From:	Drogos, Donna, Env. Health
To:	Cullen, Andrew (Penske)
Cc:	Khatri, Paresh, Env. Health; Doran, Neil; Hey, Eva; "McGrath, Angus"
Subject:	RE: RO#354 - 725 Julie Ann Way, Oakland
Date:	Monday, May 23, 2011 1:32:00 PM

Andrew,

ACEH understands your concerns regarding untimely responses from us in the past. However, that was in the past, and ACEH has been clear and responsive since 2008. Please note that moving cases forward towards closure is a collaborative process in which the Responsible Party and the regulatory agency must work in concert to achieve the common goal of case closure we both desire in a cost-effective manner. With that being said, ACEH has identified concerns regarding shallow soil and groundwater contamination at the site and the apparent incorrectly constructed monitoring wells with excessively long screened intervals in our April 8, 2008 correspondence.

From reviewing the site with Paresh it appears that Stantec believes that Fenton's Reagent had sufficiently remediated the site and no further investigation or cleanup is necessary. However, to address ACEH's concerns, Stantec conducted a remediation confirmation soil and groundwater investigation in 2009. In Stantec's September 1, 2009, "Soil and Groundwater Investigation and Groundwater Monitoring Report," confirmation soil sample analytical results detected TPH-g, TPH-d, benzene, and naphthalene at elevated concentrations of 320 mg/kg, 12,000 mg/kg, 4.8 mg/kg, and 0.610 mg/kg, respectively. Confirmation "grab" groundwater samples detected TPH-g, TPH-d, benzene, and naphthalene at elevated concentrations of 300,000 µg/L, 4,000,000 µg/L, 12,000 µg/L, and 950 µg/L, respectively, indicating the significant residual contamination is present in shallow soil and groundwater after remediation activities. In our December 17, 2009 correspondence, ACEH stated that "static depths to groundwater in site groundwater monitoring wells are shallower at approximately 5 feet bgs. According to the several boring logs included in the above-mentioned report, soils were logged as "wet" at approximately 5 feet bgs (SB-1, SB-3, SB-4, SB-6, and SB-7)," again reiterating our concerns that first encountered, impacted groundwater at the site is very shallow and that monitoring wells should be re-installed accordingly.

Stantec submitted a work plan on October 27, 2009 in response to ACEH's request. In this work plan, Stantec proposed that "[f]ollowing advancement of the borehole at least 10 feet into first-encountered groundwater, the tool string will be removed and static groundwater will be allowed to equilibrate in the borehole for approximately one hour. This will allow for an accurate determination of the static depth-to-groundwater prior to installing the well casing, in order to confirm that the well screen intercepts the groundwater surface."

However, in Stantec's "Monitoring Well Installation and 2010 Semi-annual Groundwater Monitoring Report," dated March 25, 2010, Stantec stated that "[e]ach borehole was advanced to approximately 20.5 ft-bgs, the tool string was removed, and a temporary well casing was installed in the borehole. Groundwater levels in the boreholes were allowed to equilibrate overnight to provide for an accurate measurement of the static groundwater elevation. The static depth-to-groundwater was measured at 4.5 ft-bgs in the boring for MW-1R and at 5 ft-bgs in the boring for MW-7R. These measurements were used to determine the screened interval of the permanent well casing." Therefore, based on Stantec's original proposal and ACEH's concerns identified in our April 8, 2008 and December 17, 2009 correspondences, the monitoring wells should have been installed with a screened interval from 3.5 ft to a maximum 13.5 ft bgs However, Stantec disregarding ACEH's earlier concerns that previously installed wells had excessive long screen intervals, installed these replacement monitoring wells screened from 3.5 feet to 20 feet bgs instead of shorter screened intervals that would target the first water-bearing zone of interest. ACEH's August 12, 2010 correspondence provided detailed comments on ACEH's concerns with this work. Further, ACEH's November 17, 2010 correspondence did not concur

with Stantec's proposed alternative sampling methodology however this work was then subsequently implemented by Stantec.

Based on the chronology of events that have transpired from 2008 to present, we believe that ACEH has been clear in our concerns and have made every effort to move this case towards closure and would appreciate equal cooperation from the Responsible Party and their consultant in the future. To summarize, ACEH has concerns that the replacement wells are not installed to target the shallow, first-water bearing zone and data from these wells may not be representative of actual site conditions.

