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**Alameda County
Environmental Health**



November 5, 2007

Mr. Jerry Wickham
Alameda County Health Care Services Agency
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

Re: **Lead Change Notification and Draft CAP Recommendation**
1230 14th Street
Oakland, California
ACEH Case No. RO0000433

Dear Mr. Wickham:

On behalf of property owner Andy Saberi, Pangea Environmental Services, Inc. (Pangea) prepared this letter to notify the ACEH of the pending change in remediation lead for the subject site, and to offer a recommendation to expedite site remediation in response to the September 19, 2007, letter from the Alameda County Environmental Health (ACEH).

Change in Remediation Lead

In late September 2007, Mr. Andy Saberi and Shell Oil Products (Shell) reached a tentative settlement agreement. Pangea understands that under the terms of the agreement Mr. Andy Saberi will be responsible for implementing all site corrective action conducted after October 31, 2007. Court confirmation of the final settlement agreement is anticipated in the near future.

Recommendation to Expedite Site Remediation – Test Workplan within Draft CAP

The ACEH letter requests preparation of a SVE/AS pilot test workplan and then, following agency approval of the workplan, preparation of Draft Corrective Action Plan (CAP) for agency and public review. Under the current ACEH schedule, Pangea anticipates that SVE/AS pilot testing would likely be approved by January/February 2008, which is the middle of the wet season. However, Pangea does not recommend SVE pilot testing during the wet season due to seasonally elevated water table elevation and rain infiltration that limits the effectiveness of SVE. To best evaluate SVE at this site where adequate vacuum influence not been demonstrated during previous pilot testing, Pangea recommends conducting pilot testing during the dry season (about June) to give SVE the best chance of success. If pilot testing were conducted in late spring/early summer 2008, the Draft CAP incorporating pilot test results would likely be submitted in late summer/early fall 2008. The agency and public review would occur within the fall 2008, and CAP implementation would likely be performed in the dry season of 2009. Our recommendation below accelerates the site remediation, reduces the amount of agency review, and shortens the agency/public review schedule.

To expedite initiation of site remediation, Pangea recommends submitting the pilot test workplan within the required Draft CAP. The Draft CAP would propose SVE/AS pilot testing as the first task. The selected final remedial approach would be based on the pilot test results. Pangea anticipates that the final remedial approach will be SVE/AS or DPE/AS, although other remedial

PANGEA Environmental Services, Inc.

1710 Franklin Street, Suite 200, Oakland, California 94612 Telephone 510.836.3700 Facsimile 510.836.3709 www.pangeaenv.com

alternatives will be evaluated and discussed in the Draft CAP. This approach of preparing a CAP with feasibility testing and rationale for final remedy selection based on the test results was recently *requested by the RWQCB* for another site under corrective action by Pangea. With this RWQCB-approved approach, the Draft CAP/Test Workplan could be submitted shortly after court confirmation of the final settlement (estimate submittal by December 20, 2007), and agency/public review could occur during the wet season. Assuming CAP approval by March 20, 2008, test well installation and pilot testing could occur in the early dry season (May 2008). System installation could be performed over the summer, with the goal of system startup by the late summer 2008. This recommended approach could allow site remediation to commence up to 6 to 12 months earlier than the current approach. Furthermore, to help avoid system installation delay, Pangea recommends initiating service connection with PG&E concurrently with the Draft CAP review.

Clarification

The ACEH's September 19, 2007 letter references a number of reports reviewed by ACEH staff. Please clarify that the ACEH received and reviewed Pangea's letter report dated July 11, 2007 *Comments on Revised Remediation Work Plan*. Pangea's July 11, 2007 letter report addressed a number of concerns regarding implementing SVE at the site. If the ACEH concurs with information presented in this July 11 letter, the ACEH could allow implementation of DPE/AS and even further accelerate the cleanup schedule. If the ACEH has already reviewed the July 11, 2007 letter, Pangea could reference the letter and not need to restate relevant information in the requested test workplan and/or Draft CAP.

Pangea respectfully requests an extension for the Draft CAP/Test Workplan of December 20, 2007, with the assumption that the final settlement agreement will be completed shortly. If you have any questions or comments, please contact me at (510) 510-435-8664 or briddell@pangeaenv.com.

Sincerely,

Pangea Environmental Services, Inc.



Bob Clark-Riddell
Principal Engineer

cc: Andy Saberi, 1045 Airport Boulevard, South San Francisco, CA 94080