

ALAMEDA COUNTY  
**HEALTH CARE SERVICES  
AGENCY**

COLLEEN CHAWLA, Agency 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

26 July 2018

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

Casey Hoffman  
Aspire Public Schools  
1001 22<sup>nd</sup> Avenue, Suite 100  
Oakland, CA 94606  
(Sent via E-mail to: [casey.hoffman@aspirepublicschools.org](mailto:casey.hoffman@aspirepublicschools.org))

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

Subject: Fuel Leak Case No. RO0000411 and GeoTracker Global ID T0600101950, Pacific Electric Motors, 1009 66<sup>th</sup> Avenue, Oakland, CA 94621; **Meeting Summary and Technical Report Request**

Dear Responsible Parties:

Alameda County Department of Environmental Health (ACDEH) has reviewed the fuel leak case file for the above-referenced site, including the following reports prepared on behalf of Aspire Public Schools (Aspire) by Arcadis U.S., Inc. (Arcadis):

- Vapor Intrusion Evaluation Summary Memorandum, Building 300, dated 8 June 2018
- Indoor Air Assessment Report, dated 25 January 2018

In addition, ACDEH met with Aspire and Arcadis to discuss the report findings and pathway to closure for this site. This letter provides a summary of the meeting action items, technical comments, and technical report requests.

**SUMMARY OF ACTION ITEMS FROM 12 JUNE 2018 MEETING**

ACDEH met with representatives from Aspire Public Schools and its consultant, Arcadis, at the ACDEH offices on 12 June 2018. The following action items were agreed at the meeting:

- The source of petroleum compounds in indoor air is uncertain and may be the result of vapor intrusion. During the next indoor air monitoring event additional outdoor air samples are needed to evaluate ambient air conditions. Sampling should be performed when building conditions are representative of normal operating conditions.
- Gasoline impacts to groundwater beneath Building 300 warrant further review. A tabular Conceptual Site Model (CSM) is recommended to help identify and separate the environmental impacts at the site.
- It appears necessary to upgrade the vapor mitigation system (VMS) at the site to active mode, and thereby increase reliability over the current approach of controlling indoor air quality through HVAC system operations.

- As-built drawings of the Building 300 VMS should be included in an Operations and Maintenance (O&M) Plan for the site. A single O&M plan addressing environmental concerns at the site is recommended. An O&M Plan should be a recommended response action following preparation of the CSM.
- Groundwater monitoring well locations at the site need to be uploaded to GeoTracker.

## TECHNICAL REPORT REQUEST

Please upload technical reports to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- 31 August 2018: Groundwater Monitoring Well Locations to GeoTracker  
Please e-mail a copy of the confirmation page.
- 30 September 2018 – Conceptual Site Model Report (Tabular)  
File to be named: CSM\_R\_yyy-mm-dd
- 15 November 2018 – Indoor Air Monitoring Report  
File to be named: SWI\_R\_yyy-mm-dd

Sincerely,



Robert W. Schultz, CHG  
Senior Hazardous Materials Specialist

Attachment: Responsible Party(ies) Legal Requirements/Obligations

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](mailto:santos.carmen@epa.gov))  
Joel Gibson, Aspire Public Schools (Sent via E-mail to: [joel.gibson@aspirepublicschools.org](mailto:joel.gibson@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](mailto:Erica.Kalve@arcadis-us.com))

Dilan Roe, ACDEH (Sent via E-mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))

Robert Schultz, ACDEH (Sent via E-mail to: [robert.schultz@acgov.org](mailto:robert.schultz@acgov.org))

GeoTracker, eFile

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> December 14, 2017
	<b>ISSUE DATE:</b> July 25, 2012
	<b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016
<b>SECTION:</b> ACDEH Procedures	<b>SUBJECT:</b> 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, Division3, 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/](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 values<sup>1</sup> 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
<b>2016 Subsurface Investigation Report</b>	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
<b>2012 Site Assessment Work Plan</b>	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>2010 GW Investigation Report</b>	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	✓	✓	✓	✓	✓

<sup>1</sup> GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> NA
	<b>ISSUE DATE:</b> December 14, 2017
	<b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016
<b>SECTION:</b> ACDEH Procedures	<b>SUBJECT:</b> 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/](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.