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
FAX (510) 337-9335

December 8, 2016

John Protoppapas
Madison Park Financial Corporation
Lake Merritt Tower
155 Grand Avenue, Suite 1025
Oakland, CA 94612
(*Sent via email to John@mpfcorp.com*)

Subject: Conditional Approval to the Data Gap Evaluation and Subsurface Investigation Work Plan for Site Cleanup Program Case No. RO0003160, Precision Cast Products, 1549 32nd Street and 2868 Hannah Street, Oakland, CA 94608

Dear Mr. Protoppapas:

We recently participated in a meeting on July 28, 2016. Attendees of the meeting included property owner representatives Simon Chen and Bob Huff (Madison Park Financial Corporation); Paul King (P&D Environmental); and Dilan Roe and Kit Soo (Alameda County Department of Environmental Health [ACDEH]).

The purpose of the meeting was to discuss steps necessary for the redevelopment of the site for residential purposes. Based on the meeting, a Data Gap and Subsurface Investigation Work Plan was requested to evaluate data gaps associated with historical investigation and the proposed residential development at the site; to delineate the tetrachloroethene (PCE) impacts on the southern portion of the property, and to verify the proposed remediation action of soil excavation (removal and disposal) as referenced in the *Soil Remediation Action Work Plan Amendment* (RAP Work Plan Amendment), dated January 8, 2016, which was prepared on your behalf by P&D Environmental. Note that the RAP Work Plan Amendment replaced the initially proposed remedial action of aeration of PCE-impacted excavated soil.

Specifically, the following potential data gaps were discussed:

- Contamination caused by trespasser prior to demolition of the site buildings;
- Residual surface contamination associated with site building demolition,
- Onsite and offsite delineation of PCE in soil and groundwater;
- Potential offsite up-gradient PCE impact to the site;
- Historical site evaluation for petroleum, VOCs including naphthalene, and metals;
- Quality of imported fill used to backfill excavated areas;
- Residual contaminant concentrations at neighboring properties located to the east of the subject site;
- Project elevator pit relative to residual contamination;
- Offsite Utility Survey;
- Vapor intrusion risk and hazard at offsite downgradient property boundary.

ACDEH staff has reviewed the case file for the above referenced site including the recently submitted document *Data Gap Evaluation and Subsurface Investigation Work Plan* (Work Plan), dated November 28, 2016. The Work Plan, which was prepared on your behalf by P&D Environmental, Inc., presents plans to evaluate data gaps associated with historical site investigations and the proposed residential development at the site. These activities include: collection of surface soil samples to evaluate post-building demolition surface conditions; the collection of soil and groundwater samples to delineate and evaluate the extent of PCE and other constituents of concern; and the collection of soil samples to assess the quality of imported fill used to backfill previously excavated areas.

TECHNICAL COMMENTS

Based on our review, the proposed scope of work in the November 28, 2016 Work Plan is generally acceptable, provided the following comments are incorporated and addressed during the field implementation:

1) **Residual Surface Contamination Associated with Site Building Demolition**

- A total of six surface soil samples S1 to S6 are proposed to be collected and analyzed for lead to evaluate potential surface soil lead contamination. Where possible, locate the borings along the drip-line of the former buildings.
- Indicate how the surface soil samples will be collected and indicate the targeted depth.

2) **Historical Site Evaluation for Petroleum, Volatile Organic Compounds (VOCs, including Naphthalene), and Metals**

- Figure 16 presents naphthalene concentrations in soil samples. Although most of the Total Petroleum Hydrocarbon as Diesel (TPH-d) and naphthalene concentrations detected above their respective Tier 1 screening level of 230 mg/kg, and 0.033 mg/kg were excavated out, the following locations, which were not excavated, will require to be delineated and addressed further:
    - MW-3 contained naphthalene concentrations of 0.706 mg/kg at 1 feet below ground surface (bgs). This sample is generally located in the central portion of the site.
    - EB9 contained total petroleum hydrocarbons as diesel (TPH-d) of 1,700 mg/kg and 290 mg/kg at 7.5 feet bgs) (1,700 milligrams per kilogram) and 16 feet bgs (290 mg/kg), respectively. This sample is located on the northeastern corner of the property. Naphthalene was not analyzed at this location. Naphthalene analysis appears to be warranted to adequately delineate soil impact.

- Figure 23 presents metal concentration in soil samples. Samples from E-11 and E-13 contain nickel concentrations in soil above the Tier 1 ESL of 86 mg/kg. Indicate whether the sample from E-11 (130 mg/kg at 10-11 feet bgs) which is located in the central portion of the site was excavated during the previous excavation activities or not. No further investigations are proposed for the locations at E-11 and E-13 based on the absence of a vapor intrusion risk. However, if the elevated nickel concentrations are proposed to be left in place and the potential for direct contact exist, then this issue must be addressed in a Site Management Plan which will be required prior to site development.

- TPH as gasoline (TPH-g) and TPH-d were detected above their respective Tier 1 ESL of 100 micrograms per liter (ug/L) in groundwater at EB8 (460 ug/L [TPH-g] and 3,100 ug/L [TPH-d]). EB8 is located on the southeastern portion of the property. Although TPH-g and TPH-d impacts at this location is not proposed to be delineated during this phase of investigation, delineation activities must be performed during the remediation phase of the PCE, at the latest. ACDEEH recommends addressing this data gap during this mobilization to cost-effectively complete site characterization.

