

## Wickham, Jerry, Env. Health

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**From:** Mansour Sepehr [msepehr@somaenv.com]  
**Sent:** Thursday, June 12, 2014 9:19 AM  
**To:** Wickham, Jerry, Env. Health  
**Cc:** 'Richard A. Bruzzone'; montroseinc@comcast.net; 'Corinne Calfee'; 'Zachary Walton'  
**Subject:** Comments on Shell's workplan-6039 College Avenue

Good morning Jerry:

On behalf of the property owners and their representatives please review our comments on CRA's workplan dated May 28, 2014 for the subject site. Please contact me if you have any comments or would like to discuss any further.

- 1) "**Page 2 under Section 2.4.1, second paragraph**" Using air knife to drill the top 5 feet of the vapor boreholes is not allowed, since it will disperse the vapor way and under-estimate the vapor concentration. On page 3 under Section 2.4.2 second paragraph the workplan also insists using air knife rig.
- 2) "**Page 3 under Section 2.4.2, First Paragraph, Second sentence** " This sentence from an old template since no other vapor probes except SVP7 thru SVP-9 will be drilled.
- 3) "**Page 3 under Section 2.4.3, First Paragraph, Second sentence**" according to DTSC guideline the vapor samples should be collected 5 days prior to any measureable rainfall, two days as CRA standard procedure says is not supported.
- 4) "**Page 4 under Section 2.4.4 LEAK TESTING**" for conducting the leak test, the workplan should follow DTSC Guidance document dated April 2012. The guideline recommends conducting shut-in-test, purge volume test and Leak tests before collecting the vapor samples. These test are required in order to make sure that atmospheric air is not augmenting the soil vapor sample through air intrusion processes.
- 5) "**Page 4 under Section 2.5 Chemical Analysis**" the workplan does not recommend what Method will be used to analyze the vapor samples for petroleum hydrocarbons and naphthalene. TO-15 should be utilized for TPH-g, BTEX and MtBE and TO-17 should be utilized for analyzing naphthalene.

Regards

Mansour Sepehr