

**From:** amy brownell <amy@phch.org>  
**To:** mary rose cassa <mcassa@waterboards.ca.gov>  
**Date:** 8/31/2006 10:15:21 PM  
**Subject:** Comments on Feasibility Study for Hookston Station

Hi Mary Rose:

Below are a few more comments on the Hookston Station Feasibility Study dated July 10, 2006. These are mostly a repeat of what I have already submitted with maybe a few nuances. Please feel free to consolidate the similar comments into one comment (I don't need double answers).

1) The timeframe that is projected for reduction of the portion of the plume downgradient from the PRB seems like an aggressive schedule. Unfortunately, the homeowners who have been impacted by this plume have been potentially (depending on the configuration of their home, crawl space etc) exposed to unacceptable levels of vapors for a long time. So any possibility to speed up the cleanup under the impacted homes should be considered. To this end, an active treatment, such as injection of the ZVI slurry at appropriately spaced intervals starting from the outer edges of the downgradient plume and going inward would be well worth the expense. I would suggest a pilot test to see whether it is feasible and workable to inject the solutions into the A Zone underneath the neighborhood.

2) Please make sure all costs associated with Institutional Controls and particularly the cost of a county ordinances or county requirements for tracking the Soil Management Plan for the arsenic soils are included in the cost estimates. The RPs should be paying all the costs of the Institutional Controls, they shouldn't be passed on to any governmental agency. If there will be costs associated with the Institutional Controls that will have to be passed on to future property owners/developers then the RPs should develop, write and assist governmental agencies in implementing permitting or other schemes that will set up programs to reimburse the county or cities or whatever governmental agencies will have to implement the systems that track the Institutional Controls.

3) Please make sure there are sufficient monitoring wells around the PRB to verify that you are getting appropriate capture and treatment of the core of the plume.

4) Make sure the monitoring schedule to prove the effectiveness of the treatment is very aggressive at the beginning of the cleanup implementation, especially if you do not add any extra treatment downgradient of the PRB. Once the treatment is proven effective, then monitoring could be reduced.

thanks for all your hard work. the neighborhood is very lucky that you were assigned to this project.  
talk to you soon,  
Amy Brownell, P.E.