

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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November 30, 2007

Mr. Robert Saur
PG&E
3400 Crow Canyon Road
San Ramon, CA 94583

Subject: SLIC Case No. RO0000099 and Geotracker Global ID T0600100258, PG&E, 4930 Coliseum Way, Oakland, CA 94601

Dear Mr. Saur:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above referenced site including the recently submitted document entitled, "Additional Investigation Work Plan, PG&E Oakland General Construction Yard, 4930 Coliseum Way, Oakland, California," dated November 16, 2007.

The Work Plan, which was prepared by Geomatrix, proposes advancing soil borings at nine locations to collect soil and groundwater samples.

Petroleum hydrocarbons and chlorinated solvents, including 1,3-dichlorobenzene and 1,4-dichlorobenzene, have been detected in soil and groundwater samples collected on four adjacent properties in the area of your site. It appears that the chlorinated solvents are from a common source of historic releases that occurred on each of the four properties (PG&E, Learner Investment Company, AAA Equipment, and Superior Plaster Casting), resulting in a commingled plume. Therefore, ACEH considers all four parties responsible for the release. As presented in directive letters and discussed during a meeting with each of the four responsible parties held on October 10, 2007, ACEH requested that responsible parties for each of four adjacent properties work individually or cooperatively to evaluate the source and extent of the groundwater impacts. We thank PG&E for their cooperation in preparing a Work Plan to accomplish this goal. We note that Alta Properties LLC and Mr. Richard Neu have also submitted a work plan for site investigation on the adjacent AAA Equipment and Learner Investment Company properties. To date a work plan has not been submitted for the Superior Plaster Casting site and we have again requested that a work plan be submitted for this fourth property.

The proposed scope of work in the November 16 work plan is generally acceptable and may be implemented provided that the technical comments below are addressed during the proposed field investigation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed. We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1. **Proposed Soil and Groundwater Sampling.** The proposed soil and groundwater sampling locations and methods are generally acceptable. However, we request that the proposed soil samples within the former excavation area (borings SB-26 and SB-28) be collected 6 inches below the fill and native soil contact where the contact is obvious rather than at the proposed fixed interval. If the fill and native soil contact is not obvious, the soil samples are to be collected at 9.5 feet bgs in SB-26 and 8 feet bgs in boring SB-28.
2. **Depth of Deeper Soil Borings.** The proposed depth of deeper soil borings SB-29 and SB-30 was not specified in section 3.2.2 of the Work Plan. We request that borings SB-29 and SB-30 be extended to a minimum depth of 35 feet bgs. Determining the depth intervals for collection of depth-discrete groundwater samples in the field based on encountered soil stratigraphy is acceptable.
3. **Proposed Laboratory Analyses for Soil Samples.** We request additional analyses for several soil samples as shown on the attached Revised Table 1. We request that the four soil samples that will be analyzed for polynuclear aromatic hydrocarbons (PAHs) also be analyzed for polychlorinated biphenyls (PCBs) using EPA Method 8082 and CAM 17 metals using EPA Method 6010. We also request analysis for VOCs and TPH as diesel and motor oil for several additional samples as shown on attached Revised Table 1. Please present these results in the Site Investigation Report requested below.
4. **Proposed Laboratory Analyses for Groundwater Samples.** The proposed laboratory analyses for groundwater samples are acceptable.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Mr. Jerry Wickham), according to the following schedule:

- **April 18, 2008** – Site Investigation Report

ELECTRONIC SUBMITTAL OF REPORTS

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater

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cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

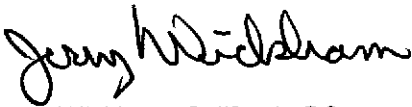
The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional 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.

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Hazardous Materials Specialist

Attachment: Revised Table 1

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Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Marcella Harrison, GVA Kidder Mathews, 505 Sansome Street, Suite 300, San Francisco,
CA 94111

Jack Krause, Alta Properties, LLC, P.O. Box 2399, Oakland, CA 94614

Richard Neu, Edenwood Corp., 47 Parsippany Road Whippany, NJ 07981

Robert Nichols, P.O. Box 6716, Oakland, CA 94603

John Miller, 250 Cambridge Avenue, Palo Alto, CA 94306

Tom Chandler, LFR, 3150 Bristol Street, Suite 250, Costa Mesa, CA 92626-7324

Robert Schultz, Geomatrix, 2101 Webster Street #12, Oakland, CA 94612

Donna Drogos, ACEH
Jerry Wickham, ACEH
File RO2746
File RO2478

Revised Table 1

Table 1. Sampling and Analysis Plan

Sampling Location	Location	Sample Depths to be Analyzed (feet bgs)	VOCs	TPHg	TPHd with Silica Gel Cleanup	TPHmo with Silica Gel Cleanup	PAHs	Metals and PCBs
SB-23	Former diesel UST, downgradient of former Superior Plaster	Soil: 3 ¹	X					
		Soil: 4 ²			X	X		
SB-24	Downgradient of former Superior Plaster	Soil: 3	X		X	X		
		Groundwater: first ³	X		X	X		
SB-25	Downgradient of former Superior Plaster and Learner, Adjacent to former Excavation	Soil: 3 ¹	X					
		Soil: 4 ²			X	X	X	X
		Groundwater: first ³	X	X	X	X		
SB-26	Downgradient of former AAA, Superior Plaster, and Learner	Soil: 9.5 8.5	X		X	X	X	X
		Groundwater: first ³	X	X	X	X		
SB-27	Downgradient of former AAA	Groundwater: first ³	X	X	X	X		
SB-28	Downgradient of former AAA	Soil: 8 8	X		X	X	X	X
		Groundwater: first ³	X	X	X	X		
SB-29	Downgradient of well OW-7, adjacent to former excavation	Soil: 3 ¹	X	X				
		Soil: 4 ²			X	X	X	X
		Groundwater: first and deeper ³	X	X	X	X		
SB-30	Downgradient of well OW-7	Soil: 3 ¹	X					
		Groundwater: first and deeper ³	X	X	X	X		
SB-31	Downgradient of former AAA, Superior Plaster, and Learner	Groundwater: first ³	X	X	X	X		

Notes:

- ¹ Sample to be collected in vadose-zone soil at least 1 foot above first-encountered groundwater.
- ² Sample to be collected from immediately above first-encountered groundwater.
- ³ Depth to groundwater is estimated at 5 feet bgs. Sampling interval will be from water table to 5 feet below.
- X Sample to be analyzed for listed parameters.

3.2.6 Quality Assurance and Quality Control Methodology

Field quality assurance/quality control (QA/QC) samples for chemical analysis will include the collection of one groundwater blind field duplicate and one trip blank per sample cooler. QA/QC procedures will include adherence to protocols for field sampling and decontamination procedures, as well as collection and laboratory analysis of controlled standards, matrix spike