

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, SUITE 250
ALAMEDA, CA 94502
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July 2, 2018

Mr. Mo Mashhoon
Mash Petroleum, Inc.
428 13th Street, Floor 10
Oakland, CA 94588

(Sent via electronic mail to:

momashhoon@mashpetroleum.com)

Mr. David Cropper
BA1 2201 Valley LLC
c/o TMG Partners
100 Bush Street, Suite 2600
San Francisco, CA 94104

(Sent via electronic mail to: dcropper@tmgpartners.com)

Subject: Conditional Revised Work Plan Approval; Site Cleanup Program Case No. RO0003258 and Geotracker Global ID T10000010738, A+A Gas & Mart, 2200 Telegraph Avenue, Oakland, CA 94612

Dear Messrs. Mashhoon and Cropper:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the *Revised Workplan for Further Investigation and Rebound Study*, dated June 18, 2018, by SOMA Environmental Engineering, Inc (SOMA) for work proposed at 2200 Telegraph Avenue and at 2201 Valley Street, in Oakland California. Thank you for submitting the revised work plan. The revised work plan incorporated elements of the previously submitted documents entitled *Workplan for Further Investigation and Rebound Study*, dated May 24, 2018, and *Addendum to "Workplan for Further Investigation and Rebound Study"*, dated June 14, 2018, by SOMA, and included responses to comments in the directive letter issued by ACDEH on June 14, 2018.

ACDEH staff have also reviewed the *Amendment to Work Plan for Pre-Construction Soil Characterization Investigation*, dated July 2, 2018, by PES Environmental, Inc (PES.).

The Revised Work Plan by SOMA proposes the installation of 10 DPT soil bores at 2201 Valley Street consisting of separate bores for the shallow and deep water bearing zones to define the extent of the groundwater naphthalene plume, 20 semi-permanent soil vapor points at both 2200 Telegraph Avenue and 2201 Valley Street to determine the risk of vapor intrusion to the future building from historic as well as recent land uses, and to determine if existing plumes have been sufficiently remediated for the future building; and 7 soil bores at 2200 Telegraph Avenue to pre-profile soil within the pile cap excavations.

The Revised Work Plan by SOMA also proposed to conduct rebound monitoring of groundwater and soil vapor at two to three week intervals due to a previously conducted extended pilot test.

The Work Plan Amendment by PES acknowledged modifications to the scope of work proposed by PES in the work plan entitled *Work Plan for Pre-Construction Soil Characterization Investigation*, dated May 29, 2018.

Based on ACDEH staff review of the above referenced documents and of the case file we generally concur with the recently proposed scope of work, provided that you address the following technical comments, submit the requested documents, and upon ACDEH approval, perform the proposed work, and send us the technical reports requested 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) **Conditional Work Plan Approval** – The referenced SOMA revised work plan proposes a series of actions with which ACDEH is in general agreement of undertaking; however, ACDEH requests modifications to the approach as discussed below. Please submit a report by the date specified below.
 - a) **Modified Random Sampling for Additional Soil Analytical** – The work plan proposes to include additional laboratory analysis related to historic site uses, including analysis for CAM17 metals,

SLTC / WET testing when appropriate of elevated metal concentrations, Total Petroleum Hydrocarbons (TPH) as gasoline (TPHg), as diesel (TPHd), as motor oil (TPHmo), and 50% random analysis for a full scan Volatile Organic Compound (VOC) analysis, 15% Semi-Volatile Organic Compounds (SVOC), 15% random Poly-Chlorinated Biphenyl's (PCBs) and 15% random Organochlorine Pesticides (OCPs). ACDEH requests that the samples be biased towards samples with elevated photoionization Detector (PID) responses, staining, or other indications of contamination. For PCBs, ACDEH requests the samples be biased towards samples with more elevated detections of heavy hydrocarbons, and for OCPs be biased towards surficial soil samples.

- b) **MPE Rebound Testing** – As noted above, the Revised Work Plan proposes to conduct rebound monitoring of groundwater and soil vapor at two to three week intervals due to a previously conducted extended pilot test. In that rebound testing is to evaluate back diffusion of contamination from soil to groundwater or soil vapor over a potentially extended period of time, ACDEH does not object to intervals of two to three weeks. ACDEH notes that rebound is identified when concentrations reach asymptotic levels.

- 2) **PES Work Plan Amendment** – ACDEH has no further comments with respect to this referenced document.

TECHNICAL REPORT REQUEST

Please submit the following technical reports and deliverables to the State Water Board's Geotracker website and notify your case worker by electronic mail (mark.detterman@acgov.org), in accordance with the following specified file naming convention and schedule, as provided below, and in the Responsible Party(ies) Legal Requirements/Obligations which is included as Attachment 1. Please note ACDEH no longer accepts reports on the ftp site.

- **November 14, 2018** – Site Investigation and Rebound Study Report
File to be named RO3258_SWI_R_yyyy-mm-dd

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

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: Mansour Sepehr, SOMA Environmental Engineering, 6620 Owens Dr., Suite A, Pleasanton, CA 94588; (Sent via electronic mail to: msepehr@somaenv.com)

Denise Pinkston, BA1 2201 Valley LLC; c/o TMG Partners; 100 Bush Street, Suite 2600, San Francisco, CA 94104; (Sent via electronic mail to: dpinkston@tmgpartners.com)

William Mast, PES Environmental, Inc, 7665 Redwood Blvd, Suite 200, Novato, CA 94954; (Sent via electronic mail to: wmast@pesenv.com)

Messrs. Mashhoon and Cropper

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Rob Crepes, PES Environmental, Inc, 7665 Redwood Blvd, Suite 200, Novato, CA 94954; (Sent via electronic mail to: rcrepes@pesenv.com)

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"/>				
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.