Detterman, Mark, Env. Health

From:	Detterman, Mark, Env. Health
Sent:	Monday, March 10, 2014 3:17 PM
То:	'Allen, Nathan'
Cc:	Roe, Dilan, Env. Health; 'Waite, Brian A'
Subject:	RE: 206145 - Scope of Work to Address Alameda County Environmental Health's Path to Closure Request
Attachments:	DIR_L_2013-09-20.pdf; RO454_CORRES_L_2013-12-23.pdf

Nathan,

Thanks for finding your email; it had escaped my notice earlier.

Please be aware that this email does not contain an approval of the scope of work described, but is intended to be used as a discussion for the submittal of a work plan using standard procedures (signed and stamped work plan with perjury statement).

I've also attached several PDFs as background to this email in order to more effectively communicate past requests.

In regards to the scope of work, we are in general agreement that the four locations appear appropriate to collect analytical data necessary to fill data gaps in the 5 to 10 foot depth interval at the site. However, instead of collecting soil samples at a predetermined 5.5 foot depth as proposed, please select the soil sample based on PID readings, other indications of contamination (positively biased toward the highest).

Additionally, our review of the data indicates it is prudent to collect confirmation soil samples at a depth of 9 feet at existing data points with elevated analytical concentrations (up to 92 mg/kg benzene). This depth will provide a direct comparison of old and new analytical data (new soil analytical may show that concentrations have reduced since the collection of the older data). Without this data, the existing documented concentrations are problematic for site closure.

Also please collect naphthalene and PAH analytical data adjacent to the former waste oil UST to fill the data gaps in this area.

Please present your strategy for collecting this data in the most efficient and cost effective manner possible.

Should you have questions, please let me know.

Mark Detterman Senior Hazardous Materials Specialist, PG, CEG Alameda County Environmental Health 1131 Harbor Bay Parkway Alameda, CA 94502 Direct: 510.567.6876 Fax: 510.337.9335 Email: mark.detterman@acgov.org

PDF copies of case files can be downloaded at:

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

Mark -

Here's the scope of work we sent December $\mathbf{5}^{\text{th}}$ for your consideration / approval - Please advise -

Nathan Allen, P.G.

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From: Allen, Nathan
Sent: Thursday, December 05, 2013 1:12 PM
To: 'Roe, Dilan, Env. Health'; <u>mark.detterman@acgov.org</u>
Cc: 'Waite, Brian A'
Subject: 206145 - Scope of Work to Address Alameda County Environmental Health's Path to Closure Request

Dilan and Mark -

As Brian Waite of Chevron and I discussed with you during our phone conference on September 30, 2013, we are providing this email communication in lieu of a work plan outlining what we agreed to regarding ACEH's request to further assess historic benzene in soil onsite at concentrations above the screening levels for utility worker exposure limits and the residential and commercial/industrial volatilization to outdoor air exposure limits (5 to 10 feet below ground surface [bgs]).

After review of historic soil data, we propose to advance four soil borings in the area southwest of the 2002 remedial overexcavation area shown on the attached figure. The soil borings will be advanced using a 3.5-inch diameter hand auger to 6 fbg. Once the borings have been advanced and soil samples collected, they will be backfilled with Portland cement to approximately 1 fbg and then completed to grade to match the existing surface material.

Soil will be continuously logged using the modified Unified Soil Classification System and will be screened using a photoionization detector (PID). One soil sample from each boring will be collected in a 6-inch long, 2-inch diameter stainless steel sleeve at approximately 5.5 fbg using a slide hammer. Soil samples submitted for analysis will be labeled, entered onto a chain-of-custody form, packed on ice, and sent to Lancaster Laboratories (Lancaster) in Lancaster, Pennsylvania. Soil samples will be analyzed for the following:

- Benzene and Ethylbenzene by EPA Method 8260
- Naphthalene by EPA Method 8270D (detection limit less than 10 milligrams per kilogram)
- PAHs by EPA Method 8270D

Soil cuttings and decontamination water generated during site assessment activities will be stored onsite in labeled U.S. Department of Transportation approved 55-gallon drums pending analysis and proper disposal at a Chevron-approved facility. Upon completion of the above activities, CRA will prepare a site assessment report that will include the following:

- A summary of soil boring activities
- Boring logs
- Tabulated analytical results
- Analytical report and chain-of-custody form
- Waste disposal status
- CRA's conclusions and recommendations

CRA will begin the proposed work upon receipt of ACEH approval of this workscope. CRA will submit a report of findings approximately 60 days following the receipt of all final analytical data.

Please let me know if have any questions. Thank you.

Nathan Allen, P.G.

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