



ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 LOCAL OVERSIGHT PROGRAM (LOP)
 For Hazardous Materials Releases
 1131 Harbor Bay Parkway
 Alameda, CA 94502-6577

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

NSN 9450-02562-13-42



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
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October 11, 2017

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: Work Plan Approval; 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 Department of Environmental Health (ACDEH) staff has reviewed the case file including the *Sub-Slab Depressurization and Soil Vapor Extraction Feasibility Test Report*, dated September 1, 2017, and the *Subsurface Investigation Work Plan*, dated October 10, 2017. The feasibility test report was prepared and submitted on your behalf by Geosyntec Consultants, and the work plan was prepared and submitted on your behalf by P&D Environmental, Inc. Thank you for submitting them.

As discussed in the meeting held in our office on October 5, 2017, conclusions reached in the feasibility testing report indicated that even with elevated applied vacuums the lateral influence and Radius of Influence was limited in both the sub-slab depressurization and soil vapor extraction testing, respectively, and it was determined that both methods were not viable vapor mitigation methods for the subject site.

As discussed in the meeting of October 5, 2017, and given the need to manage exposures to elevated tetrachlorethene (PCE) vapor concentrations in the sub-slab during planned tenant improvements, a series of actions were discussed to allow the work to proceed. The subject work plan is the first of several steps.

Based on ACDEH 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) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Work Plan Approval** – The referenced work plan proposes a series of actions with which ACDEH is in general agreement of undertaking; however, ACDEH requests one modification to the approach. Please submit a data report on the proposed work, and identify a range of potential meeting dates to discuss the findings, by the date specified below.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

Please note that ACDEH has updated Attachment 1 with regard to report submittals to ACDEH. ACDEH will now be requiring a Submittal Acknowledgement Statement, replacing the Perjury Statement, as a cover letter signed by the Responsible Party (RP). The language for the Submittal Acknowledgement Statement is as follows: