

Detterman, Mark, Env. Health

From: king, michelle [mkking@EKICONCONSULT.COM]
Sent: Tuesday, February 11, 2014 2:45 PM
To: Detterman, Mark, Env. Health; Christensen, Dwain; Maiden, Todd O.
Cc: Roe, Dilan, Env. Health; shaw, jeff
Subject: RE: Meeting Followup: RO42 & RO43 6601-6603 Shellmound St., Emeryville

Mark-

Thank you for that clarification, which provides a very important distinction, and we appreciate the example SMP. We will pass along this information to Julie Treinen.

-Michelle

From: Detterman, Mark, Env. Health [mailto:Mark.Detterman@acgov.org]
Sent: Tuesday, February 11, 2014 2:37 PM
To: king, michelle; Christensen, Dwain; Maiden, Todd O.
Cc: Roe, Dilan, Env. Health; shaw, jeff
Subject: RE: Meeting Followup: RO42 & RO43 6601-6603 Shellmound St., Emeryville

Michelle,

A bit of clarification to your question. At this juncture ACEH does not believe that a deed restriction is required at the two site, but rather believes that a Land Use Restriction may be all that is needed. ACEH would place the land use restriction in Geotracker, on the ACEH ftp site, and would inform the City of Emeryville permit tracking system of the restriction. ACEH would request notification at the time of any land use changes. I've attached an example Site Management Plan (SMP) that would be used under the land use restriction. This example is from another site that was recently submitted. It is for a site undergoing redevelopment, which required an SMP for unexpected areas of contamination, which have been found, and which the document is handling reasonably well. The subject two sites are not under construction, consequently the SMP would need to be modified to fit the particulars (future underground repairs, etc.) of the sites, in the vicinity of contamination associated with the USTs (or other known contamination documented as a result of associated investigations). To also clarify, the two sites would be closing under the current commercial land use classification. As the recent directive letter states, if residential land use is being considered, cleanup would necessarily be to residential goals.

Should you have questions, please let me know.

Mark Detterman
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PDF copies of case files can be downloaded at:

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

From: king, michelle [mailto:mkking@EKICONCONSULT.COM]
Sent: Friday, February 07, 2014 4:37 PM
To: Detterman, Mark, Env. Health; Christensen, Dwain; Maiden, Todd O.

Cc: Roe, Dilan, Env. Health; shaw, jeff

Subject: RE: Meeting Followup: RO42 & RO43 6601-6603 Shellmound St., Emeryville

Hi Mark-

To follow up on our discussion this afternoon, we have a few clarifications to the email. I have used your same numbering to discuss the points below.

1. Land Use Restriction: Julie Treinen indicated that the property owners cannot agree to a deed restriction without having an understanding of the actual restrictions that may be applied to the property. Presumably, those decisions cannot be made until we have completed the additional activities requested below. In the interim, it would be really helpful if you could provide an example deed restriction that can be provided to the property owners and can be used to start the discussion.
2. Vapor Intrusion: Per our discussion, we will analyze the sub-slab soil vapor samples for BTEX compounds and naphthalene, but not the full suite of PAHs. It is our understanding that the low-threat closure policy (LTCP) only requires soil vapor analysis for benzene, ethylbenzene, and naphthalene.
3. Direct Contact and Outdoor Air: We understand that the LTCP criteria for PAHs consider soil from 0-5 ft bgs and 0-10 ft bgs. Our data set includes a few soil samples that were collected from 5-5.5 ft bgs. Based on our discussion, you indicated that it would be acceptable to use the soil samples collected from 5-5.5 ft bgs to represent the 0-5 ft bgs zone.
4. Data Gap Work Plan: We requested clarification on the level of detail that would be required for the Site Conceptual Model. You indicated that it would be acceptable to only focus on the issues raised in #2 and #3. In addition, we indicated that our final report would include a consolidation of data tables that (1) added the requested water level information to the groundwater data, (2) combined the soil data from historical and more recent investigations, (3) provided clarifying footnotes as to which samples were subjected to silica gel cleanup, and (4) compared data to the LTCP criteria and ESLs in the absence of LTCP criteria.

Please let us know if you have any concerns or comments regarding our understanding of the next steps.

