



25 April 2018

Mr. Jeremy Harris
1919 Crew LLC
Pier 54, Suite 202
San Francisco, CA 94158
(Sent via E-mail to: jeremy@owow.com)

Subject: Remedial Action Plan Approval, Site Cleanup Program (SCP) Case No. RO0003205 and GeoTracker Global ID T1000009433, 1919 Market Street, Oakland, CA

Dear Mr. Harris:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file for the above-referenced site, including the following documents prepared on your behalf by Pangea Environmental Services, Inc. (Pangea):

- *Site Investigation Report*, dated 29 January 2018 (SIR)
- *Revised Remedial Action Plan*, dated 29 January 2018 (RAP)
- *Construction Soil and Groundwater Management Plan*, dated 27 February 2018 (CSGMP)
- *Response to Public Comments on Revised RAP*, dated 9 April 2018

This letter summarizes: (1) information and plans described in the above-listed reports, (2) public participation activities conducted by the ACDEH relative to the RAP, (3) technical comments, and (4) technical report requests.

JANUARY 2018 SITE INVESTIGATION REPORT, RAP, AND CSGMP

The SIR describes the results of soil, soil gas, and groundwater sampling conducted in October 2017 and January 2018 by Pangea. Volatile organic compounds (VOCs) and petroleum hydrocarbons were reported in all three media sampled. The report includes an updated Conceptual Site Model (CSM) describing the cumulative environmental data collected for the site.

The RAP describes proposed tasks to be performed during construction to address subsurface contamination at the site. Proposed tasks include (1) excavation and offsite disposal of lead-containing soil; (2) excavation and offsite disposal of VOC-containing soil; (3) construction, testing, operation and maintenance of a Vapor Mitigation System (VMS) at the site; (4) capping of lead-containing soil at the site; and (5) preparation and recordation of a land use covenant to limit the potential for exposure to residual lead-containing soil at the site.

The CSGWMP describes environmental measures, including contingency measures, that will be performed at the site during construction. Soil gas and groundwater monitoring will be performed. The CSGWMP includes notification and reporting procedures, and roles and responsibilities of environmental project personnel.

PUBLIC PARTICIPATION

On 8 February 2018, the ACDEH mailed notification of a community meeting to interested persons. A community meeting was conducted on 27 February 2018 to discuss the SIR and the RAP. On 3 March 2018, a fact sheet describing the RAP was mailed to interested persons and the public was invited to submit

comments to the RAP by 3 April 2018. Pangea's response to public comments was posted online, to the State's database for cleanup sites, GeoTracker, on 9 April 2018.

TECHNICAL COMMENTS

Based on our review of the case file, ACDEH conditionally approves the RAP provided that you address the technical comments listed below as part of the implementation. Submittal of a revised workplan or a workplan addendum is not required. We request that you address the following technical comments, perform the proposed work and send us the report(s) described below. Provide 72-hour advance written notification to robert.schultz@acgov.org prior to the start of field activities.

1. **Verification sampling of soil for lead concentrations following excavation.** Soil samples need to be collected from planter areas using Multi Increment Sampling (MIS) techniques and analyzed for lead following excavation. Designation of decision units, systematic planning, and sample collection procedures will comply with the Hawai'i Department of Health, 2016, Office of Hazard Evaluation and Emergency Response, *Technical Guidance Manual* (<http://www.hawaiidoh.org/>) and with the Incremental Sampling Methodology guidance from the Interstate Technology & Regulatory Council (<http://www.itrcweb.org/ism-1/>). A six-inch, core-shaped increment of soil will be removed from each collection point using a sampling tube or other tool, as appropriate for the soil type encountered. Care will be taken to ensure that an equal amount of soil is taken from each point. The soil increment collected from each point within a targeted DU area will be transferred into its appropriate container, sealed, and stored on ice. A minimum ten-gram subsample will be collected in a systematic, random manner from 30 or more points in the processed sample for extraction and analysis by the laboratory.
2. **VMS Design and Verification.** VMS design drawings suitable for construction and a Basis of Design (BOD) Report must be submitted to the ACDEH for review. Following ACDEH approval the VMS design drawings will be submitted to the City of Oakland and included in the building permit. The report will include procedures to verify operation of the VMS and protection of indoor air.
3. **CSGWMP Implementation.** All subsurface and grading work at the site, including demolition, excavation and subsurface utility construction, shall be conducted in conformance with the CSGWMP. The CSGWMP must be implemented immediately and implementation is required until termination is approved in writing by the ACDEH. You may request termination of the CSGWMP after the structure foundations have been constructed, and the site cap is in place by submitting a written request for termination to the ACDEH.
4. **Soil Gas and Groundwater Monitoring During Construction.** Soil gas and groundwater monitoring must be conducted every 2 months following the protocol described in the CSGWMP. Each event must be reported within 2 weeks of sample collection.
5. **Reporting During Construction.** Submittal of weekly reports to the ACDEH is required during implementation of the CSGWMP. On Friday each week, a report summarizing work performed during the subject week and listing the subsequent week's anticipated activities must be uploaded to GeoTracker. Copies of all monitoring logs shall be included in each weekly report. Weekly reporting should continue until the foundation is poured and the site is capped.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

ACDEH requires a Submittal Acknowledgement Statement, signed by the Responsible Party (RP), as a cover letter to technical reports and submittals. The requirement is described in Attachment 1. 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 Resources Control Board's GeoTracker website."

TECHNICAL REPORT REQUEST

Please upload technical reports to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- 15 May 15, 2018 – Basis of Design Report with Vapor Mitigation System drawings
File to be named: RO-3205_DEV_PLAN_YYYY-mm-dd
- 4 May 2018, and weekly thereafter – Remediation Progress Report
Files to be named: RO-3205_REM_R_YYYY-mm-dd
- 1 June 2018, 1 August 2018, 1 October 2018 – Soil Gas and Groundwater Monitoring Report
Files to be named: RO-3205_GWM_R_YYYY-mm-dd
- 30 November 2018 – Remedial Action Completion Report
File to be named: RO-3205_RAC_R_YYYY-mm-dd
- 30 November 2018 – Land Use Covenant and Proof of Recordation;
File to be named: RO3205_LUC_YYYY-mm-dd

If you have any questions, please call me at (510) 567-6721 or send me an electronic mail message at robert.schultz@acgov.org. Online case files are available for review at the following website:

Sincerely,



Robert W. Schultz, CHG
Senior Hazardous Materials Specialist

cc: Bob Clark Riddell, Pangea Environmental (Sent via E-mail to: briddell@pangeaenv.com)
Dilan Roe, ACDEH (Sent via E-mail to: dilan.roe@acgov.org)
Robert Schultz, ACDEH (Sent via E-mail to: robert.schultz@acgov.org)
GeoTracker, eFile

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.