

Jakub, Barbara, Env. Health

From: Jakub, Barbara, Env. Health
Sent: Tuesday, May 28, 2013 1:57 PM
To: 'lee@douglasparking.com'
Cc: 'Bob Clark-Riddell'; Roe, Dilan, Env. Health; dehloptoxic, Env. Health
Subject: RO129, Douglas Parking

Mr. Douglas,

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Workplan for Additional Assessment and Soil Gas Sampling*, dated April 4, 2013, which was prepared by Pangea for the subject site. The work plan recommends advancing two soil borings, one soil vapor monitoring well and three sub-slab points to address remaining data gaps.

ACEH has evaluated the data and recommendations presented in the above-mentioned report, in conjunction with the case files, and the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP). Based on ACEH staff review, we have determined that the site fails to meet the LTCP Media-Specific Criteria for Vapor Intrusion to Indoor Air, and the Media-Specific Criteria for Direct Contact.

Therefore, at this juncture ACEH requests that you prepare a Revised Data Gap Investigation Work Plan to evaluate the remaining data gaps identified in the May 28, 2013 meeting with Robert Clark Riddell of Pangea, Dilan Roe and Barbara Jakub of Alameda County Environmental Health for the criteria specified above.

As discussed in the meeting please prepare a scope of work for the following items:

- Present a strategy to evaluate soil concentrations near the previously collected underground storage tank (UST) confirmation samples with elevated detections of benzene to verify that residual contamination does not pose a threat to human occupants due to vapor intrusion into buildings. As discussed in the meeting, please adjust the proposed soil vapor well/sub-slab locations to serve a dual purpose of confirming (1) that secondary source has been removed to the extent practicable via remediation previously conducted at the site, and (2) that soil vapor does not pose a risk to on- and off-site building occupants.
- Present a strategy to collect and analyze soil samples in the upper ten feet to satisfy the direct contact and outdoor air criteria. As discussed in the meeting, please also collect TPH data from the same borings to characterize the bioattenuation zone and thereby provide an alternate line of evidence to verify that vapor intrusion is not an issue at this site and therefore, possibly preclude the need for additional seasonal soil vapor data to satisfy.
- Update the soil vapor sampling procedures to reflect naphthalene analysis by Method TO-17 in accordance with DTSC 2011 guidance.

Please submit the requested work plan by June 28, 2012.

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PDF copies of case files can be downloaded at:

<http://ehgis.acgov.org/dehpublic/dehpublic.jsp>