

ALAMEDA COUNTY
**HEALTH CARE SERVICES
AGENCY**

COLLEEN CHAWLA, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
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9 October 2018

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

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

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

Subject: Fuel Leak Case No. RO0000411 and GeoTracker Global ID T0600101950, Pacific Electric Motors, 1009 66th Avenue, Oakland, CA 94621; **Response to Air Sampling Plan**

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 workplan prepared on behalf of Aspire Public Schools (Aspire) by Arcadis U.S., Inc. (Arcadis): *Air Sampling Plan for Buildings 200 and 300 Former Pacific Electric Motors Site, 1009 66th Avenue, Oakland California*, dated 28 September 2018 (Sampling Plan). Arcadis proposes to collect and analyze:

- 6 Indoor Air (IA) samples from Building 300,
- 4 IA samples from Building 200,
- 2 Crawl Space (CS) samples from Building 200,
- 3 Riser Pipe Grab samples from Building 300, and
- 9 Outdoor Air (OA) samples, including 6 onsite and 3 offsite locations.

The samples will be analyzed for total petroleum hydrocarbons in the gasoline range (TPHg) and volatile organic compounds (VOCs) using USEPA Method TO-15 SIM.

In addition, ACDEH met with Aspire and Arcadis on 25 September 2018 to discuss the pathway to closure for this site. This letter responds to Aspire's 28 September 2018 Sampling Plan.

TECHNICAL COMMENTS

ACDEH requests that you address the following technical comments as part of your implementation of the Sampling Plan and perform the proposed work in conformance with the conditions listed below.

Please conduct air sampling in accordance with Technical Comment 1.

1. **Air Sample Collection Period.** Consistent with California Department of Toxic Substance Control (DTSC) guidance, air samples should be collected over a typical school day and while school is in session (i.e., under normal operating conditions). It appears that indoor air samples from the site have not been collected over a 24-hour period, as recommended by the DTSC during initial evaluation of vapor intrusion (VI). Because VI to the school is being further evaluated, in addition to the samples proposed by Arcadis, at least 3 indoor and 1 outdoor 24-hour air samples need to be collected as part of the proposed monitoring event.

Please address Technical Comment 2 in the workplan requested below.

2. **Groundwater Sampling.** Groundwater monitoring wells at the site were most recently sampled in January 2014. Isoconcentration maps depicting the extent of the contaminant plumes in groundwater (e.g., TPHg, benzene, and MTBE) have not been prepared, and the lengths of the contaminant plumes have not been estimated. The site is located within 250 feet of Lion Creek, and monitoring well MW-3 is approximately 200 feet from the creek. Arcadis states in the Sampling Plan that contaminant concentrations are increasing in some groundwater monitoring wells and decreasing in others. Plots of petroleum concentrations over time were not included in the Sampling Plan. VI is a concern at the site and due to shallow groundwater, benzene in soil vapor would indicate a likelihood of groundwater contamination. It appears appropriate to conduct additional evaluation and groundwater sampling prior to destruction of groundwater monitoring wells.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

ACDEH requires a Submittal Acknowledgement Statement, signed by the Responsible Party (RP), as a cover letter to technical reports and submittals. The requirement is described in Attachment 1. The language for the Submittal Acknowledgement Statement is as follows:

"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 Resources Control Board's GeoTracker website."

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:

Responsible Parties
RO0000411
9 October 2018
Page 3

- 15 November 2018: Vapor Intrusion Investigation Report
File to be named: SWI_R_yyy-mm-dd
- 30 November 2018: Work Plan for Groundwater Sampling
File to be named: WP_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)
Joel Gibson, Aspire Public Schools (Sent via E-mail to: joel.gibson@aspirepublicschools.org)
Rajesh Varma, Aspire Public Schools (Sent via E-mail to: Rajesh.Varma@aspirepublicschools.org)
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GeoTracker, eFile