From: Wickham, Jerry, Env. Health
Sent: Thursday, June 12, 2008 8:32 AM
To: 'Gail Jones'
Subject: RE: 9201 San Leandro June 12th filed work

Attachments: MISC_SAMP_R_1998-10-16.pdf
Ms. Jones,

Your email message below indicates that you are proceeding with a modified scope of work rather than submittal of a Revised Work Plan by July 18, 2008 as requested in our May 9 correspondence. As noted in your message, the proposed investigation will not address several of our technical comments. I cannot comment on the specifics of your proposal as approval or negotiation of modified scopes of work by email is not an accepted practice for us. Since you are apparently initiating this work in response to the request of your client, you should make the responsible parties aware that proceeding without authorization may result in their costs being ineligible for reimbursement from the UST Cleanup Fund. I am attaching the 1998 report which you were unable to locate, which can also be found on the LOP Records on our public website.

Regards,

Jerry Wickham
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From: Gail Jones [mailto:gail@eras.biz]
Sent: Friday, June 06, 2008 12:44 PM
To: Wickham, Jerry, Env. Health
Cc: 'David Siegel'
Subject: 9201 San Leandro June 12th filed work

Mr. Wickham:
We have received your letter regarding the revised work plan dated May 9th. Your letter requires another revised work plan on 18 July 2008. I tried to telephone you earlier but got your voice mail stating you will be out of the office until June 6th. Unfortunately, the responsible parties have a court mediation date of July 1st 2008 for which results of the proposed investigation are required. This court date requires an estimate of the overall project costs. Therefore, we are planning to proceed with the proposed investigation on June 12, 13, 16 and 17, incorporating your technical comments to the degree possible.

The technical comments that will be integrated into the field scope of the investigation are listed below.

4. Vertical delineation: One of the borings adjacent to the former 550-gallon UST and the 3 borings down-gradient and cross gradient to the former UST will be cored and logged to a maximum depth of 40 feet or

until an aquitard is proved. Depth discreet groundwater samples will be collected from separate borings based on the lithography encountered, vertical extent field evidence of contamination, and the presence or absence of an aquitard.

5. Groundwater analyses. Groundwater at this site was not historically analyzed for MTBE. Because MTBE had not previously been tested, ERAS analyzed or groundwater samples from the monitoring wells sampled in November 2007. MTBE was not detected above the laboratory reporting limits while BTEX compounds were all detected above the ESLs. According to the laboratory analytical chemist with which I discussed the matter, while 8260 is the more accurate method for analysis of MTBE, method 8021 is more accurate for BTEX concentrations. Therefore ERAS proposed 8015/8021 as the more accurate method for the contaminants of concern. However, based on your request we will analyze groundwater for TPH-g/ BTEX/Oxygenated 1,2-DCA and EDB by EPA Method 8260.

7. Proposed Soil Vapor Analyses. I discussed this matter with an analyst at Air Toxics. While TO-15 can report gasoline range hydrocarbons, Method TO-3 is considered more accurate for TPH-g. Therefore, ERAS will analyze TPH-G by TO-3, BTEX/MTBE and 2-propanol (leak compound) by TO-15, and CO2, O2 and methane by ASTM 1945D.

8. Detailed Map. A more detailed map including building walls and used in the area north of the former UST exaction and a more detailed description of the occupancy of the adjacent areas will be developed and included in the investigation report.

10. Soil along RR Tracks. Soil samples will be collected from each hand auger boring at 1.5 and 3.0 feet. If contamination is observed at 3 feet an additional sample will be collected at 5 feet for analysis.

11. PCBs in Soil: Soil samples will be collected at 0.5 and 2.5 feet from each boring.

12. TPH –k and TPH-mo in boring B18. 3 borings were proposed around former boring B18. The proposed location southeast of B18 (offsite) will be moved to about 20 feet northwest of B18, adjacent to the outside wall of the paint room. This is done both to comply with your request, and because we have run out of time to negotiate an access agreement with the adjacent property owner. We understand that the current investigation may not adequately delineate the contamination around B18 and that data from the adjacent property may be required in the future.

Those Technical Comment we will be unable to address with this investigation are listed below with explanation.

3. Move the two boring proposed along to the northwest boundary about 120 feet to the inside of the Warehouse Storage Area. One of the key pieces of information needed for the July 1st court date is ascertaining if contaminated groundwater associated with the former UST is advancing offsite. Therefore we will advance the borings in the proposed location along the downgradient property boundary. Additionally due to the use of the inside area for storage, drilling inside the warehouse presents logistical challenges which we lack the time to review to propose additional borings in the building at this time. We proceed with the borings as proposed with the understanding that the results of this investigation may not provide adequate characterization of the contamination associated with the former 550 gallon UST and that additional sampling, including from under the

warehouse building may be required in the future.

6. Soil Vapor Sampling. We acknowledge the error you noted in our Table 4 of the work plan and I apologize for the error. The table will be corrected in the investigation report. Based on a correct reading of the data the concentrations of BTEX exceed ESLs in borings B5 and B6 (as well as TPH-g concentrations as noted in the work plan).
You state that these borings are located inside the building. However, we have review Alameda County files for this site and the report which presumably included information on the boring locations was not included in the file. We only had an opportunity to review a letter that gave the analytical results. Thus we have no information regarding the locations of B-5 and B6 including whether they were located inside or outside the building. Do you have the Jonas 16 Oct 98 report "B5 and B6 Soil Vapor Sampling Results" in your files. If so please let me know.
You requested proposal of additional vapor sample locations based on the known contamination inside the building. However since we do not know the locations of B-5 and B-6 we can not propose a vapor delineation investigation based on these results.

The rationale for the proposed vapor and soil sample location near MW-3 is to provide a near maximum concentrations in vapor and soil since it is in an area we expect to be severely impacted from the former UST based on the groundwater results from MW-3. The proposed sub-slab sample will indicate if contaminant vapor undergoes additional concentration under the concrete slab. However, because a ventilation system to protect the current occupants is operating I do not see the sub-slab sample as key sample immediately. Therefore if will collect the soil-gas sample from the location near MW-3 (I need a soil sample from there anyway). I will not collect the sub-slab sample. It is my intention to discuss with you the objectives of this phase of the investigation and prepare a more thorough work plan for a soil-gas investigation.

Therefore we will collect the vapor samples in the proposed locations with the understanding that this will not provide a complete delineation of vapor contaminant distribution. We expect to propose additional delineation samples based on the results of these samples, the more detailed building map discussed above, and hopefully the locations of the previous samples B5 and B6, if found.

9. Proposed Utility Survey in are of MW4. The principle problem with work inside the building is that the large steel racks are not easily moveable. My understanding is that moving the racks at this time is not an option because it would interfere too much with business operations. I spoke with Anthony at Subdynamics regarding use of GPR to locate a UST under a rebar reinforced concrete slab. He stated the usefulness of GPR is dependent on the grain-size of the shallow soil. GPR may work for very sandy soil. If the soil is very fine-grained GPR is less likely to be useful.

The objective for the proposed borings is to ascertain the severity of impact to the groundwater from any leak to the UST near MW4 as a way of estimating the contribution of this UST to overall project costs for the court mediation. We fully recognize that this will not provide maximum concentrations for various mediums or otherwise fully characterize the area. However, a solution to the steel rack problem will have to be pursued before we can propose an investigation inside the building.

Please feel free to call me to discuss the project when you get this e-mail. I will be drilling in the field on

the 12th if you would like to meet with me onsite.

Thank you
Gail Jones, P.G.
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