

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY

DAVID J. KEARS, Agency Director

December 16, 1996

STID 1211

page 1 of 2

Aldo Guidotti  
Estate of Jean Josephine  
1 Bates Blvd., #300  
Orinda CA 94536

ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION (LOP)  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577  
(510) 567-6700  
FAX (510) 337-9335

RE: Pacific Cryogenic, 2311 Magnolia St., Oakland CA 94607

Dear Mr. Guidotti,

Since my last letter to you, dated 8/23/95, I have received the following documents:

- 1) 9/6/95 "Quarterly Groundwater Sampling Report," prepared by Hageman-Aguiar;
- 2) 6/7/96 "Quarterly Groundwater Sampling Report," prepared by Hageman-Aguiar;
- 3) 11/21/96 "Quarterly Groundwater Sampling Report," prepared by Hageman-Aguiar; and
- 4) your letter dated 12/5/96.

Groundwater was reportedly sampled on 8/23/95, 5/8/96 and 11/15/96. This represents the 3rd, 2nd and 4th quarters, respectively. I understand that the 3rd quarter 1995 sampling was already being conducted when I wrote my last letter. As per my last letter, you were requested to sample (all of) the wells in the "spring quarter." Please note that this means the 1st quarter, during the hydrogeologic high cycle, between January 1st and March 31st. To reiterate, **MW1 and MW2 should be sampled annually, in the first quarter. It would be acceptable to reduce the sampling frequency of wells MW3 and MW4 from quarterly to semi-annually (first and third quarters).** It would also be acceptable to reduce the frequency of groundwater elevation (GWE) measurements to semi-annual. Reports may be submitted semi-annually. A copy of my last letter is enclosed for your reference.

The accumulating purge water must be properly disposed. You are requested to periodically check the condition of the drums and to periodically dispose of the purge water. The drums should be in good condition, labeled, and sealed. Disposal documentation must be submitted to this office. This information will be utilized when this case reaches closure.

December 16, 1996  
STID 1211  
page 2 of 2  
Aldo Guidotti

Your request for case closure, dated 12/5/96, has been received. "Residual" soil and groundwater contamination remains onsite. In particular, the pipeline excavation did not remove all the contaminated soil. In addition, ongoing groundwater sampling indicates continued contamination. When residual soil and/or groundwater concentrations remain onsite, the threat to human health and the environment must be evaluated in order to close the case. This could be done quantitatively via a risk evaluation or risk assessment. In the past year, new guidance pertaining to fuel sites has been received from the Regional Water Quality Control Board (RWQCB). For your reference, I have enclosed a copy of the RWQCB's "Supplemental Instructions," dated 1/5/96. This document refers to risk assessments in item #5 under "low risk soils case" section and in the third question on the Fact Sheet.

You basically have two options for proceeding with this case. You may either continue groundwater sampling on the reduced frequency schedule for an undetermined length of time ("long term monitoring"), OR you may submit a risk evaluation. The risk evaluation must be prepared by a professional environmental company, under signature and seal of a P.E., R.G., or C.E.G. This risk assessor should contact me prior to preparing the risk assessment to discuss the parameters. One such parameter is the projected property use. If the property is only zoned for commercial/industrial use, it would be acceptable to use the commercial/industrial scenario, as opposed to the residential scenario. However, in that case, the final closure letter would indicate that if a change in land use is proposed, this agency must be contacted by the property owner. Further risk assessment may be warranted in such a case.

Computer software is available for the ASTM risk assessment, referred to in the RWQCB guidance. Most of the work is in selecting the correct parameters; inputting the data into the software is relatively straightforward. Although this ASTM guidance is fairly new, many environmental consultants now utilize the ASTM software.

If you have any questions, please contact me at 510-567-6700, ext 6761.

Sincerely,



Jennifer Eberle  
Hazardous Materials Specialist

cc: Gary Aguiar, 3732 Mt. Diablo Blvd., suite 372, Lafayette CA 94549  
J. Eberle/file

je.1211-A  
enclosure