ALAMEDA COUNTY HEALTH CARE SERVICES





Sien 1 10-4-05

DAVID J. KEARS, Agency Director

October 3, 2005

Ms. Sally Goodin PG&E P.O. Box 7640, Mail Code B24A San Francisco, CA 94120

Dear Ms. Goodin:

Subject: Toxics Case No. RO0002633, Case Closure, PG&E Substation E, 408 Linda Ave., Piedmont, CA 94611

Alameda County Environmental Health staff has received and reviewed the September 15, 2005 Subsurface Investigation Work Plan for the subject site prepared by P&D Environmental. As you are aware, this site was previously closed with the caveat that the current land use remain the same and that no determination of the existing building would be made. This work plan was prepared to evaluate the site for unrestricted residential use post demolition of the existing building. We generally concur with the work plan and request that you address the following technical comments when performing this work.

TECHNICAL COMMENTS

- Prepare a health and safety plan. The health and safety plan must be appropriate for all site workers, neighboring residents, commercial workers and school children. Lead particulates from the leaded paint on the building should be monitored in the H&S plan.
- Sumps have been identified as potential source areas within the building.
 The sumps should be cleaned and inspected prior to sampling soil from
 beneath them. As discussed, additional sampling may be necessary
 based upon inspection of surface soils after the building foundation has
 been removed. We concur with the COCs, ie total lead, TPHmo and
 PCBs.
- 3. The sink drainpipe along the exterior of the building will be inspected and removed and a minimum of three soil samples collected from the drainpipe joints or from areas of visual contamination. The drainpipe must be removed to the property boundary and capped.
- 4. Three groundwater samples are proposed from the borings within the building. Please identify and provide rationale for their locations prior to their advancement.
- 5. Appropriate cleanup levels shall consider the SFRWQCB Environmental Screening Levels (ESL) for the COCs. The California Human Health

ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, 12 2 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335 Ms. Sally Goodin October 3, 2005 Page 2 of 3

Screening Level (CHHSL) proposed for PCBs for residential land use is noted to be less than the corresponding ESL, therefore, may not be appropriate to use.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health, according to the following schedule:

 45 days after completion of SSI, Soil and Groundwater Investigation Report

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy 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 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, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

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.

Ms. Sally Goodin October 3, 2005 Page 3 of 3

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 case meet this requirement.

If you have any questions, please call me at (510) 567-6765.

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

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Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: files, D. Drogos

Mr. Paul King, P&D Environmental, 55 Santa Clara Ave., Suite 240, Oakland, CA 94610

10_3_05 408 Linda Ave





SENT 5-23-05

DAVID J. KEARS, Agency Director

May 12, 2005

Ms. Sally Goodin
PG&E
P.O. Box 7640, Mail Code B24A
San Francisco, CA 94120

ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

Dear Ms. Goodin:

Subject: Toxics Case No. RO0002633, Case Closure, PG&E Substation E, 408 Linda Ave., Piedmont, CA 94611

This letter confirms the completion of site investigation and remedial action for the soil investigation on the outside of the existing building at the above referenced site in regards to diesel, motor oil, lead and PCBs releases. No further action is required at this site. We are transmitting the enclosed case closure summary. These documents confirm the completion of the investigation and cleanup of the reported releases at the subject site. This letter is based upon the available information and with the provision that the information provided to this agency was accurate and representative of site conditions. The subject Toxics case is closed.

SITE INVESTIGATION AND CLEANUP SUMMARY

Please be advised that the following conditions exist at the site.

 Total petroleum hydrocarbons as diesel (TPHd) up to 69 parts per million (ppm), TPH as motor oil up to 67 ppm, 178 ppm lead and 0.14 ppm PCBs remain in soil at this site.

If you have any questions, please call Barney Chan at (510) 567-6765. Thank you.

Sincerely,

Donna L. Drogos, P.E.

