



May 23, 2018

Ms. Ashley Piatek (Sent via electronic mail to: apiatek@centerpoint.com)
CenterPoint Properties Trust
1808 Swift Drive
Oak Brook, Illinois 60523

Subject: Conditional Approval of the *Environmental Due Diligence Summary and Work Plan for Data Gap Investigation*, Site Cleanup Program Case No. RO0003291 and GeoTracker Global ID T10000011211, 2230 & 2242 Davis Court located at 2230 & 2242 Davis Court (APNs: 439-58-22-5, 439-58-22-4, 439-58-22-3), Hayward, CA 94545

Dear Ms. Piatek:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the site cleanup case file for the above referenced site including the *Environmental Due Diligence Summary and Work Plan for Data Gap Investigation* (the Work Plan), dated April 13, 2018, prepared by Farallon Consulting, LLC (Farallon) on your behalf and electronically received by ACDEH on April 13, 2018. A kick-off meeting with you, your environmental consultants (Farallon), and ACDEH was conducted on January 31, 2018 to discuss the current site conceptual model and potential data gaps including locations of soil, soil gas, sub-slab vapor, and groundwater samples to further investigate subsurface conditions at the Site. Additional email correspondence with Farallon and ACDEH was conducted on March 1, 2018 to discuss ACDEH's request to evaluate risk to onsite users from exposure to potential chemicals of concern (PCOC) in the area of the railroad tracks adjacent to the Site.

ACDEH understands the Site is located in the southeast terminus of Davis Court at 2230 and 2242 Davis Court in Hayward. The Site is currently developed as an industrial building which was constructed in 1970 and renovated in 1984. The Site building is divided into two tenant spaces: the western portion comprising approximately 60,000 square feet, using the 2230 Davis Court address; and the eastern portion comprising approximately 80,000 square feet, using the 2242 Davis Court address. Paved parking areas and storage areas are located in the western and northern areas outside of the Site building. The eastern and southern areas outside of the Site building are developed as unpaved soil which are fronting railroad tracks. The entire Site is surrounded by chain-link fencing with the exception of the northwestern parking area. The Site consists of three parcels (see above for assessor parcel numbers; APN) located in a commercial/industrial area which includes a railroad spur located in the southern portion of the property. ACDEH also understands that a new tenant will occupy the property after field activities associated with this Work Plan are conducted, however, a dated of new occupancy is unknown.

To date the following documents have been submitted to ACDEH for review:

- *Phase 1 Environmental Assessment Report, 2230 and 2242 Davis Court, Hayward, CA*, prepared by Farallon Consulting LLC, dated July 17, 2017;
- *Comprehensive Phase II Environmental Site Assessment Findings, 2230 and 2242 Davis Court, Hayward, CA*, prepared by Farallon Consulting LLC, dated July 14, 2017;

- Draft *Figure 2 – Site Plan Showing Sampling Locations With PCE in Soil, Soil Gas, and Groundwater and Proposed Supplemental Sampling Locations*, prepared by Farallon Consulting LLC, dated November 20, 2017;

The existing Phase I report and this Work Plan indicate previous operations at 2242 Davis Court included (1) a metal stamping and painting company (1991 through 1994) with hazardous materials and storage in the southeastern interior of the Site building and painting operations in the eastern interior of the Site building which included the use of a paint dip tank, and generation of waste paint sludge and waste oil, (2) an insulation company (2001 and 2002) which listed storing 220 and 330 gallons of diisocyanate, and small quantities of acetone, toluene, and naphthalene, and (3) a pole line metal hardware manufacturer which was listed as using lubricating oils, welding gases, and sulfuric acid, and generating waste oils with a building layout consistent with the area used for storage by the previous metal stamping company. Previous operations at 2230 Davis Court included a manufacturer of fish supplies and medicines (1974 to 2018) which contained a two-story office, warehouse areas with storage racks, a machine shop, and various laboratory areas where products are tested, blended, and packaged. The facility contained various pieces of old equipment related to a gravel coating and painting operation that was discontinued in approximately 2009.

