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By Alameda County Environmental Health 11:12 am, May 23, 201

May 17, 2017

Ms. Karel Detterman Alameda County Health Care Services Agency 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577

I, Bob Winet, hereby authorize ERAS Environmental, Inc. to submit the Addendum to the Work Plan for Limited Phase II Subsurface Investigation for 1091 Calcot Place, Oakland, California, dated May 16, 2017 to the Alameda County Health Care Services Agency.

"I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the SWRCB's GeoTracker website."

306 Winet 5/18/2017

Signature:

Printed Name: Bob Winet

Mr. Bob Winet East Bay Lofts LLC 36966 Pinto Palm Street Rancho Mirage, CA 92270 bwinet3@verizon.net **E**RAS 1533 B Street

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May 16, 2017

Mr. Bob Winet East Bay Lofts LLC 36966 Pinto Palm Street Rancho Mirage, CA 92270

Subject: Addendum to Work Plan for

Limited Phase II Subsurface Investigation 1091 Calcot Place, Oakland, California Alameda County Site R00003162

Dear Mr. Winet,

The following is an addendum to the work plan for the subject site that was dated March 1, 2017. The purpose of this addendum is to 1) provide additional information for evaluation of case closure, 2) provide additional justification for the proposed work and 3) add an additional task to the proposed work. The location of the subject site is shown on **Figure 1**.

The information is this addendum is in response to the letter from Ms. Karel Detterman of the Alameda County Health Care Services Agency (ACHCSA) in the letter dated April 28, 2017. An evaluation of the subject site in relation to the Low Threat Case Closure Policy (LTCP) is as follows.

#### **Low Threat Case Closure Evaluation**

The following criteria should be met for a site to qualify for closure per RWQCB's *Interim Guidance* on Required Cleanup at Low-Risk Sites.

- The leak has been stopped and ongoing sources including free product, have been removed or remediated;
- The site has been adequately characterized;
- The dissolved plume is not migrating;

- No groundwater impact currently exists, no contaminants are found at levels above the established MCLs or other water quality objectives;
- No water wells, deeper drinking water aquifers, surface water, or other sensitive receptors are likely to be impacted; and
- The site presents no significant risk to human health or the environment.

## Leak Has Been Stopped and Ongoing Sources Have Been Removed

The previous investigations have determined that former underground fuel oil tanks are not present. Therefore, the leak in this area has been stopped. The other potential sources of contamination are the former furnaces which have been removed and these areas are to be investigated in this proposed scope of work. This scope of work also includes the installation of a groundwater extraction well in the area of the former oil tanks to remove floating product, a secondary source of contamination.

## Site is Adequately Characterized

Petroleum hydrocarbons and semi-volatile organic compounds (SVOCs) remain in the soil and groundwater beneath the subject site. This investigation is designed to assess the vertical and lateral extent of contamination in soil and groundwater.

## Dissolved Plume is Not Migrating

This proposed investigation is designed to assess the extent of petroleum hydrocarbons in groundwater to assess if the dissolved plume is migrating.

#### No Water Wells or Other Sensitive Receptors Are Threatened

ERAS (2016) previously reported on a 2,000-foot radius well survey and did not identify groundwater wells that would likely to be threatened. The Property is approximately 1000 feet from the Brooklyn Basin harbor area between Oakland and Alameda. This investigation is designed to assess the vertical and lateral extent of contamination in soil and groundwater which will allow an opinion to be developed regarding the threat to sensitive receptors associated with the nearest surface body of water.

#### Site Presents No Significant Risk

The data for soil and groundwater previously discovered, as well as data from this proposed investigation will be used to assess the risk to human health safety and the environment.

Note the Site Conceptual Model (SCM) and Data Gap Analysis that was included in the March 1, 2017 work plan will be updated and included in the report of the results of this additional investigation.

### **Summary of Groundwater Occurrence**

Shallow groundwater at the Property has been determined to be at a depth of approximately 15 feet below ground surface (bgs). The groundwater appears to be in an approximately 2-3-foot-thick bed of clayey silt interbedded with silty clay. Note the thin saturated zone yields little water and therefore previous borings were extended to 24 feet to reasonably collect the proper groundwater samples. The silty clay beneath the saturated zone appears to extend to at least 24 feet bgs which is the deepest depth explored.

In the location of the former oil USTs groundwater was encountered at a depth of approximately 3 feet bgs. This groundwater appears to be perched water that has filled the former UST excavation.

## **Summary of Extent of Contamination**

Soil and groundwater has been impacted by diesel and oil range hydrocarbons and several SVOCs that appears to be from the area of the former oil USTs. Soil contamination of elevated hydrocarbons outside the former UST is located only in boring B-7 to the northeast of the former UST area. Thus, the known soil contamination appears to be restricted in extent to this area.

Soil containing SVOCs, specifically phenol, above ESLs were found in the 4-foot bgs sample in Borings B-5, B-6 and B-7, located around the former UST location. Deeper samples did not contain phenol *although the reporting limits (RL) was elevated above the ESLs due to limitations in the laboratory analytical method.* Benzo (a) pyrene was detected in the shallow soil sample in Boring B-4 but was not detected in the deeper sample. Naphthalene and 2-methyl naphthalene was detected in Boring B-7 only in the deeper 8-foot sample. The lateral and vertical extent of SVOCs in soil has not been determined.

