



January 9, 2018

Dr. Michael Park
1940 Webster Street, Suite 200
Oakland, CA 94612
(Sent via electronic mail to: mkparkmd@gmail.com)

Subject: Conditional Work Plan Approval; Fuel Leak Case No. RO0000071 and Geotracker Global ID T0600102203, Goldsmith Lathrop, 5813-5815 Shellmound St, Emeryville, CA 94608

Dear Dr. Park:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case files including the *Report of Groundwater Monitoring Activities and Workplan to Conduct Additional Investigative Activities*, dated November 8, 2017. The work plan was submitted on your behalf by Gribi Associates (Gribi). Thank you for submitting the work plan.

The report documented the redevelopment of site wells and the subsequent sampling of groundwater from the wells. Well C-1 was not located and is reported to be positioned beneath a recently replaced sidewalk on the western side of the building at the site. Concentrations of Total Petroleum Hydrocarbons as diesel (TPHd) up to 30,000 micrograms per liter ($\mu\text{g/l}$) were documented in well C-3 which could not be sampled during the June 2017 groundwater sampling event. According to the State Water Resource Control Board (SWB) concentrations of TPHd in groundwater above 5,000 $\mu\text{g/l}$ are indirect evidence of Light Non Aqueous Phase Liquids (LNAPL) in soil or groundwater at a site (*Technical Justification for Vapor Intrusion Media-Specific Criteria*, SWB, March 2012).

The report additionally proposed the installation of two soil gas sample locations on the western property line, two subslab vapor locations in the sidewalk adjacent to the existing site building, three indoor air samples, and one outdoor air ambient air sample at the site. Due to the shallow depth to groundwater, the two soil vapor wells were proposed to be installed to a maximum depth of 3.0 feet. All wells were proposed to be temporary in nature.

Based on ACDEH 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. Once field work is approved, 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 Comments and Clarifications** – The referenced work plan proposes a series of actions with which ACDEH is generally in agreement of undertaking; however, ACDEH requests several modifications to the approach. Please incorporate the modifications and submit a site investigation report by the date identified below.
 - a. Proposed Temporary Vapor Sampling Locations** – Consistent with Department of Toxic Substances Control (DTSC) guidance for temporal / seasonal vapor sampling, ACDEH requires that all soil vapor and subslab vapor point locations be installed at this site as semi-permanent locations for later resampling. The permanency will be determined by need in the future.

b. SG-1 and SG-2 Conversion to Soil Vapor Wells – Vapor sampling locations SG-1 and SG-2 were proposed to be installed as subslab vapor points. To determine if the sanitary sewer and city water utility lines represent a preferential vapor pathway, ACDEH requests these locations be converted to semi-permanent vapor wells installed consistent with other vapor wells at the site (proposed three foot deep).

c. Extent of Utility Lines – The extent of potential preferential pathways at the site does not appear to be fully determined and may be a work in progress. The water lines appear to end abruptly beneath the southern end of the sidewalk located at the site, but are expected to extend to the kitchen and restrooms. Please further define the locations of the water line beneath the building.

Based on a review of Figure 6, ACDEH cannot determine if the electric and natural gas lines terminate in the storage room, and are then above grade, or if the lines continue below grade beneath the building. Please define any additional underground extent of these utility runs, or clarify if they are above grade in future submitted figures.

d. Pairing of Subslab and Indoor Air Vapor Sampling – ACDEH requests that all semi-permanent subslab vapor points be paired with indoor air vapor samples in the same enclosed space or room, and concurrently sampled. This will define the attenuation factor of the concrete slab, and help validate analytical results.

e. Subslab and Indoor Air Sampling Density – Based on our review of Figure 6 of the referenced work plan, ACDEH cannot determine if the spaces identified as conference rooms and offices are enclosed or if they are open air cubicles. ACDEH additionally cannot determine the number of offices, and cannot determine the nature or use of the room west of the area marked “restrooms”. Therefore, ACDEH requests a more comprehensive updated figure for these areas be submitted with the report requested below.

Based on the results of the updated figure, ACDEH is requiring a minimum of two additional paired subslab and indoor air sampling location in identified enclosed spaces, such as conference rooms, offices, storage, kitchen, or other enclosed air spaces. This is requested to help identify areas of potential concern, and should consider the number of slab penetrations within the enclosed space, as well as spacing the coverage across the entire slab area. ACDEH can provide further input should it be requested prior to undertaking installation of the subslab points.

f. Outdoor Air Sampling Location – To minimize the potential for outdoor air to be affected by subsurface vapor contamination, ACDEH requests the outdoor ambient air sample be relocated to the northwestern corner of the site which appears to have been minimally affected by petroleum hydrocarbon contamination associated with the former underground storage tank (UST) previously located at that location.

g. Shroud Tracer Concentrations – To quickly verify, and to document, vapor shroud concentrations, ACDEH is requiring the addition of a column in the table reporting vapor results to report shroud tracer concentrations as a percentage, as is also required for the percentages of oxygen, carbon dioxide, nitrogen, and methane.

h. Naphthalene Inclusion in Analytical Suite - ACDEH is in general agreement with the proposed analytical suite for vapor sampling; however, requests the addition of naphthalene to the suite and resulting data tables. Consistent with DTSC guidance, please additionally analyze for naphthalene by TO-17, due to the potential for preferential adsorption of naphthalene to sample tubing.

i. Soil and Groundwater Analytical Suite – In order to collect shallow, more recent, analytical data from areas previously sampled, and to extend the collection of data beneath the existing building, ACDEH is requiring the collection of one or more soil samples from each vapor well based on indications of contamination (odor, Photoionization Detector response, discoloration, or other

signs). Should groundwater be encountered in the soil vapor bore, ACDEH additionally is requiring the collection of a grab groundwater sample within the pre-planned soil bore depth.

- j. **Concrete Slab Crack and Penetration Evaluation** – To evaluate the nature and quality of the concrete slab beneath the building, ACDEH requests a detailed crack and penetration evaluation of the slab, including the identification of areas where the slab is obscured by flooring covers. Penetrations are requested to include utility penetrations, other penetrations (i.e. dental chair penetrations), including former penetration areas, and the identification and depiction of electrical wall outlets which can be a vapor pathway.

TECHNICAL REPORT REQUEST

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

- **March 23, 2018** – Soil, Groundwater, and Soil Vapor Investigation
(File to be named RO3267_SWI_R_yyyy-mm-dd)

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>.

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, PG, CEG
Senior Hazardous Materials Specialist

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

cc: Jim Gribi, Gribi Associates, 1090 Adams Street, Suite K, Benicia, CA 94510, (Sent via electronic mail to: jgribi@gribiassociates.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.