

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

COLLEEN CHAWLA, Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
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ALAMEDA, CA 94502
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August 31, 2018

Mr. Chris Freise
6655 Hollis Owner LLC
222 Kearny St, Suite 600
San Francisco, CA 94108
Sent via electronic mail to:
chris@liftrp.com

Kay & Merkle, LLP
Dorothy D McGuire
100 The Embarcadero,
Penthouse
San Francisco, CA 94105
(Sent via electronic mail to:
wmerkle@kmlaw100.com)

Shirley J Davini &
c/o Mr. Walter Merkle
Address Unknown

Mr. David Davini
Loretta A McGrath Family Trust
Address Unknown

Mr. Jon Braden
McGrath Steel Company
Address Unknown

Subject: Conditional Approval of Interim Remedial Action Plan; Fuel Leak Case No. RO0000063;
(Global ID # T0600102099); McGrath Steel Company, 6655 Hollis Street, Emeryville, CA
94608

Dear Ladies and Gentlemen:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file for the subject site, including the *Interim Remedial Action Plan* (IRAP), dated June 25, 2018. The report was prepared and submitted on your behalf by Weiss Associates. Thank you for submitting the report.

The referenced IRAP proposed the installation of four Dual Phase Extraction (DPE) wells in the vicinity immediately around the former underground storage tank (UST) location, which contains some of the highest soil and groundwater concentrations at the site, and immediately adjacent to well MW-3 which has contained up to three feet of free phase (FP). The IRAP proposed a two week operational period.

Based on ACDEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Conditional Work Plan Approval** – The referenced IRAP proposes actions with which ACDEH is in general agreement of undertaking; however, ACDEH requests several modifications. The approval is as an Interim Remedial Action due to the potential of vapor intrusion to the adjacent warehouse as documented by Indoor Air concentrations relative to Outdoor Air concentrations, as well as the potential to downgradient warehouses, and also as a pilot test to determine the longer-term applicability of DPE at this site. Please submit the results of the investigation in a report by the date identified below.
 - a. **DPE Effectiveness Determination** – The referenced IRAP proposes to at a minimum determine the effective Radius of Influence (ROI) and vapor removal rates. To ensure that sufficient data is collected during field implementation to adequately determine the effectiveness of the DPE, ACDEH requests that the final report include the following minimum:

- Conduct the DPE at a minimum of two operational pressures and collect sufficient groundwater elevation/vacuum measurements to evaluate ROI for both operational scenarios.
 - Demonstrate ROI for both the vapor phase and the aqueous phase. If geology is sufficiently heterogeneous/anisotropic, identify how these characteristics effect the distribution of the effective treatment zone.
 - Clear identification of treatment performance goals and allowable discharge parameters (e.g. temperature, pH, concentrations, flow rates) for both the aqueous phase and vapor phase.
 - Provide adequate instrumentation to report the flow rate (in Standard Cubic Feet per Minute) and pressure/vacuum data for the treatment influent and discharge effluent for the vapor phase.
 - Include the flow rate/totalizer data for the system influent and effluent for the aqueous phase.
 - Piping and instrumentation diagram (P&ID) identifying all components of the DPE system and labeling each valve, gauge, sample location, and each influent/effluent.
 - Copies of field sheets.
 - Copies of discharge permits (Bay Area Air Quality Management District [BAAQMD], and Sanitary Sewer or National Pollutant Discharge Elimination System [NPDES]).
- b. ROI Determination** – To adequately determine the ROI for the vapor and aqueous phase, additional subsurface sampling points may be required. Please review the adequacy of the proposed system and existing sampling points to evaluate this. Should additional sampling points be appropriate, ACDEH requests the submittal of an IRAP addendum by the date identified below. This can be a brief letter communicating the reason for need in detail with a revised figure to depict the proposed locations of these points.
- c. Well Bores Logs** – The IRAP currently proposes the installation of four DPE wells. To preclude misunderstandings, in addition to the items included in the description of the resulting report, ACDEH requests the generation of well bore lithologic logs with photoionization detector (PID) results to help determine the heterogeneity of the treatment area and an evaluation of contaminant concentrations. If additional observation wells are proposed in an addendum, the collection of soil samples may be appropriate depending on their locations.

TECHNICAL REPORT REQUEST

Please submit the following technical reports and deliverables to the State Water Board's Geotracker website and notify your case worker by electronic mail (mark.detterman@acgov.org), in accordance with the following specified file naming convention and schedule, as provided below, and in the Responsible Party(ies) Legal Requirements/Obligations which is included as Attachment 1. Please note ACDEH no longer accepts reports on the ftp site.

- **September 21, 2018** – IRAP Addendum (if required)
File to be named: RO63_IRAP_ADDEND_YYYY-MM-DD
- **October 10, 2018** – Site Investigation and Data Gap Work Plan
File to be named: RO63_SWI_WP_R_YYYY-MM-DD
- **December 7, 2018** – Interim Remediation Results
File to be named: RO63_IR_R_YYYY-MM-DD
- **February 1, 2019** – Second 2018 Semi-Annual Groundwater Monitoring Report
File to be named: RO63_GWM_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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. If your email address does not appear on the cover page of this notification, ACDEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

If you have any questions, please call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,



Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations and Electronic Report Upload (ftp) Instructions

cc: Tom Fojut, Weiss Associates, 2000 Powell Street, Suite 925, Emeryville, CA 94608; (Sent via electronic mail to: tjf@weiss.com)

Joyce Adams, Weiss Associates, 2000 Powell Street, Suite 925, Emeryville, CA 94608; (Sent via electronic mail to: jea@weiss.com)

Markus Niebanck, Amicus Strategic Environmental Consulting, 580 Second Street, Oakland, CA 94609; (Sent via electronic mail to: markus@amicusenv.com)

Dilan Roe, ACDEH, (Sent via electronic mail to: dilan.roe@acgov.org)

Paresh Khatri, ACDEH; (Sent via electronic mail to: paresh.khatri@acgov.org)

Mark Detterman, ACDEH, (Sent via electronic mail to: mark.detterman@acgov.org)

Electronic File; GeoTracker

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6731, 6735, and 7835) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately licensed or certified professional and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.