

**Khatri, Paresh, Env. Health**

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**From:** Angus McGrath [amcgrath@secor.com]  
**Sent:** Tuesday, April 15, 2008 12:45 PM  
**To:** Drogos, Donna, Env. Health; Khatri, Paresh, Env. Health  
**Cc:** Saut, Richard (Indust, PTL)  
**Subject:** 725 Julie Ann Way - Case No. RO0000354

Mr. Paresh Khatri,

We received your letter regarding the 725 Julie Ann Way site and would like to request a meeting to discuss your letter. As you can imagine, after waiting 4 years for a response to a simple question from the ACHCS – EHS, my client is concerned about doing more work. In 2003 when SECOR met with the previous case worker, there were several issues discussed that are presented in the current letter:

1. Mr. Amir Gholami reported that he did not have time to meet with us in 2003 because he was trying to get all of his cases up on GeoTracker, including this case. Case closure was requested before GeoTracker was required to be input.
2. The screened interval is below the groundwater surface in a couple of the wells but these wells were all dewatered prior to sampling in order to assess whether product was present. Product thickness may have been difficult to estimate, but product would have been present given that the water surface was within a couple of feet of the screened interval. There was no indication of product beyond a sheen. That was reported by the field staff to the project manager as being more like that observed for ferrous iron precipitation than the rainbow color of free product. – groundwater concentrations were also indicative of concentrations well below saturation.
3. It is very difficult to ascertain what might be the driver for preferential migration on a site that has so flat a water table that groundwater flows multiple directions on the small site. It is not clear to us what a preferential migration study would do nor how it would be designed given that the groundwater gradient is so flat and erratic. The fact that groundwater does not move significantly on site was also a rationale for closure.
4. Benzene is only observed in one well and would be the risk driver for this site given that groundwater is designated for non-beneficial use and there are only commercial/industrial sites in the area. There is no evidence of high residual concentrations at the site at this point, so what is the point of additional soil sampling and a preferential migration study?
5. It is not clear what reports the county would like for the site given that all of the reports have been submitted previously and would be required to conduct a comprehensive review.

We were very surprised to receive this letter without any contact and discussion given that the request has now languished for 4+ years. The request seems misplaced given site conditions, local zoning, the status of groundwater in this area, and the level of contamination observed in groundwater. ACHCS-EHS has recommended closure on sites with significantly more contamination higher risk given that these sites were located adjacent to residential neighborhoods. Hopefully we can come to some understanding about what will be required to achieve closure. This would be the second or third time that my client has requested this information and acted on it. In both cases when the conditions for closure were met (low benzene and no free product) no one was available to review the documents.

SECOR would like to request a meeting to discuss your request for additional studies. Please let us know what your availability is to meet in approximately two weeks time. Mr. Richard Saut will need to fly from Pennsylvania to be at this meeting, so we will need to schedule at least two weeks in advance.

Thank you.

Angus...

**Angus E. McGrath, Ph.D.**

4/15/2008

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