

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
ALEX BRISCOE, Director



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ENVIRONMENTAL PROTECTION
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July 9, 2014

Mr. John Murray
John Murray Productions
1196 32nd Street, Oakland, CA 94608
(Sent via email to johnm@johnmurray.com)

Mr. Reid Settlemier
RWW Properties LLC
6114 LaSalle Avenue, #535
Oakland, CA 94611
(Sent via email to reid@rww-llc.com)

Subject: Modified Work Plan Approval; Site Cleanup Program (SCP) Case No. RO0003142, Adeline Foundry, 3037-3115 Adeline Street, Oakland, CA 94608

Dear Mr. Murray and Mr. Settlemier:

Alameda County Environmental Health (ACEH) has reviewed the case file including the *Work Plan for Limited Phase II Subsurface Investigation*, dated August 7, 2014, and the *Addendum to Workplan for Limited Phase II Subsurface Investigation*, dated September 30, 2014. Both documents were prepared and submitted on your behalf by ERAS Environmental Inc. (ERAS). Thank you for submitting the work plan and addendum. The addendum was submitted as the result of a meeting held on September 25, 2014 between, Clinton Stockton of John Murray Productions, David Siegel of ERAS, and Mark Detterman of ACEH.

The work plan proposed the installation of three soil bores around soil bore PES-B2, to an approximate depth of 20 feet below grade surface (bgs), the collection of at least one soil sample from each soil bore based on indications of contamination, and the collection of a grab groundwater sample from each soil bore. Laboratory analysis was proposed to include Total Petroleum Hydrocarbons as gasoline (TPHg), TPH as diesel (TPHd), TPH as motor oil (TPHmo), volatile organic compounds (VOCs), Semi-Volatile Organic Compounds (SVOCs), Poly-Chlorinated Biphenyls (PCBs) and the five Leaking Underground Storage Tank (LUFT) metals.

The work plan addendum added soil bores and modified the bore locations based on discussions in the meeting. Bores B-2, B-3, and B-6 are the three soil bores surrounding earlier bore PES-B2, and will collect soil samples to be analyzed as described above; however, the need for additional groundwater samples was eliminated in the meeting based on available groundwater analytical results. Bore B-4 is proposed to investigate the vicinity of earlier soil bore PES-B4 which contained indications of volatile compounds as recorded by a photoionization detector (PID). Soil samples are proposed to be submitted for TPHg, TPHd, and TPHmo from this location. Soil bores B-1, B-7, and B-8 are proposed to be installed in the vicinity of a former furnace, a former storage shed, and former bore PES-B1 which contained somewhat elevated metals concentrations at a depth of three feet below grade surface (bgs). Rather than the five LUFT metals, metals analysis will now consist of copper, lead, and tin due to the former presence of a bronze foundry at the site.

Based on ACEH 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 Modifications – The referenced work plan proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH requests several modifications to the approach. Please submit a report by the date specified below.

a. Soil Sample Selection Protocols Hydrocarbons – The work plan addendum proposes to collect approximately three soil samples in each soil bore (B-2, B-3, B-6, and B-4) at predetermined depth intervals (1.5, 8, and 12 feet bgs). To preclude miscommunication ACEH requests that soil samples be collected, and submitted for analysis, at signs of contamination (odor, discoloration, PID responses, etc.), and at significant changes in lithology. Please be aware that delineating the vertical extent of soil contamination remains a requirement. Please ensure that sufficient soil samples are analyzed to define the vertical extent of soil contamination beneath the site.

Although it appears the proposed sampling intervals, as modified, will sufficiently address the collection of shallow petroleum hydrocarbon analytical data, ACEH requests attention to the collection and analysis of petroleum hydrocarbons within the 0 to 5 and the 5 to 10 foot intervals in order to be consistent with the Low-Threat Closure Policy (LTCP) for petroleum hydrocarbons.

b. Soil Sample Selection Protocols for Metals – The work plan addendum proposes to analyze soil samples for copper, lead, and tin, at the native soil- subgrade contact beneath the pavement surfaces at the site. This is estimated to be approximately 1.5 to 2 feet in depth in the addendum; however, ACEH requests that the actual depth of contact be documented in order to confirm field sampling depths. Because metals contamination may not produce obvious signs of contamination (discoloration, odor, elevated PID results), ACEH additionally requests that sufficient shallow soil samples be submitted for analysis to characterize and define the lateral and vertical extent of metals contamination. Analysis of soil samples in the 0 to 5 and 5 to 10 foot depth zones, which is also consistent with shallow LTCP sample sampling requested above, is likely to ensure this characterization is achieved.

