

## Detterman, Mark, Env. Health

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**From:** Detterman, Mark, Env. Health  
**Sent:** Wednesday, October 01, 2014 5:33 PM  
**To:** 'Carey Andre'  
**Cc:** 'Paul King'; 'Tom Graf'; Roe, Dilan, Env. Health; Detterman, Mark, Env. Health  
**Subject:** Approval of Sub-Slab Vapor Pin Work Plan; (James River Corp; RO2468)

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: <a href="mailto:carey@jonesdevelopers.com">carey@jonesdevelopers.com</a> )
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**Subject:** Modified Approval of Sub-Slab Vapor Investigation; SCP 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 DRAFT *Sub-Slab Soil Gas Investigation Work Plan*, dated September 4, 2014. The work plan was prepared and submitted in draft form to ACEH for review.

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 a work plan 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](mailto: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 requests several modifications to the approach. Please submit a report by the date specified below.
  - a. Submittal of a Final Work Plan with Perjury Statement** – The referenced draft work plan appears appropriate to investigate the potential for vapor intrusion into the indoor air space of the subject building; however, the work plan has not been finalized or submitted to ACEH with a perjury statement. Please submit a final work plan by the date referenced below.
- 2. GeoTracker Compliance** – A review of the State Water Resources Control Board's (SWRCB) GeoTracker website continues to indicate that the site has not been claimed. Because this is a state requirement, ACEH requests that the site be claimed in GeoTracker by the date identified below. **This is an outstanding request repeated over several previous directive letters. Delay of these actions will eventually delay site closure.**

Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. Also, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude to sub-meter accuracy using NAD 83. A California licensed surveyor may be required to perform this work. **In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs, including SCP programs.** Additionally, pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3893, 3894, and 3895, beginning July 1, 2005, the successful submittal of electronic information (i.e. report in PDF format) shall replace the requirement for the submittal of a paper copy. Please claim your site and

upload all future submittals to GeoTracker and ACEH's ftp server by the date specified below. Electronic reporting is described below on the attachments.

Additional information regarding the SWRCB's GeoTracker website may be obtained online at [http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/) and [http://www.swrcb.ca.gov/ust/electronic\\_submittal/report\\_rqmts.shtml](http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml)) or by contacting the GeoTracker Help Desk at [geotracker@waterboards.ca.gov](mailto:geotracker@waterboards.ca.gov) or (866) 480-1028.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below, according to the following schedule:

- **October 31, 2014** – Claim Site in Geotracker and Notify ACEH and Provide Notification to ACEH  
File to be named: RO2468\_CORRES\_L\_yyyy-mm-dd
- **October 31, 2014** – Upload Documents to ACEH ftp and Geotracker Websites and Notify ACEH; Including Hydraulic Fluid Release Closure Documentation and Provide Notification to ACEH  
File to be named: RO2468\_CORRES\_L\_yyyy-mm-dd
- **December 15, 2014** – Site Investigation and Site Conceptual Model  
File to be named: RO2468\_SWI\_SCM\_R\_yyyy-mm-dd

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. If your email address is not listed on the first page of this letter, or in the list of cc's listed below, ACEH is requesting your email address to help expedite communications and to help lower overall costs.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org).

Sincerely,

Mark E. Detterman, P.G., C.E.G.  
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations  
Electronic Report Upload (ftp) Instructions

cc: Dilan Roe (sent via electronic mail to [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))  
Mark Detterman, ACEH (sent via electronic mail to [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))  
Electronic File, Geotracker

*Mark Detterman  
Senior Hazardous Materials Specialist, PG, CEG  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
Direct: 510.567.6876  
Fax: 510.337.9335  
Email: [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org)*

*PDF copies of case files can be downloaded at:*

*<http://www.acgov.org/aceh/lop/ust.htm>*

