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By Alameda County Environmental Health at 5:06 pm, Dec 19, 2012

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VIA ALAMEDA COUNTY FTP UPLOAD

Mr. Keith Nowell
Alameda County Environmental Health
1331 Harbor Bay Parkway, Suite 250
Alameda, California 94502

Re: **Remediation System Rebound Test**

5175 Broadway, Oakland, California, ACEH Fuel Leak Case No. RO0000139

Dear Mr. Nowell:

On behalf of Rockridge Heights, LLC, Pangea Environmental Services, Inc (Pangea) has prepared this letter following our meeting at your Alameda County Environmental Health (ACEH) office yesterday. During our meeting ACEH expressed concern that the September 2012 soil gas concentrations in select probes were near applicable environmental screening levels (ESLs). ACEH also expressed concern that residual hydrocarbons (and potentially free product) could be present within fractured rock at the site. In addition, ACEH requested additional monitoring of soil gas and groundwater to further evaluate site conditions. Finally, ACEH indicated that additional remediation of residual impact would help facilitate regulatory case closure.

Therefore, Pangea proposes to restart the existing DPE/AS system at the site as a rebound test. Restarting of the system will help determine if, after the several months of system downtime, hydrocarbon removal rates achievable by the system have rebounded. Pangea plans to initially measure influent hydrocarbon vapor concentrations in all extraction wells, but quickly optimize the DPE/AS on wells located where more elevated hydrocarbons persist in soil vapor (field monitoring of DPE wells), in soil gas (from prior probe sampling), and in groundwater (from ongoing groundwater monitoring data). Pangea anticipates a slight initial rebound in hydrocarbon removal rates, but only resuming DPE operation for approximately 1 to 3 months depending on site conditions. We discussed that resumed system operation would not automatically require another full year of monitoring following system shutdown. (Note that Pangea proposes rebounding testing as soon as possible to facilitate additional remediation and subsurface evaluation before the winter rains reduce remedial effectiveness. Pangea also proposes the resumed operation to take advantage of the existing remediation equipment that can be used 'rent free' in accordance with the rental contract. If the system is not used soon, the equipment provider can retrieve the equipment, and any future remediation would incur rental costs.)

Following additional DPE/AS, Pangea plans to perform additional groundwater and soil gas monitoring to evaluate post-rebound test conditions. This monitoring can be performed on existing site wells and soil gas probes. Additional soil gas probes may be installed to provide additional lateral and/or vertical delineation of hydrocarbons in soil gas.

Pangea respectfully requests rapid ACEH approval of resumed DPE/AS to optimize work before the winter rains begin. If you have any questions, please call me at (510) 435-8664.

Sincerely,

Pangea Environmental Services, Inc.

Bob Clark-Riddell, P.E.
Principal Engineer

cc: Ernie Nadel, Rockridge Heights, LLC
SRM Development

PANGEA Environmental Services, Inc.

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