LOP and Toxics Program Manager

cc: Ms. Cherie McCaulou, SFRWQCB

Mr. John Speakman, Piedmont FD, 120 Vista Ave., Piedmont, CA 94611 Files, (w/original enc), D. Drogos (w/enc), R. Garcia-LaGrille (w/enc)

ALAMEDA COUNTY HEALTH CARE SERVICES

AGENCY



800 22-04

DAVID J. KEARS, Agency Director

October 21, 2004

Ms. Sally Goodin PG&E P.O. Box 7640, Mail Code B24A San Francisco, CA 94120

Dear Ms. Goodin:

Subject: Toxics Case RO0002633, 408 Linda Ave., Piedmont, CA 94611

ENVIRONMENTAL HEALTH SERVICES ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

Alameda County Environmental Health staff has reviewed the case file for the referenced site including the October 14, 2004 Proposed Supplemental Remedial Action for Lead in Shallow Soil Former Pacific Gas and Electric Company Substation E 408 Linda Avenue, Piedmont, California. As you are aware, our office will be commenting on the remediation of the soil outside of the existing substation building only. We cannot comment on the environmental or human health risk of the building, interior or exterior. In regards to the outside soil investigation, our office has the following technical comments to the proposed remedial actions.

TECHNICAL COMMENTS

- 1. Given the historic site use, the contaminants tested, lead, PCB and petroleum hydrocarbons are appropriate. Based upon current analytical data, lead is the only contaminant of concern exceeding environmental screening levels. In addition, given the presence of lead in only shallow soils, it is reasonable that the source of the elevated lead contamination is the lead based paint from the exterior of the building. The supplemental remedial action proposes to excavate the eastern strip of the property, where concentrations of lead exceeded residential ESL, 200 ppm, to a depth of approximately 24" and collect three confirmation soil samples. This proposal is approved.
- 2. Based upon the past analytical data, our office requests that two additional soil samples be collected in the locations of SESP-1 and SESP-4. It is noted that these are two locations, which initially had detected lead exceeding the residential ESL, but no confirmation sample taken. Your sample should be at a depth > the excavated depth of 10".
- 3. The laboratory results from Torrent Laboratory, Inc. for samples S-1 through S-4, taken on 6/28/04 were received with a cover sheet that was unsigned and undated. Please provide a copy of the signed and dated cover sheet attached to the same analytical results.
- 4. Please evaluate the potential of lead impact to groundwater at this site.

The proposal is approved with the condition that the above items are addressed.

You may contact me at (510) 567-6765 if you have any questions.

Sincerely,

Barney M. Chan

Hazardous Materials Specialist

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C: B. Chan, D. Drogos

10_21_04 408LindaAve

ALAMEDA COUNTY HEALTH CARE SERVICES





Sent 8-11-04

DAVID J. KEARS, Agency Director

August 3, 2004

Ms. Sally Goodin PG&E P.O. Box 7640, Mail Code B24A San Francisco, CA 94120 **ENVIRONMENTAL HEALTH SERVICES**

ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

Subject: RO 0002633, Site Investigation at PG&E's Piedmont Substation "E", 408 Linda Ave., Piedmont, CA 94611

Dear Ms. Goodin:

ACEH has received your request for review of reports and request for a no further action letter at the above-referenced site in regards to lead, PCBs and asbestos impacts. Under California Health and Safety Code Section 101480, ACEH has the authority to establish site cleanup goals and to certify cleanup of a contaminated site. ACEH is willing to review your consultant's reports and to comment on the completeness of investigation and the appropriate response based on your consultant's findings and conclusions. Please be aware that ACEH will only comment on the validity and appropriateness of the technical conclusions and recommendations by responsible professionals, with respect to the data submitted to ACEH.

In order for ACEH to review reports relevant to the site, we would require an oversight account for the above-referenced site. To set up your account, please send a check in the amount of \$6,000 payable to Alameda County Environmental Health. Please send your check to the attention of our Finance Department.

This initial deposit may or may not be sufficient to provide all necessary regulatory oversight. ACEH will deduct actual costs incurred based upon the hourly rate specified below. If these funds are insufficient, additional deposit will be requested. Otherwise, any unused monies will be refunded to you or your designee.

The deposit is authorized in Section 6.92.040 of the Alameda County Ordinance Code. Work on this project is being debited at the Ordinance specified rate, currently \$160.00 per hour.

Please write 'Toxics" (the type of project), the site address and AR# 0311896 on your check.

If you have any questions regarding this request, please call Barney Chan at (510) 567-6765.

Sincerely,

Division Chief

cc: Donna Drogos, ACEH Barney Chan, ACEH