

## Khatri, Paresh, Env. Health

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**From:** Khatri, Paresh, Env. Health  
**Sent:** Friday, August 12, 2011 9:45 AM  
**To:** 'Mehrdad Javaher'  
**Cc:** Drogos, Donna, Env. Health; Jim Roessler; bburrowsre@aol.com; GabrielHC8@aol.com; Tiana C. Jenkins; John Park; DWP5334@aol.com; 'Bud Duke'  
**Subject:** RO2863; Crow Canyon Cleaners, 7272 San Ramon Rd., Dublin

Hello Mehرداد,

I am disappointed to read that you think that we are unresponsive. Our June 9, 2011 directive letter requesting a FS/CAP seems quite clear. Your questions regarding the FS/CAP, sent to us in an e-mail on June 27, 2011, were responded to on June 28, 2011. At this point, we are simply waiting for your submittal. Please be assured that I am still your case manager for the site.

In your recent e-mails, you now wish to forego the FS/CAP process and continue the interim remedial action. Your request is not adequately justified and preparation of an FS/CAP is required and was due by August 8, 2011.

Let me remind you that after performing the interim remedial action, you stated that the system successfully cleaned up the site and requested case closure stating that concentrations of PCE in soil vapor are low to non-detect in a meeting at ACEH. ACEH requested that you install sufficient vapor monitoring points across the site to verify system effectiveness. As you must be aware, concentrations of PCE now detected at the site are the highest detected to date. Based on a review of the boring logs, the soil type at the site has been identified as Clayey Silt to Sandy Silty Clay. It is common knowledge (as well as referenced in many EPA guidance documents) that soil vapor extraction has limited success in fine-grained soils. This is evidenced by the soil vapor data collected to date. A reasonable person can understand why ACEH is requesting an FS/CAP to evaluate additional cleanup alternatives as the interim remedial alternative, based on the soil vapor data, appears to have failed in adequately cleaning up the site. Therefore, ACEH cannot simply approve the same cleanup alternative again as it may be waste of valuable time and monetary resources and may not yield the desired results.

Please note that although the site is a shopping plaza, the sensitive land-use (i.e. the Montessori School) precludes ACEH from accepting your commercial land-use scenario cleanup goals and ACEH will evaluate this site to the appropriate residential land-use cleanup scenario.

We will contact you and Mr. Roessler on Thursday, August 18, 2011 @ 9:00 am to discuss your request.

Sincerely,

Paresh C. Khatri  
Sr. Hazardous Materials Specialist  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577

Phone: (510) 777-2478  
Fax: (510) 337-9335

E-mail: Paresh.Khatri@acgov.org

<http://www.acgov.org/aceh/index.htm>

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**From:** Mehrdad Javaher [mailto:mehrdad@endpoint-inc.com]  
**Sent:** Thursday, August 11, 2011 5:07 PM  
**To:** Khatri, Paresh, Env. Health  
**Cc:** Drogos, Donna, Env. Health; Jim Roessler; bburrowsre@aol.com; GabrielHC8@aol.com; Tiana C. Jenkins; John Park; DWP5334@aol.com  
**Subject:** Fwd: Re: ACEH Correspondence for RO2863

Paresh-

I'm in receipt of your voicemail from earlier today. Indeed, we do have outstanding questions related to the next steps on the above referenced site; these questions have been voiced in multiple emails and attempted followups (please see the email below sent to you and Donna on July 20th, and then again in an email from the spokesperson for the PRP group attached as a Word file herein).

Kindly review the emails below and attached, which outline the basis for the PRPs request for re-initiating the interim remediation measures which were implemented for only two months (and followed by monitoring per County's request to evaluate potential rebound) in accordance with the County-approved IRAP. As detailed below and attached, given that all but 3 localized onsite wells show PCE vapor concentrations that are below C/I ESLs, we believe that resumption of the approved IRAP provides the most effective and cost-efficient measure targeting the localized area remaining above the ESLs, in lieu of a lengthy CAP process which will likely result in the same alternative being implemented several months down the line. This approach also maximizes protection of occupants of neighboring suites adjacent to the release area.

Please advise as to a desired date and time for me to contact you on this matter, as your voicemail suggests you no longer work on these cases and our past emails have gone largely unanswered.

