

From: [Detterman, Karel, Env. Health](#)
To: ["Robert Robitaille"](#)
Cc: ["John Buestad"](#); [Roe, Dilan, Env. Health](#)
Subject: RE: VI Mitigation at Former Good Chevrolet
Date: Thursday, February 07, 2013 9:39:33 AM

Hi Bob:

The Interim Source Removal Report conveys the findings of the source removal which should be synthesized into the Draft FS/CAP. I've reviewed the *Well Abandonment and Replacement Work Plan Addendum* received December 13, 2012 but had difficulty evaluating the replacement monitoring well locations without knowing the remedial alternatives being planned for evaluation, so have refrained from providing comments on the Work Plan. The Work Plan should be reviewed concurrently with the Draft FS/CAP.

Since the Draft FS/CAP has not been submitted yet, I would suggest incorporating the elements of this Work Plan into the long term groundwater monitoring component of alternatives to be evaluated in the Draft FS/CAP.

The proposed parcel split letter was received on January 22, 2013 and is in the 60 day review cycle; however, because the proposed parcel split is a component in the FS/CAP, it too, should be incorporated into the Draft FS/CAP. We understand that with the proposed parcel split, the proposed building locations have not been changed.

The State Water Resources Control Board passed Resolution No. 2012-0062 on November 6, 2012 which requires all agencies to identify ways to increase the efficiency of implement of UST program implementation. The gradual submittal of the documents as described above is an inefficient process and results in increase costs for both regulatory agency review and cost to the RP to adhere to regulatory agency directives.

As previously requested, please update the Baseline Environmental Schedule with a revised submittal date for the Draft FS/CAP and submit the revised the Baseline Environmental Schedule to ACEH by February 15, 2013. In the revised Schedule please include time for preparation of detailed design documents for the alternative selected in the final approved FS/CAP. Be sure to include 60 day review cycles for all submittals to ACEH. If active remediation is an element of the approved alternative in the Final FS/CAP, it should also be incorporated into the revised Baseline Environmental Schedule.

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: Robert Robitaille [mailto:rrobitaille@aeiconsultants.com]
Sent: Wednesday, February 06, 2013 2:30 PM
To: Detterman, Karel, Env. Health
Cc: John Buestad; Roe, Dilan, Env. Health
Subject: Re: VI Mitigation at Former Good Chevrolet

Thank your for your reply Karel. The Cupolex foundation, combined with proper venting, should provide an effective vapor intrusion barrier during the final stages of remediation at the site. AEI presented several vapor intrusion mitigation alternatives to FSI and we agree with their choice that this is the best option for the project. As you are aware, FSI's development schedule includes occupancy of the new commercial building prior to gaining regulatory closure of the site. One advantage of this system is that the development project - from construction through occupancy - can proceed prior to receiving closure of the site. We will include it as an element of our Draft FS/CAP.

Yes, we are behind schedule wrt to the Draft FS/CAP, as well as several other tasks. That document will be based, in part, on ACEH comments to the December 7, 2012, Interim Source Removal Report and Well Abandonment and Replacement Workplan Addendum, and any directives based on those comments. AEI plans to revise and submit the project schedule and begin preparation of the Draft FS/CAP once we have reviewed the comments/directives.

Also, FSI is awaiting your comments to the proposed parcel split (January 15, 2013 letter). Can you please let us know when you will provide a response?

Regards,

Robert Robitaille
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On Wed, Feb 6, 2013 at 1:30 PM, Detterman, Karel, Env. Health
<Karel.Detterman@acgov.org> wrote:
Hi Bob:

According to the October 8, 2012 Baseline Environmental Schedule (Schedule) prepared by Foley Street Investments (FSI) and AEI, the Draft Feasibility/Correction Action Plan (FS/CAP) was due to ACEH on December 3, 2012. This Cupolex product sounds like it could be a viable short-term mitigation measure that could be included as a component of one of the three alternatives of that Draft FS/CAP.

While preparing the Draft FS/CAP, please refer to Technical Comment #2a of ACEH's November 3, 2011 Directive Letter:

“After generating sufficient data to support a remediation technology, preparation of an FS/CAP is appropriate. The FS/CAP must include a concise background of soil and groundwater investigations performed in connection with this case and an assessment of the residual impacts of the chemicals of concern (COCs) for the site and the surrounding area where the unauthorized release has migrated or may migrate. The FS/CAP also includes, but is not limited to, a detailed description of site lithology, including soil permeability, and most importantly, contamination cleanup levels and cleanup goals, in accordance with the San Francisco Regional Water Quality Control Board (SFRWQCB) Basin Plan and appropriate Environmental Screening Levels (ESL) guidance for all COCs and for the appropriate groundwater designation. Soil cleanup levels should ultimately (within a reasonable timeframe) achieve water quality objectives (cleanup goals) for groundwater in accordance with the SFRWQCB Basin Plan. The FS/CAP is to include appropriate cleanup levels and cleanup goals and the time frame necessary to reach those goals, in accordance with 23 CCR Section 2725, 2726, and 2727.”

“The FS/CAP must evaluate at least three viable alternatives for remedying or mitigating the actual or potential adverse effects of the unauthorized release(s) besides the “no action” and “monitored natural attenuation” remedial alternatives. Each alternative shall be evaluated not only for cost-effectiveness but also its timeframe to reach cleanup levels and cleanup goals, and ultimately the Responsible Party must propose the most cost-effective corrective action. Public participation is a requirement for the CAP process. Potentially affected stakeholders who live or own property in the surrounding area of the proposed remediation must be notified through mailing of a fact sheet. The draft fact sheet is first reviewed by ACEH. Once the fact sheet has been approved, public comments on the proposed remediation will be accepted for a period of thirty days. Following the public comment period, the comments received including ACEH's comments, must be addressed and incorporated into a Final FS/CAP.”

As requested in my January 3 and January 25, 2013 e-mails, please update the Baseline Environmental Schedule with a revised submittal date for the Draft FS/CAP and submit the revised the Baseline Environmental Schedule to ACEH by February 15, 2013. In the revised Schedule please include time for preparation of detailed design documents for the alternative selected in the final approved FS/CAP. Be sure to include 60 day review cycles for all submittals to ACEH. If active remediation is an element of the approved alternative in the Final FS/CAP, it should also be incorporated into the revised Baseline Environmental Schedule.

Thank you,

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From: Robert Robitaille [mailto:rrobitaille@aeiconsultants.com]
Sent: Friday, January 25, 2013 5:30 PM
To: Detterman, Karel, Env. Health
Subject: VI Mitigation at Former Good Chevrolet

Hello Karel,

We came across this while researching tools for vapor mitigation. The concept is simple - we will raise the concrete slab 8 to 12 inches above the soil and then place vents from the void space to the roof of the building. The vents will be equipped with wind-driven or solar powered turbines (with provisions for powered fans if needed) to induce negative pressure in the void space. Using this system, we can eliminate the expense of trenching and installing SSD piping, and eliminate the need for a vapor barrier.

Our vendor has assured me that they have gained approvals from every agency where it has been requested in California, the USA, Canada and Europe. However, when I asked him if he had ever used it in Alameda County, he replied that he had not. I realize that you can't approve it without a 60-day review, but could please let me know your initial thoughts/concerns? FSI is currently working with their structural engineers and we would like to incorporate this product into the slab design in the next few weeks. If you have considered this option in the past and recommended against it, or if you see this as a non-starter for any other reason, I'd like to know asap.

Thank you,

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