

Nowell, Keith, Env. Health

From: Nowell, Keith, Env. Health
Sent: Thursday, August 03, 2017 3:07 PM
To: 'Gary Aguiar'
Subject: RE: Former C&L Trucking

Gary,

The San Francisco Bay Region, Regional Water Quality Control Board (SFBR-RWQCB) does not utilize silica gel clean up (SGC) when evaluating concentrations of total petroleum hydrocarbons (TPH) as diesel (TPHd) and TPH as motor oil (TPHmo) with the Environmental Screening Levels (ESLs). For consistency, ACDEH follows the SFBR-RWQCB lead when evaluating cases having TPHd and TPHmo concentrations with regard to the ESLs. Therefore, TPHd and TPHmo analyses should be performed without SGC for evaluation of risks to human or ecological receptors.

However, ACDEH acknowledges that useful information may be gathered when comparing TPH concentrations for a sample analyzed both with and without SGC. For example, the SFBR-RWQCB will accept SGC for the purpose of comparison of duplicate samples processed with and without SGC to assess the relative degree of biodegradation. Therefore, our position is that SGC may be used on selected samples for comparison with non-SGC concentrations.

Regards,
Keith

From: Gary Aguiar [mailto:gary@hydroanalysis.com]
Sent: Thursday, August 03, 2017 2:56 PM
To: Nowell, Keith, Env. Health <Keith.Nowell@acgov.org>
Subject: Former C&L Trucking

Re: sampling at former C&L Trucking, 2460 Wood Street, Oakland, CA

Keith:

What is the County policy regarding silica gel cleanup prior to sample analysis for TPH-diesel?

For each sample, Santa Cruz County Health requires analysis for TPH-diesel, both with and without silica gel cleanup.

We have had recent experience with the methodology proving to be beneficial. The diesel results for our site in Watsonville were particularly high without the cleanup and were non-detect with the cleanup. The polar, biogenic compounds that were removed by the silica gel cleanup were most likely related to organic matter present in the low-lying river bottoms upon which the site was located.

It seems like the location of the C&L Trucking site could pose a similar scenario. However, I assume you guys have seen enough of these sites on the Bay Plains to know whether or not silica gel cleanup is worth the trouble.

Thanks for any comments you might have!

Gary Aguiar, P.E.

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