

Nowell, Keith, Env. Health

Subject: RO117- Osage Property
Entry Type: Phone call
Company: Golden Gate Tank Removal

Start: Wed 2/13/2013 10:15 AM
End: Wed 2/13/2013 10:45 AM
Duration: 30 minutes

I received a voicemail from 2/12/13 from Brent Wheeler of Golden Gate Tank Removal re the Osage Property- RO117. The call was in response to my 2/04/13 inquiry regarding the case status. Mr. Wheeler indicated the property owner was trying to sell the property, but that no work had been performed at the site since the ACEH approved the CAP in May, 2010. We discussed the possible closure under the LTCP. I reviewed the most recent GWM report (4th Q 2008) and saw no-to-low benzene concentrations for the six wells. Mr. Wheeler indicated additional wells had been installed and tabalized data for these wells were presented in the CAP. We have no SWI or GWM reports to document these wells. Review of the CAP data indicated elevated benzene concentrations to 1670 ug/L. Depth to water at the site is as shallow as 2 feet. The CAP proposed soil excavation and soil gas sampling.

We reviewed site data and the LTCP. I raised the issues that the LTCP does not recognize a bioattenuation zone for GW less than 5 feet, soil gas data may be problematic with such a shallow GW depth, and that soil samples collected "in the upper 5-feet" may still be below the water table and may not meet the soil guidelines. We discussed the sunset of the Fund, and he mentioned the Fund had allocated \$40k for the site in the FY2012-13. Mr. Wheeler said he would review the LTCP checklist against the CAP and inform the RP if the site met the LTCP closure requirements. If it did not then Mr. Wheeler would prompt the RP to perform work- either implement the existing CAP or modify the CAP to see if LTCP conditions could be met. I indicated a significantly modified CAP would need a new public comment period.

I mentioned ACEH uses a data gap identification checklist that aids us in identifying data gaps and developing a path to closure strategy, and added the ACEH checklist mimics the LTCP checklist, making the Geotracker checklist much easier to complete. Mr. Wheeler expressed an interest in the ACEH checklist, so I said I would forward him a copy.