

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Wednesday, February 20, 2013 4:26 PM
To: 'Gilbert, Judy'
Subject: RE: Chevron 95607

Hi Judy,

Sorry I did not make the “pre-vacation” request; I had a number of Chevron Requests for Closure that needed to get out that week... Regardless, thought I’d respond.

In reviewing the site history, it looks like it would be best to proceed with a “Draft CAP”. There has been a general policy change since the RAP was submitted and approved in early 2007. Pilot tests are generally conducted under an interim RAP scenario, but with installation of a remedial compound it appears a CAP process, with public participation, would now appear appropriate. The Draft CAP would propose cleanup goals, evaluate three viable alternatives, discuss confirmation sampling, post-remediation monitoring, and include a schedule. That’s probably more than you were anticipating, but is pretty standard. I hope to send a letter soon, and it will have the standard Draft CAP language and will likely approve the proposed well location. The modifications, and the reasons, you’ve proposed should be covered in the Draft CAP. It’s kinda good to know that RW-1 is located very close to C-6, as it had not been so located previously. I suspect we could lose that well, but I think wells C-3 and C-6 should be kept for confirmation sampling and continuity, rather than to remove them from the monitoring well network. That said, those two wells, as well as all extant wells are pretty poor tools for monitoring groundwater concentrations at the site and vicinity (well screens ranging from 20 to 30 feet!). Because the well screens are so long, a good case can be made for a vertical contaminant concentration dilution in the wells, and in the case of C-1, it would look to be permanently submerged, so I’m not sure groundwater concentrations from right adjacent to the former tank pit it are representative of groundwater at that location (if any of the others are). (So would post-remedial monitoring, with a good screen interval, in the vicinity of C-1 be appropriate?) Please also note that residual tank pit soil contamination was highest along the northwestern corner proximal to C-1. As a consequence, and to compensate a bit for the poor data quality, it might be appropriate to install three DPE wells rather than the two you outlined, covering the C-3, C-6, and C-1 areas (the goal being to quickly knock any residual at the site down). One of the recently passed items associated with the LTCP, is the identification of a Path to Closure with a schedule, and the three DPE well approach is suggested with the intention of moving the site forward in one remedial mob rather than a longer extraction period to perhaps compensate, or an iterative well install approach. The SWRCB intends to try to shut down the USTCF ASAP (2016), and I’d like to get this site moving towards that intended end.

We can talk, but this is just my initial take or thinking on the site for now. Hopefully it can get you going on a track.
Regards,

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PDF copies of case files can be downloaded at:

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

From: Gilbert, Judy [mailto:jgilbert@craworld.com]
Sent: Thursday, February 07, 2013 4:17 PM

To: Detterman, Mark, Env. Health

Subject: Chevron 95607

Hello Mark – This is a follow up to the voice mail message I left you this afternoon. As you know, CRA is planning to install a DPE system at the site. On January 8, 2007, Cambria submitted a Remedial Action Plan, which proposed that a DPE would be installed at the site and that existing groundwater monitoring wells C-1, C-3, C-6, C-9 and C-12 and recovery well RW-1 would be utilized as extraction wells. Based on current site conditions, CRA recommends the following:

1. The extraction system will operate on compliance wells C-3 and C-6. The wells will be reinstalled and constructed as 4" diameter wells with screen tops set 1 to 2 feet above the current high water table elevation, and base of screen set several feet below the base of the smear zone. The base of the smear zone should be defined with field soil screening data during well installation.
2. Wells C-1, C-9 and C-12 have dissolved benzene concentrations and trends below low-threat closure policy criteria and are not recommended to be included in the extraction well array.
3. Well RW-1 exhibits elevated dissolved concentrations, and is immediately adjacent to well C-6. CRA is requesting permission to abandon this well.
4. CRA would like to conduct the drilling to reinstall wells C-3 and C-6 and install the well proposed in our August 28, 2012 SCM during the same mobilization.

Please let me know if you concur with our recommendations. Also, would you like for us to prepare an addendum to the RAP, a work plan, memo, or email that would detail the new or revised scope or work that we are proposing to do at the site? And if there's any chance that you could, please respond to this email before you go on vacation.

Thanks

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