## Dear Mr. Grayson:

As discussed in our phone conversation this morning I recommend that you have the analytical laboratory include analysis of dissolved metals in the suite of analysis performed on the groundwater samples collected on Wednesday May 2, 2012 by Stratus Environmental from the subject site. This recommendation is based on my review of the dissolved metals concentrations presented in the Pilot Test Report (Status, Feb 2011) and the First Quarter 2011 Quarterly Monitoring and Sampling Report (Stratus, March 2011). In the Pilot Test Report Stratus states that with the exception of Fe, metals concentrations reported in post-injection samples did not show a significant change in concentration from pre-injection levels, and in the First Quarter 2011 Monitoring Report, although the results are tabulated, the dissolved metal concentrations are not discussed at all. The conclusion that the RegenOx injection did not cause an unexpected increase in dissolved metals concentrations is not consistent with the analytical data presented in Table 2 – Groundwater Analytical – Dissolved Metals Summary. Of particular note are the arsenic concentrations detected in samples collected from groundwater monitoring well DW-1 which shows arsenic concentrations increasing from a pre-injection concentration on August 3, 2010 of 9.4 ug/L to 87 ug/L on October 7, 2010, and 41 ug/L in January 13, 2011. Based on a review of subsequent groundwater monitoring reports, it appears that no additional analysis for dissolved metals has been performed to monitor the concentrations of dissolved metals.

Regards,

## Dilan Roe, P.E.

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