

Nowell, Keith, Env. Health

From: Nowell, Keith, Env. Health
Sent: Tuesday, July 26, 2016 4:03 PM
To: Lockwood, George@Waterboards
Cc: 'michael.harris@redhorsecorp.com'; Roe, Dilan, Env. Health
Subject: RE: GMC TRUCK CENTER (T0600101692), 8099 COLISEUM WAY, OAKLAND, ALAMEDA COUNTY - USTCF none

George,

The San Francisco Bay Region, Regional Water Quality Control Board (SFBR-RWQCB) recently released the document entitled *Petroleum Metabolites- Literature Review and Assessment Framework, a Technical Resource Document*, dated June 27, 2016. The document states the Regional Water Board staff will continue requiring evaluation of petroleum metabolites at sites where: 1) significant petroleum contamination is detected; and 2) human or ecological receptors are present. Regarding silica gel clean up (SGC) of samples prior to analysis of total petroleum hydrocarbons (TPH), Regional Water Board staff will consider it only for the purpose of comparison of duplicate samples processed with and without SGC to assess the relative degree of biodegradation.

Alameda County Department of Environmental Health (ACDEH) thinks it appropriate to follow the SFBR-RWQCB guidance with regard to SGC when evaluating concentrations of TPH as diesel (TPHd) and TPH as motor oil (TPHmo) where human or ecological receptors are present in light of the significant concentrations of TPHd and TPHmo documented in the fill material overlying the bay muds.

For consistency, ACDEH recommends following the SFBR-RWQCB lead when evaluating cases having TPHd and TPHmo concentrations, acknowledging that useful information may be gathered when comparing TPH concentrations for a sample analyzed both with and without SGC.

Your feedback is greatly appreciated.

Regards,
Keith Nowell

From: Lockwood, George@Waterboards [mailto:George.Lockwood@waterboards.ca.gov]
Sent: Tuesday, July 26, 2016 8:46 AM
To: Nowell, Keith, Env. Health <Keith.Nowell@acgov.org>; Roe, Dilan, Env. Health <Dilan.Roe@acgov.org>
Cc: Michael Harris <michael.harris@redhorsecorp.com>
Subject: GMC TRUCK CENTER (T0600101692), 8099 COLISEUM WAY, OAKLAND, ALAMEDA COUNTY - USTCF none

Keith, Dilan, I kept thinking about this case and something kept bothering me. I find it difficult and unusual that heavy range TPH would move as far as shown for this case in the soil types we are working in. I think something else might be going on here so, in our review letter agreeing with Alameda we are putting in the letter that future samples must have silica gel cleanup run on them. Being that this site is in the wet lands, marsh, or tidal area I think it is a good likelihood that most of TPH in the soil and groundwater is possibly biological organics (eg polar vs non-polar petroleum) and are related to the wet lands.

If you have questions please let me know.

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State Water Resources Control Board

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