

Jakub, Barbara, Env. Health

From: Jakub, Barbara, Env. Health
Sent: Thursday, November 08, 2012 11:42 AM
To: 'Bates, Gary'
Subject: RE: Red Hanger Cleaners RO0002981

Sensitivity: Confidential

Yes, you should comply with those instructions to not sample within five days of a significant rain event. We'll be happy to give you an extension if needed.

From: Bates, Gary [mailto:Gary_Bates@efiglobal.com]
Sent: Thursday, November 08, 2012 11:26 AM
To: Jakub, Barbara, Env. Health
Subject: RE: Red Hanger Cleaners RO0002981
Sensitivity: Confidential

Thank you, but at the bottom of my email I had one other question.

Additional EFI Request - Do we have to conform to the DTSC protocol that says that no sampling should be done within 5 days of a 0.5" or greater rainfall event since all of our sample locations are either under paving or inside of a building. Thank you for your time, please advise.

Gary L. Bates

Director, Environmental Remediation Services
EFI Global, Inc.

address: 11000 Richmond Avenue, Suite 250 Houston, TX 77042

phone: 832-518-5145 | **TF:** 866-464-2127 | **fax:** 832-518-5157 | **mob:** 713-562-6773

email: gary_bates@efiglobal.com | **web:** www.efiglobal.com

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From: Jakub, Barbara, Env. Health [mailto:barbara.jakub@acgov.org]
Sent: Thursday, November 08, 2012 1:06 PM
To: Bates, Gary
Subject: RE: Red Hanger Cleaners RO0002981
Sensitivity: Confidential

Gary,

You can use IPA, but with the understanding that if there is any interference, you may have to resample.

The purpose of the other gases is to get multiple lines of evidence. PCE degrades primarily in anaerobic conditions so knowing the oxygen, CO2 and nitrogen concentrations can help identify the subsurface conditions. Oxygen, CO2 and nitrogen are to also identify if there are any leaks (atmospheric gases). Methane is not needed. However, ethane and ethene are degradation products of PCE and would be good to exchange for methane. We believe the insight these additional analyses provide is invaluable. These may help provide credible evidence of biodegradation, if needed in the future.

Regards,
Barb

From: Bates, Gary [mailto:Gary_Bates@efiglobal.com]
Sent: Thursday, November 08, 2012 9:27 AM
To: Jakub, Barbara, Env. Health
Cc: Bates, Gary
Subject: [WARNING : MESSAGE ENCRYPTED] RE: Red Hanger Cleaners RO0002981
Importance: High
Sensitivity: Confidential

1. Barbara EFI Global is preparing for the vapor intrusion investigation at the Red Hanger Cleaners site located at 6239 College Avenue in Oakland California. We thank the agency for their general concurrence, however would like to modify or gain clarification to the Technical Comments presented in the Agency letter dated October 19, 2012 and attached above.

Agency Technical Comments

1. Vapor Sampling Protocols- The work plan proposes utilizing the April 2012 Department of Toxic Substances Control and Los Angeles Regional Water Quality Board Advisory - Active Soil Gas Investigations to conduct the soil vapor survey. However, ACEH has the following concerns based on the proposed methodology:

a. **Shroud and Tracer Gas** - The sampling protocols do not indicate that a shroud will be used while sampling. ACEH recommends using a shroud so Helium gas can be used as the tracer gas rather than isopropyl alcohol. This will minimize the interference with the analytes being tested.

EFI Global Response - Can we use a different tracer than helium? Our contractor, TEG Northern California, tells us that helium is very difficult to come by because of a world-wide shortage. He strongly suggests either isopropyl alcohol or, if a gas must be used, CO₂.

b. **Additional Soil Vapor Analytical Suite** - In addition to the proposed sampling analytes please report all volatile organic compounds that are detected by EPA 8260B and add analysis for oxygen and the tracer gas used (Helium). To better understand the soil vapor environment please additionally analyze for atmospheric gases (nitrogen and oxygen), as well as methane, CO₂, and the tracer gas by appropriate methodologies.

EFI Global Response - What is the purpose of collecting CO₂, methane, nitrogen and oxygen for our dry cleaner investigation?

c. **Vapor Point Construction**- The DTSC Guidance specifies that at least six inches of dry granular bentonite be placed on top of the sand pack before hydrated bentonite is used. Also the guidance specifies to add the water to the hydrated bentonite at the surface. Please make this change to your protocol.

EFI Global Response - Agreed

NOTIFICATION OF FIELDWORK ACTIVITIES

Please schedule the fieldwork activities and provide ACEH with at least three (3) business days notification prior to conducting the fieldwork.

[EFI Global Response - Agreed](#)

TECHNICAL REPORT REQUEST

Please upload technical reports to ACEH's ftp site and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below.

December 31, 2012 - Soil and Water Investigation Report (File to be named: SWI_R_yyy-mm-dd)

1. [Additional EFI Request](#) - Do we have to conform to the DTSC protocol that says that no sampling should be done within 5 days of a 0.5” or greater rainfall event since all of our sample locations are either under paving or inside of a building. Thank you for your time, please advise.

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