

## Detterman, Mark, Env. Health

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**From:** Detterman, Mark, Env. Health  
**Sent:** Monday, December 01, 2014 10:50 AM  
**To:** ekirk.marks@earthlink.net; billbanker@comcast.net  
**Cc:** Tom Graf; 'James Gribi'; Roe, Dilan, Env. Health  
**Subject:** Additional Actions Including Plume Delineation and Sensitive Receptor Survey; RO00002520 (Global ID #T06019788682), Maz Glass; 3800 San Pablo Avenue, Emeryville, CA

Ms. Elaine Kirk  
Marks Management Co.  
c/o Banker, Marks, & Kirk  
1721 Broadway, Suite 202  
Oakland, CA 94612  
(sent via electronic mail to:  
[EKirk.marks@earthlink.net](mailto:EKirk.marks@earthlink.net))

Mr. William H. Banker, Jr.  
San Pablo Avenue Venture  
c/o Banker, Marks, & Kirk  
1721 Broadway, Suite 202  
Oakland, CA 94612  
(sent via electronic mail to: [BillBanker@comcast.net](mailto:BillBanker@comcast.net))

Dear Ms. Kirk and Mr. Banker:

Alameda County Environmental Health (ACEH) has reviewed the case file, including the *Third Quarter 2014 Groundwater Monitoring Report*, and the *Report of Data Gaps Investigation*, both dated November 7, 2014. The reports were prepared and submitted on your behalf by Gribi Associates (Gribi). Thank you for submitting the reports. The reports document the installation of soil bores SB-29 and SB-30, the collection of soil vapor samples at five locations, and the collection of shallow soil samples for the purpose of pre-characterizing native soil prior to redevelopment excavation. The report also indicates that the ozone remediation system was shut down on October 24, 2014.

Review of available reports indicates several previously requested gaps in data remain at the site. Based on the review of the case file ACEH requests that you address the following technical comments and send us the documents requested below.

As discussed in our meetings, ACEH is committed to expediting review of submitted reports to help facilitate the site redevelopment schedule. As soon as ACEH receives the items noted below, ACEH will be able to review and comment on the appropriateness of proceeding with site redevelopment while the case progresses towards closure. To facilitate evaluation of the appropriateness of proceeding with site redevelopment prior to case closure, the results of Technical Comments 1 to 3 can be submitted under separate cover at an earlier date than Technical Comment 4.

### **TECHNICAL COMMENTS**

- 1. Preferential Pathway and Sensitive Receptor Surveys** – As previously requested in multiple directive letters (November 16, 2012, January 23, 2014, and June 27, 2014) a preferential pathway study including the location and depth of utilities, and of vicinity water supply wells using Department of Water Resources (DWR) and the Alameda County Public Works Agency (ACPWA) resources, has not been conducted. ACEH notes that the well survey was proposed in the work plan addendum. Utility information has been summarized, but not depicted in site figures which are useful in understanding potential bore location limitations or other considerations. The Geotracker Groundwater Ambient Watering and Assessment (GAMA) website has also been reviewed for water supply wells; however, as previously requested, DWR and ACPWA databases have not been. Because the databases of each agency and website are separate and different, it is appropriate to review each of these resources. Review of Figure 5 from the *East Bay Plain Groundwater Basin Beneficial Use Evaluation Report, Alameda and Contra Costa Counties, CA*, San Francisco Regional Water Quality Control Board, dated June 1999, indicates that this region of Emeryville has a high incidence of early, potentially unregistered, water supply wells. Please depict utilities on figures with the proposed locations of the borings. Please also depict water supply well locations on a figure and tabulate identified wells. ACEH recognizes that well construction details are confidential; however, well locations are not.

A sensitive receptor survey (schools, hospitals, sensitive populations, and building construction details [e.g. basements]) was requested in the July 18, 2014 directive letter in an effort to support the delineation of a potential groundwater plume associated with the southern UST at the site (see next comment). This also has not been conducted.

2. **Delineation of Southwestern UST Groundwater Plume** – As previously requested in the July 18, 2014 directive letter, the groundwater dissolved-phase plume for the former southern UST location has not been delineated to the southwest. Soil bore SB-28 detected 910 micrograms per liter (µg/l) Total Petroleum Hydrocarbons as gasoline (TPHg) in the likely downgradient direction of groundwater. At this juncture, in lieu of conducting additional subsurface plume delineation field work, please prepare a site figure using the LTCP *Technical Justification for Groundwater Media-Specific Criteria* to depict the average and 90<sup>th</sup> percentile characteristic plume lengths for TPHg. Please include on the site map the results of the sensitive receptor survey (including basements that shorten the distance between a receptor and a groundwater plume) and the well survey proposed to be conducted in the work plan addendum, in order to determine if receptors are at risk within that area. Please present the results of the analysis in a report by the date identified below.
3. **Affect of Site Grading on Western Parking Lot** – As discussed in the October 23, 2014 meeting, an enlargement of the western outside parking area would be submitted by November 1<sup>st</sup> to depict how grading activities associated with the undergrounding of electrical power at the power pole near well MW-3 would impact the well. This has not been submitted, and consequently ACEH cannot yet make a determination that site redevelopment can proceed at the site.
4. **Planned Actions** – The referenced site investigation report indicates that an additional round of soil vapor sampling will be conducted due to initial results, and that an additional groundwater monitoring event will occur in early December 2014 in order to investigate for the potential of groundwater contaminant rebound at the site. ACEH is in general concurrence with these actions, and requests the submittal of a report by the date identified below.

#### **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:

- **February 20, 2015** – Site Investigation Report (with Groundwater Monitoring Data)

File to be named: RO2520\_SWI\_R\_yyyy-mm-dd

These reports are being requested 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 in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

Thank you for your cooperation. If you have any questions, please call me at (510) 567-6876 or send me an electronic mail message at [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org).

Sincerely,

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

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