

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, SUITE 250
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

October 25, 2018

Christine King and Beritzhoff, Trustees
Attn: Mr. Michael Beritzhoff
1273 Laurel Lane
Lafayette, CA 94549
(Sent via electronic mail to:
mikebertzhoff@sbcglobal.net)

Christine King and Beritzhoff, Trustees
Attn: Christine King
5820 Deer Trail Circle
Woodbury, MN 55129

Subject: Conditional Work Plan Approval, Fuel Leak Case No. RO0003225 and GeoTracker Global ID T10000009578, 2449 – 2451 Santa Clara Street, 2449 – 2451 Santa Clara Street, Alameda, CA 94501

Dear Mr. Beritzhoff and Ms. King:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the *Work Plan for Additional Phase II Subsurface Investigations*, dated September 4, 2018, and slightly revised on October 19, 2018. The work plan was prepared and submitted on your behalf by ERAS Environmental, Inc. Thank you for submitting the work plan.

The work plan proposes the installation of ten soil bores, and the collection of soil and grab groundwater samples for analytical testing. Soil from two of the bores (SB-17 and SB-18) are proposed to be held as a contingency should soil or groundwater contamination remain undefined at other bore locations. Additionally three soil vapor probes are proposed from beneath the existing site building to determine the risk of vapor intrusion residual contamination may present to commercial users of the building.

Based on ACDEH staff review of the referenced documents and of the case file we generally concur with the recently proposed scope of work, provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or technical comments below is proposed. We request that you address the following technical comments, submit the requested document, and upon ACDEH approval, perform the proposed work, and send us the technical reports requested 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 is requesting several modifications to the scope of work as detailed below. Please submit a site investigation report by the date specified below.
 - a. **Additional Contingency Soil Bore** – A minimum of one additional contingency soil bore for soil and grab groundwater sample collection to the northwest of soil bore SB-6, which contains the highest residual soil contamination documented at the site. Additional step-out contingency soil bores maybe required to full define the lateral extent of contamination documented, as depicted in Attachment B.
 - b. **Soil and Groundwater COC Analytical Suite** – ACDEH is in general agreement with the proposed analytical suite for areas already explored but lacking all appropriate analytical data; however, for bores that are intended to laterally define the extent of soil and groundwater contamination (B-10, B-12, B-13, B-14, B-15, B-19, and B-17, and B-18) ACDEH requests the analytical suite include all Chemicals of Concern (COC) for the site. This includes Total Petroleum Hydrocarbons (TPH) as gasoline (TPHg), TPH as diesel (TPHd), TPH as motor oil (TPHmo), benzene, toluene, ethylbenzene, total xylenes (BTEX), methyl tert butyl ether (MTBE), and naphthalene.

- c. **Soil Vapor COC Analytical Suite** – The referenced work plan proposes to collect soil vapor for laboratory analysis by EPA Method TO-15. ACDEH additionally requests vapor analysis for TPHg by an appropriate EPA TO method, and specifically the inclusion of naphthalene in the TO-15 analytical results. Due to the preferential adhesion of naphthalene to certain plastic tubing as discussed in Department of Toxic Substances Control (DTSC) guidance, ACDEH additionally requests naphthalene confirmation analysis by TO-17.
- d. **Atmospheric Gas Analysis** – ACDEH additionally requests the collection and analysis of standard atmospheric gases from the soil vapor samples. This is requested to include oxygen, carbon dioxide, nitrogen, and methane.
- e. **Helium Tracer Use** – ACDEH no longer accepts the use of isopropyl alcohol (IPA or 2-propanol) as a tracer as proposed in the work plan. ACDEH requires the use of helium in vapor shrouds, and requires the maintenance of a minimum of 20% helium in the shroud. ACDEH additionally requires the collection of a shroud vapor sample from each vapor location for analytical analysis in order to document the shroud tracer concentration. Analysis of helium in each vapor sample is additionally required.
- f. **Data Presentation** – For quick communication and ease of review, ACDEH requires the results for oxygen, carbon dioxide, nitrogen, methane, and the tracer to be reported as a percentage in the vapor analytical table.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

Please note that ACDEH has updated Attachment 1 with regard to report submittals to ACDEH. 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 ACDEH's FTP server and the SWRCB'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. Please note ACDEH no longer accepts reports on the ftp site.

- **December 17, 2018** – Site Investigation report
(File to be named: RO3225_SWI_R_yyyy-mm-dd)

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.

If your email address does not appear on the cover page of this notification, ACDEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Mr. Beritzhoff and Ms. King
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Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark E. Detterman", with a stylized flourish at the end.

