

Soby, Matthew, Env. Health

From: Soby, Matthew, Env. Health
Sent: Monday, April 13, 2015 9:05 AM
To: Amitai Schwartz; 'mjacobson@php.ucsf.edu'
Cc: 'jallison@medsfgh.ucsf.edu'; 'mlindenstein@gmail.com'; 'hpietropaoli@stellar-environmental.com'; Richard Makdisi
Subject: Fuel Leak Case No. RO3143 and GeoTracker Global ID T10000006106, Paramount UST, 811 Paramount Road, Oakland, CA 94610

Good morning Mark Jacobson, Ilona Frieden, and Amitai Schwartz,

I hope this e-mail finds you all doing well. I am forwarding this conversation between myself and Stellar Environmental as it contains an official ACEH report extension request approval. Stellar presented points that were valid for an extension to the site investigation as detailed in the last paragraph. The salient feature: **ACEH is amenable to a report deadline extension of an additional 60 days to August 3, 2015** for the soil, groundwater, and soil vapor investigation report requested in ACEH's March 30, 2015 directive.

Should you have any questions regarding the site investigation, please contact me.

Respectfully,
Matthew

From: Soby, Matthew, Env. Health
Sent: Wednesday, April 08, 2015 12:35 PM
To: 'hpietropaoli@stellar-environmental.com'
Cc: Richard Makdisi
Subject: RE: ACEH Correspondence for RO3143

Hello Henry and Richard,

I hope you both are doing well today. Thank you for your response to ACEH's March 30, 2015 Directive. I have provided a response to each question below, in red. Please e-mail me if you have any further questions or concerns.

Respectfully,
Matt

From: Henry Pietropaoli [<mailto:hpietropaoli@stellar-environmental.com>]
Sent: Monday, April 06, 2015 1:06 PM
To: Soby, Matthew, Env. Health
Cc: Richard Makdisi
Subject: RE: ACEH Correspondence for RO3143

Hi Mathew,

Thank you for cc'ing me on your letter for the subject site. I am emailing you today on behalf of the RP's representative.

We have some additional site information that was not included in the Feb 23rd Workplan that may impact the proposed investigation and I also have a few other questions as follows:

The house basement extends about a third to one half the distance from the back toward the front of the house and the front portion of the house is crawl space. This would place the closest edge of the basement slab around 30+ feet from the UST location, beyond the most conservative LTCP scenario, therefore does your agency still need multiple depth soil gas collection?

ACEH response:

Thank you for the additional information regarding the house construction. The lateral separation of the basement adds to the CSM; however, until more data is collected, soil vapor extents are delineated, and potential preferential pathways eliminated, ACEH would require multi-level sampling to determine where the highest concentration of source mass resides. ACEH prefers to have soil gas collected at two depths to determine soil vapor attenuation with depth. ACEH requires sampling 5 feet below the lowest foundation depth per regulatory guidance.

Also, does this affect the agency's requested need to use of TO-17. We find that TO-15 easily meets the residential ESLs for naphthalene.

ACEH response:

ACEH generally follows the DTSC guidance and References provided in the April 2012 VI Advisory. Notably, Appendix E – Naphthalene Soil Gas Collection – TO-15 acceptable data recovery stems from these issues: 1) Naphthalene Recovery, 2) Naphthalene Carryover, 3) Canister Cleanliness, and 4) Canister Age. DTSC's guidance states: *"If TO-15 is used for naphthalene sampling, TO-17 should be used to confirm TO-15 sampling results at a frequency of five to ten percent of the field samples. The number of confirmatory samples should be a function of the data quality objectives for the site. Confirmation sampling is especially prudent when using data for risk assessment purposes or when verifying cleanup objectives."* As this site's preliminary COPC and risk driver for vapor intrusion appears to be naphthalene (due to the unusually high detections in soil), ACEH requires following DTSC guidance for the first round of vapor sampling until the baseline naphthalene response is quantified. Should there be a need for a second vapor sampling, and depending on the first round vapor sampling, ACEH is amenable to either TO-15 or TO-17 alone, depending on the DQOs.

Of course the sorbent tubes have the most short circuit potential hence the need for all the QA/QC expense. If TO-17 remains a requirement, we would propose collecting a duplicate in parallel to really be valid, a minimum of 4 tubes would be required at + a trip, and equip blank...this becomes expensive.

ACEH response:

The additional expense of TO-17 (sorbent tubes) is acknowledged and understood. ACEH would like to ensure that the data collected is sound, has undergone adequate QA/QC, and meets the data quality objectives. Although the expense is higher for TO-17 with the added QA/QC, ACEH's mission is to protect human health, and therefore ACEH wants to ensure the assessment is adequately protective. However, your observations are noted.

You are also requesting installation permanent soil gas wells. Does this mean you plan to ask for additional future soil gas collection?

ACEH response:

It is very likely a second round of soil gas sampling may be required. ACEH generally requires multiple rounds (seasonally) of soil gas sampling, especially for a human health risk assessment. Therefore, permanent soil vapor wells are preferred as this eliminates the need to advance vapor probes during the second mobilization.

The workplan may have used the PRT term somewhat loosely. The hand-held AMS™ drive rod sampling apparatus utilizes a retractable tip and has minimal connections and short-circuit potential.

<http://www.ams-samplers.com/itemgroup.cfm?CNum=84&catCNum=3>

ACEH response:

Thank you for the clarification regarding the PRT versus the AMS drive rod with retractable tip. ACEH is not opposed to the use of AMS as long as the atmospheric-short circuiting potential is eliminated. Whatever drive method is utilized, ACEH requires permanent vapor wells in the instance multiple rounds of vapor sampling are required.

Lastly, I am making these inquiries to you on behalf of the RP and we are not under contract. The RP may want to get additional bids and in any event, there are numerous things to line up for this project: they will need to get a proposal to conduct this work, the contracted consultant will need to get drill bids, get the permit, reserve driller, analytical TAT, and report prep, thus if you sum a reasonable time required for each of these tasks a report due date of Jun 1 is very tight.

ACEH response:

Thank you for the project timeline explanation. ACEH is amenable to a report deadline extension of an additional 60 days to August 3, 2015. I understand the difficulties regarding the selection of potential consultants, bids, permits, etc... Please keep me up to date and ACEH can adjust deadlines as necessary and prudent. This e-mail serves as an extension request approval for the site investigation report.

Please let me know your comments,
Regards,

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From: dehloptoxic, Env. Health [<mailto:deh.loptoxic@acgov.org>]
Sent: Monday, March 30, 2015 2:40 PM
To: 'mjacobson@php.ucsf.edu'; 'jallison@medsfgh.ucsf.edu'; 'mlindenstein@gmail.com'
Cc: Amitai Schwartz; 'hpietropaoli@stellar-environmental.com'; 'markdisi@stellar-environmental.com'; Roe, Dilan, Env. Health; Soby, Matthew, Env. Health
Subject: ACEH Correspondence for RO3143

Dear Interested Parties,

Attached is Alameda County Environmental Health's (ACEH) correspondence for your case, RO0003143

Please add our email address to your book to prevent future e-mails from being filtered as spam.

Sincerely,

ACEH