

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
ALEX BRISCOE, Agency Director



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January 26, 2015

Archstone
c/o Mr. Daniel Emerson
807 Broadway Street, Suite 210
Oakland, CA 94607
(sent via electronic mail to: DEEmerson@achstonemail.com)

Archstone Emeryville Residential LLC
7 Giralda Farms
Madison, NJ 07940

Archstone Emeryville Residential LLC
c/o EQR. Tax Dept
PO Box 87407
Chicago, IL 60680

API Emeryville Parkside
c/o Lehman Brothers Holdings
Atten: Joelle Halperin
1271 Avenue of the Americas
New York, NY 10020

Subject: Request for Site Investigation Work Plan; Fuel Leak Case No. RO0003109 and GeoTracker Global ID T1000000444, API Emeryville Parkside - UST, 5750 – 5780 Hollis Street, Emeryville, CA 94608

Dear Mr. Emerson:

Alameda County Environmental Health (ACEH) has reviewed the case file, including the November 13, 2012 *Removal of Underground Storage Tank*, prepared and submitted on your behalf by Treadwell & Rollo (TR). On September 11, 2012 one approximately 6,000-gallon single-walled steel heating oil underground storage tank (UST) was removed from the site. Two soil samples were collected beneath the UST at a depth of 12 feet below surface grade (bgs), and four sidewall samples were collected at 4.5 or 6.0 feet bgs. Up to 200 milligrams per kilogram (mg/kg) total petroleum hydrocarbons as diesel (TPHd) and 360 mg/kg TPH as motor oil (TPHmo) were detected. Groundwater was not encountered in the UST excavation. The data indicate that an unauthorized release has occurred at the site.

Further work is required to assess the extent of contamination around the area of the former UST and to characterize the case. Please ensure that the case is characterized in light of the requirements contained in the Low Threat Closure Policy (LTCP). At present the case fails General Criteria e (Site Conceptual Model or SCM) and the Media-Specific Criteria for Groundwater.

Based on the review of the case file ACEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

1. **LTCP General Criteria e (Site Conceptual Model)** – According to the LTCP, the SCM is a fundamental element of a comprehensive site investigation. The SCM establishes the source and attributes of the unauthorized release, describes all affected media (including soil, groundwater, and soil vapor as appropriate), describes local geology, hydrogeology and other physical site characteristics that affect contaminant environmental transport and fate, and identifies all confirmed and potential contaminant receptors (including water supply wells, surface water bodies, structures and their inhabitants). The SCM is relied upon by practitioners as a guide for investigative design and data collection. All relevant site characteristics identified by the SCM shall be assessed and supported by data so that the nature, extent and mobility of the release have been established to determine conformance with applicable criteria in this policy.