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

November 2, 2018

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

Matthew Friedman
Murry Hill Partners, LLC
(Sent via E-mail to: matthew@mifriedman.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 and Mr. Friedman:

Thank you for attending the meeting held at Alameda County Department of Environmental Health's (ACDEH) offices on June 8, 2018. The purpose of the meeting was to discuss the case status and identify the next steps to simultaneously facilitate site redevelopment and move 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
- Figure 1, Proposed Sampling Locations e-mailed to ACDEH August 11, 2017
- Tenant Improvements and Mitigation Measures dated November 20, 2017
- Figures and Tables provided for the June 8, 2018 Meeting

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), subslab (SS), soil, and groundwater, and the site appears to be downgradient of a TCE groundwater plume possibly originating from the former K & L Plating Company that was located at 989 89th Avenue, Oakland. Risk of vapor intrusion to indoor air (VI/IA) is currently under investigation in the five site buildings.

During the meeting we discussed the following:

- Building B-South: The subslab ventilation is 90% installed; Sewer lines are located 18inches below the proposed vent piping.
 - Phase 1: 8430 Amelia Street: Amelia Street Ventures; need survey coordinates; epoxy not Retrocoat; voluntary improvements;
 - o Phase 2: Building B South; in construction end of year;
 - o Phase 3: Building B North NIMBY; tenant lease is up at the end of the year
- Depth to water on-site is approximately eight feet below ground surface (bgs)
- Soil and Groundwater Management Plan
- Health and Safety Plan

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- Building A, Building B-North, and Building B-South: For each phase:
 - Record Report of Construction with building permit;
 - o Install HVAC vent pipes sufficient distance;
 - Labeled iron/steel on pipe & on wall with sign on floor
- Need to submit installation plan for construction of interior walls (metal panels) with the following details:
 - o Bolting through floor C channel walls information;
 - Bolts through slab;
 - Application of epoxy;
 - o Trenches must be covered;
- Building E:
 - o Record Report of Construction with building permit;
 - o As-built,
 - Surveyed trench;
- Building B-South:
 - Need Soil and Groundwater Management Plan;
 - o Record Report of Construction with building permit;
 - o Prior to occupancy, submit subslab, indoor air, and outdoor air sampling plan;
 - o Description of epoxy installation and bolt protocol sequencing;
- Building B-North Improvements after tenant vacates;
- Offsite Source K&L Plating, 989 89th Street, Oakland, (EPA Site ID CAD009183948)
 - Mitigate or remediate;
 - o Monitoring well installation;
- New data: Soil Excavation;
- Permeable fill clay;
- No tetrachloroethylene (PCE) in groundwater; only trichloroethylene (TCE)

TECHNICAL COMMENTS:

- Work Plan Submittal: To determine if the off-site upgradient TCE plume may be impacting the site, ACDEH requests submittal of a Work Plan to install and sample a groundwater monitoring well near the eastern upgradient property line in the vicinity of Building B-North, as discussed during the meeting.
- 2. Soil and Groundwater Management Plan submittal: As discussed during the meeting.
- **3. Soil Gas Sampling Work Plan:** As discussed during the meeting, please submit a work plan to collect soil gas samples for equilibrium data.
- **4. Electronic Submittal of Information (ESI) Compliance:** Please continue to upload all data to Geotracker.

TECHNICAL REPORT SCHEDULE

Please upload technical reports to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule and please e-mail the documents to the ACDEH Caseworker (Attention: Karel Detterman karel.detterman@acgov.org):

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December 3, 2018: Groundwater Monitoring Well Installation Work Plan

File to be named: RO3240_WP_R_yyyy-mm-dd

January 7, 2019: Soil and Groundwater Management Plan

File to be named: RO3240_SGMP_R_yyyy-mm-dd

• January 7, 2019: Soil Gas Sampling Work Plan

File to be named: RO3240_WP_R_yyyy-mm-dd

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

Enclosures: Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations

ACDEH Electronic Report Upload (ftp) Instructions

Attachment A - Pangea Figures with meeting mark-ups

cc: 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

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) REVISION ISSUE IN PREVIOUS 15 201

REVISION DATE: December 14, 2017

ISSUE DATE: July 25, 2012

PREVIOUS REVISIONS: September 17, 2013, May

15, 2014, December 12, 2016

SUBJECT: Responsible Party(ies) Legal

Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

SECTION: ACDEH Procedures

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	Sampl e Period	PDF Report	GEO_ MAPS	Sample ID	Matrix	GEO _Z	GEO _XY	GEO_ BORE	GEO_WEL L	EDF
2016 Subsurface Investigation Report	2016 S1	√	√	Effluent	SO					√
2012 Site Assessment Work Plan	2012	✓	✓							
2010 GW Investigation	2008 Q4	✓	✓	SB-10	W	√				✓
Report				SB-10-6	SO					✓
				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

Attachment 1

Alameda County Environmental Cleanup	REVISION DATE: NA			
Oversight Programs	ISSUE DATE: December 14, 2017			
(LOP and SCP)	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.

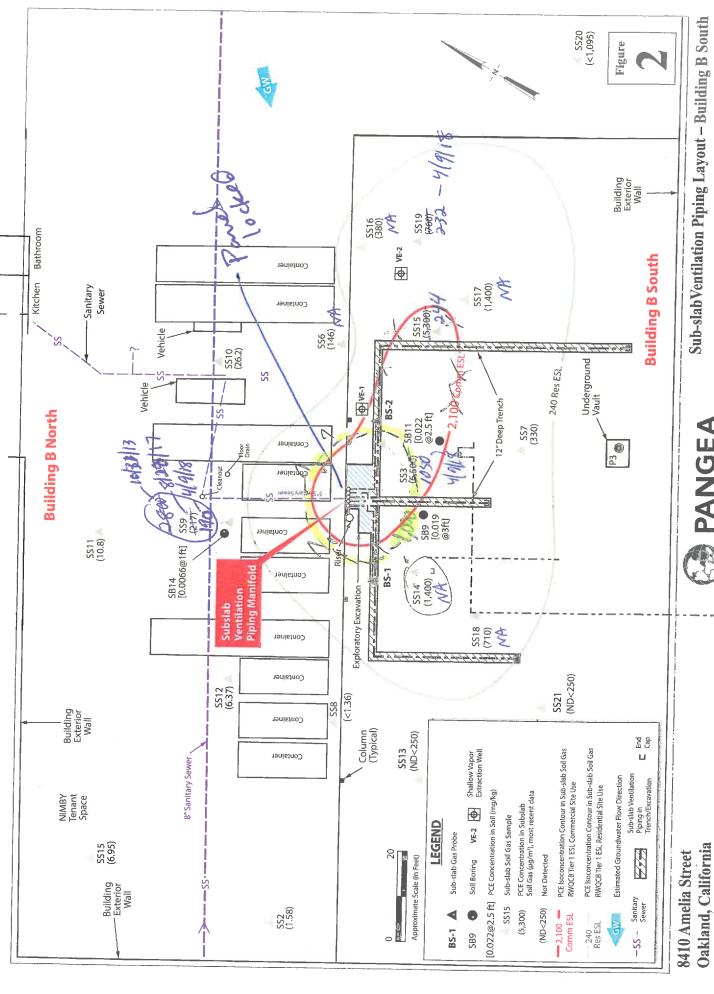
UNDERGROUND STORAGE TANK CLEANUP FUND

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.

ATTACHMENT A



PANGEA

