

Jakub, Barbara, Env. Health

From: Jakub, Barbara, Env. Health
Sent: Friday, July 12, 2013 10:31 AM
To: 'christopher.payne@e-arc.com'
Cc: 'smichelson@erscorp.us'; Roe, Dilan, Env. Health; 'Griffin, Leroy'; dehloptoxic, Env. Health
Subject: RO151, City Blue Print, 1700 Jefferson St., Oakland, CA

Dear Mr. Payne,

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Conceptual Site Model and Work Plan* (Work Plan) dated January 25, 2013, and *Addendum to Conceptual Site Model and Work Plan* (Addendum) dated May 13, 2013 which were prepared by Environmental Risk Specialties Corporation (ERS) for the subject site. The CSM identifies data gaps including the investigating soil in the source area, defining the lateral extent of the groundwater plume and investigating the vapor intrusion pathway. The Addendum proposes advancing six soil borings, six grab groundwater samples, and three soil vapor samples.

ACEH has evaluated the data and recommendations presented in the above-mentioned reports, 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 General Criteria d (Free Product), f (Secondary Source Removal), the Media-Specific Criteria for Groundwater, the Media-Specific Criteria for Vapor Intrusion to Indoor Air, and the Media-Specific Criteria for Direct Contact.

The scope of work presented in the work plan cannot be fully approved at this time. ACEH requests that you address the following technical comments, perform only the requested work and send us a work plan addendum/letter report as requested below.

TECHNICAL COMMENTS

1. **Preferential Pathway Study** – As ERS states “Utility trenches can influence contaminant migration.” To determine if utility lines in the area are influencing contaminant migration, ERS proposes performing a study along the utility lines to assess vapors by advancing probes along the utility trench, collecting a soil gas sample and analyzing the sample using a PID. Based on the utility survey and subsequent soil gas analysis, the location of the borings may be adjusted. ACEH requests that the utility survey be performed before the investigation so that if any boring adjustments are deemed necessary, the locations will be noted in the requested addendum. Please perform the recommended survey, readjust the boring/soil vapor locations based on the new information and submit the results (with any proposed boring location adjustments) in the work plan addendum with preferential pathway survey requested below.
2. **Proposed Investigation** – ERS proposes advancing six soil borings, six grab groundwater samples, three soil vapor samples, and performing a utility survey. However, while some of the details are included, full standard operating procedures (SOPs) are not included for review for any of the proposed work. Please include the SOPs for the proposed soil borings, groundwater sampling and vapor sampling in a work plan addendum by the due date requested below.
3. **Contaminant Source Area Characterization** – ERS proposes advancing borings in the locations of the former underground storage tank (UST) pit and dispenser area. In order to collect sufficient data to satisfy the direct contact and outdoor air exposure criteria in these locations, please also collect samples and analyze soil from the zero to five foot and five to ten foot intervals, at the groundwater interface, lithologic changes, and at areas of obvious impact in addition to the proposed sampling scheme. Also, include a proposal for the requisite analysis for naphthalene and polycyclic aromatic hydrocarbons (PAH) in addition to the proposed analytes (total petroleum hydrocarbons and benzene, toluene, ethylbenzene and xylenes) in the work plan addendum by the due date requested below.

TECHNICAL REPORT REQUEST

Please upload technical report to ACEH's ftp site and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below.

- **October 18, 2013** –Work Plan Addendum with results of the Preferential Pathway Survey
(File to be named: WP_ADEND_R_yyyy-mm-dd)

Sincerely,

Barbara Jakub, P.G.

Hazardous Materials Specialist

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PDF copies of case files can be downloaded at:

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