

## Detterman, Mark, Env. Health

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**From:** Detterman, Mark, Env. Health  
**Sent:** Friday, August 17, 2012 4:00 PM  
**To:** 'James Gribi'; Tougeron, Christopher, Env. Health; billbanker@comcast.net; ekirk.marks@earthlink.net; pgriffith@tecacutite.com; gbaldocchi@tecacutite.com  
**Subject:** RE: 3800 San Pablo Avenue Tank Removal Lab Results

Hi Jim,

In March of this year, the state provided guidance that AB 358 (passed last year) requires that all sites with a release (including de minimis quantities) are required to file a URF. As I understand it, this is to standardize procedures across the state as there have been differences in interpretation as to what constitutes a release (1 ppm, 50 ppm, 100 ppm?) and to provide documentation of tank removals for the future (principally it appears to be a record keeping requirement). I understand the reported analytical concentration is less than that, but both odor and discoloration indicated an (old) release. These sites can be closed "quickly" with no, or very limited, investigation, but they need to be reported / recorded, and shown on Geotracker. I would suggest that this UST be wrapped with the ongoing investigation and be closed at the same time as a way to limit actions and to include tank reporting with that (eventual) closure, but am open to other suggestions.

Best,

*Mark Detterman*  
*Senior Hazardous Materials Specialist, PG, CEG*  
*Alameda County Environmental Health*  
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*PDF copies of case files can be downloaded at:*

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

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**From:** James Gribi [mailto:JGribi@gribiassociates.com]  
**Sent:** Friday, August 17, 2012 1:59 PM  
**To:** Tougeron, Christopher, Env. Health; billbanker@comcast.net; ekirk.marks@earthlink.net; pgriffith@tecacutite.com; gbaldocchi@tecacutite.com  
**Cc:** Detterman, Mark, Env. Health  
**Subject:** RE: 3800 San Pablo Avenue Tank Removal Lab Results

Chris

I believe strongly that an URF is not warranted for this site. You were there when we sampled and have seen the results. According to the sidewalk stamp, this UST was installed prior to 1931, so it is not unusual to see visual indications of fuels, but no residual contaminants.

I would like to formally protest the issuance of a URF for this site and ask on what scientifically sound basis you are making your determination. Visual evidence of fuel impacts, without supporting analytical data, does not constitute a scientific (or perhaps legal) basis on which to issue a URF.

I have been involved on literally hundreds of tank removals over the last 23 years and I have never seen a URF issued on the sole basis of field evidence without supporting lab analysis. In this case, there is not even a grey area: the tank is

very old (80 years old), whatever was released in the past has degraded, and what is left no longer constitutes a reportable fuel release.

Again, I wish to protest in the strongest terms the issuance of a URF for this tank and would like to hear about the recent regulatory changes that apparently allow for the issuance of a URF based on anecdotal, and not scientific, evidence.

Thanks  
Jim Gribi, PG



**James E. Gribi, PG**  
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**From:** Tougeron, Christopher, Env. Health [<mailto:Christopher.Tougeron@acgov.org>]  
**Sent:** Friday, August 17, 2012 1:31 PM  
**To:** James Gribi; 'billbanker@comcast.net'; 'ekirk.marks@earthlink.net'; 'pgriffith@tecacutite.com'; 'gbaldocchi@tecacutite.com'  
**Cc:** Detterman, Mark, Env. Health  
**Subject:** RE: 3800 San Pablo Avenue Tank Removal Lab Results

Mr. Gribi,

Alameda County Department Environmental Health (ACDEH) has received and reviewed the submitted laboratory analysis results from soil samples taken during the UST removal.  
Based on the results submitted and in the interest of public safety you are permitted to replace the sidewalk removed during the UST removal with the understanding that future work under the sidewalk may be required.

ACDEH will make a determination, upon submittal of the UST Removal Report, if further sampling or if additional site remediation activities are required.

Based on field observations during the tank removal (soil discoloration and petroleum odor) an Unauthorized Release Form will need to be completed and submitted to ACDEH. This is due to recent regulatory changes.

Please contact me or Mark Detterman if you have any questions.

Thank you

Sincerely,

Chris Tougeron  
Hazardous Materials Specialist  
Alameda County Health Agency

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**From:** James Gribi [<mailto:JGribi@gribiassociates.com>]  
**Sent:** Wednesday, August 15, 2012 5:36 PM  
**To:** Tougeron, Christopher, Env. Health  
**Cc:** Detterman, Mark, Env. Health; Bill Banker; Elaine Kirk; Gino Baldocchi; Peter Griffith  
**Subject:** 3800 San Pablo Avenue Tank Removal Lab Results

Chris

Attached please find the two lab reports for the tank removal at 3800 San Pablo Avenue in Emeryville. One lab report (T121358f) is for the four verification soil samples, and one report (T121356f) is for the composite soil stockpile sample. These results show essentially no hydrocarbon or other impacts in either the verification or stockpile soil samples.

Due to the very real risk to pedestrian traffic, TEC-Accutite already backfilled and compacted the stockpiled soil back into the excavation cavity. Based on the lab results, I assume that a URF will not be filed and no additional investigation will be required. With this in mind, is it okay for them to resurface the sidewalk now?

Thanks  
Jim



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