

Nowell, Keith, Env. Health

From: Nowell, Keith, Env. Health
Sent: Wednesday, March 13, 2013 10:50 AM
To: 'Kirk.Larson@waterboards.ca.gov'
Cc: Drogos, Donna, Env. Health
Subject: RE: Claim 2343, 1735 24th Street, Oakland, Pacific Supply
Attachments: CORRES_L_2010-05-12.pdf; USTCF_PHONE_LOG_2012-09-13.pdf; DIR_L_2010-04-29.pdf; USTCF_5YR_CONFIDENTIAL_2012-03-09.pdf

Hello Kirk,

As I mentioned in my recent voice mail messages, there are some correspondences which may not be available to you on Geotracker. Case file review identifies a recurring issue for this site is the practice of performing work but not uploading reports to the Alameda County Environmental Health (ACEH) ftp site or the State Board Geotracker website. I've attached four documents to aid in your evaluation of Claim # 2343, Pacific Supply, 1735 24th Street, Oakland, ACEH # RO514. Please contact me if you have any questions. Note I will be out of the office March 15th and from the 19th through 21st. I will be in the office Monday morning March 18th, and returning on March 22nd.

Case summary of recent events:

April 29, 2010- ACEH requests RP to present a workplan for preferential pathway study and conduct soil vapor survey (**letter included as attachment**).

May 5, 2010- UST Cleanup Fund (CF) 5-year review concurs with ACEH that the RP address preferential pathways and conduct soil vapor survey.

May 12, 2010- ACEH reiterates request for RP to present a workplan for preferential pathway study and conduct soil vapor survey (**letter included as attachment**).

January 26, 2012- UST CF 5-year review reverses May 5, 2012 decision and recommends ACEH consider the case for closure, though no additional work had been performed at the site.

March 9, 2012- ACEH responds to the January 26, 2012- UST CF recommendation, indicating it disagrees with the CF closure consideration as outstanding data gaps have not been addressed (**letter included as attachment**).

September 13, 2012- Conference call between representatives of ACEH and USTCUF (Lisa Babcock, Bob Trommer, Pat Cullen) (**meeting summary included as attachment**). Pacific Supply- RO514 and Claim 2343- was included in the conference call discussion. ACEH outlined it 's position on why it disagrees with the CF position. At the end of this case discussion the CUF said they would review the case file based on the information provided in the phone discussion. My principal objections to closure:

1. The highest TPHg and benzene (5,700 mg/kg and 2.5 mg/kg, respectively) concentrations in soil reported in the most recent SWI (report dated 1/31/2005) were reported adjacent to the office area of the on-site office/warehouse building. No vapor intrusion study has been conducted at the site;
2. Well screens for all on-site groundwater monitoring wells have submerged well screens, with the well screens submerged since the date of their installation - poor data to rely on for decision making;
3. Grab GW sample (2005), recovered at the top of groundwater, contained 23,000 µg/L TPHg and 1,100 µg/L benzene- this sample may be more reflective of GW concentrations than samples from the MWs;
4. Depth to water has been as shallow as 3.7 feet BGS- shallow enough for utility trenches acting as preferential pathway.

September 18, 2012- ACEH is provided a Preferential Pathway Study report (PPS), dated December 20, 2010, performed by Brunsing Associates, Inc. (Brunsing). The PPS did not address any on-site pathways, such as sewer laterals or other utilities. Groundwater at the site has been reported as shallow as 3.37 feet below the ground surface. The PPS concluded that offsite sanitary sewer and storm water sewer trenches do intersect the groundwater table. In the Conclusions and Recommendation section of their report Brunsing acknowledged a data gap with regard to off-site contaminant migration and recommended a monitoring well be installed in 24th Street.

No additional study has been implemented to address this data gap. Until this data gap is addressed we cannot state the contaminant plume is largely limited to the source area, nor can we conclude the plume is stable or decreasing in extent. Until a vapor intrusion study is performed, assessment of indoor air health risks cannot be addressed. ACEH has not requested further work pending the decision of the CUF 5-year review.

Regards,
Keith Nowell

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PDF copies of case files can be reviewed/downloaded at:

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