

BALCO  
PROPERTIES

September 29, 2017

Mr. Keith Nowell  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577

RE: Response to September 19, 2017, Alameda County Case File Review, Balco Properties LLC, 2855 Mandela Parkway, Oakland, California (Fuel Leak Case Number RO0000378)

Dear Mr. Nowell:

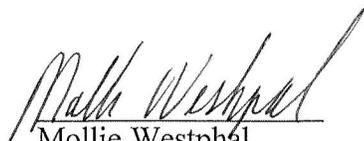
The property located 2855 Mandela Parkway in Oakland, California (the site) has been under the jurisdiction of Alameda County Department of Environmental Health's (ACDEH) Local Oversight Program (LOP) Fuel Leak Case Number RO0000378 since December 2001. Balco Properties LLC (Balco) has been working with ACDEH after acquiring the Site in 2006. A brief summary of recent correspondence between Balco and the ACDEH is summarized as follows:

ACDEH, in a letter dated July 14, 2017, presented a number of technical comments regarding the site. On September 15, 2017, Trihydro Corporation (Trihydro), on behalf of Balco, submitted a Response to Comments, including submittal of historical data to Geotracker. ACDEH, in a letter dated September 19, 2017, requested additional historical data.

Please find an enclosed Response to September 19, 2017 Alameda County Case File Review. Balco appreciates ACDEH's continued assistance with this project. If you have any questions regarding this Additional Site Investigation Report, please free to call me at (510) 763-2911 or Matt Jones (Trihydro Corporation) at (360) 312-9109.

I have read and acknowledge the content, recommendations, and/or conclusions contained in the attached document *Response to September 19, 2017, Alameda County Case File Review, 2855 Mandela Parkway, Oakland, California*, submitted on my behalf to ACDEH's FTP server and the SWRCB's GeoTracker website.

Sincerely yours,

  
Mollie Westphal  
Balco Properties, LLC

21B-001-002



September 29, 2017

**RECEIVED**

By Alameda County Environmental Health 10:56 am, Oct 16, 2017

Mr. Keith Nowell, PG, CHG  
Alameda County Health Care Services Agency  
1131 Harbor Bay Parkway  
Alameda, CA 94502

RE: Response to September 19, 2017, Alameda County Case File Review – Fuel Leak Case  
No. RO0000378 and Geotracker Global ID T0600101522, Wareham Property Development,  
2855 Mandela Parkway, Oakland, CA 94607

Dear Mr. Nowell:

This letter transmits Trihydro Corporation's (Trihydro) Response to Alameda County Department of Environmental Health's (ACDEH) September 19, 2017, letter, regarding the property at 2855 Mandela Parkway in Oakland, California (Figure 1), currently owned by Balco Properties (Balco). Ongoing corrective action activities are conducted pursuant to ACDEH's Local Oversight Program (LOP) via Fuel Leak Case Number RO0000378. Balco has been working with ACDEH since 2006, after acquiring the property. ACDEH's comments, along with responses, are summarized below:

**ACDEH Comment A:**

*Geo\_Bores – More than 30 GEO\_BORE files have been recently submitted to GeoTracker. However, ACDEH has not been able to locate the report(s) containing the logs for the soil bores TR-10 and TR-11 and requests your assistance in locating the document(s) so that we can continue our review of the case files.*

*Additionally, ACDEH has not been able to review the GEO\_BORE files for the soil bores having the prefix 'B' and 'SB'. If not already performed, ACDEH requests submittal of the GEO\_BORE files for these soil bores. Please review your files for additional boring logs not currently located on GeoTracker and submit them for our review.*

*ACDEH requests a listing of the additional GEO\_BORE file submittals be provided via electronic mail to the attention of Keith Nowell. Please provide the file listing by the date specified below.*

**Response to Comment A:**

Trihydro was unable to locate the historical report, authored by previous environmental consultants (Treadwell and Rollo), and containing the boring logs for monitoring wells TR-10 and TR-11. The individual borings logs were however located as part of an electronic file containing many historical boring logs, but no indication of a corresponding report was identified on the individual boring logs. The Treadwell and Rollo letter report "Project Status Report: Interim Corrective Action Plan Implementation", dated February 19, 2008, refers to the installation of monitoring wells TR-10 and TR-11, but does not describe the installation activities or include well construction details or boring logs.



