

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Friday, January 22, 2010 9:14 AM
To: 'Kiernan, James'
Subject: RE: RO391 Continued GW Monitoring

Hi James,
Seems reasonable.



*Mark Detterman
Hazardous Materials Specialist, PG, CEG
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PDF copies of case files can be downloaded at:

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

From: Kiernan, James [mailto:jkiernan@croworld.com]
Sent: Friday, January 22, 2010 8:56 AM
To: Detterman, Mark, Env. Health
Subject: RE: RO391 Continued GW Monitoring

Hi Mark,

Yes, it appears the casing of well MW-8L is bent, thus only a grab sample (no purge) was able to be collected during Q2 and the detected TPHd concentration was somewhat elevated. Not sure why they couldn't also collect a grab sample during Q3 but that's another story. In any event, this detection was indeed addressed in the SCM and it was concluded that when looking at the big picture it does not appear to be a significant concern. However, as you mentioned, you still have to review the SCM. Therefore, in the interim, if monitoring must continue an annual frequency would be preferable as we have also presented our case for closure in the SCM. Based on the more recent TPHd data, it appears that fourth quarter is generally when the higher concentrations are observed. Therefore, we would suggest annual monitoring during the fourth quarter. Please let me know if this is acceptable. Thanks.

James

From: Detterman, Mark, Env. Health [mailto:Mark.Detterman@acgov.org]
Sent: Tuesday, January 19, 2010 3:34 PM
To: Kiernan, James
Subject: RE: RO391 Continued GW Monitoring

Hi James,
Thanks for the reminder; yes it does get busy here...

We moved the site from quarterly to semi-annual as a result of Resolution 2009-0042, so there's been a reduction already this year (and granted Chevron moved from no sampling to sampling in 2009). While I have not reviewed the SCM the significant increase in DRO in well MW-8L catches my eye, and there is not an apparent ability to resample the well due

to the obstruction. I would strongly suspect there will be questions as to what's going on there. I don't yet know how you've handled that in the SCM, but I'd suggest some effort to verify the analytical results. At present I would recommend either a semi-annual or annual (using worst quarters as the baseline) in the interim until I can review the site for the "Impediments to Closure" review that needs to be done for Geotracker. And unfortunately that will still be some time out.

Not a perfect solution, but still...hope this helps,

Mark Detterman

Hazardous Materials Specialist, PG, CEG

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From: Kiernan, James [mailto:jkiernan@craworld.com]

Sent: Monday, January 18, 2010 8:52 AM

To: Detterman, Mark, Env. Health

Subject: FW: RO391 Continued GW Monitoring

Hi Mark,

Hadn't heard back from you regarding the e-mail below and know you guys are busy so wanted to send it again. Thanks.

James

From: Kiernan, James

Sent: Wednesday, January 06, 2010 11:29 AM

To: 'Detterman, Mark, Env. Health'

Subject: RO391 Continued GW Monitoring

Hi Mark,

Regarding continued GWM at site RO391 (500 Grand Ave, Oakland), in e-mails dated 9/21/09 (see attached pdf, sorry don't have original) we agreed that the site would be monitored for two consecutive quarters (Q2/Q3) for data inclusion in the recently submitted *SCM and Closure Request* dated 12/14/09, then the frequency would be reduced to semi-annual if continued monitoring was required thereafter. As we have submitted a case closure request, and based on the low concentrations detected and the significant effort and cost required to sample the five wells in Grand Avenue, further monitoring does not appear warranted and it is our opinion that suspension of monitoring at this site while the closure request is being reviewed is appropriate. Could you please let me know if this request is reasonable to ACEH. Thanks.


Sincerely,

James P. Kiernan, P.E.

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