Thanks in advance  
Mehrdad

----- Original Message -----

**Subject:**Re: ACEH Correspondence for RO2863

**Date:**Wed, 20 Jul 2011 20:56:18 -0700

**From:**Mehrdad Javaher <[mehrdad@endpoint-inc.com](mailto:mehrdad@endpoint-inc.com)>

**To:**Drogos, Donna, Env. Health <[donna.drogos@acgov.org](mailto:donna.drogos@acgov.org)>, Khatri, Paresh, Env. Health <[paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org)>

**CC:**[bburrowsre@aol.com](mailto:bburrowsre@aol.com) <[bburrowsre@aol.com](mailto:bburrowsre@aol.com)>, [jim@roesslerinvestmentgroup.com](mailto:jim@roesslerinvestmentgroup.com) <[jim@roesslerinvestmentgroup.com](mailto:jim@roesslerinvestmentgroup.com)>, [DWRP5334@aol.com](mailto:DWRP5334@aol.com) <[DWRP5334@aol.com](mailto:DWRP5334@aol.com)>, [jpark@gmail.com](mailto:jpark@gmail.com) <[jpark@gmail.com](mailto:jpark@gmail.com)>, [gabrielHC8@aol.com](mailto:gabrielHC8@aol.com) <[gabrielHC8@aol.com](mailto:gabrielHC8@aol.com)>, [tianacjenkins@aol.com](mailto:tianacjenkins@aol.com) <[tianacjenkins@aol.com](mailto:tianacjenkins@aol.com)>

Paresh and Donna-

In support of our discussion referred to by Donna below, please find attached Table 1 showing the PCE vapor concentrations over time, including before, during, and since the limited SVE operations (limited to two months of operation time) implemented as a pilot test. I've included a figure which shows the well locations; both the

table and figure were included in the most recent monitoring report submitted to the County.

The table shows:

-Six wells (VE1S, VE1D, VE2S, VM1S, VM1D, and VM3D) who's concentrations declined from baseline levels during the SVE operations and thereafter, but then rebounded after cessation of the SVE based on the latest available concentration in each well. Note that despite the rebound, the latest concentration in four of these six wells remains below the Commercial Environmental Screening Level (ESL) for protection of indoor air quality.

- Four wells (VE2D, VE3S, VE3D, VM3S, and VM4S) who's concentrations declined as a result of SVE operations without rebound based on available data. The latest data point from each of these wells, including at VM4S which was the primary target of the pilot test (due to proximity to the Montessori School) and which declined from 10,000 ug/m<sup>3</sup> to 1,100 ug/m<sup>3</sup> seventeen months after cessation of the SVE), all remain below the Commercial ESLs.

-Seven wells were newly installed after the SVE operations, so only data post pilot testing was available for these wells. Nevertheless, six of these seven wells (VM5SS, VM6SS, VM2SS, VM7, VM8, and VM10) all recorded concentrations below the ESL. Only one of these wells (VM-9SS) yields a concentration above the ESL.

Based on the above, of the 17 site wells, 14 yield concentrations below ESLs, including 10 that were positively affected by the limited, 2-month long SVE pilot test. The RP's are interested in simply restarting the SVE system (as an interim measure) to take advantage of the summer months to maximize vapor extraction and to further these benefits, particularly targeting the remaining 3 wells above ESLs which are in a localized source area; this alternative provides the most efficient and most timely benefit over the next several months ideal for SVE, including furthering the efforts already started to protect indoor air quality at the adjacent Montessori School.

Please advise as to your availability to discuss.

Thank you in advance for your time.

Regards,  
Mehrdad

On 7/20/2011 5:04 PM, Drogos, Donna, Env. Health wrote:  
Mehrdad,

Please continue to work with Paresh on this site. He is still handling case contamination cases while in his new position however he is only working on these cases and responding during a limited period of time each week, but he will respond to case inquiries. He will be in contact with you re: this e-mail.

Regarding this site, the data indicates that interim cleanup activities were not successful, significant contamination remains and development of a CAP, which is standard process for remediation, is necessary.

Lastly, please include the RPs as cc's when you send e-mails to ACEH regarding contamination cases.

Thank You, Donna

**Donna L. Drogos, P.E.** | Division Chief  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
510-567-6721 | Ext. 36721 | [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org)

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**From:** Mehrdad Javaher [<mailto:mehrdad@endpoint-inc.com>]  
**Sent:** Wednesday, July 20, 2011 4:11 PM  
**To:** Drogos, Donna, Env. Health  
**Subject:** Fwd: Re: ACEH Correspondence for RO2863

Hi Donna-

I apologize in advance for reaching you directly regarding this; however, I've made multiple unsuccessful attempts (including the emails below) to reach Paresh Khatri, the case officer for the above-captioned project, to discuss the following request.

