

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Tuesday, March 08, 2016 5:06 PM
To: Leslie Mulholland
Cc: 'Megan Walsh'; 'agates@ramboll.com'; Roe, Dilan, Env. Health
Subject: Mulholland Residence (RO3070) Meeting Followup; Request for Site Investigation
Attachments: RO3070 Suggested Bore Locations.pdf

Ms. Leslie Mulholland
Leslie Mulholland Trust
132 Guilford Road
Piedmont, CA 94611

Subject: Request for Site Investigation; Fuel Leak Case No. RO0003070 and GeoTracker Global ID T1000002521, Mulholland Residence, 132 Guilford Road, Piedmont, CA 94611

Ms. Mulholland,

Alameda County Department of Environmental Health (ACDEH) is providing this email directive letter as discussed in our meeting of March 2, 2016.

Technical Comments

ACEH has evaluated the data and recommendations presented in available reports to determine if the site is eligible for closure as a low risk site under the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on ACEH staff review, we have determined that the site fails to meet the LTCP Media-Specific Criteria for Groundwater, the Media-Specific Criteria for Vapor Intrusion to Indoor Air, and the Media-Specific Criteria for Direct Contact.

The site does not meet the Groundwater Criteria due to the lack of delineation of a potential groundwater plume, and the presence of two privately owned water supply wells within 315 feet of the petroleum release (130 and 315 feet), in presumed downgradient directions. Using LTCP guidance to predict a minimal plume length of less than 250 feet (248 feet) indicates that one well is within the estimated plume and one well is approximately 65 feet further downgradient; neither satisfy the policy (as the closest well must be greater than 250 feet from the plume edge). As identified in the meeting, it appears that an appropriate next step is to request the sampling of the two wells in question for Total Petroleum Hydrocarbons (TPH) as diesel or heating oil, benzene, ethylbenzene, toluene, total xylenes (or BTEX), methyl tert butyl ether (MTBE), and naphthalene in an attempt to determine if the wells have been impacted by the release. Because the release and any associated plume is considered to be mature, it would be expected that any associated plume would have already migrated to these locations. Please be aware that the collection of groundwater must conform to industry standard sampling procedures, use laboratory supplied containers, and be professionally overseen, reported, and stamped by a California registered professional geologist or engineer.

The site does not meet the Vapor Intrusion to Indoor Air and the Direct Contact and Outdoor Air Exposure Criteria due in part to the lack of lateral delineation of soil contamination at the site. To preclude the need for notifications to the property deed, as discussed in the meeting, it appears appropriate to install a minimum of four soil bores at the site to quickly determine the extent and magnitude of soil contamination. Two soil bores to the west along the sidewalk / lawn contact, and two to the northwest, of the former underground storage tank (UST) location were discussed in the meeting (See attached figure). The second step-out bore to the west and northwest is intended to be held pending the results of the closest bores to the former tank location (this may require expedited lab results at an increased cost). The bore locations to the northwest is a slight change to those discussed in the meeting (which were tentatively to the north), and these are based on the location of the former UST and the location of the residential home (see attached figures). Bores to the northwest would be more protective of the home; the garage is less of a concern. Similar to groundwater,

laboratory analysis for TPH as diesel or heating oil, BTEX, MTBE, and naphthalene are requested. To meet LTCP guidelines, soil samples must be collected from both the 0 to 5 and the 5 to 10 foot depth intervals at signs or indications of contamination (staining, odor, Photo-Ionization Detector [PID] response, etc.). The bores should extend to a minimum of 9.5 feet due to the depth of the tank excavation and residual contamination at 9 feet in depth; deeper would be better and help define the vertical extent of any contamination. The brief summary report discussed must include bore logs, a tabulation of analytical data, figures as needed (site location, site plan (depiction of bore locations and other important site features)), and text.

Please be sure to request EDF's (Electronic Data Format) from the analytical laboratory so that the data can be uploaded to the State Geotracker database as required by the State. In order for this to occur, the site will need to be claimed in Geotracker by Ms. Mulholland. Data uploads by others can then be allowed by her.

As discussed in the meeting, hand auger drilling methods are acceptable, providing the soil sample is relatively undisturbed (in-place sampling with metal tubes rather than jars which result in aeration of the sample) and drilling depths can be achieved. We also discussed direct push and powered augers for drilling. A number of drilling companies can mobilize all three on one relatively small drilling rig.

In an effort to minimize the need for additional future site investigations, and as discussed in the meeting, I can be present in the field, but will need a minimum of one working week to coordinate my schedule.

Technical Report Request

Please upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **June 3, 2016** – Geotracker Submittal Notification
Please email your case worker
- **June 3, 2016** – Site Investigation Report
File to be named: RO3070_SWI_R_yyyy-mm-dd

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

Should you have any questions, please contact me at (510) 567--6876 or send me an email message at mark.detterman@acgov.org.

Thank you for your assistance and cooperation.

*Mark Detterman
Senior Hazardous Materials Specialist, PG, CEG
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
Direct: 510.567.6876
Fax: 510.337.9335
Email: mark.detterman@acgov.org*

PDF copies of case files can be downloaded at:

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