2902

Wickham, Jerry, Env. Health

To: Matthew Ryder-Smith
Cc: Chris Lucasey; Paul Strange; oj@clearwatergroup.com
Subject: RE: 2744 East 11th Street, Oakland / SLIC Case #RO0002902

Matthew,

Based on the information provided, you may propose the Gore Sorber technique as a method for delineation prior to soil or groundwater sampling. With regard to the extension, a 3 month extension is abnormally long in that the typical total response time for a Work Plan is 60 days. The schedule is extended 30 days to July 7, 2007.

Regards,
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From: Matthew Ryder-Smith [mailto:MRyder-Smith@clearwatergroup.com]
Sent: Thursday, May 10, 2007 3:27 PM
To: Wickham, Jerry, Env. Health
Cc: Chris Lucasey; Paul Strange; oj@clearwatergroup.com
Subject: 2744 East 11th Street, Oakland / SLIC Case #RO0002902

Dear Jerry,

Thank you for your April 6, 2007 letter regarding the Lucasey Manufacturing site at 2744 East 11th Street, Oakland. We are writing to clarify or respond to the four technical comments raised in that letter.

Identification of Adjacent Property Owners (Technical Comment #4). In response to this request, we have identified those three properties which are directly adjacent to the recent soil borings which contained the contaminants of concern. Each of these properties is located across the street/intersection from the subject property. For these three properties, we have supplied the owner name(s), the parcel number and the owner contact address (all of these parcels are owner occupied).

In Technical Comment #3, concurrence with Clearwater Group's recommendation to conduct a soil vapor survey using Gore-Sorbers was denied. Subsurface site conditions and the nature of the heavy oil were the reasons given for rejection of this technique for subsurface investigation. To confirm that these reasons would be sufficient to reject the technique, Clearwater staff contacted Gore Laboratory staff to discuss the site and to provide them site specific information about the site geology and the type of oil at the site (crude / bunker oil). Gore staff responded that the Gore-Sorber modules can detect hydrocarbons up to C20 (see attached emails). C20 is within the carbon range of crude / bunker oil.

We would appreciate your reconsideration of the Gore method for further delineating the plume. The main reasons that we would like to use Gore-Sorber modules at the site are as follows:

- The extents of the oil contamination can be assessed on a large scale, more rapidly and for lower costs;
- Remote access areas, that would otherwise be difficult to access with a rig (inside buildings), can be easily screened for contamination;
- Source areas, narrow contaminant pathways and migration patterns, which could be missed with single borings on wide centers, are frequently easier to identify with this method.

We understand that soil samples, collected after acquisition of a Gore-Sorber survey, would be required to validate the findings.

Clearwater staff also requests an extension for the submittal of the Work Plan, which, is currently due on June 7, 2007. Pending receipt of your response on this issue, we would appreciate an extension of 3 months.

Regards,

Matthew Ryder-Smith
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