The responsible party group (RP's) for the above-referenced site is requesting your consideration for continuing the interim measures implemented at the above-referenced site under the previous County-approved workplan, in lieu of the CAP requested in the County's recent letter following monitoring activities at the site. In short, soil vapor extraction (SVE) operations were conducted for two months in 2009 as an interim measure under a County-approved workplan; the SVE resulted in significant reductions in source concentrations. However, the system was turned off after only 2 months, with subsequent monitoring over the following 17 months, which has showed rebound in a very localized source area; this monitoring has resulted in the County's request for a formal CAP. Rather than going through a lengthy CAP process, which is likely to recommend further SVE, the RP's are interested in restarting the SVE system already in place and to re-initiate mass removal to help move the site toward closure; such operation would be done in the exact manner as the previous interim measure was conducted, and following the same procedures outlined in the interim measure workplan that the County already approved prior to the initial SVE operation. The RP's feel that this approach will result in significant more progress toward mass removal and site closure over the next 6 months, than would a lengthy CAP process which would conclude in the same remediation but which would be delayed significantly. If necessary, the CAP could be revisited after completion of interim measures.

I would appreciate a chance to discuss the RP's request with you. Can I trouble you for a window of time which you may have to discuss the above?

Thanks  
Mehrdad

Mehrdad Javaherian, Ph.D(c), MPH, PE  
Endpoint Consulting, Inc.  
415-705-8935

----- Original Message -----

**Subject:**Re: ACEH Correspondence for RO2863

**Date:** Fri, 15 Jul 2011 17:04:29 +0000  
**From:** [mehrdad@endpoint-inc.com](mailto:mehrdad@endpoint-inc.com)  
**Reply-To:** [mehrdad@endpoint-inc.com](mailto:mehrdad@endpoint-inc.com)  
**To:** Khatri, Paresh, Env. Health <[paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org)>

Paresh

I did not hear back from you re- the email below. Can you please let me know if we can set up a time for a brief phone call (with you and/or Donna) to discuss the County's requested CAP re- the above-referenced site?

Thanks  
Mehrdad

-----Original Message-----  
To: Khatri, Paresh, Env. Health  
Subject: Re: ACEH Correspondence for R02863  
Sent: Jun 28, 2011 6:07 PM

Hi Paresh

I spoke to the RPs and wanted to get a clarification regarding addressing groundwater in the CAP requested by the County. As you may recall, the investigation and interim remediation efforts at this site have been largely focused on soil vapor (and vapor intrusion impacts). May I have a few minutes of your time tomorrow to discuss? If so, would a particular time be best for you?

Thanks in advance

Mehrdad

-----Original Message-----  
From: Khatri, Paresh, Env. Health  
To: Mehرداد endpoint email  
Subject: RE: ACEH Correspondence for R02863  
Sent: Jun 28, 2011 10:37 AM

Good morning Mehرداد,

ACEH requests that the selected remedial alternative is further discussed with procedures/details for implementation.

Sincerely,

Paresh C. Khatri  
Sr. Hazardous Materials Specialist  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577

Phone: (510) 777-2478  
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E-mail: [Paresh.Khatri@acgov.org](mailto:Paresh.Khatri@acgov.org)

<http://www.acgov.org/aceh/index.htm>

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intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

From: Mehrdad Javaher [<mailto:mehrdad@endpoint-inc.com>] Sent: Monday, June 27, 2011 4:06 PM To: Khatri, Paresh, Env. Health Subject: Fwd: ACEH Correspondence for R02863

Hi Paresh- A quick clarification on the CAP/FS that the County has requested. Do you look for an implementation section in the CAP which outlines the details/procedures to be followed for implementing the preferred remedial alternative selected through the CAP/FS, or do you want the CAP/FS to stop at evaluating the remedial alternatives and selecting the preferred alternative? I assume the former based on what DTSC and RWQCB requires, but I want to make sure that is the same for the County. Thanks Mehrdad ----- Original Message -----

Subject:

ACEH Correspondence for R02863

Date:

Fri, 10 Jun 2011 08:50:33 -0700

From:

dehloptoxic, Env. Health <[deh.loptoxic@acgov.org](mailto:deh.loptoxic@acgov.org)>

To:

'Mehrdad Javaher' <[mehrdad@endpoint-inc.com](mailto:mehrdad@endpoint-inc.com)>, "'BDuke@dtsc.ca.gov'" <[BDuke@dtsc.ca.gov](mailto:BDuke@dtsc.ca.gov)>, "Dizon, Cherylanne, Zone 7" <[cdizon@zone7water.com](mailto:cdizon@zone7water.com)>

CC:

Drogos, Donna, Env. Health <[donna.drogos@acgov.org](mailto:donna.drogos@acgov.org)>, Khatri, Paresh, Env. Health <[paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org)>

Dear Interested Parties,

Attached is Alameda County Environmental Health's (ACEH) correspondence for your case, R00002863.

Please add our e-mail address to your address book to prevent future e-mails from being filtered as spam.

Sincerely,

ACEH

Sent via BlackBerry by AT&T