

PROTECTION

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January 21, 2000

Mr. Barney Chan
Alameda County Health Care Services
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

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Al Martinez

SUBJECT:

**ASTM Tier 2 RBCA Analysis** 

Amendment #2 New Genico Site

3927 East 14th Street, Oakland, California

ATC Project No. 61137.0007

Dear Mr. Chan:

ATC Associates Inc. (ATC) is pleased to present this ASTM Tier 2 RBCA Analysis Amendment #2 summarizing the results of an additional American Society of Testing and Materials (ASTM) Tier 2 Risk Based Corrective Action (RBCA) evaluation, for the New Genico site (site) located at 3927 East 14<sup>th</sup> Street in Oakland, California.

This second amendment is submitted in response to additional comments from the Alameda County Health Care Services (ACHCS), dated August 3, 1999. The ACHCS's requests were made following the review of ATC's "ASTM Tier 2 RBCA Analysis Amendment and the Second Quarter 1999 Groundwater Monitoring Report for 3927 East 14<sup>th</sup> Street, Oakland, California."

### **ASTM TIER 2 RBCA EVALUATION**

The ASTM Tier 2 RBCA evaluation was performed following Standard E 1739-95 and the ASTM Tier 2 Guidance Manual for Risk Based Corrective Action published by Groundwater Services. Inc. (GSI) of Houston. Texas.

At the request of ACHCS, ATC incorporated the most recent groundwater monitoring data. The RBCA analysis reflects the California slope factor for benzene of 0.1 and the acceptable risk of 1X10E-5. Other input parameters remained the same as the July 1999 evaluation presented in Amendment #1.

## Representative Benzene Concentration

The constituent of concern for the ASTM Tier 2 RBCA evaluation was benzene. ATC used benzene concentrations from the last three quarterly monitoring events (1999) from groundwater monitoring wells HMW-1, HMW-2, HMW-3, and HMW-4 to estimate a representative concentration of 0.12 mg/L. The representative concentration was calculated using the RBCA software and is the 95th percentile Upper Confidence Limit of the calculated mean benzene concentration, based on data collected during the four quarterly groundwater sampling events in 1999. XABJ FORFILW-1++MOJ3

## **Results of RBCA Modeling**

Using the above referenced representative concentration, the indoor and outdoor air pathways were evaluated. Cleanup goals for the site, or Site Specific Target Levels (SSTL's) were estimated for soil and groundwater (results attached)

The groundwater SSTL's for benzene are presented below in comparison to the representative benzene concentration in groundwater.

Scenario	target risk	Exposure	SSTL (mg/L)	Representative Concentration (mg/L)
Volatilization from groundwater into on-site indoor air	1.0 E-5	Commercial	0.53	9.12° <b>v</b> 0.24
Volatilization from groundwater into on-site outdoor air	1.0 E-5	Commercial	61	9.12- 0.24

The applicable SSTL would be the lowest calculated SSTL which is 0.53 mg/L. As shown on the table above this SSTL is higher than the representative groundwater concentration of 0.12 mg/L. Therefore, the representative concentration of benzene beneath the site is below the site-specific cleanup goal calculated using the ASTM Tier 2 RBCA methodology.

Based on the information presented in this report, current regulatory guidelines, and the judgment of ATC, the following conclusions are presented:

Using a target risk of 1X10E-5, slope factor of 01, and representative benzene concentrations using site 1999 data, the representative concentration of benzene in groundwater is below the calculated SSTL.

 Because the representative concentration of benzene in groundwater is below the SSTL, the site may be considered a low risk groundwater case as described in the Regional Water Quality Control Board (RWQCB) memorandum which discusses low risk groundwater cases.

#### RECOMMENDATIONS

The results of this ASTM Tier 2 RBCA Analysis show that the concentration of benzene in groundwater at the site is below the calculated SSTL. In addition, the concentrations of petroleum hydrocarbon in the site groundwater are naturally attenuating, primarily as a result of intrinsic bioremedation. The total petroleum hydrocarbon (TPH) as gasoline (TPH-G) and benzene charts (see Agency Response Letter dated November 4, 1999) indicate that the overall concentrations of the contaminants at the site have declined since groundwater monitoring was initiated in August 1996. Therefore, ATC recommends that this site be granted regulatory site closure.

If you have any questions regarding this report please do not hesitate to call Al Martinez at (925) 460-5300.

Sincerely,

ATC ASSOCIATES INC.

acmosting

Beata Goodrich, PE Project Engineer

Al Martinez Project Manager

Attachments

cc: Mr. Tommy Conner, Conner Bak

# RBCA TIER 1/TIER 2 EVALUATION

Output Table 1

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Software: GSI RBCA Spreadsheet Version: 1.0.1

Serial: G-313-VKX-542

RBCA SIT		Tier 2 Worksheet 9.2									
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>Res indicates risk-based target concentration greater than constituent residual saturation value

Software: GSI RBCA Spreadsheet

Serial: G-313-VKX-542

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