Results of recognized environmental concerns identified in the Phase I were further investigated as part of a Phase II subsurface investigation conducted at the Site during May and June 2017. Thirty borings were advanced for the collection of soil, sub-slab vapor, and groundwater samples. Data from the Phase II investigations indicate that total petroleum hydrocarbons as diesel-range (TPH-d) and as motor oil-range (TPH-mo), polycyclic aromatic hydrocarbons (PAHs), and metals were detected in soils located in the southern and eastern areas outside of the Site building at concentrations exceeding San Francisco Bay Regional Water Quality Control Board Environmental Screens Levels (ESLs) for commercial use. Tetrachloroethene (PCE) was detected in sub-slab vapors exceeding the ESLs for potential vapor intrusion under commercial land use, with the highest concentrations detected in the southeastern portion of the Site building, in the vicinity of the metal-working activities. PCE was detected in groundwater samples collected at both the up- and down-gradient portions of the Site. Upgradient PCE concentrations were detected below groundwater ESL in groundwater samples, however, downgradient PCE concentrations were detected above groundwater ESLs in the southeastern portion of the Site near the area where elevated concentrations of PCE were detected in soil gas.

A data gap analysis was conducted and summarized in the Work Plan. Results of the analysis indicated the following data gaps: site-specific groundwater flow and gradient, confirmation of shallow aquitard across the Site, potential exposure risk to onsite users from shallow soil concentrations in the area of the railroad tracks, additional delineation of potential onsite source areas, lateral and vertical delineation of PCE in soil gas including evaluating potential offsite sources, lateral delineation of PCE in groundwater, and evaluation for exposure including indoor air pathways under all future commercial use.

As a result, Farallon proposes to conduct additional onsite investigations to address the data gaps mentioned above and further characterize soil, groundwater, soil gas, and sub-slab vapor conditions at the Site. The scope of work presented in this Work Plan includes the advancement of 4 onsite borings (S-7 through S-10) adjacent to the railroad tracks, the installation and sampling of 4 groundwater monitoring wells (MW-1 through MW-4), and the advancement of 3 soil gas probes (SGW-1 through SGW-3) and 7 sub-slab vapor pins (VP-1 through VP-7).

Based on our review, ACDEH conditionally approves the Work Plan and requests that you address the Technical Comments regarding the Work Plan below, perform the proposed work, and submit the requested *Deliverables* to the State Water Resources Control Board's GeoTracker website in accordance with the compliance schedule provided below and the *Responsible Party (ies) Legal*

Requirement/Obligations Instructions and File Naming Conventions which are included as Attachments 1 and 2 respectively. ACDEH requests email notification verifying the requested deliverables have been uploaded to Geotracker (e-mail preferred to: andrew.york@acgov.org).

TECHNICAL COMMENTS

Please address the comments below and incorporate them during implementation of the scope of work presented in the Work Plan.

1. **Groundwater Monitoring Well Installation, Development, and Sampling** – The Work Plan states that groundwater samples will be collected to further assess potential data gaps located up-, down-, and cross-gradient of the Site and evaluate the central portion of the impacted area within the building. The Work Plan proposes laboratory analyses including a full suite of volatile organic compounds (VOCs) by EPA Test Method 8260B. ACDEH's review of the TPH analytical data for soil and groundwater samples indicated TPH-d concentrations exceeding ESL in the suspected upgradient portion of the site near vicinity of S-4 and GW-5 and the suspected down- and cross- gradient portions of the site at S-2, GW-1, and GW-2. As a result, ACDEH requests that additional analyses be performed including TPH-d by EPA Method 8015 on all proposed wells (MW-1 through MW-4) in order to delineate the suspected up-, down- and cross-gradient well locations.
2. **Vapor Pin and Soil Gas Well Installation and Sampling** – The Work Plan states that soil gas sampling will be performed in accordance with the *Advisory– Active Soil Gas Investigations* dated July 2015, prepared by the California Department of Toxic Substances Control (DTSC Advisory) and that a shroud with Helium tracer gas will be used to monitor for system leaks. The purpose of this leak check method is to provide a quantifiable means of evaluating the data quality effects of ambient air intrusion into the soil gas sample. In order to ensure that the quality of helium data is sufficient and adequate for this purpose, ACDEH requests that (1) the encapsulating shroud entirely encompass the sample apparatus and surface completion of the soil gas well or vapor pin; (2) an at least 20% helium atmosphere is maintained within the encapsulating shroud throughout the duration of purging and sampling; and (3) shroud helium concentrations be monitored, recorded, and reported in field logs. Helium monitoring may be conducted using a field meter as long as the detector is capable of reporting Helium detections between 100% and 0.1% with a precision of at least +10% at 0.1%. Lastly as stated in the Work Plan, soil gas samples are to be analyzed for helium using ASTM D1946.

