

Wickham, Jerry, Env. Health

From: Wickham, Jerry, Env. Health
Sent: Thursday, September 20, 2012 5:38 PM
To: 'Leonard Niles'
Cc: 'Vicki ZumBrunnen'; 'Marc Cunningham'
Subject: RE: RO0002483 Former Grand Auto, 4240 International Blvd., Oakland

Leonard,

Per DTSC guidance, a minimum of two sampling events is required before a risk determination is made. However, I have no objection to shortening the interval between sampling from 6 to 2 months.

Regards,

Jerry Wickham

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From: Leonard Niles [<mailto:leonard@allwest1.com>]
Sent: Thursday, September 20, 2012 4:23 PM
To: Wickham, Jerry, Env. Health
Cc: 'Vicki ZumBrunnen'; 'Marc Cunningham'
Subject: RO0002483 Former Grand Auto, 4240 International Blvd., Oakland

Jerry,

In our Additional Sub-Slab Soil Vapor Investigation Work Plan dated 8/1/12 for the former Grand Auto site at 4240 International Blvd., Oakland, we proposed a followup soil vapor sampling event 6 months after the initial sub-slab probe installation and sampling. This was based on a misinterpretation of the DTSC Vapor Intrusion Guidance document (October 2011). I thought that at least 2 sub-slab sampling events were required, similar to that for indoor air sampling.

In fact, the language from the DTSC VIG document Appendix G says "When evaluating subslab soil gas for a building, DTSC recommends that permanent sampling points be installed so that repeated sampling can be conducted, as necessary, to evaluate seasonal or temporal variations." So it does not appear to specifically require additional sampling events unless "necessary".

In your June 5, 2012 letter requesting the sub-slab investigation workplan, you did not require multiple sampling events; and you did not comment on our proposal for that in your September 6, 2012 letter. Therefore, I would like to eliminate our proposal for the second soil vapor sampling event, and also change the sub-slab probe installation from semi-permanent to temporary, with the probes to be removed and boreholes grouted immediately after sampling.

Would this be acceptable, and would you like us to submit an addendum letter to the workplan?

Thanks,

Len

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