

ALAMEDA COUNTY  
**HEALTH CARE SERVICES  
AGENCY**

REBECCA GEBHART, Interim 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 13, 2017

D. W. Nicholson Corporation  
PO Box 4197  
Hayward, CA 94540-4197  
Attention: Thomas Reed Jr.  
(Sent via electronic mail to [reedjr@dwnicholson.com](mailto:reedjr@dwnicholson.com))

Subject: Work Plan Review, Site Cleanup Program Case No. RO0003213 and GeoTracker Global ID T10000009567, 24747 Clawiter Rd., 24747 Clawiter Rd., Hayward, CA 94545

Dear Mr. Reed Jr.:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the recently submitted document entitled *Soil and Groundwater Investigation Work Plan (Work Plan)* dated May 8, 2017 and prepared by Environmental Risk Assessors (ERA) for the subject case. The purpose of the investigation presented in the Work Plan is to aid in evaluating data collected to date and address data gaps identified in the site conceptual model (SCM) evaluation. As presented in the Work Plan, ERA proposes to advance four on-site soil bores (SB-5 through SB-8) for the collection and laboratory analysis of soil and grab-groundwater (GGW) samples and four vapor probes (SG-1 through SG-4) within the main warehouse/office building for the collection and analysis of both sub-slab vapor and soil gas samples.

The locations of the soil bores are depicted on Work Plan Figure 3. Two of the proposed bores are shown along the property boundary in the northeast area of the site and two are depicted along the property boundary in the southwest site area. The rationale for the locations of the soil/GGW bores includes the evaluation on-site conditions in the up gradient and down gradient areas of the site, based on an inferred groundwater flow direction using data from a nearby property. The evaluation will aid in determining if the groundwater beneath the site is impacted from an off-site up gradient source and if the site has contaminated groundwater leaving the site. As presented in Table 5, at least two soil samples from each boring (one each from within the 0 to 5- foot depth interval and the 5-foot to 8 or 10-foot depth interval). Soil samples will be screened in the field with a photoionization detector (PID). Additionally, samples exhibiting elevated PID readings and/or evidence of chemical staining will be collected and submitted for laboratory analysis. ERA states that soil samples will not be collected from below the groundwater table.

As presented in the Work Plan, soil and GGW samples will be analyzed for volatile organic compounds (VOCs) by U.S. EPA Method 8260B, Total Petroleum Hydrocarbons (TPH) as gasoline (TPHg) by U.S. EPA Method 8015B (purgeable) and TPH as diesel (TPHd), motor oil (TPHmo) TPH as bunker oil (TPHbo) by U.S. EPA Method 8015B (extractable). Following sampling, each borehole will be backfilled.

The vapor probe locations are depicted on the Work Plan Figure 3, and are all situated within the main warehouse/office building. Soil vapor samples will be collected at depths of approximately 0.5 feet and 5.5 feet below the bottom of the concrete floor slab from temporary soil gas probes. Soil gas sampling locations SG-1 and SG-2 are shown in the eastern portion of the building near the office area. Location SG-3 is shown in the northwestern area of the building in the vicinity of bores advanced as part of the November 10, 2015 investigation documented in the report entitled *Limited Phase II Environmental Site Assessment Report (PhII)*. Soil gas sampling location SG-4 is depicted in the west-central building area. Soil gas samples will be analyzed for VOCs by test method 8260 using a mobile laboratory.

Based on the review of the case file, ACDEH requests that you address the following technical comments and send us the documents requested below.

### **TECHNICAL COMMENTS**

**1. Areas of Concern** - As indicated above, ACDEH reviewed of the case file in conjunction with our Work Plan review. The September 17, 2014 *Phase I Environmental Site Assessment* (ESA) conducted for the site identifies manifesting of polychlorinated biphenyls (PCBs), material containing PCBs, and unspecified oil-containing waste, from at least 1993 to 2012. As these materials may contain potential chemicals of concern (PCOCs), ACDEH requests the material handling and storage location(s) pertaining to these materials be located on the figure requested below. Please propose an adequate number of shallow soil bores to characterize the area(s) and include the proposed boring locations on the figure requested below.

Alternatively, provide to ACDEH the rationale why potential contamination in this area(s) does not present a significant risk to human health or the environment.

The ESA identified the location of an underground hydraulic lift in the mechanical warehouse portion of the site and fuel dispensers in an exterior area. Please include these features on the figure requested below.

**2. SB-5 Bore Location**- The proposed bore SB-5 is situated in the vicinity of a paint storage shed. As documented in the PhII, soil boring SB-4 was advanced in the vicinity of the shed. Analysis of soil and GW samples recovered from SB-4 revealed the presence of VOCs. ACDEH requests the proposed bore SB-5 be relocated so the bore is downgradient of the shed. Please include the relocated boring location on the figure requested below.

**3. Additional Up Gradient Bore(s)**- As discussed above, a rationale for the locations of the soil/GGW soil bores includes the evaluation of off-site releases having impacted site groundwater beneath the site. ACDEH notes the distance between the proposed up gradient bores SB-7 and SB-8 is approximately 275 feet. ACDEH recommends that at least one additional bore be proposed between SB-7 and SB-8 to more adequately evaluate potential impacts from an up gradient source. Please include boring location(s) on the figure requested below.

Upon review and approval of the Revised Figure 3 depicting the information requested above, ACDEH will issue a letter regarding Work Plan implementation.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACDEH FTP site (Attention: Keith Nowell), and to the SWRCBs GeoTracker website, in accordance with the following specified file naming convention and schedule:

- **November 3, 2017** – Revised Figure 3; (Provided to ACDEH via electronic mail, Attention: Keith Nowell)

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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

Thank you for your cooperation. ACDEH looks forward to working with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org).

Thomas Reed Jr.  
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Sincerely,

Keith Nowell, PG, CHG  
Hazardous Materials Specialist

cc: Lita Freeman, Environmental Risk Assessors, 1420 East Roseville Parkway, Suite 140-262, Roseville, CA 95661  
(Sent via electronic mail to: [litafreeman@gmail.com](mailto:litafreeman@gmail.com))

Dilan Roe, ACDEH (Sent via electronic mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))  
Paresh Khatri, ACDEH (Sent via electronic mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org))  
Keith Nowell, ACDEH (Sent via electronic mail to: [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org))  
GeoTracker, file