

**From:** Roe, Dilan, Env. Health  
**To:** ["Pat.Cullen@waterboards.ca.gov"](mailto:Pat.Cullen@waterboards.ca.gov); [Bob Trommer](#)  
**Cc:** [carybgrayson@gmail.com](mailto:carybgrayson@gmail.com); ["Kasey Jones"](#)  
**Subject:** Fuel Leak Case No RO00002862, Houston Place, Dublin - Former Bay Counties Petroleum  
**Date:** Wednesday, January 16, 2013 1:46:00 PM

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Hi Pat:

I would like to inquire about the status of the USTCF's review of the subject site. I have not heard from you since our last communication in August 2012, at which time you contacted me to notify me of the USTCFs intent to conduct a 5-Year Review of the site per the request of the Responsible Party, Mr. Cary Grayson. During our conversation in August I relayed to you that we had been working with Mr. Grayson and Stratus, the consultant for the site, to address ACEH's concerns with site data including:

- Elevated DRO concentration in post remediation verification monitoring results presented in the Second Quarter 2012 groundwater sampling event. At that time, two post-remediation groundwater monitoring events had been conducted subsequent to the implementation of the RegenOX Pilot Test in September and November 2010. A review of the data from these two events, indicated that petroleum hydrocarbon concentrations increased in samples collected from four of the five on-site monitoring wells (DW-1, DW-2, DW-3 and DW-5) between the third quarter 2011 and the first quarter 2012 monitoring events, with the most significant rise in concentration in well DW-3 increasing from 780 ug/L to 9,000 ug/L.
- Lack of assessment of post remediation metals mobilization in groundwater. In the Pilot Test Report, dated February 2011, Stratus stated that with the exception of Fe, metals concentrations reported in post-injection samples did not show a significant change in concentration from pre-injection levels. However, the conclusion that the RegenOX injection did not cause an unexpected increase in dissolved metals concentrations was not consistent with the analytical data which showed an increase in arsenic from a pre-injection concentration of 9.4 ug/L to a post -injection concentration of 87 ug/L. Our review also indicated that no additional analysis for dissolved metals had been performed to monitor the concentration of dissolved metals.
- Change in the groundwater flow direction over the past several years at the site from a southeast direction to a northwest direction, thus changing the effectiveness of the monitoring well network to define groundwater impacts "downgradient" of the TPH-d plume.
- Non-compliance of electronic submittal of information (ESI) to the GeoTracker database.

I also relayed to you that ACEH had been working extensively with Stratus to successfully bring the site into compliance with ESI requirements and conduct additional monitoring to assess the groundwater conditions at the site and investigate the cause of the spike in DRO concentrations. ACEH convened a meeting with representatives of ACEH and Stratus on July 31, 2012 to discuss site

data and develop a path forward. During this meeting Stratus provided a summary of groundwater sampling activities, laboratory methodology, and analytical results for samples collected during the second quarter 2012 and as presented in the document entitled "Groundwater Sampling and Laboratory Methodology/Analytical Results Summary", dated June 20, 2012. Stratus concluded that the elevated DRO concentrations were due to concentrations of an ethoxalated surfactant. Stratus discussed this finding with RegenOx who stated that their product does not contain ethoxalated surfactants and would not likely combine with anything naturally to become an ethoxalated surfactant. Stratus was at a loss of how the surfactant appeared in the wells and stated that they had returned to the site and checked the well head expansion caps for tightness and replaced all of the old locks with new locks.

At this meeting ACEH and Stratus agreed it was prudent to conduct additional quarterly groundwater sampling to evaluate DRO and dissolved metals in the groundwater monitoring wells at the site and to develop a work plan to assess the reasons for the change in groundwater flow direction and assess the true "downgradient" impacts to the site. However, subsequent to your phone call in August, ACEH refrained from issuing directives on the site until we had received the USTCF's 5-Year Review. Yesterday I called Mr. Jones to discuss the results of the Third Quarter 2012 Quarterly Monitoring and Sampling Report. During our conversation I inquired if he had heard anything from the USTCF regarding the 5-Year Review. Mr. Jones indicated that you had sent him an email on December 18, 2012 stating that the USTCF had not received comments from ACEH on a draft 5-Year Review that was provided to us for review and comment (see email correspondence below). We are confused by the email correspondence as a review of our files does not indicate that we ever received a draft 5-Year Review for review and comment, nor do we see a copy of a final 5-Year Review on GeoTracker.

A review of the recent data indicates the DRO concentrations in the existing monitoring wells have stabilized. ACEH would therefore like to proceed along our identified course of action to resolve the remaining data gaps in the "downgradient" plume extent in order to move this site towards closure. ACEH would appreciate an update on the USTCF's review of this site, prior to requesting a submittal of a workplan to address this data gap.

Thank you,

**Dilan Roe, P.E.**

Hazardous Materials Specialist  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
510.567.6767; Ext. 36767  
QIC: 30440  
[dilan.roe@acgov.org](mailto:dilan.roe@acgov.org)

PDF copies of case files can be reviewed/downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>

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**From:** Cullen, Pat@Waterboards [<mailto:Pat.Cullen@waterboards.ca.gov>]  
**Sent:** Tuesday, December 18, 2012 6:40 AM  
**To:** Kasey Jones  
**Subject:** RE: 6310 Houston Place, Dublin - Former Bay Counties Petroleum

This is the recommendation that was made to the LOP. I received no response.

“Based on available information, residual petroleum hydrocarbons at the Site do not pose significant risks to human health, safety, or the environment; however, since hexavalent chrome was detected in one sample well above the Water Quality Objective (WQO) in 2010. One additional round of post remediation monitoring should be completed, specifically adding hexavalent chromium to the analyte list. If favorable results are received, this Site should be evaluated using the Low Threat Closure Policy criteria for closure.”

For you and your client to analyze:

- Make sure you have an approved budget with the Fund
- Do not exceed your approved budget without a budget change request
- As long as you do what was recommended in the 5-Year, you should be fine.

Hopefully, this assists you and your client. If that Hex Chrome is stable and /or reducing concentrations this Site is a candidate for Closure under Low Threat Closure Policy. I've attached the checklist that we use for your convenience, if you have questions call me at 530-957-0627 (m) that way we don't play phone tag.

Pat

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**From:** Kasey Jones [<mailto:kaseyjones@stratusinc.net>]  
**Sent:** Monday, December 17, 2012 10:37 AM  
**To:** Cullen, Pat@Waterboards  
**Subject:** RE: 6310 Houston Place, Dublin - Former Bay Counties Petroleum

Good morning Pat,

I just wanted to check in with you regarding this project and your 5-Year Review that is in the works. I believe that the last time we talked, you had sent your comments off to Alameda County for review and comment and that they had 45 days to respond. Has there been any progress made with issuing this Review?

I am currently preparing the groundwater sampling schedule for 1Q13 and am not sure if I should include this site on the list. You had mentioned that you were recommending two additional quarters of monitoring, which we have already conducted in 3Q and 4Q 2012. I just don't want to sample this site in 1Q13 and waste funds if we know we are going to start down the road toward closure.

Sincerely,

Kasey L. Jones

Senior Project Manager

***STRATUS ENVIRONMENTAL, INC.***

PH (415) 516-0373

[www.stratusinc.net](http://www.stratusinc.net)



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