Detterman, Karel, Env. Health
"Miles Grant"
amwaldman@sbcglobal.net; "P.J. Smith"
RE: Questions RE Site RO0003065, 2520 Blanding Ave, Alameda
Monday, June 25, 2012 2:57:26 PM

Hi Miles: At this stage of the investigation it is not appropriate to prepare a work plan to remove contaminated soil in the tank pit because adequate characterization is necessary in order to successfully remove the contaminated soil. Please submit the deliverables I requested in my 5/2/12 directive letter. I noticed on Geotracker that the site has not yet been claimed and that no reports have yet been uploaded to Geotracker. Additionally, the soil and groundwater

investigation work plan has not been submitted by the due date of June 15th nor was an extension request received. Please claim the site and upload the reports in Geotracker and submit the work plan by July 6, 2012.

Thanks,

Karel Detterman, PG Hazardous Materials Specialist Alameda County Environmental Health 1131 Harbor Bay Parkway Alameda, CA 94502 Direct: 510.567.6708 Fax: 510.337.9335 Email: <u>karel.detterman@acgov.org</u>

PDF copies of case files can be downloaded at:

http://www.acgov.org/aceh/lop/ust.htm

From: Miles Grant [mailto:milesg2000@hotmail.com]
Sent: Thursday, June 14, 2012 8:07 AM
To: Detterman, Karel, Env. Health
Cc: amwaldman@sbcglobal.net
Subject: RE: Questions RE Site RO0003065, 2520 Blanding Ave, Oakland

Hi Karel:

I have a quick question on this file. For our work plan, instead of characterizing the site further we would like to write a work plan to remove contaminated soil in the tank pit and then perform confirmation sampling to ensure that we have removed all of the contaminated soil. We would then request site closure. We have already demonstrated that groundwater outside of the tank pit area is not contaminated. As we will state in the addendum, no groundwater samples from either of our investigations had any hydrocarbon odor (or any odor at all). Is writing a work plan to remove soil and perform site clean-up as a prelude to requesting site closure acceptable to you?

Thanks: Miles

Miles Grant, PG, CEG Pacific Engineering and Construction, Inc. 35 Stillman Street, Suite 126 San Francisco, CA 94107 415-378-4114 <u>milesg2000@hotmail.com</u>

From: Detterman, Karel, Env. Health [mailto:Karel.Detterman@acgov.org]
Sent: Thursday, May 24, 2012 3:16 PM
To: 'Miles Grant'
Cc: amwaldman@sbcglobal.net; 'P.J. Smith'
Subject: RE: Questions RE Site RO0003065, 2520 Blanding Ave, Oakland

Hello Miles:

Here are responses to your questions:

Comment 3, Bullet Item 1: Please refer to Technical Comment 3a of my directive letter. As the consultant on record, please propose what you think may be appropriate. I'll look forward to reviewing the work plan.

Comment 3, Bullet Item 2: If it appears appropriate in your technical opinion. ACEH may then make some modifications based on your proposal;

Comment 4, Bullet Item 1: The site first needs to be adequately characterized before it can be considered a low threat closure candidate;

Comment 4, Bullet Item 2: Unknown – we've heard June 30, 2012, we've heard by the end of the year, or unknown if there are legal challenges to the Low Threat Closure Policy;

Comment 4, Bullet Item 3: See reply to Comment 4, Bullet Item 1 and 2; because there are many unknowns, it depends on your client's time line: he can take control of the situation by performing the work or he can just wait & see. Site characterization will still need to be complete per the Policy.

Thanks,

Karel Detterman, PG Hazardous Materials Specialist Alameda County Environmental Health 1131 Harbor Bay Parkway Alameda, CA 94502 Direct: 510.567.6708 Fax: 510.337.9335 Email: <u>karel.detterman@acgov.org</u>

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From: Miles Grant [mailto:milesg2000@hotmail.com]
Sent: Tuesday, May 08, 2012 3:06 PM
To: Detterman, Karel, Env. Health
Cc: amwaldman@sbcglobal.net
Subject: Questions RE Site RO0003065, 2520 Blanding Ave, Oakland

Dear Mr. Detterman:

Thank you for reviewing this case and moving it forward. We are happy to address your Technical Comments within the specified time frame. Following are our replies and questions to your comments.

Comment 1: We will upload all of our monitoring well information if in fact we ever establish any monitoring wells on the site. To date, all that have been collected are grab samples from Geo-Probe borings and sampling has consisted of soil from the borings and grab groundwater samples. Therefore, as of the date of this communication, this comment does not apply to this site. However, again, we will be happy to upload any data that we generate in the future that lies within the parameters of the Geo Tracker criteria.

Comment 2: We will address all of the points that you bring up in an addendum to our first two reports in the near future.

Comment 3: In your request for a Work Plan, you say that a "limited additional investigation is needed" and you suggest two borings at the north and south end (but within) the former tank pit. You also asked for a more complete soil sample plan. We have two questions for clarification purposes:

- If we submit a work plan that proposes two or three borings at the north and south ends (and maybe on in the middle) of the former tank pit (and within the former tank pit) and take soil samples above and below the water the groundwater depth, will this be satisfactory?
- Do you require sampling and analytical testing of the new fill overlying the former tank pit area?

Comment 4: We have some questions regarding the new Low-Threat UST Case Closure Policy.

- If this policy is adopted, would this site be considered a low-threat site and be eligible for closure with no further action?
- When will this policy be adopted?
- In terms of saving our client as much money as possible, if this policy is going to be adopted soon, can we wait to implement our work plan and additional site work to see if we can get site closure under this new policy?

We will start work on the work the Addendum that you requested right away, and we will start work on the Work Plan as soon as we receive the answers to our questions.

We do thank you sincerely for reviewing this case and getting it moving forward, and we look forward to working with you in the future.

Sincerely: Miles Grant

Cc: Mark Waldman, Principal Engineer

Miles Grant, PG, CEG

Pacific Engineering and Construction, Inc. 35 Stillman Street, Suite 126 San Francisco, CA 94107 415-378-4114 <u>milesg2000@hotmail.com</u>