



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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Alameda, CA 94502-6577  
(510) 567-6700  
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July 8, 2015

Stephen Boyd  
Pacific Electric Motor Company  
137 Fiesta Circle  
Orinda, CA 94563-4350

Mala Batra  
Aspire Public Schools  
1001 22<sup>nd</sup> Avenue, Suite 100  
Oakland, CA 94606  
(Sent via E-mail to: [Mala.Batra@aspirepublicschools.org](mailto:Mala.Batra@aspirepublicschools.org))

Richard R. Anderson  
Modad Properties, LLC  
561 4<sup>th</sup> Street  
Oakland, CA 94607-3558

Subject: Vapor Intrusion Evaluation for Building 200 for Fuel Leak Case No. RO0000411 and GeoTracker Global ID T0600101950, Pacific Electric Motors, 1009 66<sup>th</sup> Avenue, Oakland, CA 94621

Dear Responsible Parties:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the most recent report entitled, "*Vapor Intrusion Evaluation Report for Building 200, Former Pacific Electric Motors Site, 1009 66<sup>th</sup> Avenue, Oakland, California*" dated June 1, 2015 (Report). The June 1, 2015 Report, which was prepared on your behalf by ARCADIS, presents results from soil vapor and crawl space sampling conducted in January 2015 for existing Building 200.

As discussed in the Technical Comments below, the results of the soil vapor and crawl space sampling indicate that further evaluation of the potential for vapor intrusion to Building 200 will be required. Please see the Technical Comments below regarding additional sampling to further evaluate the potential for vapor intrusion.

### **TECHNICAL COMMENTS**

- 1. Total Petroleum Hydrocarbons as Gasoline in Crawl Space Samples.** Total petroleum hydrocarbons as gasoline (TPHg) were detected in the two crawl space samples at concentrations of 190 and 230 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ), respectively, which exceed the Environmental Screening Level (ESL) odor threshold of  $100 \mu\text{g}/\text{m}^3$  but are less than the residential ESL of  $590 \mu\text{g}/\text{m}^3$  (San Francisco Bay Regional Water Quality Control Board, December 2013). TPHg was not detected at concentrations exceeding the reporting limits in the outdoor air samples. The detections of TPHg in crawl space samples but not in outdoor air samples indicates a potential for vapor intrusion that requires further evaluation. In addition, temporal variability needs to be assessed. Therefore, we request that you collect repeat the collection of crawl space, outdoor air, and soil vapor samples and present the results in a Second Vapor Intrusion Evaluation Report no later than October 8, 2015.
- 2. Benzene in Crawl Space Samples.** Benzene was detected in the two crawl space samples at concentrations of 0.70 and  $0.73 \mu\text{g}/\text{m}^3$ , respectively, which exceeds the residential ESL for indoor air of  $0.084 \mu\text{g}/\text{m}^3$  (San Francisco Bay Regional Water Quality Control Board, December 2013). Benzene was also detected in the outdoor air samples at concentrations up to  $0.55 \mu\text{g}/\text{m}^3$ . Additional data for

benzene in the crawl space is required to evaluate temporal variability and the contribution of outdoor air to the benzene concentrations observed in the crawl space. As discussed in Technical Comment 1, we request that you perform a second sampling event to collect crawl space, outdoor air, and soil vapor samples and present the results in a Second Vapor Intrusion Evaluation Report no later than October 8, 2015.

3. **Soil Vapor Sampling.** No soil vapor samples were collected at planned locations SVP-6, SVP-9, and SVP-10 due to water in the soil vapor probes and tight soil conditions. The Report recommends additional soil vapor sampling to reattempt sample collection at planned locations SVP-6, SVP-9, and SVP-10 and to resample SVP-7 and SVP-8. We concur with re-sampling of these soil vapor probes and request that you present the results in a Second Vapor Intrusion Evaluation Report no later than October 8, 2015.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACEH ftp site (Attention: Jerry Wickham), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **October 8, 2015** – Second Vapor Intrusion Evaluation Report for Building 200  
File to be named: SWI\_R\_yyyy-mm-dd RO0411

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 you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org). Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297  
Senior Hazardous Materials Specialist

Attachments: Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

Responsible Parties  
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cc: Carmen Santos, USEPA Region 9 (LND-4-1), 75 Hawthorne Street, San Francisco, CA 94105,  
(Sent via E-mail to: [santos.carmen@epa.gov](mailto:santos.carmen@epa.gov))

Tim Simon, Aspire Public Schools (Sent via E-mail to: [Tim.Simon@aspirepublicschools.org](mailto:Tim.Simon@aspirepublicschools.org))

Erica Kalve, ARCADIS, 100 Smith Ranch Road, Suite 329, San Rafael, CA 94903 (Sent via E-mail  
to: [Erica.Kalve@arcadis-us.com](mailto:Erica.Kalve@arcadis-us.com))

Tracy Craig (Sent via E-mail to: [tracy@craig-communications.com](mailto:tracy@craig-communications.com))

Jerry Wickham, ACEH (Sent via E-mail to: [jerry.wickham@acgov.org](mailto:jerry.wickham@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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) 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 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 Spills, Leaks, Investigations, and Cleanup (SLIC) 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 for more information on these requirements ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)).

#### PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." 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 6735, 6835, and 7835.1) 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 registered 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 fuel leak case meet this requirement.

#### UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later 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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> May 15, 2014
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) 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](mailto: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) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
    - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
  - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
  - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - e) 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](mailto: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.