

Drogos, Donna, Env. Health

Subject: RO266 - 1432 Harrison St
Entry Type: Conversation

Start: Thu 9/20/2007 10:00 AM
End: Thu 9/20/2007 11:30 AM
Duration: 1.5 hours

Conf call w/Mark Borsuck (RP) & Mark Jonas (CRA)

Discuss site, communication. Presentation to SWRCB that work not occurring onsite, when in fact ACEH actively communicating with RP Borsuck re: comments on site data, arranging conference call. Issues, CRA says repeated calls to SWRCB. 1st I heard of case was conversations w/RP Borsuck beginning in May 2007. Conflicting communications from RP & consultant to ACEH, requested that RP & consultant confer on their respective communication with ACEH rather than operating independently.

Off-site sources

1424 Harrison - data provided in August ltr, appears source exists at 1424. Vertical profile of contamination is similar to 1432, ie., from invert depth to 26'+ bgs. However, 1432's [C] are much higher particularly for Benzene. Both sites have their own contamination so 1432 cannot say their problem is due to off-site contamination. Could be plume commingling, both responsible.

Next Actions: ACEH will review data & determine how to proceed re: requesting work at 1424 Harrison.

He has new information that 1400, 1500 Harrison St are also potential sources of contamination. & that [C] detected offsite in MWs could also be from those sources. Requested he submit that data in a report, with clear supporting graphics (extended site maps, UST locations, pollution locations, etc). Discussed demonstrating offsite location is a source, he will need to provide data to support this hypothesis, either existing or data he collects. Discussed that offsite sources could be contributors however, based on the [C] at his site he is a contributor to offsite dissolved plume.

Next actions: not known until substantiated data is submitted.

Risk Assessment

Uses pre-remediation levels for Benzene in soil & concludes no further cleanup, move to closure.

Issues:

Premature RBCA, site characterization incomplete, plume extent not well characterized, source area characterization completeness not apparent (onsite & in street).

RBCA performed w/out considering specific development plans, 2 stories subgrade proposed, RBCA disregards data collected below 20' bgs. Highest levels of benzene below 20' bgs not considered.

Averages [C] over entire site, cannot average over 30'x30' for residential.

Offsite pollution not addressed.

ACEH does not concur with RBCA analysis & how data was selected and eliminated.

Remediation

Effectiveness not evaluated or demonstrated.

GW contamination remains, no soil sampling performed.

Soil gas sampling

Needed, agency review & concurrence needed on locations.

How site should proceed

Investigation completed, offsite extent determined.

Prepare CAP (cleanup methods & cleanup goals & levels onsite & offsite), public comment period on CAP. Have impacted neighbors properties & owners need notification & comment period.

Site cleanup: if redeveloping into another gas station, similar use, etc, can likely redevelop. Residential development needs cleanup in order to proceed, demonstrate that cleanup effective. Soil & GW contamination cannot pose threat to

residential. Some discussion over requiring GW cleanup onsite as long as soil onsite cleaned up. If soil onsite is cleaned up then GW [C] not expected, if GW contamination persists then an existing soil source likely present.

CRA wants to proceed with confirmation soil sampling & soil gas sampling, revised risk assessment.

Told them they need regulatory review of case, with an evaluation of all data collected, and a directive letter issued that addresses current data gaps & maps path to closure. Do not concur with additional portions of work prior to this review. Not effective use of RP \$\$ or USTCF \$\$. ACEH does not concur with conclusions to date.

Regarding offsite sources, if plume commingling then RPs will need to work together to address pollution, cleanup, joint CAP, etc.

Waste Oil USTs 1443 Alice (contiguous property)

Waste Oil USTs on adjacent Borsuck owned property at 1443 Alice. Contamination detected. 1 MW installed 40' away in x-gradient location. ? Whether this source investigated. Data reported in file as part of this site. RP & CRA said no agency identified waste oil USTs as site. Told him we will be looking at this too, whether part of this site or its own site. Appears it was included in this site & unaddressed, likely a separate case.

Schedule

His development no longer imminent. Construction estimated 2 years away. Explained that for development will need to set a schedule that includes our review & comment. Can work with him on setting milestones as needed. With current plan do not foresee problem. Will be assigning this case to a new caseworker, undergoing hiring now. Cannot give timeframe at this point, anticipate assignment 2-3 mos -estimated.