

## **Nowell, Keith, Env. Health**

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**From:** Nowell, Keith, Env. Health  
**Sent:** Friday, May 20, 2016 9:48 AM  
**To:** Daniel Ross  
**Cc:** Dennis Laduzinsky; Roe, Dilan, Env. Health  
**Subject:** SCP Case RO2914, City of Oakland Parking Lot, 910 Broadway, Oakland; Geotracker Global ID T06019705750

Dear Mr. Ross:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file including the recently submitted document entitled *Work Plan*, dated May 19, 2016 prepared for the subject site. The Work Plan was prepared by Northgate Environmental Management, Inc. (Northgate) and provided to ACDEH in an electronic mail with a figure depicting the sampling locations included as an attachment.

The Work Plan proposes to collect indoor air samples at two locations inside the hotel with each sample collected using a 6-liter summa canister fitted with a regulator set to continuously sample indoor air over an approximate 8-hour time period. Canister pressures will be recorded at the start and at the end of the sampling period. Methane readings will also be recorded at the start and end of the sampling period in each room using a hand-held field instrument (Gastech Land Surveyor) calibrated for methane. The indoor air samples will be analyzed for methane, oxygen, carbon dioxide, and nitrogen.

ACDEH generally concurs with the proposed scope of work and the proposed work scope may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. ACDEH requests the proposed work be conducted in accordance with the document entitled *Final-Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance)* (Guidance) prepared by Cal/EPA, dated October 2011. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed.

### **TECHNICAL COMMENTS**

1. The Guidance states the sampling duration for the first indoor air sampling event should be collected over a 24-hour period to ensure diurnal fluctuations in vapor intrusion and indoor air concentrations are included in the sampling period. ACDEH requests 24-hour sampling interval be used for collection of the air samples.
2. The Guidance states indoor air sampling should be conducted under conservative conditions; therefore, heating, ventilation, and air conditioning (HVAC) systems should be operated normally for the season and time of day. ACDEH requests the HVAC system be operated normally during the duration of the sample collection.
3. Per the Guidance, site-specific ambient (outdoor) air samples should be collected when indoor air sampling is conducted, with ambient air samples be collected at locations that are not influenced by subsurface contamination. Therefore, ACDEH requests the recovery of an ambient air sample at a suitable location for laboratory analysis. Note that the Guidance indicates, in part, that ambient air sampling should be conducted concurrent with the indoor air sampling.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACDEH ftp site (Attention: Keith Nowell), and to the State Water Resources Control Board's GeoTracker website, in accordance with the following specified file naming convention and schedule:

- **July 20, 2016** – Indoor Air Investigation Report (file name: RO0002914\_SWI\_R\_yyyy-mm-dd)

Thank you for your cooperation. ACDEH looks forward to working with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org)

Regards,  
Keith Nowell

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