

Khatri, Paresh, Env. Health

From: Khatri, Paresh, Env. Health
Sent: Friday, June 27, 2008 7:50 AM
To: 'Douglas W. Lovell'
Cc: Juli A. Brady
Subject: RE: 4401 Market Street, Oakland

Hello Doug,

Thank you for providing clarification regarding the exposure duration used in the risk calculation. As for the report submittals requested in our letter, I agree that a report summarizing soil vapor and groundwater sampling will be sufficient and a revised SCM is not necessary at this time.

Respectfully,

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

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

From: Douglas W. Lovell [mailto:doug_lovell@streamborn.com]
Sent: Thursday, June 26, 2008 5:11 PM
To: Khatri, Paresh, Env. Health
Cc: Juli A. Brady
Subject: 4401 Market Street, Oakland

Hello Paresh

I left you a voicemail but I wanted to follow up with an email while we still have your attention.

Thank you for your letter dated 20 June 2008 (attached to this email) directing further action at the subject site. Through no fault of yours, we have been seeking regulatory directive on this site for more than 4 years and really appreciate receiving it.

FYI - the risk assessment table (Table 7) (attached to this email) provided the justification for reducing the exposure duration from the standard 25 or 30 years, to the 10 years that was employed in the calculations. General note (c) of the tables states "The exposure duration (ED) was taken as 10 years (instead of the 25 or 30 years cited in the ASTM standard). The actual exposure duration was based on the observed natural biodegradation that will decrease the soil and groundwater concentrations with time, eventually leading to nondetectable concentrations." In other words, we did not use 25 or 30 years because natural attenuation would decrease the concentrations to nondetect within 10 years.

The risk assessment, current as of 2004, relied upon the accepted practice to calculate soil vapor concentrations on the basis of soil concentrations - a practice that is no longer accepted by the San Francisco Bay Regional Water Quality Control Board. However, your letter incorrectly stated that "it is not clear why the default value for ED was modified ..." and we wanted to correct the misconception.

According to your letter, I understand the following needs to be performed:

- 1 - submit workplan for soilgas sampling. Due 19 August 2008.
- 2 - perform soilgas sampling, groundwater well development, and groundwater well sampling.
- 3 - submit report summarizing the soilgas and groundwater sampling. Due 30 October 2008.
- 4 - Have the site surveyed and perform Geotracker uploads.

I am unclear regarding the need or non-need to submit a revised site conceptual model report. Is the report outlined in item 3 above sufficient?
We can discuss this further after the data are collected, but, for example, if the soilgas measurements are below ESLs and the groundwater concentrations are below ESLs, do you need a revised site conceptual model report?

Let me know of any other questions or comments.

Regards

Doug

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