



August 31, 2017

Mr. Steve Wolmark
Amelia Oakland LLC
5821 Pinewood Road
Oakland, CA 94611
(Sent via E-mail to: swolmark@murrayhillpartners.com)

Subject: Site Cleanup Program Case No. RO0003240 and GeoTracker Global ID T10000010203,
Amelia Street Redevelopment, 8410 Amelia Street, Oakland, CA 94621

Dear Mr. Wolmark:

Thank you for attending the meeting held at Alameda County Department of Environmental Health's (ACDEH) offices on August 4, 2017. The purpose of the meeting was to discuss the case status and identify the next steps to simultaneously facilitate site redevelopment and progress the case to closure. ACDEH staff has reviewed the case file including the following documents prepared and submitted on your behalf by Pangea Environmental Services, Inc. (Pangea):

- *Interim Remedial Action Plan (IRAP)* dated April 3, 2017
- *Interim Remedial Action Plan Addendum (IRAP Addendum)* dated May 8, 2017
- *Vapor Intrusion Assessment Work Plan – Buildings C, D, & E (Work Plan)* dated June 2, 2017
- E-mail from Pangea to ACDEH dated August 11, 2017
- *Figure 1, Proposed Sampling Locations* e-mailed to ACDEH August 11, 2017

The IRAP, Addendum, and Work Plan were submitted in response to a meeting with you and Pangea representatives on March 1, 2017 and April 20, 2017. Thank you for submitting the documents.

The site, comprised of five buildings designated A, B, C, D, and E, is used for commercial/industrial purposes. Chemicals of potential concern (COPCs) identified at the site include trichloroethene (TCE), tetrachloroethene (PCE), carbon tetrachloride, 1,1,2,2-tetrachloroethane (1,1,2,2-TCA), benzene, and ethylbenzene. Historical uses of the five buildings appear to have contributed to the presence of COPCs in indoor air (IA), slab (SS), soil, and groundwater, and the site appears to be downgradient of a TCE groundwater plume possibly originating from the K & L Plating Company located at 989 89th Avenue, Oakland. Risk of vapor intrusion to indoor air (VI/IA) is currently under investigation in the five site buildings with two goals:

1. Either remediate the risk of VI/IA to current and future occupants through removal action; and/or
2. Implement engineering controls to mitigate the risk of VI/IA to current and future occupants if remediation is not possible due to existing infrastructure.

Engineering controls under evaluation include the application of epoxy or RetroCoat, installation of a slab ventilation system, and installation of trench plugs. At this juncture, ACDEH requests that you address the Technical Comments below and submit the requested documents according to the dates provided in the Technical Report Schedule.

TECHNICAL COMMENTS:

1. **Table Preparation and Revision:** Please prepare three tables as listed below. Please use the Excel spreadsheets sent under separate cover as templates.
 - a. Table 1 Building - Tenant Information;
 - b. Table 2 CPOC Concentration by Building;
 - c. Table 3 CPOCs by Building and by Media.

Please revise the Analytical Data Tables (Tables 1, 2, and 3) presented in the IRAP to show in bold font the reporting limits (RL) when they exceed the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) Environmental Screening Levels (ESLs). Please submit the three new tables and the revised IRAP Analytical Data Tables (Tables 1, 2, and 3) in the Soil and Groundwater Investigation Report by the date provided below in the Technical Report Schedule.

2. **Additional Site Investigation:** Please collect grab groundwater, sub slab, indoor air, and outdoor air (ambient air) samples in accordance with the scope of work provided in Pangea's e-mail correspondence dated August 11, 2017 (Attachment A). If the TCE concentrations on groundwater or sub slab samples exceed the SFRWQCB's Trigger Levels and/or Indoor Air concentrations exceed the Accelerated Response Action Levels (ARALs) or Urgent Response Action Levels (URALs) you must immediately notify ACDEH and propose Indoor Air sample collection.
3. **Proposed or Installed Tenant Improvements and Mitigation Measures:** Please submit a report documenting all proposed or installed tenant improvements and mitigation measures for each of the buildings. The report must include a complete building permit plan set submitted to and approved by the City of Oakland Planning Department with the addition of utilities, trench dams, and configuration of tenant spaces for the buildings.
4. **Electronic Submittal of Information (ESI) Compliance:** A review of the case file and the State's GeoTracker database indicates that the site is not in compliance with California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, stating that beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs, including the Site Cleanup Program (SCP) cases. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites was required in GeoTracker. At present missing data and documents include, but may not be limited to:
 - analytical data for soil, water and vapor samples collected for the purpose of subsurface investigation or remediation, including influent/effluent water samples from remediation systems (EDF files);
 - complete copies of reports, in pdf format, including the signed transmittal letter and professional certification (GEO_REPORT files);
 - depth-to-water information for permanent sampling points whenever the data is collected, even if the well is not sampled during the sampling event (GEO_WELL files);

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- stand alone site maps displaying tank locations, streets bordering the facility, and sampling locations for all soil, water and vapor samples (GEO_MAP files);
- stand alone boring logs with depth to the screened interval and the length of screened interval for any permanent monitoring well installed (GEO_BORE files);

Please upload the missing documents and soil and groundwater analytical data to GeoTracker. See Attachment 1 and the State's GeoTracker website for further details. ACDEH requests e-mail notification of, and a list of, the documents uploaded to Geotracker. Please upload all submittals to GeoTracker and to ACDEH's ftp website by the date specified below.

