

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Friday, May 15, 2015 3:25 PM
To: 'Gwen Tellegen'; wlewerenz@aol.com; 'awgeisler@sbcglobal.net'
Cc: Roe, Dilan, Env. Health; Detterman, Mark, Env. Health
Subject: Conference Call Modification of Data Gap Work Plan; Fuel Leak Case No. RO0000398
Chromex, 1400 Park Avenue, Emeryville, CA 94608

Emeryville Properties LLC
c/o Mr. Zachary Wasserman
1111 Broadway
Oakland, CA 94607

Emeryville Properties LLC
c/o Mr. William Lewerenz and Anthony Geisler
3963 Woodside Ct.
Lafayette, CA 94549

(sent via electronic mail to wlewerenz@aol.com and

awgeisler@sbcglobal.net)

Dear Messrs. Wasserman, Lewerenz, and Geisler:

As a result of discussions held in a conference call at 11:00 am this day, ACEH is in partial agreement with changes proposed to the ACEH directive letter dated April 8, 2015 by you and your consultant Ms. Gwen Tellegen of DUDEK. As stated in the meeting, ACEH has since undertaken an additional evaluation of the site and data, and has confirmed that partial modification of the scope of work is reasonable as is detailed below. ACEH has one remaining area of concern as also detailed below.

TECHNICAL COMMENTS

- 1. Soil Bore Installation** - The installation of the three soil bores by hand auger methods is acceptable. As discussed, signs of hydrocarbon contamination are to be targeted and evaluated for laboratory analysis such that multiple soil samples are submitted from the three soil bores in the 0 to 5 and the 5 to 10 foot depth intervals evaluated under the Low Threat Closure Policy (LTCP).
- 2. Southwestern Groundwater Flow Direction** - The February 9, 2015 *Work Plan for Underground Storage Tank Closure*, proposed to collect groundwater samples from groundwater monitoring wells MW-1 and MW-2 should hydrocarbon contamination be discovered in proposed soil bores HA-1 to HA-3. In ACEHs view, wells MW-2 and MW-3 have consistently contained no to trace concentrations of hydrocarbons in each of the groundwater monitoring events conducted at the site and thus it does not appear warranted that additional groundwater samples from these wells is necessary should hydrocarbon contamination be encountered in the proposed bores.
- 3. Northwestern Groundwater Gradient** – As discussed in the April 8, 2015 letter, ACEH remains concerned with a documented unmonitored groundwater gradient direction to the northwest, as generated by use of wells MW-1, MW-2, and MW-3. The unmonitored flow direction appears to bypass well MW-1 and appears to trend towards Temescal Creek. The site vicinity is additionally known for multiple highly permeable granular paleochannels that are associated with former locations of the creek and that act as preferential hydrological conduits. Therefore, it appears appropriate to collect a grab groundwater sample from soil bore HA-1 (that is depicted to the northwest of the former UST excavation on Figure 5 of the referenced work plan), provided signs of hydrocarbon contamination are encountered in soil in the bore. ACEH recognizes that should a grab groundwater sample be necessary, the analytical results may bias high due to the use of a hand auger bore installation method that would result in a higher percentage of suspended solids in the groundwater sample. As discussed, the use of a temporary well screen and sand pack in the soil bore should be considered. Additional methods to reduce the turbidity of the grab groundwater sample may also be appropriate.
- 4. Groundwater Analysis** – Should a groundwater sample be collected from soil bore HA-1, please analyze the sample for chemicals of concern at the site as discussed in the April 8, 2015 letter.

5. **Soil Bore Permits** – Please be aware that soil bores deeper than 3 feet below grade surface (bgs) require that a soil bore permit be obtained from the Alameda County Public Works Agency (ACPWA). This requirement cannot be waived by ACEH.

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 following specified file naming convention and schedule:

- **July 31, 2015** – Site Investigation Report
File to be named: RO398_SWI_R_YYYY-MM-DD

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. If your email address is not listed on the first page of this letter, or in the list of cc's listed below, ACEH is requesting your email address to help expedite communications and to help lower overall costs.

ACEH thanks you for your additional comments in the conference call regarding this case. The resulting discussions have further limited the apparent appropriate scope of work necessary to determine if the case can be closed under the LTCP. Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations and
Electronic Report Upload (ftp) Instructions

cc: Gwen Tellegen, DUDEK, 605 Third Street, Encinitas, CA 92024 (sent via electronic mail to GTellegen@dudek.com)

Dilan Roe, ACEH (sent via electronic mail to dilan.roe@acgov.org)
Mark Detterman, ACEH, (sent via electronic mail to mark.detterman@acgov.org)
Geotracker, Case Electronic File

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PDF copies of case files can be downloaded at:

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