

From: [Detterman, Karel, Env. Health](#)
To: [john buestad](#)
Cc: ["Ken Carvalho"](#); [Jamie Keating](#); ["Jeremy Smith"](#); [Peter McIntyre](#); [Tom Graf](#); [Roe, Dilan, Env. Health](#)
Subject: Fuel Leak Case No. RO0000008 and GeoTracker Global ID T0600100655, Good Chevrolet Parcel B, 1630 Park Street, Alameda, CA 94501
Date: Wednesday, November 20, 2013 3:50:06 PM

Hello John:

The following topics were discussed during our Monday November 18, 2013 meeting at ACEH's offices:

1. Please sample soil vapor probes SV-4 and SV-13 on Friday, November 22nd, analyze the vapor samples for TPHg and VOCs by TO12 as described in AEI's Soil Vapor Investigation Work Plan dated 4/4/2013, and report these and all soil vapor sampling results in an updated SCM according to the schedule provided in the Technical Report Request below. The additional soil vapor samples are requested because the soil vapor probes are located in or near the proposed building foot print, elevated PCE concentrations persist, and a decreasing trend has not yet been established due to the lack of seasonal data.
2. The three onsite groundwater monitoring wells (MW-1, MW-2, and MW-3) and seven Dual Phase Extraction wells (DPE-1, DPE-4, DPE-6, DPE-8, DPE-9, DPE-10, & DPE-11) may be decommissioned as described in the *Sampling Summary Report and Work Plan for Well Abandonment* dated November 12, 2013 by AEI. Please provide the Well Decommissioning Report by the date shown below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- December 20, 2013 – Well Decommissioning Report
File to be named: RO8_WELL_DCM_R_yyyy-mm-dd
- January 18, 2014 – Updated Site Conceptual Model
File to be named: RO8_SCM_R_yyyy-mm-dd

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

Thank you,

Karel Detterman, PG
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502

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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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Subject: Fuel Leak Case No. RO0000008 and GeoTracker Global ID T0600100655, Good Chevrolet Parcel B, 1630 Park Street, Alameda, CA 94501
Date: Friday, December 06, 2013 4:04:46 PM

Hello John:

Thank you for incorporating my preliminary review comments on the November 21, 2013 *Site Management Plan (SMP) – Commercial Development* prepared on your behalf by AEI Consultants (AEI). Summarizing the current site status, the site has undergone a number of interim remedial actions including the October 2013 overexcavation of a former hydraulic hoist area due to the discovery of free product in well DPE-5. Upon completion of the excavation, three additional vapor monitoring points were installed to assess the potential risk of vapor intrusion to occupants of the proposed new building. The vapor points have been sampled twice to date (October and November) which is an inadequate interval to assess the potential risk of vapor intrusion.

Based on a review of my notes from our 11/18/2013 meeting, in addition to properly decommissioning all on-site monitoring wells, DPE wells, and vapor points, the following two options were identified to facilitate construction to begin in December 2013:

1. Monitor the vapor points over time to assess the success of the interim remedial actions or
2. Install a Vapor Intrusion (VI) Mitigation System (Cupolex or similar) to temporarily mitigate vapor intrusion risk

At the 11/18/2013 meeting the Foley Street Investments (FSI) team unanimously chose the second option, the installation of a VI Mitigation System, however, ACEH has not been provided documentation detailing the installation of the VI Mitigation System, including, but not limited to a construction schedule, product specifications, site-specific construction details, quality control measures, or an Operation & Maintenance Plan. Prior to granting approval of the start of construction, this documentation is required to ensure the system will be installed, operated, and monitored appropriately. Please either provide me with an SMP Addendum detailing the planned installation of the VI Mitigation System or revise the SMP to include these same details by the date specified in the Technical Report Request Section below.

As you are likely aware ACEH follows DTSC's Vapor Intrusion Mitigation Advisory October 2011 Guidance document. This document provides the following rationale for the installation of a VI mitigation system: *"The goal of a VI mitigation system is to mitigate the intrusion of subsurface contaminant vapors to indoor air and prevent human exposure at unacceptable levels. A VI mitigation system is implemented to reduce contaminant entry into the building until the subsurface contamination is remediated or no longer poses a significant risk to human health. Remediation and mitigation are complementary components of a volatile chemical response action, addressing cleanup of subsurface contamination and impacts to the human receptor via the VI pathway, respectively. DTSC does not consider a VI mitigation system as a means of remediating the source of the subsurface contamination"*.

