

To: San Francisco Regional Water Quality Regional Control Board
From: Lucy Goodell, Chair Colony Park Neighbors Association
Subject: Comment on Hookston Station Feasibility Study
Date: August 29, 2006

- We would like the plan to include specific benchmarks in time (1 year after implementation?) to determine whether or not sufficient degradation is occurring under our homes to meet the three to four year expected decrease in vapor intrusion to acceptable levels.
- We would like to know how adaptable the selected alternative is. If the plan comes up short of expectations within the benchmark time period can course corrections be made to get the remediation back on track?
- There was no consideration of an alternative combining in situ treatment with pump and treat.
- Primary concern to our neighborhood is contamination already in the ground water below our homes. Concern for this matter was reflected at the meeting at Fair Oaks School where several people suggested remediation within the neighborhood in addition to the permeable reactive barrier. We don't see how the permeable barrier can be really effective in the hot spots beyond stopping the plume from spreading and getting worse. The concept of meaningful natural degradation and attenuation of TCE has not occurred in the last 13 years on the plume. Can we realistically expect this as a means of degrading the TCE in the hot spots under the houses just by virtue of stemming the additional flow from upgradient?
- To what extent has the Water Board or ERM had prior experience with the use of iron? It is an expensive project to see if it works when we know pump and treat does work and is more effective.
- We request that the Permeable Reactive Barrier be constructed in a way that allows the iron mixture to be replenished if needed.
- Guidelines state that air sampling should be conservative. We believe that 12-hour indoor air sampling yields more conservative results than 24-hour sampling. A longer sampling period increases the likelihood of diluting the results due to doors and windows being opened. Some assumptions about indoor air testing are based on different conditions on the East Coast compared to California. Vapor intrusion on the East Coast may be worst in the winter months. In that season 24-hour sampling might be reasonable due to significantly colder temperatures that discourage leaving doors and windows open. Indoor air sampling programs should consider and be developed with local atmospheric conditions in mind. Land use should also be considered. Residential indoor air monitoring should have a conservative approach. The risk factors of TCE are currently being re evaluated; there are differences of opinion. A conservative approach should be taken if only for this reason. Findings indicate that winter is not the worst period for vapor intrusion in California. We would want the houses to be kept closed as much as possible during the sampling in order to capture maximum risk and that can be managed better during a 12-hour period.