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Alameda County  
Environmental Health



November 8, 2007

***VIA ALAMEDA COUNTY FTP SITE***

Mr. Barney Chan  
Alameda County Environmental Health  
1131 Harbor Bay Parkway, Suite 250  
Alameda, California 94502

Re: **Proposed Feasibility Testing/Source Removal and Well Installation**  
7240 Dublin Boulevard  
Dublin, California  
ACEH Case No. 304

Dear Mr. Chan:

On behalf of Mr. Hooshang Hadjian, Pangea Environmental Services, Inc (Pangea) prepared this letter to notify you that Pangea plans to implement the feasibility testing/source removal and shallow well installation initially proposed in our *Site Investigation Report* dated August 11, 2006. Pangea has requested concurrence with the proposed work in quarterly monitoring reports, but has not received any response from the ACEH. To facilitate your review, Pangea reiterates the proposed work scope below. It is important to note that Pangea hopes to conduct the feasibility testing/removal within the next few weeks to hopefully complete the work before the winter rains commence in earnest. Better test results and source removal can be achieved during drier conditions.

**Feasibility Testing Work Scope**

Given the fairly limited extent of the most elevated constituent concentrations, Pangea recommends conducting *short-term feasibility testing/source removal* on key site wells (MW-3A, MW-7AA, MW-7A, MW-6A). Source removal and/or site remediation should improve site conditions and reduce the potential for subsurface contaminants to use the sanitary sewer line backfill as a preferential pathway. If concentrations decrease in wells nearby the sewer line, no further characterization efforts along the sewer would be recommended. The testing/removal would be conducted using a *portable dual phase extraction (DPE) system for up to five (5) days*. DPE is a common and cost-effective technique for remediating sites impacted with elevated concentrations of petroleum hydrocarbons and MTBE, especially for targeting upper shallow 'AA' zone and shallow 'A' zone saturated soil. DPE involves the simultaneous extraction of soil vapor and liquid (groundwater/free product mixture) from site wells using a large above-ground extraction blower. For the short-term testing/source removal, a portable generator and temporary water storage tanks would be used.

**PANGEA Environmental Services, Inc.**

Pangea will prepare a report presenting test/removal procedures, results, conclusions and recommendations. The report would comment on the benefit of additional short-term source removal (via DPE or vacuum truck extraction events) or additional groundwater monitoring before evaluating the need for additional source removal. If deemed appropriate after the testing/removal, Pangea would recommend preparation of a Corrective Action Plan (CAP), which would compare active remedial alternatives to monitored natural attenuation (MNA). Data from the feasibility test would assist with evaluation of potential remedial alternatives.

Testing/source removal is also recommended for the proposed site wells referenced below, if elevated concentrations are detected in those wells. If the testing is conducted before the winter rains and before the well installation can be permitted and completed, the testing of the new wells will not be conducted during the planned test/removal event.

### **Proposed Installation of Two Shallow Monitoring Wells**

Pangea recommends installing additional monitoring well locations west of the dispenser islands, as shown in Figure 10 of the August 11, 2006 *Site Assessment Report*. Two wells would be installed, screened from approximately 7 to 14 ft bgs, and from 15 to 20 ft bgs to evaluate contamination in the upper shallow 'AA' zone and the shallow 'A' water-bearing zone.

Pangea will prepare a report describing the well installation activities. The report will include boring logs and soil analytical results. Groundwater monitoring from the wells will be included in regular monitoring reports.

### **Implementation Notice**

Section 2722 in Title 23 of the California Code of Regulation stipulates that a responsible party may implement proposed corrective action if no regulatory comments have been received within 60 days of submission, as long as written notification is provided to the lead regulatory agency stating the responsible party's intent regarding the proposed corrective action and their willingness to comply with agency conditions or required mitigation provided in the future.

The letter will be submitted to the ACEH via uploading to the Alameda County FTP site. As requested, Pangea will not submit a hard copy to the ACEH.

Proposed Feasibility Testing/Source Removal and Well Installation  
7240 Dublin Boulevard  
Dublin, California  
November 8, 2007

**Closing**

Thank you for your assistance with this project. If you have any questions or comments, please call me at (510) 435-8664.

Sincerely,

**Pangea Environmental Services, Inc.**



Bob Clark-Riddell, P.E.  
Principal Engineer

CC: Mr. Hooshang Hadjian, 2108 San Ramon Valley Blvd, San Ramon, CA 94583  
Mr. Jim Lange, 6500 Dublin Blvd., Suite 202, Dublin, CA 94568  
SWRCB Geotracker (electronic copy)