

**From:** [Detterman, Karel, Env. Health](#)  
**To:** ["Mehrdad Javaherian"](#)  
**Cc:** [Brian Mitchell](#); [Roe, Dilan, Env. Health](#)  
**Subject:** RE: RO3132, Site Cleanup Program Case and Geotracker Global ID T10000005804, Franklin Home Heating, 1428-1432 Franklin St Oakland, CA 94612  
**Date:** Wednesday, December 03, 2014 11:08:20 AM

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Hello Mehrdad:

Thank you for participating today in a brief conference call with Alameda County Environmental Health (ACEH). The purpose of the call was to discuss ACEH's comments on the June 16, 2014 *Soil and Groundwater Investigation Report* (Report) prepared by you on behalf of your client.

ACEH has evaluated the data and recommendations presented in the Report in conjunction with the case files, and the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) adopted in 2012. As a result of discussions during the conference call, it was apparent to ACEH that sufficient site data was presented to eliminate data gaps concerning the LTCP Media Specific Criteria: Vapor Intrusion to Indoor Air and the Media Specific Criteria: Direct Contact to Outdoor Air, but fails to meet the LTCP Media Specific Criteria: Groundwater.

Therefore, ACEH requests that you address the Technical Comments provided below in a revised Report. To expedite review please e-mail the revised Report to my attention by 1/15/2015. I will send comments so that the Report can be finalized as a Request for Closure (RFC) and uploaded per the schedule in the Technical Report Request section.

### **Technical Comments:**

1. **LTCP Media Specific Criteria for Groundwater** – Total petroleum hydrocarbons as diesel (TPHd) was detected at 1,100 milligrams per kilogram (mg/kg) in soil sample SB-2-4 from a depth of 20 feet in a silty sand and grab groundwater sample SB-2-GW detected 5,100 micrograms per liter (ug/l) during the May 2014 investigation indicating the possible presence of free product as discussed in the Technical Justification for Vapor Intrusion (VI) Media Specific Criteria for the LTCP. Additionally, our review of the case files indicates that insufficient data and analysis has been presented to support the requisite characteristics of the plume length. According to the LTCP, a plume is considered stable or decreasing if a contaminant mass has expanded to its maximum extent. As discussed during the conference call, please revise the Report to include the following lines of evidence:
  - a. The groundwater flow direction at the site is unknown because of the lack of site and nearby groundwater monitoring wells. Please utilize Geotracker to locate nearby sites with groundwater gradient data to estimate the local groundwater gradient direction and plot the adjacent sites on a figure and list the site addresses in a table.
  - b. Please perform a Preferential Pathway and Sensitive Receptor Study to determine if sensitive receptors are present in a radius of 2,000 feet of the site. ACEH requests review of both Alameda County Public Works Agency

(ACPWA) and Department of Water Resources (DWR) well data sources for a complete inventory of vicinity water supply wells. ACEH requests the identification and location on a site vicinity figure all active, inactive, standby, decommissioned (sealed with concrete), unrecorded, and abandoned (improperly decommissioned or lost) wells including irrigation, water supply, industrial, dewatering, and cathodic protection wells within a 2,000-foot radius of the site. Additionally, please identify on the same figure beneficial resources and other sensitive receptors including, but not limited to, groundwater classification, wetlands, surface water bodies, natural resources, schools, hospitals, day care centers, elder care facilities, etc. Please plot the numbered well locations on an aerial photography-based figure and provide a table with the same numbered well locations similar to the examples provided in the attachment.

- c. By referencing Table 1: *Plume Characteristics*, in the LTCP's *Technical Justification for Groundwater Media-Specific Criteria*, please plot on a separate figure the average, 90<sup>th</sup> percentile, and maximum plume lengths for TPHg.

2. **Report Revision Request:** Please revise the *Fate and Transport Mechanisms at the Site* and *Potential Exposure Pathways and Receptors* Report Sections as references to "former Motor Pool" and "onsite water supply wells" indicates that the text references an unrelated site.