Paresh is working some overtime to keep his previously assigned LOP sites progressing via regulatory directive letters and hence has very limited availability to schedule meetings pertaining to sites. I have looked at the series of correspondences for this site and find each of Paresh's regulatory directives to be very clear and comprehensive in communicating ACEH's technical comments on Stantec's work proposals. If these regulatory directives and technical comments above remain unclear please call me to discuss possible options for a meeting or conference call.

Thank You, Donna

Donna L. Drogos, P.E. | Division Chief
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
510-567-6721 **|** Ext. 36721 **|** donna.drogos@acgov.org

From: McGrath, Angus [mailto:Angus.McGrath@stantec.com]
Sent: Wednesday, May 18, 2011 12:31 PM
To: Hey, Eva; Drogos, Donna, Env. Health
Cc: Cullen, Andrew (Penske); Doran, Neil
Subject: RE: RO#354 - 725 Julie Ann Way, Oakland

Donna,

As you will recall we have previously had problems with the ACEH being unresponsive for long periods of time with respect to this site, only to then ask for significantly more work when a new project manager was assigned. Under the new board directive, one would think this site should meet the requirements for closure. We would appreciate your help in moving this case forward.

Thanks

Angus…

Angus McGrath
Principal Geochemist
Stantec
57 Lafayette Circle 2nd Floor
Lafayette CA 94549
Ph: (925) 299-9300 Ext. 241
Fx: (925) 299-9302

Cell: (510) 385-4497
angus.mcgrath@stantec.com
stantec.com

From: Hey, Eva
Sent: Tuesday, May 17, 2011 4:22 PM
To: donna.drogos@acgov.org
Cc: Cullen, Andrew (Penske); McGrath, Angus; Doran, Neil
Subject: RE: RO#354 - 725 Julie Ann Way, Oakland

Donna,

I am the project manager with Stantec, Penske's environmental consultant for the ACEHS site RO#354 at 725 Julie Ann Way in Oakland, CA.

We have been trying to set up a meeting with Paresh since the beginning of the year. In his April 13 email response included below he let me know that he is no longer the case manager for this project.

Can you tell me who to contact at ACEHS regarding this site? We would like to set up a meeting to discuss the progress on this site and our desire to move it toward closure as soon as possible.

Thank you for your assistance.

Eva

Eva Hey
Senior Geologist/Project Manager
Stantec
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Cell: (925) 395-7441
eva.hey@stantec.com
stantec.com

From: Khatri, Paresh, Env. Health [mailto:paresh.khatri@acgov.org]
Sent: Wednesday, April 13, 2011 8:19 AM
To: Hey, Eva
Cc: McGrath, Angus
Subject: RE: 729 Julie Ann Way, Oakland

Hello Eva,

Please note that although I am still working for Alameda County, I am no longer working in the

Local Oversight Program. Therefore, I cannot meet with you regarding the site. You may contact Donna Drogos at (510) 567-6721 to discuss the possibility of a meeting.

Sincerely,

Paresh C. Khatri
Sr. Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6577

Phone: (510) 777-2478
Fax: (510) 337-9335

E-mail: Paresh.Khatri@acgov.org

http://www.acgov.org/aceh/index.htm

From: Hey, Eva [mailto:Eva.Hey@stantec.com]
Sent: Thursday, March 31, 2011 2:46 PM
To: Khatri, Paresh, Env. Health
Cc: McGrath, Angus
Subject: FW: 729 Julie Ann Way, Oakland

Hi Paresh,

Stantec would like to set up a meeting with you to discuss the current condition for 729 Julie Ann Way in Oakland. Would the week of April 18 work for you?

Eva

Eva Hey
Senior Geologist/Project Manager
Stantec
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Cell: (925) 395-7441
eva.hey@stantec.com
stantec.com

From: Hey, Eva

Sent: Tuesday, March 08, 2011 1:40 PM
To: Khatri, Paresh, Env. Health
Cc: McGrath, Angus
Subject: FW: 729 Julie Ann Way, Oakland

Hi Paresh,

Any thoughts on the week of March 21st for a meeting? Would the following week work better?

Eva

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stantec.com

From: Hey, Eva
Sent: Friday, February 25, 2011 12:31 PM
To: Khatri, Paresh, Env. Health
Subject: 729 Julie Ann Way, Oakland

HI Paresh,

Penske and Stantec would like to set up a meeting with you to discuss the results of our most recent sampling event and the status of the site. Would you have availability the week of March 21st?

Eva

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