

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

COLLEEN CHAWLA, Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY, SUITE 250
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July 27, 2018

Ms. Carryl MacLeod
Chevron Environmental Management Company
6001 Bollinger Canyon Road
San Ramon, CA 94583

FWS Highlands LLC
99 S. Hill Drive
Brisbane, CA 94005

(Sent via electronic mail to: CMacleod@chevron.com)

Subject: Conditional Vapor Mitigation Work Plan Approval; Fuel Leak Case No. RO0000284 and Geotracker Global ID T0600100328, Chevron #9-0121; 3026 Lakeshore Avenue, Oakland, CA 94610

Dear Ms. MacLeod:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the *2018 Mitigation Measures Work Plan (Work Plan)*, dated June 15, 2018. The report was submitted on your behalf by Arcadis. Thank you for the submittal.

The Vapor Mitigation Work Plan proposes the installation of Retro-Coat by Land Science Technology on the floor of the first floor, and on the floor and walls of the basement of the building adjacent to the subject site located at of 3014 Lakeshore Avenue as a mitigation measure to inhibit any potential migration of vapors into the building from subsurface contamination associated with the unauthorized release at the subject site.

Based on ACDEH staff review of the Work Plan, ACDEH has determined that the proposed scope of work and methods for the installation of Retro-Coat at 3014 Lakeshore are generally appropriate and acceptable and therefore approves the Work Plan for implementation under the condition that the comments provided below are addressed. Therefore, at this juncture ACDEH requests that you implement the work, perform construction quality assurance/quality control during the installation, conduct post-installation indoor air and soil vapor sampling to monitor the effectiveness of the Retro-Coat vapor barrier, and submit as-built documentation in accordance with the Deliverable and Technical Report Request section 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. Retro-Coat Extents** – The Work Plan proposes to apply Retro-Coat to the concrete sections of the first floor and the entire basement floor and basement walls up to three feet. ACDEH requests that the Retro-Coat be applied to the entire length of the basement walls to provide adequate protection from vapor intrusion from subsurface contamination in both the saturated and unsaturated zones.
- 2. Building Infrastructure Preparation** – Prior to installation of the Retro-Coat all furniture and flooring on the first floor must be removed and lockers and any other items affixed to the walls in the basement removed. ACDEH understands that the current wall placement as noted on the building drawings included in the Work Plan is the current configuration. If changes to the walls are proposed by the property owner, they must be completed prior to the Retro-Coat installation. Additionally, the basement sump must be functioning as intended to meet the manufacturer's specification for installation and maintenance of the Retro-Coat.



