ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
COLLEEN CHAWLA, Agency 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

October 3, 2018

The Goodyear Tire & Rubber Company
c/o Karen Burlingame
2000 Innovation Way, Dept 108i
Akron OH, 44316
(Sent via E-mail to karen.burlingame@goodyear.com)

Subject: **Findings of Preliminary Site Review for Oversight Determination**
Site Cleanup Program Case No. RO0003320
GeoTracker Global ID T10000011810
Certified Tire Goodyear Dublin
6028 Dougherty Road, Dublin, CA 94568

Dear Responsible Party(ies):

Alameda County Department of Environmental Health (ACDEH) has completed the Preliminary Site Review for the above referenced property (the Site). The purpose of the Preliminary Site Review is to determine if there is sufficient evidence of a release to warrant additional site investigation and/or remediation in the Site Cleanup Program under the execution of a Voluntary Remedial Action Agreement (VRAA). This review was conducted in accordance with the terms and limitations described in the *Request for Preliminary Site Review for Oversight Determination* dated June 25, 2018 and executed on July 5, 2018. ACDEH's review included examination of the following Site Documents:

1. *Phase I Environmental Site Assessment and Limited Subsurface Investigation* report dated August 22, 2017 (the "Phase I") prepared by Stantec Consulting Services Inc. (Stantec) on behalf of the Goodyear Tire & Rubber Company (Goodyear) and submitted to ACDEH via upload to the State Water Resources Control Board's (State Water Board's) GeoTracker database on August 17, 2018.

2. *Additional Phase II Environmental Site Assessment* dated December 14, 2017 (the "Phase II") prepared by Stantec on behalf of Goodyear and submitted to ACDEH via upload to the State Water Board's GeoTracker database on August 17, 2018. .

3. A partial set of design drawings for the Dougherty Retail and Automotive Center dated June 19, 1987 through December 14, 1987 prepared by Frank Rupert Bryant Architect and a partial set of design drawings for dated June 6, 1987 prepared by Santa Clara Mechanical (collectively the "1987 Design Set"). The 1987 Design Set was submitted to ACDEH via email on September 20, 2018. This partial set of design drawings included sheets C-1, A-1, A-2, A-3, A-4, A-4.1, A-4.1a, A-5, A-7, A-8, S-4, S-5, S-6, S-7, S-8, and S-9 from Frank Rupert Bryant Architect and Sheets 1 of 5 through 5 of 5 from Santa Clara Mechanical.

Based on ACDEH's review of the submitted documents, ACDEH has identified several recognized environmental conditions (RECs) that are described below, which do not appear to have been evaluated at this time. The lack of evaluation of these RECs represent data gaps in the characterization of the Site and evaluation of whether a release of hazardous materials to the environment has occurred. Based on the presence of these data gaps, ACDEH is unable to determine whether a Site Cleanup Program case is appropriate or warranted at this time. ACDEH recommends that data gaps associated with the unevaluated RECs be closed through additional investigative activities and that the results of these activities be reported ACDEH with a request for re-evaluation.

ACDEH notes that the Phase I referenced a subsurface investigation conducted in 2010 by URS corporation. A copy of this subsurface investigation report has not been provided to ACDEH at this time and it is unclear based on the documents provided if the 2010 investigation provides information that may address some of the data gaps identified.

UNEVALUATED RECOGNIZED ENVIRONMENTAL CONDITIONS AT THE SITE

1. Historic Parts Cleaner and Associated Drain Lines

ACDEH identified a parts washer in the northwestern corner of the service area of building[1] which was not identified in the narratives of the Phase I or Phase II. Based on ACDEH's review it does not appear that the subsurface investigations reported in the Phase I and Phase II are sufficient to evaluate if a release of solvents has occurred from the historic parts washer.

The presence of the historic parts washer represents a REC relative to the Site and the lack of subsurface investigation to address this REC represents a data gap.

2. Floor Drains and Associated Plumbing

ACDEH identified floor drains with associated sub-grade plumbing that appear to be plumbed into the on-site clarifier[2]. This clarifier in turn appears to be plumbed into the sanitary sewer discharge. ACDEH notes that photographs provided in the Phase I depict cracking along the foundation indicative of differential settling emanating from the in-ground lifts. In several photographs, these cracks are observed transecting the pathway of the sub-grade drain lines and are indicative of conditions which may lead to cracking or leaking of the sub-grade drain lines.

