

From: [Andy Lojo](#)
To: [Eileen Chen](#)
Cc: [Wickham, Jerry, Env. Health](#); dylan.roe@acgov.org; jfitzpatrick@publicstorage.com; [Emmett Albergotti](#); [Tom Graf](#)
Subject: Summary of recent conversations regarding Chrome 6 issue, 6800 Overlake Place, Newark
Date: Tuesday, February 03, 2015 3:47:18 PM
Attachments: [Newark.pdf](#)
[Full Bloom.pdf](#)
[Newark map.pdf](#)

Hi Eileen,

Thank you for talking with me last Friday and yesterday about your concerns that moving the slag affected soil into potential contact with shallow groundwater could result in mobilizing hexavalent chromium out of the slag and cause a problem in groundwater at the site. Based on our conversations I understand that you do not feel the TCLP test accurately simulates conditions that would be expected below the site if the slag were to be in contact with groundwater for an extended period of time, or that it truly is a rigorous enough assessment of what might leach for many years to come. We also discussed the option of testing the soil using DI water or finding another method to simulate on-site conditions but neither you or I have been able to identify a method that will satisfy your concern. Therefore, we also discussed the possibility of testing groundwater now as a way to assess Cr+6 leaching potential at the site, but you indicated that even non-detect results will not satisfy your concern that this could happen in the future if some of the soil is moved into contact with groundwater.

We have also continued to search for professional papers applicable to the situation. The attached link is an article done by the USGS and others on chromium concentrations in groundwater in the Mojave desert from 2008. <http://ca.water.usgs.gov/news/2008/Chromium-report.pdf> It is a lengthy technical paper but it contains a good discussion on the relationship of Cr+6 concentrations to pH levels in groundwater, which is critical to our situation. The abstract states that Chrome +6 concentrations did not exceed 5 ug/L at pH values < 7.5 regardless of geology. I therefore looked up pH and DTW levels at sites in the area.

The attached monitoring report from the former Earl Automotive site located just south east and adjacent to 6800 Overlake place, contains groundwater monitoring data from 4 wells sampled semi-annually in 2010 and 2011. The highest DTW was 5.30 feet (MW-3, April 8, 2011). The highest pH value at the time of sampling during the most recent event was 6.73 (MW- 2, August 15, 2011). The second attached monitoring report from Full Bloom Baking Company located just north and adjacent to the site, contains groundwater monitoring data from the sampling of one monitoring well on March 1, 2012. The DTW was reported at 4.3 feet, and the pH value at the time of sampling was 7.59. We reviewed pH and DTW data from additional sites in the area as shown on the attached map. DTW and pH values reported at these sites are similar and cover a much broader time frame going back over 10 years, indicating that pH in the area is not likely to exceed 7.5, and DTW is not likely to be shallower than 5 feet bgs.

We therefore request your consideration of this additional information and approval of the remedial plan which includes moving some of the slag affected soil from its current depth of approximately 2 feet to 5 feet underneath the building. We have no data to suggest that Chrome +6 would leach from the slag and this new information affirms that in the unlikely case it happened, it would not migrate in

groundwater under existing pH conditions. As we also discussed, we feel that the overall benefits of getting the slag affected soil under pavement is a huge environmental benefit to the site, compared to the extremely small risk that something might leach out of it, if it is moved three feet closer to groundwater. We appreciate your prompt attention to this issue.

Sincerely

Andy Lojo

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