

## Khatri, Paresh, Env. Health

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**From:** David Dement [ddement@erscorp.us]  
**Sent:** Thursday, August 07, 2008 5:12 PM  
**To:** Khatri, Paresh, Env. Health  
**Cc:** Francis Rush; Adam Kaye  
**Subject:** 1549 32nd Street, RO 0002508

Paresh,

This response is in regard to your July 31, 2008 comment letter. I discussed a number of the issues with Mary Rose Cassa at the RWQCB and suggest the following:

Continuously-cored soil borings can be advanced to 20 feet bgs at little extra cost and all 20 feet soil samples will be held pending the analysis of the shallower soil samples;

We would like to justify deeper soil sample analyses using field indications of impact such as odor, apparent soil discoloration, and PID reading, and select 16 feet samples may also be held pending receipt of shallower soil sample analytical results;

Use of ESLs or any other criteria to help evaluate analytical results will be justified, and only the high concentration will be evaluated - please note that sample depth, soil type, and apparent distribution will also used to evaluate sample analytical results; and

We would like to perform the proposed subsurface investigation without waiting to obtain legal access to 2851 Helen Street as we believe subsurface characterization at 2859 Helen Street is more important to understanding potential offsite migration, and results obtained at 2859 Helen can easily be used to infer conditions at 2851 Helen Street located immediately next door.

Soil boring EB5 could be easily located on 2859 Helen Street at the approximate midpoint between the property line and the residence to further characterize subsurface conditions.

I do not concur that soluble lead testing is appropriate or that there is a potential for lead to leach to groundwater.

The high lead concentration of 84.4 mg/kg is still well below the RWQCB ESL of 200 mg/kg (Table A, Residential) and most of the soil brought to the site for backfill contained lower lead concentrations. STCL WET sample analysis will not be performed and is not, in my opinion, a suitable test in this instance to evaluate the potential for lead to leach into groundwater at the site.

We would like to perform the proposed scope of work as soon as feasible with the exception of: 1) Locating EB5 on the property at 2851 Helen Street; and 2) STLC WET soil analysis.

Dave

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