TECHNICAL REPORT SCHEDULE

Please note that, as your Caseworker, all correspondence should be e-mailed to:
karel.detterman@acgov.org

Please submit an Investigation Report documenting the results of the groundwater subslab, indoor air, and outdoor (ambient) air sampling discussed in Technical Comment 2. Please include the tables discussed in Technical Comment 1 in the Report.

Please upload technical reports to the ACDEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **September 29, 2017** – Soil and Groundwater Investigation Report
File to be named: RO3240_SWI_R_YYYY-MM-DD
- **September 29, 2017** – Notification of Upload of Electronic Data Submittals to Geotracker
E-mail notification to: karel.detterman@acgov.org
- **October 15, 2017** – Tenant Improvement and Mitigation As-Builts
File to be named: RO3240_DEV_MIT_YYYY-MM-DD

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

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please send me an e-mail message at karel.detterman@acgov.org or call me at (510) 567-6708.

Sincerely,

Karel Detterman, PG
Senior Geologist

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

Attachment A - E-mail from Pangea to ACDEH dated August 11, 2017

cc: Matthew Friedman, Murry Hill Partners, LLC, (Sent via E-mail to: matthew@mifriedman.com)

Bob Clark-Riddell, Pangea Environmental Services Inc., 1710 Franklin St., Suite 200, Oakland, CA 94612, (Sent via E-mail to: briddell@pangeaenv.com)

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

Karel Detterman, ACDEH, (Sent via E-mail to: karel.detterman@acgov.org)

Paresh Khatri, ACDEH, (Sent via E-mail to: paresh.khatri@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.

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 ACDEH's FTP server and the SWRCB's GeoTracker website." 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 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. 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 case meet this requirement. 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

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.

ATTACHMENT A

Detterman, Karel, Env. Health

From: Roe, Dilan, Env. Health
Sent: Wednesday, August 16, 2017 4:49 PM
To: Detterman, Karel, Env. Health
Subject: FW: RO3240_8410 Amelia Street_Urgent Update

Importance: High

Dilan Roe, PE, C73703

Chief – Land Water Division
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway
Alameda, CA
510.567.6767; Ext. 36767
QIC: 30440
dilan.roe@acgov.org

From: Bob Clark-Riddell [mailto:briddell@pangeaenv.com]
Sent: Friday, August 11, 2017 5:32 PM
To: Roe, Dilan, Env. Health <Dilan.Roe@acgov.org>
Cc: Steve Wolmark (swolmark@murrayhillpartners.com) <swolmark@murrayhillpartners.com>; 'Matthew Friedman' <matthew@mifriedman.com>
Subject: FW: RO3240_8410 Amelia Street_Urgent Update
Importance: High

Hello Dilan,

This email provides a project update following our August 4 meeting. As requested during our August 4 meeting, this email also notifies you of the owners' intent to proceed with some site work as clarified below.

ASSESSMENT UPDATE – The assessment work scoped discussed at our meeting is scheduled for later this month. The sampling locations are shown on the attached figure. This includes 8 groundwater sampling locations, subslab gas sampling of 19 existing probes in Building A and B North, and indoor air sampling at 3 locations (near existing subslab gas probes for slab attenuation evaluation), and one ambient air.

FLOORING FOR BUILDINGS D & E – The owners plan to install the epoxy moisture vapor barrier next week. Due to the construction schedule, they do not want to wait one month for grab groundwater sampling results. They understand from our meeting, that if grab groundwater results (now or in the future) exceed TCE trigger levels, then periodic indoor air sampling will be required. Per our meeting, one initial indoor air sampling event will be conducted following the moisture vapor barrier installation to evaluate indoor air quality after the floor slab work in Buildings D & E.

Note: The owners explored the option to substitute RetroCoat for the planned epoxy flooring, but the timing and additional cost were not acceptable. While the planned moisture vapor barrier (three coats of epoxy, about 40-50 mil total thickness) will provide some vapor intrusion mitigation, the owners understand this is not a chemical vapor barrier as deemed acceptable by ACDEH. They are coordinating use of RetroCoat or an ACDEH approved chemical vapor barrier for Building B South soon (and Building A and B North in the future).

Owner will also provide As-Built drawings showing surveyed location of all trench plugs.

Bob Clark-Riddell, P.E.
Pangea Environmental Services, Inc.