ACDEH notes that details of the connection between the sump for the clarifier and the downstream sanitary sewer are not provided in the 1987 Design Set, however boring B-6 is located in the vicinity of the sump-pump enclosure for the clarifier. A groundwater sample collected from boring B-6 had concentrations of diesel range and oil range hydrocarbons reported as present in groundwater at concentrations of 1,400 and 1,700 µg/L, respectively. The Phase I and Phase II do not include sampling (1) along the path of the pluming associated with the drain lines; or (2) or along the sanitary sewer line downgradient of the clarifier and sump. ACDEH further notes that groundwater gradient at the Site is unknown and that no samples were collected to the north west, north, or northeast of boring B-6

Based on ACDEH's review of the Site Documents, it does not appear that the subsurface investigations reported in the Phase I and Phase II is sufficient to evaluate if a release has occurred from the floor drain system. The lack of subsurface investigation to address this REC represents a data gap.

3. Historic Potential Polychlorinated Biphenyl Containing Transformer

ACDEH identified an "existing transformer" the south of the southwest corner of Building B[3]. Based on the Site history provided in the Phase I, the Site was originally developed with the current infrastructure sometime between 1966 and 1979. Electrical transformers manufactured prior to 1977 commonly contained polychlorinated bipheyls (PCBs). Based on the age of on-site development, the historic presence of a potentially PCB containing transformer at the Site represents a REC relative to the Site and the lack of subsurface investigation to address this REC represents a data gap.

4. Potential Asbestos Containing Dust Emissions

ACDEH identified a bench grinder and a brake shoe grinder located in the northwest portion of the service area of Building B[1]. Given the period of operation and nature of these operations, grindings from these operations may have

[1] Detail 1, Sheet A-4.1 of the 1987 Design Set
[2] Detail 2, Sheet A-4.1 of the 1987 Design Set
[3] Sheet A-1 of the 1987 Design Set

included asbestos containing materials from brake shoes, pads, and liners. The potential aeolian deposition grindings from these processes in planters and surface soils in the vicinity of the Site represents a REC relative to the Site.

5. Potential Historic Pesticide and Herbicide Use

The Phase I identifies the Site as historically being used for agricultural purposes from 1939 to at least 1966. Historic use of pesticides and herbicides was identified as a REC but was excluded from the scope of investigation because the historical agricultural use of the property was not related to Goodyear's use and occupancy. The lack of subsurface investigation to evaluate the REC associated with potential historic pesticide and herbicide use at the represents a data gap.

CLOSING

ACDEH appreciates your engagement under the terms of the *Request for Preliminary Site Review for Oversight Determination* and encourages you to address the unevaluated RECs described above. Should you wish to address the RECs and data gaps identified above under the terms of the *Request for Preliminary Site Review for Oversight Determination,* ACDEH will provide comment on work plans or proposals to conduct a scope of work to address those RECs. Should you have any questions regarding this correspondence or your case, please contact the primary caseworker assigned to this Site, Jonathan Sanders who can be reached by phone at (510)567-6791 or by email at jonathan.sanders@acgov.org.

Sincerely,

Dilan Roe, P.E. C73703
Chief
Land & Water Division

Jonathan Sanders
Senior Hazardous Materials Specialist
Local Oversight and Site Cleanup Program

DISTRIBUTION LIST:

Electronic File, GeoTracker

Dilan Roe, ACDEH, Chief Land & Water Division (Sent via E-mail to: dilan.roe@acgove.org)

Paresh Khatri, ACDEH, Supervising Hazardous Materials Specialist (Sent via E-mail to: paresh.khatri@acgove.org)

Jonathan Sanders, ACDEH, Senior Hazardous Materials Specialist (Sent via E-mail to: jonathan.sanders@acgov.org)

Alicia Jansen, Stantec, (Sent via E-mail to: alicia.jansen@stantec.com)

Cynthia Cotton, (Sent via E-mail to: racandcac@sbcglobal.net)

Walter Wallner, (Sent via E-mail to: wallner247@gmail.com)