



Ms. Townsend,

After reviewing the draft Policy, I have the following comments:

Page 3, d. Free Product has been removed to the maximum extent practicable

Comment – I believe that the term “free product” should be replaced with LNAPL, which is used later in the Appendices of the document. This would give the document more consistency in the definition of petroleum hydrocarbons that float as a separate phase on the water table or detectable in soils.

Appendix 1, Scenario 1: Unweathered LNAPL in Groundwater

Comment – Although the diagram shows the soil interval below the foundation to a depth of 30 feet, the term ‘TPH<100 mg/kg throughout 30 ‘ depth’ and ‘Total TPH (TPHg and TPHd combined) are less than 100 mg/kg throughout the entire depth of the bioattenuation zone’ is open to interpretation. Will assessments that collected samples at 5 ft intervals be sufficient for “throughout” or will soil samples collected from 0-5 ft have to be composited, 5-10’, 10-15’, etc? In other words, how many discrete samples are required, and are composite samples also acceptable?

Appendix 2, Scenario 2: Unweathered LNAPL in Soil

Comment – Same as for Appendix 1. What criteria will meet the term “throughout”

Appendix 4, Scenario 4 – Direct Measurement of Soil Gas Concentrations

Comment – Move cartoon diagram “Soil Gas Sampling - with Bioattenuation Zone” above “Soil Gas Sampling - No Bioattenuation Zone” That way when we look at table below, column A corresponds to top cartoon diagram, and column b corresponds to second.

Comment – Under Soil Gas Sampling – with Bioattenuation Zone, 2. TPH (TPHg + TPHd) is less than 100 ppm (measured in at least two depths within the five-foot zone. “ppm” should be replaced with mg/kg for consistency to Appendices 1 and 2.

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OUR SAFETY IS MY RESPONSIBILITY

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