Thanks,
Michelle

From: Detterman, Mark, Env. Health [<mailto:Mark.Detterman@acgov.org>]

Sent: Monday, February 03, 2014 10:54 AM

To: Christensen, Dwain; Maiden, Todd O.; king, michelle

Cc: Roe, Dilan, Env. Health

Subject: Meeting Followup: RO42 & RO43 6601-6603 Shellmound St., Emeryville

This time with attachments.

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From: Detterman, Mark, Env. Health
Sent: Monday, February 03, 2014 10:50 AM
To: Christensen, Dwain; Maiden, Todd O.; 'king, michelle'
Cc: Roe, Dilan, Env. Health
Subject: Meeting Followup: RO42 & RO43 6601-6603 Shellmound St., Emeryville

Dwain, Todd, and Michelle,

This email is in followup to our meeting of January 23, 2014, to discuss the subject site, the strategy for addressing data gaps under the Low-Threat Closure Policy (LTCP), and the most efficient path to closure. A summary of the main points of our discussion is provided below.

TECHNICAL COMMENTS

- 1. Land Use Restriction Acceptability** – Data indicates that LNAPL is present in soil and groundwater beneath the subject two sites, and the offsite at the property to the south. ACEH understands that while the three properties are managed by the same asset manager, they are owned by three separate entities. Due to the potential that the subject sites may be closable under the LTCP with a land use restriction, ACEH has attempted several times to determine the acceptability of a land use restriction for the property to the south without success. Therefore, it appears this effort should more properly involve discussions between the ownership entities of the adjacent parcels. As currently configured, the land use restrictions would be for commercial use. If residential is being considered, please note that site cleanup must be to those standards. If the proposed land use restrictions are pursued, please provide documentation from each entity of their concurrence by the date identified below.
- 2. Vapor Intrusion to Indoor Air** - The evaluation of tasks associated with a vapor intrusion investigation was discussed in order to determine sub-slab vapor concentration trends beneath the two onsite buildings, and the offsite building on the parcel to the south. Analysis was generally discussed to include previously analyzed compounds, with the addition of naphthalene and PAHs, unless previous data is found and provided, that supports closure under the vapor intrusion criteria of the Low-Threat Closure Policy (LTCP).
- 3. Direct Contact and Outdoor Air Criteria** – The evaluation of tasks associated with the direct contact and outdoor air exposure scenario was also discussed. An evaluation of the adequacy of existing data for naphthalene and of benzo(a)pyrene toxicity equivalence (BaPe) data to support closure under the Direct Contact and Outdoor Air criteria of the LTCP was discussed. An evaluation of the need for additional shallow soil analytical data would be undertaken.
- 4. Data Gap Work Plan and Focused Site Conceptual Model (SCM)** – As discussed in the meeting, please prepare a Data Gap Investigation Work Plan to address comments 2 and 3, and any other LTCP data gaps that you have noted in your reviews. Please support the scope of work in the Data Gap Investigation Work Plan with a focused SCM and Data Quality Objectives (DQOs) that relate the data collection to each LTCP criteria. For example please clarify which scenario within each Media-Specific Criteria a sampling strategy is intended to apply to.

In order to expedite review, ACEH requests the focused SCM be presented in a tabular format that highlights the major SCM elements and associated data gaps, which need to be addressed to progress the site to case closure under the LTCP. Please see Attachment A “Site Conceptual Model Requisite Elements”. Please sequence activities in the proposed revised data gap investigation scope of work to enable efficient data collection in the fewest mobilizations possible. The use of appropriate and comprehensive data tables for soil, groundwater, depth to water, soil vapor for the three sites was discussed due to a plethora of partially tabulated data in many different formats and legibility. In part this will allow for a quick evaluation of the groundwater wells to collect representative LNAPL and groundwater concentrations. This will also allow for a quick understanding of the history of use of Silica Gel Cleanup at the site in analytical testing for extractable-range organic compounds.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below, according to the following schedule:

- **April 4, 2014** – Acceptability of Land Use Restrictions
File to be named RO42_RO43_CORRES_L_yyyy-mm-dd
- **April 11, 2014** – Site Conceptual Model and Data Gap Work Plan
File to be named RO42_43_SCM_WP_R_yyyy-mm-dd

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

I believe this captures the principal points of our discussions, if not all. If you believe I have left something off, please let me know.

Otherwise, should you have questions, please let me know.

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