In groundwater, by far the highest concentrations of petroleum hydrocarbons were found in groundwater in the former UST area. Lower but still elevated concentrations were found in Boring B-5, to the southeast of the source area. It is possible this distribution is a result of a high-pressure water main the location of which is shown on **Figure 2**. Much lower concentrations of these contaminants were detected in the borings near the source area, indicating limited extent of groundwater contamination in this area.

The following is a response to the specific comments in the ACHCSA letter.

#### **Work Plan Comments**

a. <u>Proposed soil boring locations</u> - The workplan inadvertently discussed three proposed soil borings that did not include the four soil borings in the former furnace areas. There were four additional soil borings for a total of 8 proposed borings as shown on the attached

## Figure 2.

Previous subsurface investigations at the Property indicate the contaminants of concern in soil (at concentrations above ESLs) in Boring B-7 near the former oil USTs are diesel range petroleum hydrocarbons, the VOC naphthalene and 2-methylnaphthalene and the SVOC phenol. Concentrations of phenol were also detected in B-5 and B-6 and concentrations of benzo (a) pyrene were detected in Boring B-4. These contaminants were all detected in the upper 5 feet of soil although the reporting limits of the deeper samples were above the ESLs.

Although it was requested that soil samples should be collected from the source area (where previous Borings B-1, B-2, B-3 were drilled), this area is flooded with groundwater and the groundwater samples previously collected should be considered to represent the contamination in this area. Contamination in shallow soil in this area will be investigated by the collection of samples from the 0-5 foot and 5-10-foot soil samples from proposed Boring EW-1 and from a 5-10 foot and a 10-15-foot sample from proposed Boring B-16.

A **Table of Soil Boring Justifications** is included to summarize the purpose of each of the proposed borings.

- b. Proposed boring depth in Former Furnace Locations ERAS proposed to collect shallow samples (4 feet) in the area of former furnaces since the source of contamination in these areas would be surface spillage or from shallow piping (likely to be 2 feet or less). A deeper sample will be collected if evidence of contamination, based on field observations, extends up to 4 feet. Since these sources would have released at the surface, it is reasonable to base the need for further investigation on the results of the near surface soil samples (0-4 ft) collected.
- c. <u>Proposed Soil Boring Depths Outside of the Former Furnace Locations</u> The proposed borings, with the exception of the former furnace borings, will be drilled to a depth of 24 feet to be able to collect appropriate groundwater samples. This depth is based on experience at the Property in other borings advanced to that depth. No soil samples are proposed as the ACDEH is suggesting because there is no credible means of migration of contaminants from the source area down to the groundwater table, then over to the boring locations and then back up to the depth intervals identified (0-5 ft and 5-10 ft). Therefore, the work plan will not be altered in this regard.
- d. <u>Proposed Soil and Grab Groundwater Analytical Program</u> ERAS proposes to analyze the samples from Boring EW-1 and B-16 and the step out borings B-8, B-9, B-10 and B-11 for TPH-dro, TPH-oro, naphthalene, 2-methylnaphthalene, phenol and benzo (a) pyrene since these are the contaminants that were previously detected. Based on a conversation with the laboratory, restricting the analysis to these fewer contaminants may enable the attainment of lower detection limits.

- All the samples collected from the former furnace area will be analyzed for the analyses proposed in the workplan that was approved by the ACHCSA in the April 28, 2017 letter
- e. Request for Underground Utility Survey Based on previous underground locating at the subject site, there are significant buried metal objects that interfere with the location of underground utilities. ERAS will attempt to locate the extent of the water line shown on Figure 2 and locate other utilities in the area of investigation.

#### References

Alameda County Health Care Services Agency, Department of Environmental Health, Fuel Leak Case, RO 0000390 and GeoTracker Global ID T0600101343, Letter dated April 28, 2017. ERAS Environmental, Inc., Limited Phase II Subsurface Investigation, 1091 Calcot Place, Oakland, California, February 12, 2016.

Please contact us if you have any questions regarding the information contained in the work plan or in this addendum.

Sincerely,

ERAS Environmental, Inc.

