

ALAMEDA COUNTY
**HEALTH CARE SERVICES
AGENCY**

REBECCA GEBHART, Interim Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY, SUITE 250
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

November 17, 2016

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

Stephen Greenwood
Aspire Public Schools
1001 22nd Avenue, Suite 100
Oakland, CA 94606

(Sent via E-mail to: Steven.Greenwood@aspirepublicschools.org)

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

Subject: Conditional Approval to the Indoor Air Monitoring Work 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 Department of Environmental Health (ACDEH) has reviewed the fuel leak case file for the above-referenced site including the most recent report Buildings 200 and 300 Indoor Air Monitoring Work Plan for the Former Pacific Electric Motors Site, 1009 66th Avenue, Oakland, California (the Work Plan), dated September 26, 2016, prepared on your behalf by ARCADIS. The Work Plan presents plans to evaluate potential vapor intrusion concerns at Building 200 and 300, and assess the potential contribution of outdoor air on indoor air quality. Two rounds of indoor air and crawl space samples are proposed for Building 200, and two rounds of indoor air and riser pipe samples are proposed for Building 300.

As referenced in our email directive dated September 13, 2016, the following are the rationales for the requested additional vapor intrusion assessment:

- Due to the detection of benzene in the crawl space sample and outdoor air samples, and the absence of results associated with a number of soil gas samples in the vicinity of Building 200, we request that an indoor air sampling event be performed instead of an additional attempt to collect soil gas from existing vapor probes, to assess the benzene concentrations, and evaluate whether these concentration pose a vapor intrusion potential or are due to outdoor air contributions to indoor air quality.
- Benzene and naphthalene concentrations were detected above the United States Environmental Protection Agency (USEPA) Regional Screening Levels (RSLs) in most of the indoor air samples collected at Building 300. The only outdoor air sample collected showed similar concentrations. As such, we request that additional indoor air and vent riser piper sampling event be performed to verify the benzene and naphthalene concentrations, and evaluate whether these concentrations pose a vapor intrusion potential or due to outdoor air contributions to indoor air quality.

The Work Plan is generally acceptable provided that the following are addressed:

- Prior to indoor sampling, contingency planning and public notification as referenced in the Department of Toxic Substances Control (DTSC) Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance) should be incorporated into the Work Plan and implemented, as recommended.
- Following the completion of the building survey (as mentioned in page 2 of the Work Plan – Section 4 Field Sampling Plan), sample locations selected for Building 200 must be sent to ACDEH for comment prior to the commencement of the sampling event.

TECHNICAL REPORT REQUEST

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

- December 7, 2016 – Draft Fact Sheet and Notification Letters – via email only
- December 14, 2016 - Finalized Fact Sheet and Notification Letters
File to be named: FACT_SHEET_YYYY-MM-DD RO0411
- No later than January 18, 2017 – Perform Indoor Air Sampling
- February 20, 2017 – Additional Vapor Intrusion Evaluation Report for Buildings 200 and 300
File to be named: SWI_R_YYYY-MM-DD RO0411

Sincerely,

Kit Soo, California PG 8957
Senior Hazardous Materials Specialist

Attachment: 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)

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

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

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

Dilan Roe, ACEH (Sent via E-mail to: dilan.roe@acgov.org)

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Paresh Khatri, ACEH (*Sent via E-mail to: paresh.khatri@acgov.org*)
Kit Soo, ACEH (*Sent via E-mail to: kit.soo@acgov.org*)

GeoTracker, eFile