

From: [Detterman, Karel, Env. Health](#)
To: ["David Solis"](#)
Subject: RE: Fuel Leak Case RO3144 - Alameda Mound Street UST, Geotracker Global ID TO000006142, 1380 Mound Street, Alameda, CA
Date: Tuesday, May 19, 2015 2:34:37 PM
Attachments: [image004.png](#)

Hello David:

Here are the responses to your questions and two additional comments so that you may finalize and upload the Work Plan:

1. Boring access to the residence/lawn side of the tank is extremely limited with utilities running through the area as well as a patio obstruction being present, and would only be able to be accomplished via hand augering in a couple of locations. Is this acceptable to you?

ACEH Response: Hand auguring is an acceptable method; however, please include Standard Operation Procedures for soil and groundwater collection in the Work Plan. At a minimum the soil should be monitored with a PID or other field instrument and samples collected in metal sleeves directly from the bore in both the 0 to 5 and the 5 to 10 ft depth intervals discussed in the Low Threat Closure Policy (LTCP). The intent is to collect representative volatile compound concentrations as required under the LTCP.

2. As the constituents of concern have been identified to be primarily TPH-d and O&G, do you find it acceptable to only test for these, or will you require the complete LUFT methodology for the samples?

ACEH Response: Chemicals of Concern (COCs) at the site need to be tested for; however, ACEH generally does not request oil and grease, but TPH range analysis (TPHg, TPHd, TPHmo). Additionally, the site needs to be evaluated with respect to the LTCP, and the Low Threat Closure Policy (LTCP) requires Total TPH (TPHg and TPHd) concentrations in soil throughout the entire bioattenuation zone (0 to 5 and 5 to 10 ft). Please propose analysis as per the California State Water Resources Control Board's LUFT Guidance Manual, September 2012; additionally, please provide the rationale for determining the depth to and thickness of the bioattenuation zone at the site.

3. Will you require soil gas/vapor analysis in addition to the soil and water sampling in order to attain a low threat closure?

ACEH Response: Please evaluate the site and data with regards to the LTCP vapor criteria. If there is sufficient data to determine if the site fits the vapor criteria additional data may not be needed; however, if there is insufficient data and vapor samples are proposed please provide the rationale for soil vapor sample collection (within a LTCP evaluation process) and ensure the collection of vapor is consistent with the Department of Toxic Control (DTSC's) October 2011 Guidance for the Evaluation

and Mitigation of Subsurface Vapor Intrusion to Indoor Air

4. I have the analytical results that you forwarded. The Chain of Custody (COC) for the 8/14/2014 soil boring program indicates that soil samples for B-1, B-2, and B-3 were scheduled to be analyzed for PCP, PNA (PAH), and creosote analysis, but those analytical results were not forwarded to ACEH. If those analyses were not preformed, the reason needs to be documented. If conducted, please forward to ACEH the analytical results PCP, PNA (PAH), and creosote.

5. Additionally, if you have not already done so, please claim the site in Geotracker.

Thank you,

Karel Detterman, PG
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PDF copies of case files can be downloaded at:

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

From: David Solis [mailto:dsolis@envamerica.com]
Sent: Wednesday, May 06, 2015 10:57 AM
To: Detterman, Karel, Env. Health
Subject: FW: Fuel Leak Case RO3144 - Alameda Mound Street UST, Geotracker Global ID TO000006142, 1380 Mound Street, Alameda, CA

Hi Karel:

We have been given authorization to proceed with completion of the Work Plan and commencement of the investigation upon receipt of your approval of the Work Plan. As such, I just need to fine tune the Work Plan with your answers to the questions below. Can you please advise? Once I receive your response, we will submit the Work Plan forthwith.

Thank you.

Best Regards,

David C. Solis, JD, PhD, PE
President

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