ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577

UNITED STATES POSTAGE
PITNEY BOWES
02 1P $ 000.48[5]
0003192449 APR 04 2016
MAILED FROM ZIP CODE 94502

NIXIE 957 SE 1 0004/13/16
RETURN TO SENDER
INSUFFICIENT ADDRESS
UNABLE TO FORWARD
BC: 94502654031 *1405-07625-05-38

IA

Emeryville Properties LLC
c/o Mr. Zachary Wasserman
1111 Broadway
Oakland, CA 94607

IA

945026574 3999

003980

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
REBECCA GEBHART, Acting Director

ENVIRONMENTAL HEALTH DEPARTMENT
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

April 4, 2016

Emeryville Properties LLC
c/o Mr. Zachary Wasserman
1111 Broadway
Oakland, CA 94607

Emeryville Properties LLC
c/o Mr. William Lewerenz
3963 Woodside Ct.
Lafayette, CA 94549

Dolores W. and Anthony W. Geisler
c/o Mr. William Lewerenz
3963 Woodside Ct.
Lafayette, CA 94549

Subject: Request for Data Gap Work Plan; Fuel Leak Case No. RO0000398 and GeoTracker Global ID T0600102202, Chromex, 1400 Park Avenue, Emeryville, CA 94608

Dear Messrs. Wasserman and Lewerenz:

As you are aware, Alameda County Department of Environmental Health (ACDEH) staff has undertaken the review of the case file in order to determine the appropriateness of case closure of the underground storage tank (UST) case at the subject site under the State Water Board's Low Threat Closure Policy (LTCP). As you may be aware, soil vapor has not been evaluated at the site as generally required by the State Water Board's Low Threat Closure Policy (LTCP).

In our initial analysis of the site under the LTCP it had previously appeared that the site could be closed within the requirements of the LTCP without vapor testing; however, ACDEH's recent in-depth review of the case indicates that higher residual soil and groundwater contamination concentrations are present beneath the site than anticipated. In June 2015, concentrations of Total Petroleum Hydrocarbons (TPH) as gasoline were documented up to 130 micrograms per liter (µg/l), TPH as diesel up to 670 µg/l, and TPH as motor oil up to 2,000 µg/l. Residual soil contamination is also present at up to 190 milligrams per kilogram (mg/kg) TPH as gasoline, 1,400 mg/kg TPH as diesel, and 4,200 mg/kg TPH as motor oil. Additionally, naphthalene concentrations do not appear to have been previously analyzed for at the site, and in order to evaluate the site under the policy, it appears appropriate to evaluate the magnitude of naphthalene contamination in association with the residual hydrocarbon contamination at the site.

The LTCP allows elevated concentrations of petroleum hydrocarbons to remain at a site, provided the extent is understood and there is no risk to receptors either on- or off-site. In our analysis it appears that onsite residual contamination can be managed with a land use restriction (at the time of redevelopment, including existing building reconfigurations, the proposed redevelopment is re-evaluated relative to residual site contamination).

It has also been the experience of ACDEH that residual hydrocarbon contamination of this magnitude has a reasonable likelihood of generating sufficient subsurface methane concentrations in impacted areas proximal to the release to be an explosive hazard (above the Lower Explosive Level or LEL). Due to the poorly constrained groundwater flow direction, which includes a northward component, and the presence of an offsite building approximately 55 feet north of the release location, it appears appropriate to request the investigation and evaluation of the risk of explosive conditions to the offsite structure due to the generation of methane by degradation of residual petroleum hydrocarbons. Due to the unevaluated extent of naphthalene contamination at the site, it also appears appropriate to include naphthalene in the vapor analytical suite.

As you are aware ACEH has previously undertaken the review of case files and documents with regards to the LTCP. Based on ACEH staff review, including the more recently collected data, the site, in its current building and use configuration, generally appears to meet all LTCP criteria. However, the potential for explosive subsurface conditions due to methane generation and accumulation downgradient and offsite do not allow the environmental case to meet the nuisance general criteria yet (General Criteria h). Please be aware that while methane generation may be a future concern for any onsite