DELIVERABLES

Please submit the following deliverables according to the following schedule:

1. **Subsurface Investigation Report** – A technical report documenting the results of the scope of work presented in the approved Work Plan.
 - **July 24, 2018** – Subsurface Investigation Report
File to be named: SWI_R_YYYY-mm-dd

Thank you for your cooperation. ACDEH looks forward to working with you and your redevelopment team to advance the case toward closure. If you have any questions, please call me at (510) 639-1276 or send me an email message at andrew.york@acgov.org.

Ms. Piatek
RO0003291
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Sincerely,



Drew J. York
Senior Hazardous Materials Specialist



Dilan Roe, PE, C73703
Chief - Land Water Division

Encl.: Attachment 1 – Responsible Party (ies) Legal Requirement/Obligations Instructions
Attachment 2 – Electronic File Naming Conventions

cc: Scott Allin, Farallon Consulting, LLC (*Sent via E-mail to: sallin@farallonconsulting.com*)
Gavin Fisco, Farallon Consulting, LLC (*Sent via E-mail to: gfisco@farallonconsulting.com*)
Dilan Roe, ACDEH, Chief Land, and Water Division (*Sent via E-mail to: dilan.roe@acgov.org*)
Paresh Khatri, ACDEH (*Sent via E-mail to: paresh.khatri@acgov.org*)
Drew York, ACDEH (*Sent via E-mail to: andrew.york@acgov.org*)
Electronic File, GeoTracker

ATTACHMENT 1

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.

ATTACHMENT 2

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: August 1, 2017
	PREVIOUS REVISIONS: July 17, 2017, November 8, 2016, December 15, 2015, December 16, 2014, June 19, 2013, June 15, 2011, March 26, 2009, April 29, 2008
	ISSUE DATE: June 16, 2006
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: File Names for Electronic Reports

Format: REPORT_NAME_R_YYYY-MM-DD
Ex: SWI_R_VOL1_2006-05-25

LOP and SCP (VRAP) INCOMING REPORTS AND LETTERS	
Document Name	Abbreviation File Name= Abbreviation + Date (yyyy- mm-dd)
Abandoned Well Information/Water Supply Well Information	ABWELLINF_R
Addendum	ADEND_R (added after report name)
Additional Information Report	ADD_R
Analytical Reports (Loose data sheets not in report)	ANALYT_R
As Built Drawings (or Plans)	AS_BUILT
Case File Scanned By OFD	CASE_FILE
Cleanup and Abatement Report	CAO_R
Case Transfer Form (from CUPA)	CASE_TRNSFR_F
Conduit Study/Well Search/Sensitive Receptor/Well Survey/Preferential Pathway Study	COND_WELL_R
Corrective Action Plan (CAP)	CAP_R
Correspondence	CORRES_L
Court Injunctions	INJ_L
Development Plans (Includes Plan Set, Cross-sections, and Related Drawings)	DEV_PLAN_date
Development Schedule (Project Schedule, Gant Chart, etc.)	DEV_SCHD_date
DWR Confidential Well Logs (Report containing)	report name_R_CONFIDENTIAL_YYYY-MM-DD (Ex: SWI_R_CONFIDENTIAL_YYYY-MM-DD)
DWR Well Completion Report-Confidential (Loose well logs)	DWR_WELL_CONFIDENTIAL_YYYY-MM-DD (Date of Well Log)
ESI/DAR (Environmental Site Investigation, Data Assessment Report)	ESI_R
Excavation Report	EX_R
Extension Request Letter	EXT_RQ_L
Fact Sheet	FACT_SHT

