



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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June 1, 2015

Mr. Todd Wiederhold
Printpack, Inc.
2800 Overlook Parkway
Atlanta, GA 30339

Ms. Regina Colbert
James River Corporation
2101 Williams Street
San Leandro, CA 94577

Ms. Carey Andre
2101 Williams Associates LLC
2228 Livingston Street
Oakland, CA 94606
(sent via electronic mail to:
carey@jonesdevelopers.com)

Subject: Modified Approval of Indoor Air Investigation Work Plan; SLIC Case RO0002468 and Geotracker Global ID T06019771096, James River Corporation, 2101 Williams Street, San Leandro, CA 94577

Dear Mr. Wiederhold and Mesdames Colbert and Andre:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Indoor Air Investigation Work Plan*, dated May 13, 2015. Thank you for submitting the report. The results of two recent investigations have documented sub-slab vapor concentrations up to 520,000 $\mu\text{g}/\text{m}^3$ tetrachlorethene (PCE) and 880 $\mu\text{g}/\text{m}^3$ trichloroethene (TCE) at a number of locations beneath the subject building. The referenced work plan was submitted in order to collect and determine indoor air vapor concentrations.

Based on ACEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described 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. **Work Plan Modifications** – The referenced work plan proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH will, upon approval and distribution of the public notification fact sheets, request several modifications to the approach. Please submit a report, incorporating all recent sub-slab vapor data, appropriate figures, and analytical reports, by the date specified below.
 - a. **Draft Pre-Notification, Indoor Air Sampling, and Commonly Used Product Fact Sheets** – Consistent with the work plan, ACEH requests a copy of the draft tenant pre-notification, indoor sampling fact sheet, and Commonly Used Product fact sheet that has been proposed for distribution at the site. Examples of this type of communication are contained in the Department of Toxic Substances Control (DTSC) Vapor Intrusion Public Participation Advisory (VIPPA), dated March 5, 2012. ACEH requests the submittal of a draft Indoor Air Sampling Fact Sheet (MW Word format) intended for indoor air sampling, by the date identified below.
 - b. **Fact Sheet Distribution** – After ACEH approval of the draft fact sheets, please ensure that the fact sheets are distributed a minimum of 1 week prior to site interviews and observations. Please also ensure that the occupants of the unit have not used chemicals that contain or could confuse PCE vapor sampling results (for example that contain PCE, TCE, or other potential breakdown products etc.) are not used for a minimum of one week prior to the indoor air sampling effort. Finally, please ensure that