

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Friday, July 24, 2015 4:49 PM
To: 'Pianca, Brian'; 'Peter Cusack'
Subject: Site Management Plan Comments; Valdez Street SMP (RO3149)

Brian and Peter,

I've had a chance to review the SMP for the subject site and have a few observations and requests. I wanted to get these in writing. We can talk about them if need be. In general the SMP looks good, so I'll focus on the areas of potential concern:

- 1 The SMP should discuss the specific remedial action goal for the various contaminants, including for unknown areas; such as ESLs or other goals (e.g. TPHg, TPHd, TPHmo ESL are 100 mg/kg). This is expected to quickly guide any additional excavation needed with minimal additional communications, and provide the general knowledge of what the remedial goal at the end of the excavation will be.
- 2 The SMP should also include a discussion of standard perimeter sampling or sampling intervals (every 20 feet, including defining the number of samples on the bottom based on the area of the bottom, etc.) to confirm removal of contaminants to these goals. This is again expected to quickly guide confirmation sampling to document the removal of contaminants from the area, whether the area is inside the excavated volume, or at the perimeter, such as the former UST area, with a higher potential for residual contamination.
- 3 The SMP states that ACEH will be informed about the discovery of USTs, but is silent with respect to contamination about sumps, and the like. ACEH should also be notified, and preliminary handling of the contamination should be communicated.
- 4 Presuming the goal for lead is the RWQCB residential ESL of 80 mg/kg, two additional soil samples documented lead concentrations above this level that are not identified for special handling (EB-7-1.5 and CPT-7-8.0). Both appear to be within the volume proposed to be excavated, and based on this remedial goal, the excavated soil should be managed separately and the lateral and vertical removal extent defined, esp. as there may be additional source at these locations that is not presently known.
- 5 In the case of arsenic, the residential ESL is 0.39 mg/kg; however, ACEH recognizes that local sediments contain arsenic concentrations above this value as documented by the Master's thesis posted on the RWQCB website (Duverge, 2011). This should be communicated to those implementing the SMP, including a discussion of arsenic averages at the site and how it fits into the norm for the vicinity (presumed), in the section discussing the remedial goals.
- 6 Since dust control is an important part of the lead impacted soil abatement, it appears appropriate to include the dust control portion in the SMP. The current SMP indicates it will be developed in the future by others. Let me know if this could be a problem with the way the development is structured, and we'll see if we can determine a way around it; however, to reiterate, it is an important part of this portion of the remediation and ACEH will want to determine it is being handled appropriately.

I think that is it. I would request the SMP be revised, so that additions are not forgotten because they are in a second document. You can forward a revised draft SMP to my attention and I can review it prior to final submittal if this helps move it along. Let me know when you should be able to send it and we'll use it as a target submittal date.

Thanks,

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PDF copies of case files can be downloaded at:

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