Feasibility Study	FEASSTUD_R
Groundwater Monitoring/Quarterly Summary Report	GWM_R
Financial Assurance/Letter of Credit	FNCL_ASSRNC_LOC
Interim Remedial Action Plan	IRAP_R
Interim Remediation Results (Includes Pilot Test Reports, Vapor Mitigation Reports, Soil Reports, Free Product Removal Reports, & Dual-Phase Extraction Reports)	IR_R
Lawsuit	LAWSUIT_R
Migration Control Report	MIG_R
Miscellaneous Report/Soil Sample	MISC_R
Miscellaneous Sample Report (analytical results)	MISC_SAMP_R
Notification Letter	NOT_L
NPDES Miscellaneous Reports	NPDES_R
Operations & Maintenance Plan	OM_P
Operations & Maintenance Report	OM_R
Pay for Performance	PFP_R
Petition	PETITION_R
Phase 1 Environmental Assessment Report	PHASE1_R
Photos	PHOTO_date
Preliminary Site Assessment Report/Phase 2 (historic reports only)	PSA_R
Remedial Action Plan	RAP_R
Remedial Design & Implementation Plan	RDIP_R
Remediation Progress Report	REM_R
Request for Closure	RFC(_L or _R)
Risk Assessment Report	RISK_R
Risk Based Corrective Action	RBCA_R
List of Landowners Forms	LNDOWNR_F_DATE
SB2004 Letter of Commitment	LOC_L
Site Conceptual Model/Conceptual Site Model	SCM_R
Site Health & Safety Plan	SFTY_PLAN_R
Site Management	SITE_MANAGE_R_
Site Management Plan	SMP_R
Site Summary Report	SITE_SUM_R

Soil and Water Investigation Report (Includes soil gas/vapor reports, indoor, additional site investigation, well installation, site characterization, cross section, indoor air, additional onsite investigation, Phase II/preliminary site assessment)	SWI_R
Soil Disposal Report	SOIL_DSPL_R
Source Area Characterization	SOURCAREA_R
State Information	STATE_INFO (no date)
Status Report(monthly remediation status reports addressed to sanitary district requires no stamp/perjury)	STAT_R
Tank/Tank System Removal Report	TNK_R
Tentative Order Report	TENT_R
Unauthorized Release Form	URF_R
UST Sampling Report	UST_SAMP_R
USTCF 5 Year Review	USTCF_5YR
USTCF issued Public Notice	USTCF_PP_L
Well Construction Report (limited to water supply wells)	WELL_CST_R
Well Decommissioning Report/Letter (well destruction/abandonment)	WELL_DCM_R
Work Plan	WP_R

**LOP and SLIC
ACEH OUTGOING LETTERS AND CASE FILE DOCUMENTATION**

Document Name	Abbreviation File Name= Abbreviation + Date (yyyy-mm-dd)
90 Day Letter	90D_L
CAP Approval	CAP_AP_L
RP Certification of Public Notice	CAP_CERT_L
CAP Public Participation Letter	CAP_PP_L
CAP Public Participation Letter to RP	CAP_PPRP_L
Certified Mail Receipt	CERT_MAIL_RECEIPT
Cleanup and Abatement Order	CAO_L
Closure Public Participation Letter	CL_PP_L
Closure Package (Letter, RACC, Summary, Deed Restriction)	CLOS_L
Correspondence	CORRES_L
Deed Restriction	DEED_L_ (Copied from CLOS_L_)
Directive Letter containing Public Notice and/or Landowner request form	DIR_PP_L
Directive Letter (Landowner form, site management requirements, well decommission scheduling prior to closure of PP, copy of PP to all RPs)	DIR_L
Enforcement	ENF_L
Enforcement Referral Letter	ENF_REF_L
Extension Approval Letter	EXT_AP_L
Extension Denial Letter	EXT_DNY_L
Fund Requests	FUND_REQ_L
Final Voluntary Remedial Action Agreement	FVRAA_date
GeoTracker info	GEOTRACK_R
Late Letter	LATE_L
List of Landowners Forms	LNDOWNR_F_DATE
Mailing List for Public Notice in Excel Format	MAIL_PP_DATE
Maps & Assessor's Parcel Information	MAPS_ASSESSOR (no date)
Meeting Agenda, Minutes, Sign in Sheet	MEETING
Miscellaneous Letter	MISC_L
New Landowner Letters	LNDOWNR_REQ_L
Notice of Responsibility	NOR_L
Notice of Violation	NOV_L
Phone Log	PHONE_LOG
Photos	PHOTO_date
Post Closure Monitoring	PCMP_L
QA/QC Checklist (confidential)	QAC_report name_date
Responsible Parties Information	RPINFO_L_DATE OF THE LETTERHEAD
Returned Mail	RTN_MAIL_date

Site Visit/Inspection Report	SITEVISIT_R
Transfer Letter	TRANS_L
UST Permit	UST_PRMT
Voluntary Remedial Action Notice to State Agencies	VRA_NOTICE
Voluntary Remedial Action Request Form from RP	VREQ_F