ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY



ALEX BRISCOE, Director

ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

July 9, 2015

Stephen Boyd Pacific Electric Motor Company 137 Fiesta Circle Orinda, CA 94563-4350

Mala Batra Aspire Public Schools 1001 22nd Avenue, Suite 100 Oakland, CA 94606

(Sent via E-mail to: Mala.Batra@aspirepublicschools.org)

Richard R. Anderson Modad Properties, LLC 561 4th Street Oakland, CA 94607-3558

Subject: Review and Conditional Approval of Building 300 Vapor and Indoor Air Monitoring Plan for Fuel Leak Case No. RO0000411 and GeoTracker Global ID T0600101950, Pacific Electric Motors, 1009 66th Avenue, Oakland, CA 94621

Dear Responsible Parties:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the document entitled, "Building 300 Vapor and Indoor Air Monitoring Plan, Former Pacific Electric Motors Site, 1009 66th Avenue, Oakland, California" dated March 20, 2015 (Building 300 Monitoring Plan). The Building 300 Monitoring Plan, which was prepared on your behalf by ARCADIS, presents plans for vapor sampling, pressure measurements, and indoor air sampling to assess the adequacy of the vapor intrusion mitigation system for the school gymnasium (Building 300), which is currently under construction. The vapor and indoor air monitoring must be completed and the results reviewed and approved prior to occupancy of Building 300.

The vapor and indoor air monitoring proposed in the March 20, 2015 Building 300 Monitoring Plan is generally acceptable provided that the vent riser sampling protocols described in the attached correspondence dated May 6, 2015 are incorporated during the proposed sampling. This conditional approval does not cover issues that are directly or solely related to PCBs which are being addressed under regulatory oversight of the U.S. Environmental Protection Agency nor does it relieve you from compliance with other federal, state, and local regulations and permits.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Jerry Wickham), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

 September 2, 2015 – Building 300 Vapor and Indoor Air Monitoring Report File to be named: SWI_R_yyyy-mm-dd RO0411 Responsible Parties RO0000411 July 9, 2015 Page 2

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.

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org. Online case files are available for review at the following website: http://www.acgov.org/aceh/index.htm.

Sincerely,

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

Attachments: May 6, 2015 Correspondence from Erica Kalve describing vent riser sampling protocols

Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Carmen Santos, USEPA Region 9 (LND-4-1), 75 Hawthorne Street, San Francisco, CA 94105, (Sent via E-mail to: santos.carmen@epa.gov)

Tim Simon, Aspire Public Schools (Sent via E-mail to: Tim.Simon@aspirepublicschools.org)

Erica Kalve, ARCADIS, 100 Smith Ranch Road, Suite 329, San Rafael, CA 94903 (Sent via E-mail to: <u>Erica.Kalve@arcadis-us.com</u>)

Tracy Craig (Sent via E-mail to: tracy@craig-communications.com

Jerry Wickham, ACEH (Sent via E-mail to: <u>jerry.wickham@acgov.org</u>)
GeoTracker, eFile

From: <u>Kalve, Erica</u>

To: Wickham, Jerry, Env. Health

Subject: RE: RO411 Review of Air Monitoring Work Plan

Date: Wednesday, May 06, 2015 10:25:30 AM

Hi Jerry,

I am so sorry for the delay! Our plan for the riser sampling is to install a ball valve on the riser pipe (at the roof level) with a sample port just below it. We plan to take a vacuum reading prior to closing the ball valve to observe if we have a vacuum in the line at the time of sampling. Regardless of the vacuum reading, we plan to close the ball valve and purge the approximate volume of air/gas from the riser pipe (the volume from ground surface where it connects to the GeoVent to the ball valve at roof level, specific purge volume to be calculated prior to sampling). Because it will be a large volume, we will use a high volume gas pump such as the Gast 1532 pump. After purging one volume, we will pull the grab sample. If needed, we could plan to incorporate the shroud and tracer gas sampling technique to test for leakage, and sample using a low flow gas pump, similar to how we sample soil gas wells. Our sampling protocol for the field staff will include taking a photo of the sampling train with the ball valve closed and then after sampling is complete, the field staff will remove all the sampling materials, open the ball valve, and take a second photo so that we can visually confirm that the ball valve was open after sampling was complete.

Please let me know if you would like a formal letter documenting these sampling procedures.

Best regards, Erica

Please note my new contact information is provided below.

Erica Kalve, PG | Senior Geologist | erica.kalve@arcadis-us.com

ARCADIS U.S., Inc. | 100 Smith Ranch Road, Suite 329 | San Rafael, CA, 94903 T. 415.491.4530 ext. 22 | M. 510.206.4514 | F. 415.491.4532 www.arcadis-us.com

From: Wickham, Jerry, Env. Health [mailto:jerry.wickham@acgov.org]

Sent: Tuesday, May 05, 2015 6:27 PM

To: Kalve, Erica

Subject: FW: RO411 Review of Air Monitoring Work Plan

Erica.

I would like to complete review of the Building 300 Vapor and Indoor Air Monitoring Plan. I was not able to find an answer to the question below. Would you please send or re-send an answer on the comment below.

Jerry Wickham Alameda County Environmental Health 1131 Harbor Bay Parkway Alameda, CA 94502

510-567-6791 jerry.wickham@acgov.org

From: Wickham, Jerry, Env. Health **Sent:** Thursday, April 09, 2015 5:33 PM

To: Kalve, Erica

Subject: RO411 Review of Air Monitoring Work Plan

Erica,

I have reviewed the Building 300 Vapor and Indoor air Monitoring Plan and it generally looks good. The one area I have a question on is the vent riser sampling. Can you provide more information on how the grab vapor samples will be collected from the vent riser pipe and what the top of the pipe and sampling port look like? How will you know that the grab vapor samples from the vent risers are not mostly ambient air from the top of the pipe?

Jerry Wickham
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
510-567-6791
jerry.wickham@acgov.org

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

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.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to 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 Instructions." 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. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater 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 monitoring wells, and other data to the GeoTracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please **SWRCB** visit the website for more information on these requirements (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

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.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)

REVISION DATE: May 15, 2014

ISSUE DATE: July 5, 2005

PREVIOUS REVISIONS: October 31, 2005;

December 16, 2005; March 27, 2009; July 8, 2010,

July 25, 2010

SECTION: Miscellaneous Administrative Topics & Procedures

SUBJECT: Electronic Report Upload (ftp) Instructions

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.

REQUIREMENTS

- Please do not submit reports as attachments to electronic mail.
- Entire report including cover letter must be submitted to the ftp site as a single portable document format (PDF) with no password protection.
- It is preferable that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements must be included and have either original or electronic signature.
- <u>Do not</u> password protect the document. Once indexed and inserted into the correct electronic case file, the
 document will be secured in compliance with the County's current security standards and a password. <u>Documents</u>
 with password protection will not be accepted.
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Submission Instructions

- 1) Obtain User Name and Password
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to deh.loptoxic@acgov.org
 - b) In the subject line of your request, be sure to include "ftp PASSWORD REQUEST" and in the body of your request, include the Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to ftp://alcoftp1.acgov.org
 - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to deh.loptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.