

## Detterman, Mark, Env. Health

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**From:** Detterman, Mark, Env. Health  
**Sent:** Thursday, October 10, 2013 5:28 PM  
**To:** 'msepehr@somaenv.com'  
**Cc:** Roe, Dilan, Env. Health  
**Subject:** Request for Work Plan Addendum; ARCO (Freedom Food and Gas); 15101 Freedom Avenue, San Leandro, CA (RO473)

Messrs. Hosseinyoun, Pazdel, and Khatirine,

Alameda County Environmental Health (ACEH) met today with your consultant Mansour Sepehr and his staff of Soma Environmental Engineering, Inc (SOMA) to discuss the *Updated Site Conceptual Model and Data Gap Work Plan*, dated July 22, 2013. ACEH requested the meeting with the intent to discuss the site, the work plan, and to develop a Path To Closure for the site. This directive email is intended to document the results of the discussions, specifically documenting data gaps that were identified, and to request the work identified in the meeting as appropriate to fill the data gaps.

Based on ACEH staff review of the work plan and our understanding of the proposed revised scope of work discussed in the meeting (as noted below), the proposed modified scope of work is conditionally approved for implementation. ACEH requests that work coordination be initiated; however, prior to the start of field work, ACEH requests the submittal of a revised Figure 13 to document proposed changes to the scope of work, and the submittal of Standard Protocols (SPs) for the additional scope of work (as a work plan addendum). Upon ACEH approval of the work plan addendum, ACEH will request that the proposed work be performed, and the results be sent to us in the report described below.

### TECHNICAL COMMENTS

1. **Work Plan Modifications** - The following data gaps were identified and actions proposed. Prior to final approval of the work, ACEH requests the incorporation of the data into a revised Figure 13, and the submittal of Standard Protocols for the work.
  - a. **Free Product Fingerprinting** - Free Product (FP) has returned to offsite well MW-6. To identify the potential source of the FP, the collection of a sample of the FP for a fingerprint analysis was proposed. This will help inform the SCM for the site.
  - b. **Crawl Space Vapor Sampling** - High benzene groundwater concentrations are located at the southern property line adjacent to the residential neighborhood and a home. To provide an initial determination of the risk of vapor intrusion to the residents, a crawl space vapor sample will be collected at the closest residence in accordance with DTSC protocols. In addition to contaminants of concern (including naphthalene), please collect oxygen, nitrogen, methane, and the tracer gas by appropriate EPA vapor protocols.
  - c. **Groundwater Plume Definition** - The groundwater contaminant plume was identified to be potentially undefined beneath the residential neighborhood to the south of the site. Alternatively the plume may be defined as suggested by limited variances in the groundwater flow direction. To provide verification of plume definition beneath the residential neighborhood to the south, one soil bore will be installed at the residential home immediately to the south of the site. It is understood that access may be problematic; however, the mobilization will be timed to be loosely coincident with the vapor sample collection to minimize the intrusiveness of the proposed work.
  - d. **Groundwater Plume and Source Identification** - The contaminant distribution and source of benzene concentrations in groundwater in upgradient wells MW-2 and MW-6 was identified as unusual. To eliminate the potential that additional onsite or offsite upgradient sources may be present at the site or vicinity two CPT / MIP bores were proposed in 151<sup>st</sup> Street. This may provide separation from known upgradient sites.
  - e. **Additional MPE Event** - Due to the rapid success of recent MPE events, an additional MPE event will be conducted on wells MPE-1, MPE-2, and MW-6 after the collection of the FP for fingerprint analysis. ACEH understands that the MPE event will occur between October 15 and November 15, 2013. Because

ACEH has a copy of SPs for MPE at this site, this action may proceed concurrently with the submittal of the revised Figure 13 and other SPs.

- f. **Residential Well Resampling Event** - Not discussed in the meeting was the collection of one additional groundwater sample from downgradient residential wells. One well has been sampled and yielded concentrations of TBA. ACEH requests that an additional sampling event be conducted for contaminants of concern to verify groundwater contamination trends in these wells.

### **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 specified file naming convention below, according to the following schedule:

- October 31, 2013 – Work Plan Addendum  
File to be named RO373\_WP\_R\_yyyy-mm-dd
- December 20, 2013 – Data Packet (Tabulated soil, groundwater, and vapor analytical data, bore logs, and figures as needed to convey site information)  
File to be named RO373\_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.

Cc Mansour Sepehr, SOMA Environmental Engineering, 6620 Owens Drive, Suite A, Pleasanton, CA 94588 (Sent by E-mail to: [msepehr@somaenv.com](mailto:msepehr@somaenv.com))  
Geotracker, File

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*PDF copies of case files can be downloaded at:*

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