



June 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 Approval of Two Work Plans; 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 *SV19 Well Destruction Work Plan*, and the *Indoor Air and Sub-Slab Sampling Work Plan*, both dated June 19, 2018. The work plans were prepared and submitted on your behalf by Applied Water Resources Corporation (AWR) based on the results of the meeting of May 18, 2018. Thank you also for attending a meeting on June 25, 2018, with respect to the site. As you are aware, the meeting was requested by ACDEH staff to continue project coordination, timing of the work, and incorporation of the input and evaluation of technical comments from multiple technical teams representing onsite and offsite property owners prior to finalization of the work product. During the meeting action items, and an associated timeline, were identified. These are included further below.

With respect to the well destruction work plan, it proposed the destruction of soil vapor well SV19 due to the potential of a compromised well seal. With respect to the indoor air and sub-slab vapor sampling work plan, it proposed the collection of three indoor air samples in the three basement residential units at the adjacent property (581 18th Street), and the concurrent collection of three sub-slab vapor samples in order to evaluate the risk that vapor intrusion was occurring into the residential units, and determine an attenuation factor across the concrete slab.

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 plans propose 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. SV19 Destruction Work Plan

- i. Timing of Destruction** – As discussed in the meeting of May 25, 2018, SV19 will be destroyed after the sampling of indoor air and subslab vapor points.
- ii. Backfill Material** – As discussed in several subsequent email discussions, and in the meeting of June 25, 2018, an alternative to the vapor well backfill material proposed in

the work plan of hydrated bentonite chips has been identified as more suitable in preventing potential for vapor intrusion to the basement of the apartment building at 581 18th Street. As discussed, a sand slurry mixture will be, and is requested to be, used to backfill SV19 upon its destruction.

- iii. **Well Destruction Auger Diameter** – As mutually agreed in the May 25, 2018 meeting, the inside diameter of the auger to be used for destruction of well SV19 will be, and is requested to be, larger than the outside diameter of SV19 in order that the well and seal can be removed in full.

b. Indoor Air Work Plan

- i. **Additional Sampling of Subslab SS5** – As discussed in the meeting of May 25, 2018, ACDEH is in agreement with the recommendation for the resampling of subslab vapor point SS5 prior to the destruction of SV19, and requests that SS5 be conducted concurrent with this scope of work.
 - ii. **Photoionization Detector** – The use of a Photoionization Detector (PID) was proposed in the indoor air work plan. ACDEH requests the PID be capable of reading at a part per billion (ppb) level.
 - iii. **Removal of Consumer Products With Volatile Organic Compounds** – The work plan proposed removal of all products containing petroleum-related volatile organic compounds (VOCs) such as benzene, toluene, ethylbenzene, and total xylenes (BTEX) preferentially over other products that may contain other non-petroleum VOCs. Due to previous requests for the analysis of non-petroleum VOCs at the site, and in an attempt to limit other vapor intrusion concerns, ACDEH requests all consumer products that contain VOCs be removed from the residences.
 - iv. **Analysis for Shroud Helium Concentrations** – To clarify, consistent with Department of Toxic Substances Control (DTSC) vapor guidance, ACDEH requests that the helium concentration in each shroud be maintained at approximately 20%, and that the concentration of each shroud be sampled, analyzed, and tabulated for helium to verify the concentration.
 - v. **Naphthalene** – Consistent with the Low Threat Closure Policy (LTCP) and DTSC vapor intrusion guidance, ACDEH requests that sub-slab, indoor air, and outdoor air be analyzed for naphthalene by TO-15, with confirmation by TO-17 for any locations that use Nylaflow tubing.
 - vi. **Draft Fact Sheets** – Minor modifications to the *Sample Collection Instructions – Indoor Air Sampling Events* have been forwarded under separate cover. Otherwise, it is the understanding of ACDEH that Jefferson Court Commercial Ventures will directly distribute the Fact Sheets to the residents with sufficient time prior to indoor air sampling, without letterhead. ACDEH can issue the fact sheets on ACDEH letterhead if judged appropriate.
2. **Subslab Vapor Monitoring** - As identified in the May 25, 2018 meeting, subslab vapor monitoring is requested to be conducted on a bi-monthly to quarterly interval in order to determine and monitor for subslab vapor equilibrium conditions at 581 18th Street.
 3. **Groundwater Monitoring Intervals** – As identified in the May 25, 2018 meeting, groundwater monitoring is requested to be placed on hold until implementation of a Corrective Action Plan (CAP). Due to the relative stability, at very high concentrations, of the groundwater plume, the collection of additional groundwater data does not appear to be appropriate, pending changes anticipated post- implementation of a CAP.

TECHNICAL REPORT REQUEST

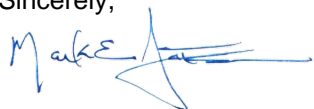
Please submit the following technical reports and deliverables to the State Water Board's Geotracker website and notify your case worker by electronic mail (mark.detterman@acgov.org), in accordance with the following specified file naming convention and schedule, as provided below, and in the Responsible Party(ies) Legal Requirements/Obligations which is included as Attachment 1.

- **August 20, 2018** – Draft FS/CAP (Word Document)
- **August 27, 2018** – List of Review Comments for Draft FS/CAP (3rd Party Review)
- **August 31, 2018** – Indoor Air and Sub-Slab Vapor Report (unless included in Draft FS/CAP)
(File to be named RO151_SWI_WELL_R_yyyy-mm-dd)
- **August 31, 2018** – Well Destruction Report
(File to be named RO151_WELL_DCM_R_yyyy-mm-dd)
- **October 4, 2018** – FS/CAP Comment Meeting
- **October 26, 2018** – Draft Public Participation Form to Alameda County (Word Document)
- **October 31, 2018** – Final FS/CAP
(File to be named RO151_FS/CAP_R_yyyy-mm-dd)
- **November 2, 2018 to December 3, 2018** – Public Participation Period
- **December 3, 2018** – Pilot Test Work Plan (if not included in FS/CAP)
(File to be named RO151_WP_R_yyyy-mm-dd)
- **December 17, 2018** – Potential Two Week Public Response Comment Period (if required)
- **January 2019** – Corrective Action Implementation Plan (CAIP; 3rd Party Reviewed)
(File to be named RO151_CAIP_R_yyyy-mm-dd)
- **February 2019** – CAIP Approval
- **End of Second Quarter 2019** – CAIP Field 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.

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)

Don Sobelman, Downey, Brand, 621 Capitol Mall, 18th Floor, Sacramento, CA 95814; (Sent via
electronic mail to: dsobelman@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@terraphase.com)

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