c. Additional Metals Analysis Request - Soil bores B-1, B-2, B-3, B-6, and B-7, as described in the work plan addendum, will be installed to characterize petroleum hydrocarbon contamination in the vicinity of earlier soil bore PES-B2. To be consistent with discussions in the meeting, ACEH requests collection and analysis of copper, lead, and tin in the shallow soil samples to be collected at the native soil contact, and at a depth of three feet bgs, in order to match existing analytical data collected at that depth. The collection of this data is anticipated to also investigate the former furnace and storage shed vicinities. The collection and holding of sufficient soil material at deeper levels is warranted in order to define the lateral and vertical extent of metals contamination should any additional metals soil contamination be found.

d. Silica Gel Cleanup – The work plan briefly touched on the use of silica gel cleanup (SGC) on extractable-ranged hydrocarbon analytical testing, but did not specifically propose the use of SGC. The San Francisco Bay Regional Water Quality Control Board (RWQCB) Environmental Screening Levels (ESLs) guidance document only recommends the use of SGC with an additional sample from the same sample without SGC, should SGC be used for extractable-ranged hydrocarbon analysis. Therefore should SGC be used at the site, ACEH requests that the highest sample result from each soil bore be run with SGC, it must also be run without SGC. Because of the length of time required to obtain the initial results to determine the highest SGC analytical result, attention to allowable hold times will be required. This data will allow a comparison of non-SGC and SGC results at the site and is consistent with the RWQCB ESL guideline.

2) Former Machine Shops – Please be aware that with the relocation of both former machine shops to the north, their former locations have not been investigated in the subsurface. At this time there is no indication of contamination at these former site locations as discovered

contamination appears to be predominantly associated with the former bronze foundry parcel. The need for a subsurface investigation at these locations is a risk decision that may need to be addressed by interested parties.

- 3) GeoTracker Compliance** – A review of the State Water Resources Control Board's (SWRCB) GeoTracker website indicates the site has not been claimed. Because this is a state requirement, ACEH requests that the site be claimed in GeoTracker by the date identified below.

In accordance with California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. Also, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude to sub-meter accuracy using NAD 83. A California licensed surveyor may be required to perform this work. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs, including SCP programs such as this site. Additionally, pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3893, 3894, and 3895, beginning July 1, 2005, the successful submittal of electronic information (i.e. report in PDF format) shall replace the requirement for the submittal of a paper copy. Please claim your site and upload all future submittals to GeoTracker and ACEH's ftp server by the date specified below. Electronic reporting is described below on the attachments.

Additional information regarding the SWRCB's GeoTracker website may be obtained online at http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/ and http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml) or by contacting the GeoTracker Help Desk at geotracker@waterboards.ca.gov or (866) 480-1028.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with Attachment 1 and the specified file naming convention below, according to the following schedule:

- **November 7, 2014** – Claim Geotracker and Upload Required Documents
File to be named: RO3142_CORRES_L_yyyy-mm-dd
- **December 5, 2014** – Soil and Groundwater Investigation
File to be named: RO3142_SWI_R_yyyy-mm-dd

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. If your email address does not appear on the cover page of this notification, ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Mark E. Detterman, P.G., C.E.G.
Senior Hazardous Materials Specialist

Mr. Murray and Mr. Settlemier
RO0003142
October 1, 2014, Page 4

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

cc: Clinton Stockton, John Murray Productions, Inc, 1196 32nd Street, Oakland, CA 94608; (Sent via E-mail to: Clinton@johnmurray.com)

David Siegel, ERAS Environmental, Inc., 1533 B Street, Hayward, CA 94541 (Sent via E-mail to: dave@eras.biz)

Dilan Roe (sent via electronic mail to dilan.roe@acgov.org)

Mark Detterman, ACEH, (sent via electronic mail to mark.detterman@acgov.org)

Geotracker, Electronic File

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/).

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: 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
 - 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 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.