

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, SUITE 250
ALAMEDA, CA 94502
(510) 567-6700
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December 29, 2017

Mr. Matthew Westbrook
ARC - Blue Print Service
945 Bryant Street
San Francisco, CA 94103
(Sent via electronic mail to:
matthew.westbrook@e-arc.com)

Mr. Jeffery Grimes
ARC - Blue Print Service
945 Bryant Street
San Francisco, CA 94103
(Sent via electronic mail to:
jeffery.grimes@earc.com)

Subject: Request for Potential Meeting Dates; Fuel Leak Case No. RO0000151 and GeoTracker Global ID T0600100196, City Blue Print, 1700 Jefferson St., Oakland, CA 94612

Dear Messrs. Westbrook and Grimes:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the *3rd Quarter 2017 – Ground Water Monitoring Report* and the *Interim Remedial Action Plan (IRAP)*, both dated October 30, 2017; the *Comprehensive Summary of Site Conditions*, dated November 30, 2017; and the *Response to Terraphase December 4, 2017 Comments on Interim Remedial Action Plan*, dated December 19, 2017. These reports and communications were submitted and generated on your behalf by Applied Water Resources Corporation (AWR). ACDEH has additionally reviewed the *Comments on Interim Remedial Action Plan*, dated December 4, 2017 that was submitted on behalf of Mr. Lance Lo, the adjacent property owner by Terraphase Engineering, Inc. Thank you for submitting the reports and communications.

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. Meeting Request** – The IRAP proposed the installation of three Soil Vapor Extraction (SVE) wells on the subject site as an interim remedial action measure and pilot test in order to determine the radius of influence, and the rate of mass removal at a sustainable air flow rate. The stated primary intent of the full-scale SVE system is to reduce the mass of petroleum contamination at the subject site, with a secondary intent of reducing the risk of petroleum vapor intrusion at the subject site and the adjacent offsite property at 581 18th Street. Based on existing sub-slab data the vapor intrusion risk at the 581 18th Street property appears limited at this time, however, soil vapor data collected at a depth of approximately five feet below the foundation of the basement of the residential property, does not meet values set by the Low Threat Closure Policy (LTCP).

As noted by AWR, the presence of submerged Light Non-Aqueous Phased Liquids (LNAPL) may be present at locations beneath both properties. In particular, offsite soil bore D8 likely documents submerged LNAPL some distance from the presumed source, while other onsite bores imply the potential for submerged LNAPL. It is the opinion of ACDEH that the implementation of a modified pilot test of the SVE system will likely reduce the short term risk of petroleum vapor intrusion at the site and the adjacent offsite property at 581 18th Street and thus are appropriate as a mitigation measure. However, due to the likely presence of submerged LNAPL, ACDEH is of the opinion that additional remedial technologies should be evaluated such as Dual Phase Extraction (DPE) of groundwater and soil vapor to reduce the petroleum hydrocarbon contamination beneath the subject site and adjacent properties. However, please note that this letter does not approve the implementation of the SVE pilot test at this time.

In order to identify a path forward at the subject site, inclusive of offsite properties, ACDEH requests a meeting with all stakeholders, and the identification of meeting dates by the date identified below.

- 2. Additional Offsite Delineation** – ACDEH is in agreement with recommendations contained in the *Comprehensive Summary of Site Conditions* report that additional offsite delineation is required, and would include the installation of a groundwater monitoring well in very close proximity to soil bore D12. In order to assess the potential risk of vapor intrusion at the residential property on the west side of Jefferson Street at that location, ACDEH additionally requests the identification and reporting of the foundation type in the requested work plan (as a part of sensitive receptor survey), including the potential that a basement or below grade elevator sumps are present west of D12.

In addition to the installation of sub-slab vapor wells beneath the western portion of the ARC building, it appears appropriate to include the resampling of vapor wells SV6 and SV8, both installed at a depth of 5 feet below grade surface (bgs), in order to determine seasonal fluctuations in vapor concentrations, and to request the reinstallation of soil vapor point SV24 due to the presence of 15.5% helium in the vapor sample which is in excess of the allowable 5% concentration per Department of Toxic Substances Control (DTSC) guidance. Additionally, it appears appropriate to include the resampling of select vapor wells installed at a depth of 5 feet below foundations of various depths in order to also determine seasonal vapor concentration fluctuations, as well as all sub-slab vapor points at both offsite properties. The requested meeting in part is intended to help identify data gaps at the site and an associated path forward. Please submit a work plan by the date identified below.

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 Attachment 1 and the following specified file naming convention and schedule:

- **January 12, 2018** – Fourth Quarter 2017 Groundwater Monitoring Report
(File to be named RO151_GWM_R_YYYY-mm-dd)
- **January 15, 2018** – Potential Meeting Dates
Please email your case worker
- **60 Days After Meeting** – Data Gap Work Plan
(File to be named RO151_WP_R_YYYY-mm-dd)
- **April 13, 2018** – First Quarter 2018 Groundwater Monitoring Report
(File to be named RO151_GWM_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>. If your email address does not appear on the cover page of this notification, ACDEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

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Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call 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

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

cc: Steven Michelson, Applied Water Resources Corporation, 1600 Riviera Avenue, Suite 310, Walnut Creek, CA 94596; (Sent via electronic mail to: smichelson@awrcorp.net)

Yola Bayram, Applied Water Resources Corporation, 1600 Riviera Avenue, Suite 310, Walnut Creek, CA 94596; (Sent via electronic mail to: ybayram@awrcorp.net)

Lance Lo, Jefferson Court Commercial Ventures, LLC, 1728 Ocean Avenue #128, San Francisco, CA 94112; (Sent via electronic mail to: llltcg@aol.com)

Cote and Cookie Reese, 1701 San Pablo Avenue, Oakland, CA 94612; (Sent via electronic mail to: citydentaloffice@aol.com)

Andy Lojo, Terraphase Engineering, Inc, 1404 Franklin Street, Suite 600, Oakland, CA 94612; (Sent via electronic mail to: andrew.lojo@terrphase.com)

Jeffrey S. Lawson, Silicon Valley Law Group, One North Market Street, Suite 200, San Jose, CA 95113; (Sent via electronic mail to: jsl@svlg.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"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<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.