Mark E. Detterman, PG 4799, CEG 1788
Senior Geologist
Senior Hazardous Materials Specialist

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

Attachment B – Additional Bore Locations ((See Technical Comment 1)

Cc: Curtis Payton, ERAS Environmental, Inc, 1533 B Street, Hayward, CA 94541, (Sent via electronic mail to: curtis@eras.biz)

David Siegel, ERAS Environmental, Inc., 1533 B Street, Hayward, CA 94541 (Sent via electronic mail to: dave@eras.biz)

Andrew Savage, ERAS Environmental, Inc., 1533 B Street, Hayward, CA 94541 (Sent via electronic mail to: andrew@eras.biz)

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

ATTACHMENT B

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, Division3, 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

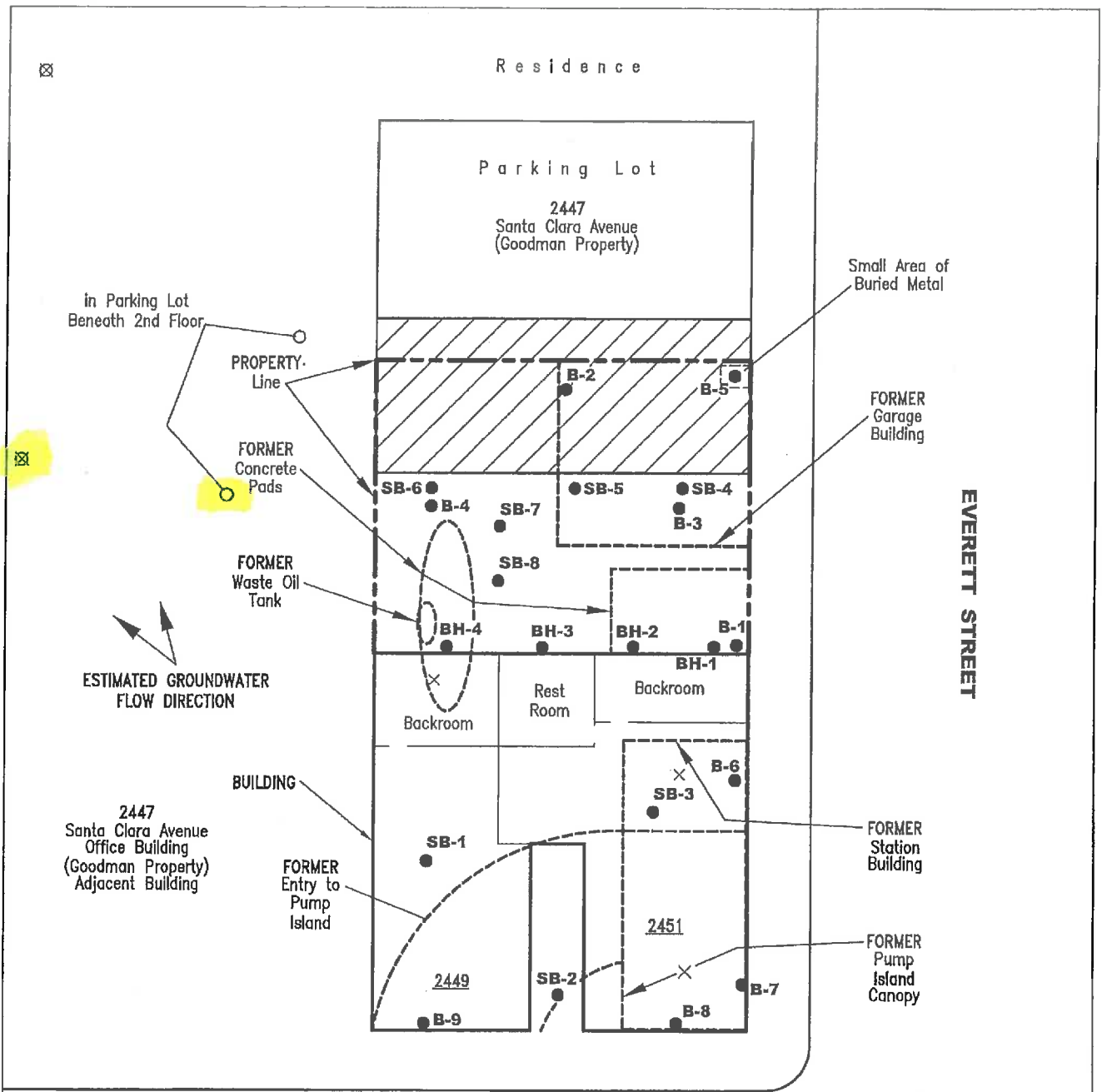
The California Business and Professions Code (Sections 6731, 6735, and 7835) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately licensed or certified professional and include 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/

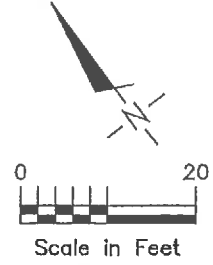
AGENCY OVERSIGHT

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.



EXPLANATION

- SB- Soil borings, ODIC (2016)/AEI (1996)
- B- Soil borings ERAS (2017)
- Proposed boring
- × Proposed sub-slab vapor sample
- ⊠ Contingency boring
- ▨ Easement
- ▭ Former Structures



SITE PLAN w/SOIL BORINGS LOCATIONS

DATE
05/2018
REVIEWED BY
DS/AS

2449-2451 Santa Clara Avenue
Alameda, California

JOB NUMBER
16-002
FIGURE
2

ERAS Environmental Inc.