

Khatri, Paresh, Env. Health

From: Khatri, Paresh, Env. Health
Sent: Tuesday, May 20, 2008 2:36 PM
To: 'Mark Detterman'
Subject: RE: RO 210: Case Closure Summary Request Questions

Hello Mark,

Thanks for the clarification regarding the status of the ORC socks at the site. When reviewing this case for closure, my only concern would be the fact that there may have not been enough time for contaminant rebound evaluation from the time ORC was introduced to the most recent groundwater sampling event. In any event, we will look at the last years analytical data (prior to ORC) as you have suggested and go from there.

Thanks again.

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

From: Mark Detterman [mailto:MDetterman@blymyer.com]
Sent: Tuesday, May 20, 2008 11:12 AM
To: Khatri, Paresh, Env. Health
Subject: RE: RO 210: Case Closure Summary Request Questions

Paresh,
Thanks for the email.

I've an email into the RWQCB to see what they might be able to provide in regards to a Case Closure Summary Form. The only one's I've found are from the Central Coast and the San Diego RWQCBs.

I also appreciate your thoughts on ORC removal; however, removing the ORC socks won't produce an instantaneous response (either increased or decreased concentrations). That takes time, on the order of at least a quarter. If we remove the ORC socks now during the next quarterly event (due 6/4, but do-able until 6/30 for the second quarter), we are not likely to see a changes until the next quarter, due 9/08. Our client is now very anxious to close the site ("The cat is out of the bag" and doesn't want to go back in). If additional sampling is to be required, they will want to see it in writing (i.e. an official communication). I would suggest that ACDEH evaluate contaminant concentrations for the June and

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September 2007 events to make that determination. If those concentrations, collected prior to ORC sock installation, are acceptable considering natural attenuation and etc. then the case should proceed to closure; if not then additional events should be required by an official communication. Wells with the highest concentrations are MW-4, MW-8, and MW-9 (wells 8 and 9 are installed in the tank basin vicinity excavation, and well 4 is downgradient).

Hope this helps. Keep me posted on any pending changes, or if you find an acceptable Case Closure Summary Form! Thanks.
Best,

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From: Khatri, Paresh, Env. Health [mailto:paresh.khatri@acgov.org]
Sent: Tuesday, May 20, 2008 8:56 AM
To: Mark Detterman
Subject: RE: RO 210: Case Closure Summary Request Questions

Hello Mark,

This e-mail is in response to your request for clarification to items listed in your May 15, 2008 e-mail.

1. Case Closure Summary Format: I have not yet come across a Case Closure Summary format/template. As soon as I find one, I will forward it to you.
2. Preferential Pathway Evaluation: Thank you for directing me to the conduit study performed for the site.
3. Since ORC was recently introduced to select monitoring points, please conduct the next quarterly groundwater event to evaluate potential contaminant rebound.

For clarification regarding the ORC Work Plan, ACEH does not believe that continued ORC introduction in monitoring wells at the site is currently warranted based on contaminant concentrations recently detected in groundwater. However, it is recommended that ORC is discontinued now and as stated above, groundwater sampling is conducted to evaluate potential contaminant rebound.

Please contact me should you have any concerns regarding this email.

Best regards,

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5/20/2008

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From: Mark Detterman [mailto:MDetterman@blymyer.com]
Sent: Thursday, May 15, 2008 3:43 PM
To: Khatri, Paresh, Env. Health
Subject: RO 210: Case Closure Summary Request Questions

Paresh,

I'm following on my voice mail from a bit earlier this afternoon to find out about several items:

1. Are there any recent preferences you can forward in regards to the Case Closure Summary Format; it's been awhile!
2. A conduit survey was included in the Remedial Investigation / Feasibility Study Report dated October 7, 2005. See Section 3.5 and Figure 3.
3. The next quarterly event was scheduled for June 4; fairly soon. I've tentatively held it. Is this correct, or should we proceed?

I also want to clarify actions at the site, there may be some confusion. The May 1 letter can be interpreted that the County does not believe that installation of ORC socks is warranted. However, the socks were installed in September 2007 well after expiration of the 60 day comment period following the ORC sock workplan submittal (February 16 2007 to April 16, 2007). Installation was documented in the Third Quarter Report for 2007, and in each subsequent quarterly report, and commented on within each report. We believe this is one of the reasons concentrations started to drop a bit more quickly, esp. TPH as diesel. This is particularly important from a reimbursement point of view. Without regulatory approval it would not reimbursable. Hopefully this will not be an issue, but we may need to have the County clarify the letter.

I look forward to your response, via voice or email, and will start the summary once I get some input.
Thanks,

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