



March 26, 2018

Mr. Matthew Westbrook
ARC - Blue Print Service
945 Bryant Street
San Francisco, CA 94103
(Sent via electronic mail to:
matthew.westbrook@e-arc.com)

Mr. Jeffery Grimes
ARC - Blue Print Service
945 Bryant Street
San Francisco, CA 94103
(Sent via electronic mail to:
jeffery.grimes@earc.com)

Subject: Conditional Work Plan Approval; Fuel Leak Case No. RO0000151 and GeoTracker Global ID T0600100196, City Blue Print, 1700 Jefferson St., Oakland, CA 94612

Dear Messrs. Westbrook and Grimes:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the *Soil Vapor Sampling*, dated March 15, 2018. The work plan was prepared and submitted on your behalf by Applied Water Resources Corporation (AWR). The work plan was submitted to document proposed vapor sampling discussed in the March 15, 2018 meeting, including vapor sampling for chlorinated volatile organic compounds (VOCs) that may be present due to the suspected presence of a former waste oil underground storage tank (UST), or identified sump or pit in the northwest corner of the property, and the detection of tetrachlorethene (PCE) and trichloroethene (TCE) in a previous vapor sampling event. The proposed vapor sampling event will utilize Standard Operating Protocols (SOPs) as previously described, modified, and accepted in earlier directive letters. The intent of this work is to obtain additional data for the planned meeting on May 18, 2018.

Based on ACDEH staff review of the work plan, and these documents, 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. Once field work is approved, 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. **Work Plan Comments** – The referenced work plan proposes a series of actions with which ACDEH is generally in agreement of undertaking. Please submit a site investigation report by the date identified in previous communications, and cited below.
 - a. **Chlorinated Volatile Organic Compounds** – The brief work plan identified PCE, TCE, cis-1,2 dichloroethene (cis-1,2 DCE), trans-1,2 DCE, and vinyl chloride (VC) as target compounds for analysis. ACDEH requests that a full VOC scan be conducted and that all detected chlorinated VOCs additionally be reported in the event that additional compounds are detected as present.
 - b. **Analysis for Fixed Gases and Helium** – To clarify ACDEHs position, ACDEH requests that fixed gases include oxygen, nitrogen, and carbon dioxide. ACDEH additionally requests that helium concentrations be analyzed at each vapor point and in each shroud. ACDEH requests the results for these gases be tabulated and reported as percentage.
 - c. **Naphthalene** – The referenced work plan proposed to collect naphthalene concentrations from all locations except subslab vapor points SS-2 to SS-8. Review of existing data indicates that naphthalene vapor concentrations from two to three previous vapor sampling events have

consistently resulted in very low non-detectable concentrations at these locations. ACDEH is in general agreement with this aspect of the work plan at this time; however, naphthalene may be requested in the future to verify continued consistency of the results.

- 2. Planned Meeting Dates and Times** – ACDEH has reserved meeting dates and times internally. Please reserve the two planned meeting dates and times as listed below.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

Please note that ACDEH has updated Attachment 1 with regard to report submittals. For final documents, ACDEH is now requiring a Submittal Acknowledgement Statement, replacing the Perjury Statement, as a cover letter signed by the Responsible Party (RP). The language for the Submittal Acknowledgement Statement is as follows:

"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.

Please make this change to your submittals to ACDEH.

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.

- **May 4 – 11, 2018** - Submittal of Draft Figures and Tables for Feasibility Study / Corrective Action Plan (FS/CAP) to all Stakeholders.
- **May 18, 2018** – Meeting; 1:00 – 3:00 P.M.
- **June 15, 2018** – Submittal of Modified Draft Figures and Tables Incorporating Meeting and 3rd Party Technical Comments.
- **June 25, 2018** – Meeting 1:00 – 3:00 P.M.
- **June 29, 2018** – Second Quarter 2018 Groundwater Monitoring Report (File to be named RO151_GWM_R_YYYY-MM-DD)
- **August 27, 2018** –Draft FS/CAP (3rd Party Reviewed) (File to be named RO151_FS_CAP_R_YYYY-MM-DD)
- **September 10, – October 10, 2018** – Public Comment Period; 30 days
- **December 14, 2018** – Corrective Action Implementation Plan (CAIP; 3rd Party Reviewed) (File to be named RO151_CAIP_R_YYYY-MM-DD)
- **December 21, 2018** – Third Quarter 2018 Groundwater Monitoring Report (with VOC Analysis?) (File to be named RO151_GWM_R_YYYY-MM-DD)
- **January – February 2019** – CAIP Approval and Implementation

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>.

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,



Mark E. Detterman, P.G., C.E.G.
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations & ACDEH Electronic Report Upload (ftp) Instructions

cc: Steven Michelson, Applied Water Resources Corporation, 2363 Mariner Square Drive, Suite 245, Alameda, CA 94501; (Sent via electronic mail to: smichelson@awrcorp.net)

Yola Bayram, Applied Water Resources Corporation, 2363 Mariner Square Drive, Suite 245, Alameda, CA 94501; (Sent via electronic mail to: ybayram@awrcorp.net)

Steve Goldberg, Downey, Brand, 621 Capitol Mall, 18th Floor, Sacramento, CA 95814; (Sent via electronic mail to: sgoldberg@downeybrand.com)

Lance Lo, Jefferson Court Commercial Ventures, LLC, 1728 Ocean Avenue #128, San Francisco, CA 94112; (Sent via electronic mail to: lltgc@aol.com)

Cote and Cookie Reese, 1701 San Pablo Avenue, Oakland, CA 94612; (Sent via electronic mail to: citydentaloffice@aol.com)

Andy Lojo, Terraphase Engineering, Inc, 1404 Franklin Street, Suite 600, Oakland, CA 94612; (Sent via electronic mail to: andrew.lojo@terrphase.com)

Chris Jones, Terraphase Engineering, Inc, 1404 Franklin Street, Suite 600, Oakland, CA 94612; (Sent via electronic mail to: chris.jones@terrphase.com)

Jeffrey S. Lawson, Silicon Valley Law Group, One North Market Street, Suite 200, San Jose, CA 95113; (Sent via electronic mail to: jsl@svlg.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.