

Wickham, Jerry, Env. Health

From: Hari Patel [HPATEL@waterboards.ca.gov]
Sent: Tuesday, February 17, 2009 1:01 PM
To: David Allen <dallen@aquascienceengineers.com>
Cc: Jerry Wickham <jerry.wickham@acgov.org>; DAVID CHARTER
Subject: Re: Fwd: FW: Pre-Approval Request for Claim #7699

Dear Mr. Allen,

I was asked by my supervisor, Mr. David charter to look at the pre-approval request that you had submitted electronically. I read the pre-approval, went on the Geo-Tracker and looked at the latest submissions (QMR 3, 2008 -report and QMR 4, 2008 data). I also looked at the RAP that you had submitted along with the pre-approval.

Based on my review, here are my findings:

There is significant soil and GW contamination with FREE PRODUCT being present in near on-site GMMW MW-3 located on 8th Street (since July of 2000). There is significant dissolved TPH(g) and benzene contamination in GMMWs MW-2, MW-4 and MW-7 located down gradient and off-site of the well no. MW-3.

The site is vacant and used as a parking lot. There is a three story building used as commercial (possibly residential) down gradient of the site, across the street from the subject site.

Depth to GW is about 17.75' bgs.

The extent of GW contamination has NOT been fully delineated.

There are NO iso concentration maps for the contaminants of concern in the QMR reports.

There is NO depiction of the soil plume and the GW dissolved plume or cross sections in the GW in the RAP.

HVDPE has been used at the site in the past with some mixed results (temporary reduction in the contaminant concentrations as FP has returned).

The RAP proposed remediation using HVDPE (Cal-Clean Inc.) for ONE month by installing three extraction wells on-site to remediate the soil and GW Plume.

The proposed RAP is for about \$139 K.

To date, the fund has paid upwards of \$550K.

I have concluded that at best the proposed Remediation would have been good as an interim RAP to address the FP, but since the FP has been around for over 8 years, that would not be feasible explanation. The extent of dissolved plume needs to be defined as benzene as high as 11,000 ppb has been detected in the down-gradient GMMW MW-2. The site needs a complete evaluation to define the extent of GW contamination, a remediation approach, that addresses the soil, vadose zone and GW contamination and gets the site to closure. Please note that the site has less than a million dollars left for the investigation, remediation, monitoring and closure activities. The Fund needs a detailed plan from the consultant explaining how the site will get to closure. Please submit the same and a proposal for remediation (may be a permanent system) to address the problem.

At this time, as proposed, the pre-approval request is denied as unreasonable.

If you have any questions, please call Mr. David Charter at (916) 341-5652 or me at (916) 341-5831.

Thank You,

Himanshu (Hari) Patel
Water Resource Control Engineer
Division of Financial Assistance
State Water Resources Control Board
Phone No. (916) 341-5831
Fax No. (916) 341-5806

>>> David Allen <dallen@aquascienceengineers.com> 1/5/2009 11:22 AM >>>
Dear Mr. Charter,

Please see the attached Pre-Approval request to perform a 30-day CalClean dual-phase extraction remediation event at the Lim Family property located at 250 8th Street in Oakland, CA. Aqua Science Engineers will perform this phase of work immediately upon receipt of your agency's approval letter.

If you have any questions or comments while reviewing this package, please do not hesitate to call me on my mobile phone or email me at any time. If you pass this package onto a colleague, please email me their contact info so that I may contact them periodically to get status of the pre-approval process.

Thank you in advance for your time and consideration in this request.
Regards.

David Allen
Vice President
Aqua Science Engineers, Inc.
55 Oak Court, Suite 220, Danville, CA 94526
925.820.9391 (office)
925.837.4853 (fax)
925.819.0963 (mobile)
dallen@aquascienceengineers.com