3. **Retro-Coat Installation** – The Retro-Coat barrier must be installed by an applicator that is a certified contractor of Land Science Technologies, and Construction Quality Assurance and Quality Control performed by an independent third party under the oversight of a registered civil engineer. Please contact Jonathan Sanders with ACDEH at 510-567-6791 or jonathan.sanders@acgov.org to schedule site visits with ACDEH during the Retro-Coat installation.
4. **Retro-Coat Record Report of Construction** – A Record Report of Construction must be submitted to ACDEH and must include at a minimum photo-documentation of each stage of the installation including but not limited to the calcium chloride moisture testing, surface preparation and application process (caulk, primer, Retro-Coat); CQA observations including Retro-Coat thickness calculations based on volume of Retro-Coat applied and square footage and wet film gauge testing results; deficiencies in work, corrective actions taken, and deviations from the Work Plan and manufacturers specifications; measures taken to protect the finished work during Retro-Coat curing; and as-built drawings of the extents of Retro-Coat application, building configuration at the time of installation, and basement sump and discharge system. The Record Report of Construction must be signed by a registered civil engineer and must include a certification statement that the vapor barrier was installed in conformance with the Work Plan and manufacturer specifications and copies of warranties by the installer against delamination, chemical attack and normal wear and tear and the manufacturer material warranty.
5. **Retro-Coat Maintenance and Repair Plan** – ACDEH requests submittal of a Maintenance and Repair Plan that establishes procedures for maintenance of the vapor barrier, and ACDEH notification requirements and required mitigation measures if the building configuration changes or breaches to the Retro-Coat occur.
6. **Retro-Coat Installation Schedule** – As discussed in a conference call between Chevron, Arcadis, and ACDEH on July 20, 2018, the following installation schedule is currently planned in order to meet the Temple's re-occupation schedule.
 - a. **Calcium Chloride Test** – Week of July 23, 2018
 - b. **Order Materials** – By July 27, 2018
 - c. **Contractor Mobilization and Installation** – August 27 to August 31, 2018
 - d. **Product Drying Period** – September 1 to September 5, 2018
 - e. **Re-Occupation of Building** – September 6, 2018
7. **Indoor Air and Soil Vapor Monitoring Work Plan** – The Work Plan states that an indoor air/soil vapor sampling plan to monitor the effectiveness of the application of the Retro-Coat at 3014 Lakeshore Avenue will be included in the Record Report of Construction. ACDEH requests submittal of a stand-alone Soil Vapor and Indoor Air Monitoring Work Plan that includes a scope of work to conduct additional indoor air and crawl space vapor sampling at 3008 Lakeshore Avenue to collect samples during the dry season to monitor the seasonality of vapor at this property. As you are aware, at present crawl space and indoor air benzene and naphthalene concentrations at 3008 Lakeshore Avenue are above Environmental Screening Levels (ESLs), as are the associated outdoor ambient air samples. To help resolve some uncertainty of the suitability of collecting an outdoor air ambient vapor sample immediately adjacent to Lakeshore Avenue, ACDEH requests collection of the outdoor ambient air sample at a location upwind of both subject buildings in order to assess upwind vapor concentrations.
8. **Semi-Annual Groundwater Monitoring** – As recently communicated, ACDEH is in agreement that groundwater monitoring at the site should be moved to a semi-annual basis, using the first and third quarters of a year as the sampling basis. Please submit reports by the dates identified below.



DELIVERABLES AND TECHNICAL REPORT REQUEST(S)

Please submit the following technical reports and deliverables to the State Water Board's Geotracker in accordance with the compliance dates provided below and the *Responsible Party(ies) Legal Requirements/Obligations* and the *File Names for Electronic Reports* which are included as **Attachment A** and **Attachment B** respectively. These technical reports are being requested pursuant to Section 25296.10 of the California Health and Safety Code and Article 11, Chapter 16, Division 3 of Title 23 of the California Code of Regulations. Failure to comply with the deliverable and technical report request compliance dates listed below could result in enforcement action(s) as described in **Attachment B**.

- **October 29, 2018** – Retro-Coat Record Report of Construction
File to be named: RO284_REM_R_yyyy-mm-dd
- **October 29, 2018** – Retro-Coat Maintenance and Repair Plan
File to be named: RO284_O&M_PLAN_yyyy-mm-dd
- **October 29, 2018** – Indoor Air and Soil Vapor Monitoring Work Plan
File to be named: RO284_O&M_PLAN_yyyy-mm-dd
- **November 29, 2018** – Third Quarter 2018 Groundwater Monitoring Report
File to be named: RO284_GWM_R_yyyy-mm-dd
- **May 31, 2019** – First Quarter 2019 Groundwater Monitoring Report
File to be named: RO284_GWM_R_yyyy-mm-dd

CLOSING

ACDEH looks forward to continuing to work with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please contact the primary caseworker, Mark Detterman who can be reached by phone at 510.567.6876 or by email at mark.detterman@acgov.org.

Sincerely,

Dilan Roe

Dilan Roe, P.E. C73703
Chief
Land & Water Division

Enclosures:

- Attachment A Responsible Party(ies) Legal Requirements / Obligations
Attachment B File Names for Electronic Reports

Distribution List:

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Rabbi David Labkowski, Chabad, 3008 Lakeshore Avenue, Oakland, CA, 94610; (Sent via electronic mail to: Rabbi@JewishOakland.org)

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Robert Goodman, Rogers, Justep, O'Donell, 311 California Street, 10th Floor, San Francisco, CA 94104; (Sent via electronic mail to: rgoodman@rjo.com)

Clifford Fried, Fried & Williams, 1901 Harrison Street, 14th Floor, Oakland, CA 94612; (Sent via electronic mail to: cfried@friedwilliams.com)

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

Jonathan Sanders, ACDEH (Sent via electronic mail to: jonathan.sanders@acgov.org)

Electronic File; GeoTracker