

## Nowell, Keith, Env. Health

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**From:** Nowell, Keith, Env. Health  
**Sent:** Wednesday, July 02, 2014 5:12 PM  
**To:** 'Jack.phillip@usw.salvationarmy.org'  
**Cc:** 'kaye.patterson@usw.salvationarmy.org'; Todd Hafner (todd.hanfer@cardno.com); Mike Sonke; Roe, Dilan, Env. Health  
**Subject:** RO3084 - SALVATION ARMY , 601 WEBSTER ST., OAKLAND , CA

Dear Mr. Phillips,

Thank you and Kaye Patterson of the Salvation Army and Todd Hafner and Mike Sonke of Cardno ATC (CATC) for the opportunity for Alameda County Environmental Health (ACEH) to review with you the status of subject case in the meeting held at the ACEH offices on July 02, 2014.

As discussed, a draft work plan will be prepared addressing laboratory analysis continuity, lateral and vertical delineation of soil and groundwater contamination, vapor intrusion to indoor air, and a sensitive receptor survey. Additionally, ACEH requested a Feasibility Study/ Corrective Action Plan (FS/CAP) be submitted by the end of the year, if warranted by the field investigation. ACEH also approved of the request to fill undulations in the tank pit back fill with gravel, provided the source of the material is disclosed and it's cleanliness verifiable.

**Analysis Continuity-** It is unclear to ACEH why the scope of analyses were not uniformly applied in the report entitled *Site Conceptual Model with Data Gap Identification, and Preliminary Subsurface Investigative Report* dated January 13, 2014 and prepared by CATC for the subject site. Specifically, total petroleum hydrocarbons as diesel (TPHd) analysis in groundwater and naphthalene analysis in soil. As agreed upon in the meeting, the full analysis scope will be applied to all samples

**Soil and Groundwater Investigation-** As agreed upon in the meeting, the lateral and vertical distribution of soil and groundwater contamination has not been identified and the proposed boring in the vicinity of the fuel dispenser not advanced.

- Propose a transect parallel to the transect created by SB4 and SB5 along a line near the base of the loading dock;
- Propose a transect perpendicular to the loading dock transect on the east side of the tank pit;
- Propose a transect parallel to Seventh Street along the north side of the tank pit
- Identify scope of analysis for the soil and groundwater samples.

**Vapor Intrusion to Indoor Air-** Elevated concentrations of benzene were detected in soil and groundwater and naphthalene in soil beneath the site. Based on the proximity of the Salvation Army structure, which includes a basement and at least three elevators, vapor intrusion to indoor air may present a health risk to the occupants of the building.

- Provide a figure on an aerial photograph base outlining the basement location and the locations of the elevators. Caption the elevators with the lowest floor serviced by each elevator;
- Propose sub-slab soil gas sampling locations in the basement area of the Salvation Army building;
- Discuss soil gas sample collection methodology;
- Provide the scope of analysis of the soil gas samples.

**Sensitive Receptor Survey** – As discussed in the meeting, the initial sensitive receptor survey should identify non-monitoring wells and surface water bodies within 2,000 feet of the site and should be included in the updated Site Conceptual Model.

- Include a search of both Alameda county Public Works and California Department of Water Resources databases

- Include a site map using a photographic base showing the site and nearby features. Include on the figure well and boring locations and circles centered on the site having radii of 1,000 and 2,000 feet. As discussed in the meeting, please reference the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) Technical Justification Groundwater Paper. Identify potential receptors within the 2,000-foot circle on the site map.

**Feasibility Study/ Corrective Action Plan** – Based in the results of the field investigation, please prepare an FS/CAP in accordance with Title 23, California Code of Regulations, Section 2725, must include a concise background of soil and groundwater investigations performed in connection with this case and an assessment of the residual impacts of the chemicals of potential concern (COPCs) for the site and the surrounding area where the unauthorized release has migrated or may migrate. The FS/CAP should also include, but is not limited to, a detailed description of site lithology, including soil permeability, and most importantly, contamination cleanup levels and cleanup goals, in accordance with the San Francisco Regional Water Quality Control Board (SFRWQCB) Basin Plan and appropriate ESL guidance for all COPCs and for the appropriate groundwater designation. Please note that soil cleanup levels should ultimately (within a reasonable timeframe) achieve water quality objectives (cleanup goals) for groundwater in accordance with the SFRWQCB Basin Plan. Please specify appropriate cleanup levels and cleanup goals in the FS/CAP.

- The FS/CAP must evaluate at least three viable alternatives for remedying or mitigating the actual or potential adverse effects of the unauthorized release(s) besides the 'no action' and 'monitored natural attenuation' remedial alternatives. Each alternative shall be evaluated not only for cost-effectiveness but also its timeframe to reach cleanup levels and cleanup goals, and ultimately the Responsible Party must propose the most cost-effective corrective action.

**Overdue Deliverables-** A review of ACEH Directive Letter dated **May 31, 2013** indicates the site is out of compliance with agency directives to submit the following items by the required due date assigned by ACEH. These items are late and overdue. ACEH requests these be uploaded concurrent with the Geotracker submittals.

- **GEO\_BORE** - The GEO\_BORE file is an electronic image of each boring log and/or monitoring well associated with an individual sampling location where the borehole was drilled. The graphics of a boring log will vary, and may require more or less detail depending on the specific project. GEO\_BORE files submitted for groundwater monitoring wells should include well construction details.

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

- **July 31, 2014 – Electronic Submittal of Information Verification-** (file name: RO0003084\_CORRES\_L\_yyyy-mm-dd)
- **July 31, 2014 – Draft Soil and Groundwater Investigation Work Plan** (file to be emailed to Keith Nowell at [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org) and cc'ed to Dilan Roe at [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))
- **TBD – Source Confirmation** (tank pit back fill with gravel (file name: RO0003084\_CORRES\_L\_yyyy-mm-dd)
- **August 15, 2014– Soil and Groundwater Investigation Work Plan** (file name: RO0003084\_WP\_R\_yyyy-mm-dd)
- **November 15, 2014– Soil and Groundwater Investigation Report and Updated Site Conceptual Model** (file name: RO0003084\_SWI\_SCM\_R\_yyyy-mm-dd)
- **December 31, 2014 - Feasibility Study/ Corrective Action Plan** (file name: RO0003084\_FS\_CAP\_R\_yyyy-mm-dd)

Thank you for your cooperation. ACEH looks forward to working with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org).

Regards,  
Keith Nowell

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PDF copies of case files can be reviewed/downloaded at:

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