

From: Wickham, Jerry, Env. Health
Sent: Wednesday, February 11, 2009 9:00 AM
To: 'Douglas W. Lovell'
Subject: RE: FS/CAP for 2440 East Eleventh St (Eandi Metal Works)

Doug,

Your approach may be acceptable. However, please keep in mind that a comparison of groundwater concentrations to ESLs can only be used to estimate risk due to the volatilization from groundwater pathway. Vadose zone sources may require soil vapor sampling to assess.

Regards,
Jerry Wickham
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
510-567-6791
jerry.wickham@acgov.org

-----Original Message-----

From: Douglas W. Lovell [mailto:doug_lovell@streamborn.com]
Sent: Tuesday, February 10, 2009 5:35 PM
To: Wickham, Jerry, Env. Health
Subject: Re: FS/CAP for 2440 East Eleventh St (Eandi Metal Works)

Jerry

Thank you for the letter directing us to move forward with the FS/CAP.

Your letter indicates we are to address potential vapor intrusion via sampling as necessary. I wanted some clarification.

A review of the SFO Bay RWQCB ESLs indicates the critical compound for vapor intrusion is benzene with a screening level of 54 µg/L in groundwater for the residential scenario (the most conservative scenario). Groundwater measurements in the past two years indicate all monitoring wells measure benzene in groundwater less than 20 µg/L. Accordingly, a comparison of site-specific groundwater concentrations against ESLs does not indicate undue risk.

I would recommend that we complete the FS/CAP and if the preferred remedy is MNA, as opposed to active remediation, we recommend/conduct vapor sampling as

part of the monitoring program.

If the FS/CAP indicates some form of active remediation is warranted, a decision on vapor sampling would await completion of the active remediation. For example, if active remediation is employed and reduces benzene concentrations to very low concentrations (near the MCL of 0.5 µg/L), we would likely not need vapor sampling.

If this approach is acceptable from your viewpoint, no reply is necessary. If not and we need to contemplate vapor sampling prior to completing the FS/CAP, let us know.

Regards

Doug

--

Douglas W. Lovell, Engineer
Streamborn
PO Box 8330
Berkeley CA 94707
510-528-4234 (work)
510-528-2613 (fax)
510-520-3146 (mobile)

on 2/3/09 5:20 PM, Wickham, Jerry, Env. Health at jerry.wickham@acgov.org wrote:

> Comment letter attached.
>
> Regards,
>
> Jerry Wickham
> Senior Hazardous Materials Specialist
> Alameda County Environmental Health
> 1131 Harbor Bay Parkway
> Alameda, CA 94502-6577
> phone: 510-567-6791
> Fax: 510-337-9335
> jerry.wickham@acgov.org
>
>

> Online case files are available at the website below

> <http://www.acgov.org/aceh/index.htm>

>

>

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> -----Original Message-----

> From: Douglas W. Lovell [mailto:doug_lovell@streamborn.com]

> Sent: Wednesday, January 28, 2009 2:27 PM

> To: Wickham, Jerry, Env. Health

> Subject: FS/CAP for 2440 East Eleventh St (Eandi Metal Works)

>

> Jerry

>

> You and I spoke circa July 2008 regarding how to move this site toward

> closure. We agreed that Streamborn should present a recommend to prepare a

> feasibility study/corrective action plan. You expressed concern that

> sufficient delineation had been performed regarding the extent of

> contamination and requested that Streamborn plot the borings and wells on a

> single figure to evaluate whether additional investigation is warranted.

>

> We completed these items in our report dated 14 Nov 2008 (attached).

>

> Any response to our recommendation to move forward with a FS/CAP?

>

> Should I give you a call to discuss?

>

> Regards

>

> Doug

> --

> Douglas W. Lovell, Engineer

> Streamborn

- > PO Box 8330
- > Berkeley CA 94707
- > 510-528-4234 (work)
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