

Jakub, Barbara, Env. Health

From: Jakub, Barbara, Env. Health
Sent: Friday, January 21, 2011 9:53 AM
To: caferealty@aol.com
Cc: 'Pat Hoban'
Subject: RE: ACEH LOP #: RO-0000271: Proposed Workplan to Address State FUND 5 Year Review

Dear Mr. Worthington,

Alameda County Environmental Health (ACEH) agrees with the UST Funds recommendation to update the Site Conceptual Model (SCM) and preferential pathway survey. However, we disagree with the fund's conclusion that a risk assessment is needed at this time. We also disagree with the consultant's view that the USTCF wants additional on-site sampling when off-site wells were only mentioned and therefore are not requesting the Risk assessment or the on-site confirmation sampling. To clarify, the USTCF is not the oversight agency and is simply rendering an opinion. Requests for work must be made by us and the additional work will not be reimbursed if not requested by ACEH.

Please continue with your planned review of the site data and synthesize this data in an SCM. The SCM should synthesize all the analytical data and evaluate all potential exposure pathways and potential receptors that may exist at the site, including identifying or developing site cleanup objectives and goals. At a minimum, the SCM should include:

- (1) Local and regional plan view maps that illustrate the location of sources (former facilities, piping, tanks, etc.) extent of contamination, direction and rate of groundwater flow, potential preferential pathways, and locations of receptors;
- (2) Geologic cross section maps that illustrate subsurface features, man-made conduits, and lateral and vertical extent of contamination;
- (3) Plots of chemical concentrations versus time;
- (4) Plots of chemical concentrations versus distance from the source;
- (5) Summary tables of chemical concentrations in different media (i.e. soil, groundwater, and soil vapor); and
- (6) Well logs, boring logs, and well survey maps;
- (7) Discussion of likely contaminant fate and transport.

If data gaps in our understanding of the site (i.e. potential contaminant volatilization to indoor air or off-site contaminant migration, etc.) are identified in the SCM, please include a proposed scope of work to address those data gaps in the work plan due by the date specified below.

Please submit the SCM, updated preferential pathway study and work plan to address data gaps by **March 21, 2011**.

The next step for this site will be to prepare a corrective action plan.

Regards,

Barbara Jakub, P.G.
Hazardous Materials Specialist
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PDF copies of case files can be downloaded at:

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

From: Pat Hoban [mailto:pat@weber-hayes.com]
Sent: Tuesday, January 18, 2011 7:52 PM

To: Jakub, Barbara, Env. Health

Subject: ACEH LOP #: RO-0000271: Proposed Workplan to Address State FUND 5 Year Review

Ms. Barbara Jakub
Alameda County Health Care Services Agency
Department of Environmental Health
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Subject: **Proposed Workplan to Address State FUND 5 Year Review**

Site Location: **Former Exxon Station, 3055 35th Avenue, Oakland**
ACEH LOP #: RO-0000271; GeoTracker #: T0600100538;

We would like to notify you that Mr. Lynn Worthington, the property owner of the above site, has hired Weber, Hayes and Associates to address comments made in the recent SWRCB State Fund 5-Year Summary Report for the subject site conditions.

Investigation at the site extends back to 1991 when four USTs were removed and the fuel release was discovered. Since that time, 14 wells have been installed on site (4 monitoring and 10 remediation wells), soil, water & vapor samples were collected from numerous on and off-site borings, and dual-phase remediation operated for 4 years (removed approximately 6,500 lbs of gasoline from the subsurface).

We have proposed completing an in-depth review of subsurface data, to include isoconcentration maps for chemicals of concern and cross-sections presenting a visual presentation of the current subsurface conditions, in order to adequately address the 4 recommendations presented by State Fund staff which include:

1. Update the conceptual site model,
2. Update the preferential pathway survey,
3. Complete an assessment of risk to human health and the environment,
4. Complete a corrective action plan,

State Fund comments suggest the Site to have been inadequately characterized, and as a result, previous remedial actions have been generally ineffective at reducing the groundwater concentrations. The goal behind our proposed review of historical and current subsurface data will be to assess why aggressive remedial actions have not significantly reduced groundwater concentrations despite the removal of nearly 6,500 pounds of gasoline from the subsurface. The ultimate goal is to use remaining State UST FUND monies on a defensible, remedial action that eliminates, or most cost effectively reduces the contaminant source so future risk is limited.

The proposed *Workplan* submittal will provide recommendations that may include obtaining *current* on-site soil data at the source locations to compare with pre-remedial action soil data, and installation of off-site wells to define the current extent of contamination in both on-site and the off-site locations.

Schedule: We propose submitting this Workplan by February 4th. All work will be conducted under the supervision of a California-registered Professional Geologist.

If you would like to discuss our proposed goals further, please let me know by email or phone. I look forward to working with you on this site cleanup.

Sincerely,

Pat Hoban, PG
Senior Geologist

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