

Chan, Barney, Env. Health

From: Chan, Barney, Env. Health
Sent: Friday, October 19, 2007 10:24 AM
To: 'Deborah Castles'
Cc: Catherine W. Johnson; John.Cavanaugh@erm.com; Drogos, Donna, Env. Health
Subject: RE: 1001 42nd Street

Deborah: Sorry for the delay in getting back to you. Referring to the County's September 13, 2007 response letter to the submitted CAP(attached), the County's concern about approving the proposed remediation ie enhanced skimming from recovery wells is that although this may be the preferred method among those considered, there is no data that suggests that what is proposed will actually be totally effective in removing free product. Given the apparent large area of the free product and the uncertainty of the release scenario, it would seem prudent to do a pilot study to estimate the expected effectiveness of this remediation approach. We discussed possibly installing an extraction trench to increase the area of effective remediation as an addition to the proposed extraction wells. Post remediation sampling is also a key to verify no rebound of free product would be expected. A pilot test would also provide evidence that the proposed would or would not be sufficient to remediate the free product area.

The cleanup objective at this site was discussed in our meeting and the County concurred that the cleanup requirements should be consistent with the site use. Provided the site is to remain commercial, we do not recommend demolition of buildings, nor meeting residential or unrestricted cleanup levels. We do require the removal of free product to the extent practical, assurance that residual contamination does not continue to create a source for offsite contamination in groundwater and verification that soil vapor is not a concern to either on or offsite populations. We concur that I hope this answers your concerns. If you would like to have further discussion, please e mail Donna and myself a list of your concerns and available dates and times for a mutually agreeable conference call.

Sincerely,

Barney M. Chan
Sr. Hazardous Materials Specialist
Alameda County Environmental Health
510-567-6765

From: Deborah Castles [mailto:deborah@mcgrathproperties.com]
Sent: Wednesday, October 10, 2007 11:10 AM
To: Chan, Barney, Env. Health
Cc: Catherine W. Johnson; John.Cavanaugh@erm.com
Subject: 1001 42nd Street

Dear Barney:

We are responding to your proposal that the County would like some assurances that the remedial approach that we are proposing will be effective before the County approves the CAP. We are not necessarily opposed to this approach but we are a little confused by the County's proposal and request some clarification.

Our original approach had been to install several recovery wells and then if the system did not seem to be working as effectively as needed, to install additional wells. While we are not necessarily opposed to a limited-duration pilot study to refine our design (via a greater understanding of site-specific factors such as radius of

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influence), we are concerned that an extended trial period in a limited area will slow down the remediation at this site. We really want to move this remediation along and complete it. Additionally, we don't want to incur the expense of installing and operating an entire system if it is apparent from the outset that the system will not satisfy the County's cleanup objectives.

Can you please clarify for us why the County believes there might be problems with the approach that we have proposed? That is, is the County concerned that vacuum-skimming will not remove the free product or is the County expressing concerns about whether removal of free product is sufficient?

It is our understanding based on recommendations from our consultant, John Cavanaugh of ERM-West, that vacuum-skimming is the most appropriate method, based on effectiveness and implementability, to remove the free product short of demolishing the buildings at the site and excavating the dirt.

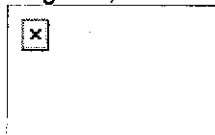
We understand that other projects in the area did an extensive dig and haul at their sites, but these sites were sites where the owners intended to redevelop the sites for residential use. At our site we do not intend to demolish the buildings since we are not planning on residential development and the buildings are completely functional. We believe our selected remedy is consistent with the underground storage tank laws and regulations, which require that we select a cost-effective remedy.

Obviously, we need to understand why the County is proposing that we conduct a pilot test of the vacuum-skimming. That is, what is the alternative if this approach doesn't work? If the County sees demolishing the buildings as an alternative, we need ACEH to clearly articulate why this approach is more favorable and cost effective.

Based on our meeting, we understand that the ACEH is amenable to an approach here that would involve removal of free product, and permit the residual soil to remain (we expect a thin layer of saturated soil would remain immediately above the groundwater) provided we also implement institutional controls such as a deed restriction (restricting digging at the property, use of fruit trees, etc.), and produce a health risk assessment establishing there is no health risk to occupants of the building. Is the County still on board with this approach?

We are anxious to remediate the site, so please let us know when you will respond. We can set up a conference call if a call would be a better way for the County to respond. Please let us know. Also, please note that my email address has changed to deborah@mcgrathproperties.com. I did not receive your 9/28/07 email until it was forwarded to me by John Cavanaugh several days after you sent it.

Regards,



Deborah M. Castles
Vice President
McGrath Properties, Inc.
(formerly Aegis Equity Partners)
130 Webster Street
Oakland, CA 94607
T: (510) 273-2002
F: (510) 251-0747