Curtis Payton

California Registered Professional Geologist 5608

David Siegel

Senior Program Manager

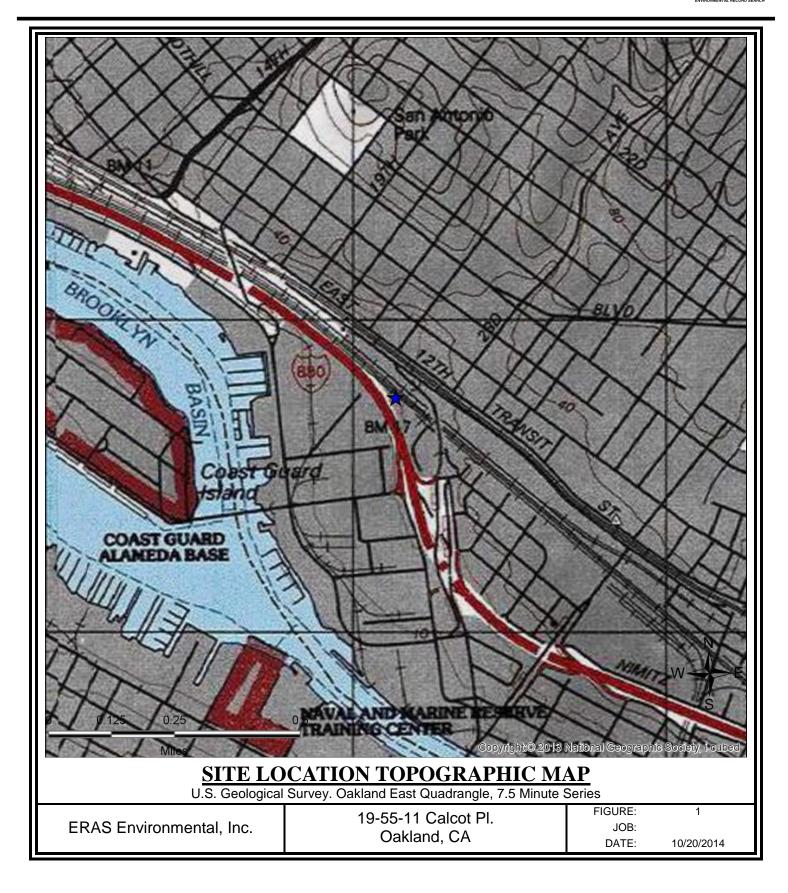
Attachment A Figure 1 - Site Location Topographic Map

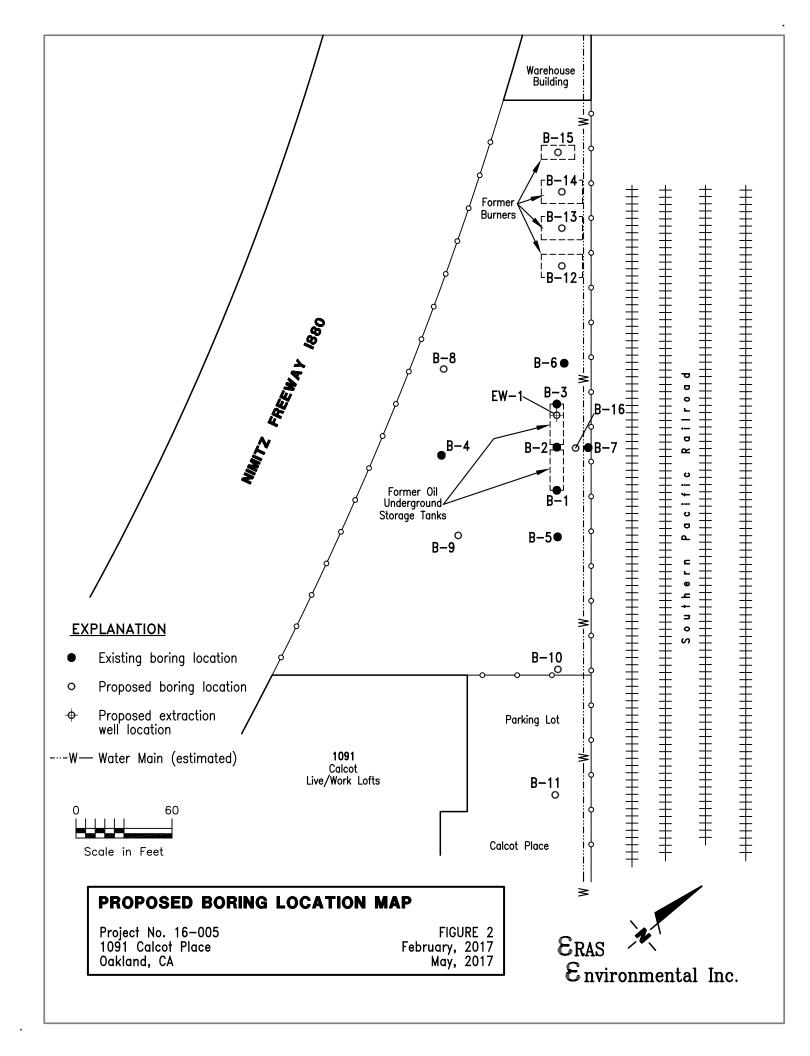
Figure 2 – Proposed Boring Location Map

Tables Table 1 – Table of Soil Boring Location Justifications











# **Table of Soil Boring Location Justifications**

Boring Number	Proposed depth (feet)	Justification for Location
EW-1	24	Extraction well in source area to remove free product
B-8	24	Determine extent of dissolved contamination
B-9	24	Determine extent of dissolved contamination
B-10	24	Determine extent of dissolved contamination
B-11	24	Determine extent of dissolved contamination
B-12	4	Assess soil in area of former furnace
B-13	4	Assess soil in area of former furnace
B-14	4	Assess soil in area of former furnace
B-15	4	Assess soil in area of former furnace
B-16	16	Assess deeper soil near source area