

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
ALAMEDA, CA 94502
(510) 567-6777
FAX (510) 337-9135

July 20, 2018

Mr. Justin Hu
125 Channing Road
Burlingame, CA 94010

(Sent via electronic mail to: justinhu123@gmail.com)

Subject: Conditional Approval of *Workplan for Additional Investigation*, Site Cleanup Program
Case No. RO0003333 and Geotracker Global ID T10000012110, 1550 Park Avenue,
1550 Park Avenue, Emeryville, CA 94608

Dear Mr. Justin Hu:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file including the workplan referenced above, dated October 2, 2018, and prepared and generated by RMD Environmental Solutions (RMD) for work proposed at 1550 Park Avenue, Emeryville, California. Thank you for submitting the work plan.

The work plan proposed the resampling of vapor pins VP1 to VP10, the installation of six temporary vapor pins, and two temporary shallow soil vapor wells, the collection of three indoor air vapor samples, and one outdoor ambient air sample to further assess the site.

Based on ACDEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. 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 these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described 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 Comments** – The referenced work plan proposes a series of actions with which ACDEH is in general agreement of undertaking; however, ACDEH requests several modifications that are expected to quickly collect adequate data and facilitate the potential property transaction of the property. Please submit the results of the investigation in a report by the date identified below.
 - a. **Permanent Vapor Locations** – Consistent with Department of Toxic Substances Control (DTSC) guidance, ACDEH requires seasonal / temporal vapor sampling. Consequently, ACDEH requests that all vapor pins and vapor wells be installed as permanent points as are the existing locations.
 - b. **Additional Vapor Sampling Location** – Due to the potential for soil vapor to have been impacted by petroleum hydrocarbon releases from the two former underground storage tank (UST) systems at the site, ACDEH requests the installation of a minimum of one additional soil vapor sampling location within the existing warehouse northwest of existing location VP2. Neither of the former UST systems were assessed for soil vapor. Vapor pins along Park Avenue appear capable of determining the risk from petroleum hydrocarbon vapors that may be present along the southern building margin. The location of the UST associated with the 1996 closure is not well defined; however, appears to have been present immediately outside of the warehouse at the northwestern corner of the building. Thus it appears appropriate to assess the potential for petroleum hydrocarbon vapors to be present in the northwest corner of the warehouse as requested above.

- c. **Vapor Analytical Suite** – In order to collect analytical data appropriate for petroleum hydrocarbon associated contamination, ACDEH requests, in addition to the currently proposed helium and oxygen analysis, the addition of carbon dioxide, methane, and naphthalene by TO-15 and confirmed by TO-17 (the later due to preferential adhesion of naphthalene vapors to certain plastic tubing compositions as discussed in DTSC guidance) at all vapor sampling locations. Future sampling events can be modified based on the results if appropriate.
- d. **Vapor Sampling Shroud** – Because the position of the vapor sampling train was not explicitly identified, ACDEH requests that the entire sampling train be enclosed within the proposed vapor shroud.
- e. **Location of Outdoor Air Ambient Sample** – The work plan indicates that the location of this sample would be identified in the field. To eliminate potential confusion, ACDEH requests that this sample be located onsite substantially upwind of all potential sources under investigation.

TECHNICAL REPORTS/WORK SCHEDULE

Please submit the following deliverables to ACDEH in accordance with the compliance schedule provided below and the *Responsible Party (ies) Legal Requirement/Obligations Instructions* and *File Naming Conventions* which are included as Attachment 1. ACDEH requests email notification verifying the requested deliverables have been uploaded to Geotracker (e-mail preferred to: mark.detterman@acgov.org).

- **November 12, 2018 - Site Investigation Report**
File to be named: RO3333_SWI_R_yyyy-mm-dd
- **November 16, 2018; 10:00 AM – 12:00 Noon** – Meeting at ACDEH
- **GeoTracker Database Compliance** – Ongoing as investigation and reports are conducted.

If you have any questions, please do not hesitate to call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,



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

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

cc: Kirsten Duey, RMD Environmental Solutions, Inc, 609 Gregory Lane, Suite 200, Pleasant Hill, CA 94523; (Sent via electronic mail to: kduey@rmdes.net)
Donald Moore, RMD Environmental Solutions, Inc, 609 Gregory Lane, Suite 200, Pleasant Hill, CA 94523; (Sent via electronic mail to: dmoore@rmdes.net)
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

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.