As noted above, this was a preliminary review. I have not had a chance to confer with Dilan on the SMP as she is currently out of the office and will return on Thursday 12/12/2013. I did want to send this e-mail so that this issue could be addressed to allow the project to commence this month.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- December 20, 2013 – Well Decommissioning Report (See my 11/20/2013 e-mail)
File to be named: RO8_WELL_DCM_R_yyyy-mm-dd
- December 20, 2013 – Site Management Plan (SMP) or SMP Addendum
File to be named: RO8_SITE_MANAGE_R_yyyy-mm-dd or
RO8_SITE_MANAGE_ADEND_R_yyyy-mm-dd
- January 18, 2014 – Updated Site Conceptual Model (See my 11/20/2013 e-mail)
File to be named: RO8_SCM_R_yyyy-mm-dd

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

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From: Jeremy Smith [mailto:jasmith@aeiconsultants.com]
Sent: Friday, December 06, 2013 8:12 AM
To: Detterman, Karel, Env. Health
Cc: Tom Graf; Peter McIntyre; john buestad; Roe, Dilan, Env. Health
Subject: Revised SMP for Parcel B

Karel

Attached is the revised SMP for Parcel B with the changes we verbally discussed. As you are aware, construction activities are planned to commence on Monday the 9th. Per our meeting on November 18th, the ACEH requested confirmation from AEI that all on-site monitoring

points were properly removed, at which time they would issue the approval to proceed with construction (it was communicated to us that this could be prepared the "same day" ACEH received the notification of abandonment activities). AEI's monitoring point abandonment notification detailed these activities and was uploaded on Monday December 2nd to the ACEH server (accepted by the ACEH server on December 5th). Therefore, will you be able to provide this approval today so that we do not hinder construction activities? Your prompt response is appreciated.

Regards

Jeremy Smith
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From: [Detterman, Karel, Env. Health](#)
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Subject: Fuel Leak Case No. RO0000008 and GeoTracker Global ID T0600100655, Good Chevrolet Parcel B, 1630 Park Street, Alameda, CA 94501
Date: Friday, December 13, 2013 6:05:57 PM

Hello John:

Alameda County Environmental Health (ACEH) understands that the Foley Street Investment (FSI) team is planning on submitting a Request for Closure along with the Updated Site Conceptual Model (SCM) that is due on January 18, 2014 (See my 11/20/2013 e-mail). As discussed in our last meeting on November 18, 2013, in lieu of a robust tetrachloroethene (PCE) soil gas data set and FSI's desire to proceed with site redevelopment prior to submittal of the SCM, ACEH and FSI agreed that the onsite monitoring wells and vapor probes could be destroyed in order to facilitate grading, and a Cupolex Venting system be incorporated into the building foundation as a conservative measure to protect against vapor intrusion into indoor air. Prior to commencement of construction of the building foundation, ACEH requested in our email dated December 6, 2013, submittal of a Site Management Plan (SMP) Addendum by December 20, 2013. The SMP Addendum is to include details of the Cupolex system including the plans approved by the City of Alameda, and the engineer's certification that the Cupolex system was designed by a California Registered Professional Engineer (PE), and the Cupolex installation will be also be observed by a PE during construction of the new building.

ACEH requests that the SCM includes a discussion about how the installation of the Cupolex system will mitigate vapor intrusion to indoor air and supporting documentation including product information, technical references, and as-built plans if available. As agreed upon in previous meetings, if based on the data presented in the SCM, ACEH determines that a vapor mitigation system is necessary to ensure the health and safety of building occupants, an Feasibility Study/ Corrective Action Plan (FS/CAP) will be required to be prepared in conjunction with the completion of the requisite 30 day public notification period prior to issuance of an occupancy permit from the City of Alameda. If ACEH determines the Cupolex system is not necessary to ensure the health and safety of building occupants, ACEH will notify the City of Alameda that an occupancy permit may be issued. Either way, ACEH will require a Record Report of Construction with as-built plans and PE certification that the Cupolex system was constructed in accordance with the plans approved by the City of Alameda.

If unexpected environmental conditions are discovered during grading activities, you are required to notify ACEH within 24-hours. Please note however, that if this occurs, ACEH staff will not be available to respond until after December 31, 2013 and any work that is conducted after notification and prior to ACEH response will be done at your own risk. We look forward to moving the site to closure in 2014.

Karel Detterman, PG
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