue does not affect completion of the FA/CAP, it will affect implementation of the proposed work outlined in the FA/CAP.

Please call to discuss at your convenience.

Stephen J. Carter, P.G.

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