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Boring logs beginning with the prefix “B-“ and “SB-“ were included in Appendix A of Trihydro’s “Focused Site Conceptual Model” report, dated March 11, 2014. Additionally, these logs were uploaded to Geotracker on September 29, 2017. Except where otherwise noted, reports are currently available from the ACDEH LUFT/SLIC website, and were therefore not uploaded to the ACDEH FTP site. A list of reports and associated boring logs is included below:

- ATEC. 1992. *Subsurface Soil Investigation, 2855 Cypress Street, Oakland, California.* July 16. Describes borings B-1 through B-3, and boring logs are listed as an appendix in the table of contents, however, appendices are not included in the electronic version of the report in Trihydro’s archives.
- Ceres. 1998. *Phase II Subsurface Investigation Report.* September 1. Boring logs for SB-1 through SB-7 are included in this report.
- Ceres. 1998. *Phase II Subsurface Investigation Report.* November 18. Boring logs for SB-8 through SB-12 are included in this report.
- Ceres. 1998. *Soil and Groundwater Assessment Report.* December 28. Boring logs for SB-13 through SB-18 are included in this report.
- Treadwell and Rollo. 2000. *1999 Site Investigation and Remediation Activities.* January 21. Boring logs for SB-17 through SB-28, SB-31, SB-33A, and SB-34A are included as Appendix A.
- Treadwell and Rollo. 2001. *Additional Remedial Investigation.* October 23. Boring logs for SB-35 and SB-36 are included as Attachments.

**ACDEH Comment B:**

*Well Construction Diagrams – Well construction documentation conveys information relevant to the relationship of screen interval, depth to water, and lithology. During our review of the GeoTracker submittals, ACDEH noted that the GEO\_BORE files for the many of the groundwater monitoring wells do not contain their associated well construction diagram. According to the Electronic Reporting Regulations (Chapter 30, Division 3 of Title 23 & Division 3 of Title 27, CCR), if a monitor well is installed, the screen depth and interval must be reported. Therefore, ACDEH requests the submittal of the well construction diagram for each of the monitoring wells.*

*ACDEH requests notification, by the date specified below, with the listing of well construction diagram submittals. Please provide the submittals listing via electronic mail, Attention: Keith Nowell.*

**Response to Comment B:**

Well construction diagrams for monitoring wells TR-1 through TR-6 are included on the boring logs uploaded to Geotracker in August 2017. Well construction diagrams for monitoring wells TR-7 through TR-9 are shown on the boring logs uploaded to Geotracker on September 29, 2017, which are



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included as attachments to the Treadwell and Rollo letter report “Additional Remedial Investigation,” dated October 23, 2001. This report has also been uploaded to Geotracker.

Well construction diagrams are not shown on the Treadwell and Rollo boring logs for monitoring wells TR-10 and TR-11, and Trihydro was unable to locate well construction diagrams, or reports containing the boring logs or descriptions of well installation in a search of its electronic archives

**ACDEH Comment C:**

*Groundwater Monitoring – One GEO\_WELL file has been submitted for the case. The submittal contains the most recent and historic depth to water and depth to product information. However, field data sheets have not been located to provide ACDEH with the ability to verify accuracy of the data presented in the submittal. Therefore, ACDEH requests that you identify the respective reports presenting the field monitoring data in order for our agency to continue its review.*

*Alternatively, please (re)submit the reports containing the field data sheets to both the ACDEH FTP and GeoTracker sites and provide notification of the report submittals via electronic mail, Attention: Keith Nowell, listing the files submitted.*

**Response to Comment C:**

Historical groundwater monitoring data has been presented in a variety of reports from several consultants. The file submitted to Geotracker was compiled based on historical data included as Table 2 of the Focused Site Conceptual Model report by Trihydro, dated March 11, 2014. Reports containing fluid level data are listed below. No reports including fluid level data from 2005 and 2006 were found in a search of Trihydro’s electronic archive.