- Groundwater above the Tier 1 ESLs for total chromium (50 ug/L) and nickel (212 ug/L) are present in B-14 located near the northwestern corner of the site. No further investigations are proposed at this location based on the absence of a vapor intrusion risk. However, if the potential for a direct contact exist, then this issue must be addressed in a Site Management Plan which will be required prior to site development.

3) Residual Contaminant Concentrations at Neighboring Properties to the East of the Subject Site

- TPH-d in groundwater is detected above its Tier 1 ESL of 100 ug/L at EB3 (730 ug/L) which is located offsite to the east at the 2859 Helen Street Residence. No further investigations are proposed for this location based on the absence of naphthalene which is the main driver in TPH-d when considering vapor intrusion issues. ACDEH notes that although naphthalene is not detected in locations closest to the EB3 which are along the eastern property boundary, naphthalene concentrations above the Tier 1 ESL of 0.17 ug/L were detected at SB-6 (20.3 ug/L) and SP-3 (139 ug/L) which are still located in close proximity to the eastern property boundary. These locations have since been excavated. Given the above information, EB-3 must be delineated and addressed during this investigation phase or during the remediation phase of the PCE, at the latest. ACDEH recommends addressing this data gap during this mobilization to cost effectively complete site characterization.

4) Quality of Import Fill Used to Backfill Excavated Areas

- Provide dimension for the combined excavated areas.

5) Vapor Intrusion Risk and Hazard at Offsite Downgradient Property Boundary

- The groundwater results from RB-5 was used to evaluate the risk and hazard at the offsite downgradient property boundary. The cumulative risk and hazard index generated for the two scenarios (depth to water of 7 feet bgs and 15 feet bgs, respectively) were less than 1 EE-06 for the cumulative risk, and 1 for the hazard risk, and are below the recommended Department of Toxics Substances Control (DTSC) guidelines for further evaluation. However, ACDEH expects the evaluation of vapor intrusion risk and hazard at offsite downgradient receptors be performed again once more data is available from this data gap investigation.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH ftp site (Attention: Kit Soo), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **February 28, 2017** – Data Gap Evaluation and Subsurface Investigation Report
  File to be named: RO3160 SWI_R_yyyy-mm-dd

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at kit.soo@acgov.org. Online case files are available for review at the following website: http://www.acgov.org/aceh/index.htm.

Sincerely,

Kit Soo

Digitally signed by Kit Soo
DN: cn=Kit Soo, o=Alameda County, ou=Department of Environmental Health, email=kit.soo@acgov.org, c=US
Date: 2016.12.08 15:42:32 -08'00'

Kit Soo, California PG 8957
Senior Hazardous Materials Specialist

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

cc: Bob Huff, Madison Park Financial Corporation, Lake Merritt Tower, 155 Grand Avenue, Ste. 1025, Oakland, California, 94612 (*Sent via E-mail to: bob@mpfcorp.com*)

Simon Chen, Madison Park Financial Corporation, Lake Merritt Tower, 155 Grand Avenue, Ste. 1025, Oakland, California, 94612 (*Sent via E-mail to: simon@mpfcorp.com*)

Paul King, P & D Environmental, 55 Santa Clara Avenue, Suite 240, Oakland, CA 94610 (*Sent via E-mail to PDKing0000@aol.com*)

Steve Carmack, P & D Environmental, 55 Santa Clara Avenue, Suite 240, Oakland, CA 94610 (*Sent via E-mail to steven.carmack@pdenviro.com*)

Dilan Roe, ACEH (*Sent via E-mail to: dilan.roe@acgov.org*)
Paresh Khatri, ACEH (*Sent via E-mail to: paresh.khatri@acgov.org*)
Kit Soo, ACEH (*Sent via E-mail to: kit.soo@acgov.org*)

GeoTracker, eFile

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

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.

ELECTRONIC SUBMITTAL OF REPORTS

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program File Transfer Protocol (FTP) site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) GeoTracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the GeoTracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to SCP sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/) for more information on these requirements.

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, late reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to $10,000 per day for each day of violation.

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	**REVISION DATE:** December 1, 2016
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
SECTION: Miscellaneous Administrative Topics & Procedures	**SUBJECT:** Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection**.
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- **Signature pages and perjury statements must be included and have either original or electronic signature.**
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted**.
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

  RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Submission Instructions

1) Obtain User Name and Password
   a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
      i) Send an e-mail to deh.loptoxic@acgov.org.
   b) In the subject line of your request, be sure to include **"ftp PASSWORD REQUEST"** and in the body of your request, include the **Contact Information, Site Addresses**, and the **Case Numbers (RO# available in Geotracker) you will be posting for**.

2) Upload Files to the ftp Site
   a) Open File Explorer using the Windows  key + E keyboard shortcut.
      i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
   b) On the address bar, type in ftp://alcoftp1.acgov.org.
   c) Enter your User Name and Password. (Note: Both are Case Sensitive)
   d) Click Log On.
   e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
   f) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.

3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
   a) Send email to deh.loptoxic@acgov.org notify us that you have placed a report on our ftp site.
   b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
   c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
   d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.