

**From:** [Soo, Kit, Env. Health](#)  
**To:** [Rita Sullins](#)  
**Cc:** [Eric Price](#); [Jenny Weese](#); [Roe, Dilan, Env. Health](#)  
**Subject:** RO394 - Arrow Rentals - 187 N. L St., Livermore - Comments to Report and Low Threat Closure Request  
**Date:** Friday, July 29, 2016 4:05:00 PM

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Dear Mrs. Sullins,

Alameda County Environmental Health (ACEH) staff has reviewed the *First Semi-Annual 2016 Groundwater Monitoring and Remediation Effectiveness Report and Low Threat Closure Request* (the Report), dated June 6, 2016, prepared by Ground Zero Analysis, Inc., associated with the case file for the above referenced site. This report was prepared in response to ACEH's directive dated January 22, 2016.

Based on our review of the case file and Report, we are unable to grant closure for this site under the Low Threat Closure Policy at this time. Our review indicates that there is incomplete data to support site closure due to failure to meet the groundwater specific criteria and vapor intrusion. We would like to meet with your consultant in person to discuss the following items (see bulleted items below) during our planned meeting (August 25, 2016 – 1-3 pm). We will still have you on the conference call at the same time. The intent of the meeting is to gain a better understanding of the data presented by Ground Zero to support the request for closure and to discuss the path to closure.

- Remediation effectiveness, radius of influence and current status of remediation system (on or off).
- Plume delineation in shallow groundwater on the southern boundary.
- Potential vapor intrusion issues on and offsite (to the south of the site).
- Verification soil sampling to confirm remediation of contaminants within the interval of the shallow and upper intermediate groundwater zones to confirm reduction in contaminant mass and support reductions in historic groundwater concentrations that have not been able to be confirmed due to drought conditions and subsequent dry wells.
- TPH-diesel analysis and reason for discontinuance.
- Rebound/verification groundwater sampling program for the intermediate and deep groundwater aquifers after system is shutdown.
- Updated Well Survey – This was requested in ACEH's directive dated January 22, 2016. We did not see this update in the submitted report.

In preparation for the meeting, please also have your consultant prepare and bring the following to the meeting to facilitate data review and discussion:

1. Table 9 – Estimation of Mass Removal Via Soil Vapor Extraction (from June 6, 2016 Report)
  - Add columns for operational period, and total number of days per period. This will provide a better idea of how many days in period for the operation duration.
2. Table 12 – Summary of DPE System Groundwater Extraction Data.
  - Same as above, add operational period and total number of days per period.
  - Indicate system shut down dates in the table.
3. Charts 1 through 6 – Time Concentration Plots for Benzene vs. Time
  - Indicate on the chart when the DPE and AS started and if there were shutdowns more

- than 48 hours.
- Overlay water level hydrographs onto each chart for each well.
  - Expand the Time Concentration Plots to include TPH-g and d.
4. Create Time Concentration charts for the remaining wells at the site and include all items mentioned in item 3.

If you have additional topics that you would like to address, please add them to this list and we can discuss them on August 25, 2016. Thank you.

Best Regards, Kit

**Kit Soo, PG**

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