

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Wednesday, June 11, 2014 4:53 PM
To: 'djerry@aol.com'
Cc: 'matthew farris'; Roe, Dilan, Env. Health
Subject: Request for Interim Remedial Action Plan; Palace Garage; 14336 Washington Ave, San Leandro (RO208)

Mr. Jeff Kerry
Kerry & Associates
151 Callan Avenue, Suite 300
San Leandro, CA 94577

(sent via electronic mail to:

djerry1@aol.com)

Mr. Jeffery Kerry
Jeffery & Dolores Kerry Trust & Jame Donnelley et. al.
19655 North Ripon Road
Ripon, CA 95366

Dear Mr. Kerry:

Alameda County Environmental Health (ACEH) staff has undertaken the review of the case file in order to update the Low-Threat Closure Policy (LTCP) and Path to Closure (PTC) checklists for the 2013 / 2014 fiscal year. In a January 21, 2014 directive letter, ACEH requested a Revised Corrective Action Plan due to the collection of additional data as discussed in that letter. Further review of the data indicates that in order to efficiently move the site forward by removing the last impediment to closure, and to quickly mitigate the risk of vapor intrusion indicated by the data, it is appropriate to modify the approach.

ACEH's review of site data indicates that the site does not meet two LTCP criteria. Existing data indicates that the site does not meet General Criteria f (dispenser secondary source removal), and also indicates that the site does not meet Media-Specific Petroleum Vapor Intrusion to Indoor Air criterion as follows. The site does not meet scenario 3a of the Media-Specific Petroleum Vapor Intrusion to Indoor Air criterion as the site does not consistently contain groundwater concentrations below 100 micrograms (ug/l) benzene, and may not have a 5 foot bioattenuation zone with Total Petroleum Hydrocarbon (TPH) under 100 milligrams per kilogram (mg/kg). The site also does not site meet scenario 3b of the Media-Specific Petroleum Vapor Intrusion to Indoor Air criterion, as the site does not contain a bioattenuation zone 10 feet in depth with residual soil contamination below 100 mg/kg TPH. Finally, site specific vapor data indicates that benzene, ethylbenzene, and naphthalene vapor concentrations greatly exceed LTCP required values by approximately 235%, 75%, and 27%, respectively, and oxygen is present at less than 4% (1.8 to 2.2%) at a depth of 5 feet. Additional details are contained in the January 21, 2014 directive letter.

Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below.

TECHNICAL COMMENTS

- 1. Request for a Interim Remedial Action Plan** – The site does not meet two LTCP criteria as discussed above. It appears that a relatively shallow localized mass of residual soil contamination is present in the clay soil beneath the site. The residual soil mass does not appear to affect groundwater significantly within the context of the LTCP as the groundwater plume is defined to be relatively short (Groundwater Media-Specific Criteria 1.2). However, the shallow residual contaminant mass appears to represent a vapor intrusion risk to the site and adjacent offsite buildings, and this is the principal remaining impediment to case closure. Consequently Interim Remedial Actions appear appropriate in order to mitigate the risk of vapor intrusion and expeditiously move the site towards closure. Please submit an Interim Remedial Action Plan (IRAP) by the date listed below.

ACEH understands that the proposed IRAP will consist of a source area excavation. Please ensure the IRAP is complete and covers topics of potential concern for the proposed remedial actions, including mitigation of noise,

dust, documentation of the cleanliness of import fill (if using recycled base rock see the *Guidance for Characterization of Concrete and Clean Material Certification for Recycling*, issued by the New Jersey Department of Environmental Protection), shoring, and offsite disposal of the excavated material.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with Attachment 1 and the following specified file naming convention and schedule:

- **August 15, 2014** – Interim Remedial Action Plan
File to be named: RO208_IRAP_R_yyyy-mm-dd

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

If you have any questions, please call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

*Mark Detterman
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PDF copies of case files can be downloaded at:

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