

## Detterman, Mark, Env. Health

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**From:** Detterman, Mark, Env. Health  
**Sent:** Wednesday, December 18, 2013 2:51 PM  
**To:** 'Markowski, Krzysztof M NFG (US)'; Paul Dixon  
**Cc:** Delucchi, Fred A CIV NG CAARNG (US); Lockwood, George@Waterboards; Roe, Dilan, Env. Health  
**Subject:** RE: Status of CA National Army Guard Site (RO3099)? (UNCLASSIFIED)  
**Attachments:** DIR\_L\_2013-12-06.pdf; RO3099\_CL\_PP\_2013-12-06.pdf

Chris,

Thank you for your email. I believe it misunderstands ACEH's handling of this fuel release case. I have attached a copy of our recent letter (dated December 6<sup>th</sup>) which somehow and unfortunately did not get addressed to you; however, it is available on both the ACEH ftp and the state Geotracker websites. The December 6<sup>th</sup> letter states that ACEH considers the site closable under the LTCP and provided there are no public comments by February 7<sup>th</sup>, ACEH will close the LOP case. I have also attached the public notice as a separate document.

On the matter of naming the California Army National Guard as a Responsible Party, state regulation requires that regulatory agencies identify all potential Responsible Parties at several junctures, including prior to closure. That was the intent of the document you recently received. If you have an objection related to being named based on the data for the site, please let me know; however, I do not perceive this to be your objection.

Your email illuminates a bit of a conundrum. Because you were not included in the public notification as required for 60 days under the LTCP, it can be reasoned that the 60-day comment period should be restarted. However, and unless Mr. Lockwood objects, I would expect that your email documents that you will not object to case closure.

Please be aware that case closure applies to the petroleum portion of the release. Reports associated with the site also indicate a potential of asbestos contamination at the site. That portion of the case will be managed under another case number, not related to the state UST program.

Should you have further question, please let me know.

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

*PDF copies of case files can be downloaded at:*

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

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**From:** Markowski, Krzysztof M NFG (US) [mailto:krzysztof.m.markowski.nfg@mail.mil]  
**Sent:** Wednesday, December 18, 2013 2:12 PM  
**To:** Detterman, Mark, Env. Health; Paul Dixon  
**Cc:** Delucchi, Fred A CIV NG CAARNG (US); Lockwood, George@Waterboards  
**Subject:** RE: Status of CA National Army Guard Site (RO3099)? (UNCLASSIFIED)

Classification: UNCLASSIFIED  
Caveats: NONE

Mark,

We have received your letter dated December 13, 2013 (attached) in which you designate California Army National Guard (CA ARNG) as one of the responsible parties in an unauthorized fuel release at the former San Lorenzo Armory. The letter states that "on June 22, 2010 one 5,000-gallon diesel underground storage tank (UST) was removed from the subject site. A grab groundwater sample was collected in the tank excavation and up to 820 ug/L TPHd, 0.62 ug/L ethylbenzene, and 6.1 ug/L xylenes were detected in groundwater."

California Army National Guard was under the impression that issues related to fuel releases from the former UST were already investigated and successfully resolved. This was confirmed in your last email (below) where you state that "the petroleum question was addressed by the submittal of a revised figure".

Three separate subsurface investigations were conducted at the site in the recent past. In summary, all the reports indicate that the groundwater has not been impacted by releases from the former UST. It appears that there are some low level concentration of diesel in shallow soil (near the vicinity of the former tank) which we feel pose no threat to water quality and will naturally attenuate over time.

All the investigation reports have been uploaded to Geotracker under Global ID T10000004346. Attached to this email is the latest Environmental Condition of Property (ECOP) report which was prepared to assess the site before the control of the property reverted back to San Lorenzo School District.

In January 2013, CA ARNG has submitted a request to your office for regulatory closure of the subject site based on the available data contained in the above mentioned reports. We are hoping that your office can review all the available data once again and issue us a No Further Action (NFA) letter in the near future. The subject site easily meets the criteria for closure stated in the State Water Resources Control Board low treat UST closure policy. Alternatively, if your office is not comfortable with issuing an NFA for the subject site you may transfer this case to SWRCB. We are confident that the residual diesel fuel in soils poses no treat to human health or the environment and we are fully prepared to petition SWRCB for regulatory closure of this site.

Thank you very much for your help.

Krzysztof (Chris) Markowski, P.G.  
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10620 Mather Road  
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-----Original Message-----

From: Detterman, Mark, Env. Health [<mailto:Mark.Detterman@acgov.org>]  
Sent: Friday, September 27, 2013 1:19 PM  
To: Markowski, Krzysztof M NFG (US); Paul Dixon  
Subject: Status of CA National Army Guard Site (R03099)?

Chris and Paul,

I am following up on the site to determine the status of the site. I've attached an extension approval on a work plan that was to incorporate sampling for asbestos, and have

also attached a bit of correspondence from around that time. I believe the petroleum question was addressed by the submittal of a revised figure for the work. Let me know where you think the site fits into the requested investigation by next Friday, October 4.

Thanks,

Mark Detterman

Senior Hazardous Materials Specialist, PG, CEG

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Classification: UNCLASSIFIED

Caveats: NONE