- Treadwell and Rollo. 2000. 1999 Site Investigation and Remediation Activities. January 21.
- Treadwell and Rollo. 2008. *Environmental Activities, First and Second Quarters 2008*. September 9.
- Treadwell and Rollo. 2009. *Groundwater Monitoring Report, Third Quarter 2008*. November 19.
- Trihydro. 2016. *Additional Site Investigation Report*. December 21.

**ACDEH Comment D:**

*Reports – ACDEH was unable to locate the report entitled Environmental Activities First and Second Quarters 2008 on either the ACDEH FTP or on GeoTracker sites. The report was prepared by Treadwell and Rollo for the subject case. ACDEH requests that you identify the report, if present in the case files, to aid in our review. Alternatively, we request the report be (re)submitted to both the ACDEH FTP and*



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*GeoTracker sites. ACDEH will incorporate the data contained in the report in our evaluation of the case under the LTCP.*

*Please review your files for additional reports not currently located on GeoTracker or the ACDEH FTP sites. ACDEH requests that you submit the missing documentation and provide notification, by the date specified below, of the report submittals. Please provide a listing the files submitted via electronic mail: Attention: Keith Nowell.*

**Response to Comment D:**

A copy of the report “*Environmental Activities, First and Second Quarters 2008*” by Treadwell and Rollo, dated September 9, 2008, was uploaded to Geotracker and the ACDEH FTP site on September 29, 2017. This report was found in the Trihydro electronic archives, and appears to be missing any attached figures.

Additional reports that have been uploaded either to Geotracker, the ACDEH FTP site, or both, include the following:

- ATEC. 1992. *Subsurface Soil Investigation, 2855 Cypress Street, Oakland, California.* July 16.
- Ceres. 1998. *Phase II Subsurface Investigation Report.* September 1.
- Ceres. 1998. *Phase II Subsurface Investigation Report.* November 18.
- Ceres. 1998. *Soil and Groundwater Assessment Report.* December 28.
- Treadwell and Rollo. 1999. *Preliminary Results of Source Investigation of Free Product.* June 4.
- Treadwell and Rollo. 1999. *Previous Soil Gas Survey Results and Indoor Air Pathway.* July 6.
- Treadwell and Rollo. 2000. *1999 Site Investigation and Remediation Activities.* January 21.
- Treadwell and Rollo. 2001. *Ambient Air Sampling Results.* March 7.
- Treadwell and Rollo. 2001. *Additional Remedial Investigation.* October 23.
- Treadwell and Rollo. 2002. *Free-Phase Product Monitoring Plan.* June 3.
- Treadwell and Rollo. 2002. *Addendum to the 1999 Remedial Investigation Report.* June 10.
- Treadwell and Rollo. 2004. *Draft Interim Corrective Action Plan.* January 22.
- Treadwell and Rollo. 2004. *Work Plan to Install Underground Fuel Conveyance Piping.* February 23.
- Trihydro. 2017. *Response to July 14, 2017 Technical Comments.* September 15.



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**ACDEH Comment E:**

*Unauthorized Release Report* – A review of the case file indicates an Underground Storage Tank (UST) Site- Unauthorized Release / Contamination Report (URF) form has not been submitted for the subject fuel leak case. ACDEH requests submittal of a completed URF by the date specified below. A copy of the URF may be found at the following SWRCB website:

[http://www.swrcb.ca.gov/ust/forms/docs/unauth\\_release.pdf](http://www.swrcb.ca.gov/ust/forms/docs/unauth_release.pdf).

Please complete the URF and provide to ACDEH as an electronic mail attachment to the attention of Keith Nowell by the date specified below.

**Response to Comment E:**

A completed copy of an Underground Storage Tank Site – Unauthorized Release / Contamination Report (URF) was sent as an electronic mail attachment to Mr. Keith Nowell on July 31, 2017. A copy of this completed form was sent as an electronic mail attachment to Mr. Keith Nowell on September 29, 2017, and was uploaded to the ACDEH FTP site.

Trihydro and Balco anticipates working with ACDEH to schedule a meeting to discuss a path forward for the site. Balco and Trihydro appreciate ACDEH's assistance with this project. Please don't hesitate to contact the undersigned with questions at (360) 312-9109.

Sincerely,  
Trihydro Corporation

Matthew Jones, P.G.  
Project Director

21B-001-002

Attachment

cc: Balco Properties