**Technical Report Request:**

- **January 15, 2015** – E-mailed revised Report to [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org)

Please upload the technical report to the ACEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **Thirty days After Report Approval** - Request for Closure  
File to be named: RO3132\_RFC\_R\_yyyy-mm-dd

Thank you,

Karel Detterman, PG  
Hazardous Materials Specialist  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
Direct: 510.567.6708  
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PDF copies of case files can be downloaded at:

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

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**From:** Mehrdad Javaherian [<mailto:mehrdad@lrm-consulting.com>]  
**Sent:** Monday, December 01, 2014 11:07 AM  
**To:** Detterman, Karel, Env. Health  
**Cc:** Brian Mitchell; Roe, Dilan, Env. Health  
**Subject:** RE: RO3132, Site Cleanup Program Case, Franklin Home Heating, 1428-1432 Franklin St Oakland, CA 94612

Perfect. Thank you.

Mehrdad Javaherian, PhD, MPH, PE, LEED GA  
LRM Consulting, Inc  
415-706-8935  
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Sent via the Samsung Galaxy Note® 3

----- Original message -----

**From:** "Detterman, Karel, Env. Health"  
**Date:** 12/01/2014 10:30 AM (GMT-08:00)  
**To:** 'Mehrdad Javaherian'  
**Cc:** Brian Mitchell, "Roe, Dilan, Env. Health"  
**Subject:** RE: RO3132, Site Cleanup Program Case, Franklin Home Heating, 1428-1432 Franklin St Oakland, CA 94612

Hello Mehrdad:

We will call you tomorrow at 4 PM to discuss.

Karel Detterman, PG  
Hazardous Materials Specialist  
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1131 Harbor Bay Parkway  
Alameda, CA 94502  
Direct: 510.567.6708  
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PDF copies of case files can be downloaded at:

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

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**From:** Mehrdad Javaherian [<mailto:mehrdad@lrm-consulting.com>]  
**Sent:** Wednesday, November 26, 2014 6:39 PM  
**To:** Detterman, Karel, Env. Health  
**Cc:** Brian Mitchell; Roe, Dilan, Env. Health  
**Subject:** Re: RO3132, Site Cleanup Program Case, Franklin Home Heating, 1428-1432 Franklin St Oakland, CA 94612

Thanks Karel for reviewing the document and getting back to me. As you know, this was the first investigation done at this site, where an old heating oil tank was removed some 10 years ago. We did not recommend any further investigation because the levels of contamination were low (i.e sufficiently low to meet the LTCP requirements) at locations (i.e, at the

release/source area) and depths (i.e., at the tank bottom and at the water table) where we felt that the highest levels would logically occur. Moreover, benzene remained absent in all soil and groundwater samples, and only a single detection of naphthalene was encountered in groundwater at approximately 10 times the drinking water standard, but remaining below levels which may pose vapor intrusion risk. Drinking water standards were not exceeded for any other hydrocarbon constituent.

Please note that further investigation to define the vertical and lateral extent of the naphthalene in groundwater would require drilling in a very active sidewalk (as we did before), and potentially in the middle of the street (for the downgradient extent), which will be very demanding and expensive to permit and implement. Again, because of the nature and age of the fuel (i.e., heating oil tank removed 10 years ago), and with only a single detection of naphthalene slightly exceeding the drinking water standard, we didn't feel this would be a necessity to achieve site closure. This logic notwithstanding, I would appreciate a chance to discuss this with you next week. Unfortunately, I'm leaving the country on Dec. 3rd, and will be gone until just before x-mas. As such, my availability next week is limited to the following:

Monday, Dec. 1st: 9 to 10 AM, or noon to 3 PM.

Tuesday, Dec. 2nd: 9 to 10 AM, or 4 to 5 PM.

Please let me know if any of these times work for you and if so, please let me know if you'd like me to call you. I'm reachable at the number below.

Thank you and happy Thanks Giving.  
Mehrddad

**Mehrddad Javaherian, Ph.D., MPH, PE, LEED® GA**

**Principal**

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On 11/26/2014 6:05 PM, Detterman, Karel, Env. Health wrote:

Hello Mehrddad:

Thank you for submitting the June 16, 2014 *Soil and Groundwater Investigation Report* (Report) prepared by you on behalf of your client. Alameda County Environmental Health (ACEH) has finished our review of the Report, and although we agree that the site meets the Low Threat Closure Policy (LTCP's) Media Specific Criteria for Direct Contact and Outdoor Air Criteria and Vapor Intrusion to Indoor Air, the Media Specific Criteria for Groundwater is not met because the vertical and horizontal extent of the plume have not been defined. We request a conference call next week to discuss the path forward for this case. Please send me three dates and times to set up a call.

Thank you,

Karel Detterman, PG