

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

COLLEEN CHAWLA, Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

March 9, 2018

Mr. Carlos Palafox
Terramar Retail Centers
5918 Stoneridge Mall Road
Pleasanton, CA 94588
(Sent via email to Carlos.Palafox@terramarcenters.com)

Subject: Conditional Work Plan Approval; Site Cleanup Program Case No. RO0003172 and Geotracker Global ID T10000007048, Rockridge Shopping Center, 5100 Broadway, Oakland, CA 94611

Dear Mr. Palafox:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the *Updated Focused Site Conceptual Model and Supplemental Data Gap Work Plan*, dated December 29, 2017. The work plan was submitted on your behalf by Tetra Tech, Inc. (Tetra Tech). Thank you for submitting the work plan.

The work plan proposes the installation of five soil vapor bores to approximately 15 feet below surface grade (bgs) and the subsequent construction of dual completion soil vapor wells in the bores at the depths of approximately 5 and 15 feet below grade surface (bgs). The soil bores and vapor wells were proposed to further investigate the release of tetrachloroethene (PCE), and associated daughter degradation products, including vinyl chloride, at the former Rockridge Cleaners dry cleaning operations. The work plan additionally proposed the installation of three sub-slab vapor pins above the former remedial excavation and former dry cleaner building, and the resampling of up to four previously installed dual completion vapor wells.

Based on ACDEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Work Plan Approval** – The referenced work plan proposes a series of actions with which ACDEH is in general agreement of undertaking; however, ACDEH requests several modifications to the approach. Please submit a report by the date specified below.

- a. **Additional Soil Vapor Wells** – In order to determine if any residual vapor contamination has utilized recently installed preferential pathways to migrate and place other areas at risk, ACDEH requests the installation of three additional, single depth, vapor wells into utility trench backfill which have been excavated through the former excavation area, and areas not excavated but documented to contain residual soil contamination (i.e. sample EXSW2). This includes the storm drain line, the domestic water line, and the sanitary sewer line.

Preferred locations include in the backfill for the storm drain and sanitary sewer runs that extend south from the formerly excavated area, and the domestic water line that was installed immediately adjacent to excavation confirmation sample EXSW2. All three requested vapor wells are requested to be installed proximal (within five feet) of previous excavations, such as the excavated former sewer line, yet within the recently installed potential preferential pathway backfill.

- b. Additional Vapor Well Resampling** – ACDEH is in agreement of resampling existing vapor wells DC-VMP-21 to DC-VMP-24; however, additionally requests the resampling of DC-VMP-13 due to the presence of PCE at a concentration of 1,500 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), which is below the commercial Environmental Screening Level (ESL), but is appropriate to verify the concentration remains consistently below applicable ESLs.
 - c. Helium Shroud Concentrations** – ACDEH requests that the concentration of helium in the vapor shroud be reported as a percentage in data tables for each sampling location.
 - d. Soil Sample Selection** – One soil sample has been proposed to be analyzed from each soil bore, and will be analyzed from the highest photoionization detector response or if none, the deepest non-saturated soil sample. ACDEH requests that additional soil samples be analyzed in order to define the vertical extent of any soil sample suspected to be contaminated by chemicals of concern at the site.
- 2. GeoTracker Compliance** – A review of the State Water Resources Control Board's (State Water Board) GeoTracker database indicates that all appropriate data files have not been uploaded to the database. At present missing data includes, but may not be limited to, most EDF submittals, and survey GEO_XYZ data.

Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30 electronic copies of all site related documents must be transmitted electronically (in PDF format) to the State Water Board GeoTracker data base via the internet. Additionally all water level measurements and analytical data including soil, soil vapor, groundwater, surface water, indoor air, and ambient air samples, must be uploaded in electronic deliverable format (EDF). Also, all permanent monitoring points utilized to collect soil vapor and groundwater samples (i.e. monitoring and vapor wells) must be surveyed (top of casing) by a California licensed surveyor to mean sea level and latitude and longitude to sub-meter accuracy using NAD 83. Additional information regarding the SWRCB's GeoTracker website may be obtained online at http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/ and http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml) or by contacting the GeoTracker Help Desk at geotracker@waterboards.ca.gov or (866) 480-1028.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

Please note that ACDEH has updated Attachment 1 with regard to report submittals. ACDEH will now be requiring a Submittal Acknowledgement Statement, replacing the Perjury Statement, as a cover letter signed by the Responsible Party (RP). The language for the Submittal Acknowledgement Statement is as follows:

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

Please make this change to your submittals to ACDEH.

TECHNICAL REPORT REQUEST

Please submit the following technical reports and deliverables to the State Water Board's Geotracker website and notify your case worker by electronic mail (mark.detterman@acgov.org), in accordance with the following specified file naming convention and schedule, as provided below, and in the Responsible Party (ies) Legal Requirements/Obligations which is included as Attachment 1.

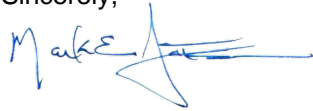
- **May 25, 2018** – Site Investigation Report
File to be named: RO3172_SWI_R_yyyy-mm-dd

Mr. Carlos Palafox
RO0003172
March 9, 2018, Page 3

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

If you have any questions, please do not hesitate to call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,



Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations
Electronic Report Upload (ftp) Instructions

cc: Tim Costello, Tetra Tech, Inc, 2969 Prospect Park Drive, Suite 100, Rancho Cordova, CA 95670;
(Sent via E-mail to: timothy.costello@tetratech.com)

Keith Hoofard, Tetra Tech, Inc, 2969 Prospect Park Drive, Suite 100, Rancho Cordova, CA 95670;
(Sent via E-mail to: keith.hoofard@tetratech.com)

Stephen Carlton, Tetra Tech, Inc, 2969 Prospect Park Drive, Suite 100, Rancho Cordova, CA 95670;
(Sent via E-mail to: stephen.carlton@tetratech.com)

Dilan Roe, ACDEH, (Sent via electronic mail to: dilan.roe@acgov.org)

Paresh Khatri, ACDEH; (Sent via electronic mail to: paresh.khatri@acgov.org)

Mark Detterman, ACDEH, (Sent via electronic mail to: mark.detterman@acgov.org)

Electronic File; GeoTracker

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

ACKNOWLEDGEMENT 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 have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6731, 6735, and 7835) 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 licensed or certified professional and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.