DUDEK

MAIN OFFICE
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September 26, 2016

Mr. Mark Detterman - Senior Hazardous Materials Specialist, PE, CEG
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502

Subject: ***Modification to Workplan for Additional Soil and Soil Vapor Sampling Required for Underground Storage Tank Closure, Former Charles Lowe Facilty, 1400 Park Avenue, Emeryville, CA***

Dear Mr. Detterman,

As discussed in our meeting on September 20, 2016 (meeting), Dudek would like to modify our May 2016 Workplan for Additional Soil and Soil Vapor Sampling Required for Underground Storage Tank (UST) Closure at the Former Charles Lowe Facility located at 1400 Park Avenue in Emeryville, California (Site). The requested modifications are designed to:

1. Present the results of previous testing of soils from beneath the USTs for naphthalene, thus satisfying the requirement for analysis of soils for this chemical of concern;
2. Provide documentation of DTSC approval of the use of a GEM 2000 for testing methane, oxygen and carbon dioxide, thus allowing for the use of this testing methodology;
3. Address the comments submitted by Alameda County Department of Environmental Health (ACDEH) in their letter dated June 30, 2016 by changing the depth of soil vapor samples and through the suggested use helium as a real time leak check compound
4. Change the number and locations of soil vapor samples collected and analyzed for methane, oxygen and carbon dioxide, as discussed in our meeting.

Previous Naphthalene Soil Sample Data

On November 13, 1995, following the removal if the two gasoline USTs and one diesel/motor oil UST at the Site, a soil sample was collected from the stockpile of impacted soils and labelled STKP-11/13 (Aqua Science Engineers, January, 1996). This grab sample of the hydrocarbon impacted soils was analyzed for SVOCs via EPA Method 8270, the results of which are included in this letter as **Attachment A**. The laboratory analytical results show a detection of naphthalene in soil at 2.0 mg/kg. This concentration is below the United States EPA Region 9 Screening Levels (RSLs) for both residential (3.8 mg/kg) and commercial (17 mg/kg) land use. No DTSC HERO Note 3 values exist for naphthalene in soil. Since the sample analyzed for naphthalene represented the worst hydrocarbon impacted soils excavated from below the USTs, the concentrations of naphthalene remaining in Site soils do not present a significant threat to human health, and require no additional sampling to allow for Low Threat Closure of the USTs and the Site.

DTSC Acceptance of Use of Hand Held Instruments for Monitoring Methane in Soil Vapor

As stated in the 2012 DTSC Advisory – Active Soil Gas Investigations:

> *"Methane may also be measured with a hand held gas emissions monitor or analyzer…..*
> - *Fixed and biogenic gases such as oxygen, carbon dioxide, methane and ethylene should be analyzed to determine whether methanogenesis is occurring. The RL for oxygen and carbon dioxide should be one percent or less….*
>
> *Hand-held instruments should be calibrated in accordance with the manufacturer's specifications. At least 10 percent of all positive detections with concentrations of more than 5,000 parts per million by volume (ppmV) should be confirmed by another hand-held instrument (either different unit or a different brand)…."*

Accordingly, soil vapor samples will be collected from the installed temporary vapor probes and analyzed for methane, carbon dioxide and oxygen using a GEM 5000 meter. This meter's accuracy falls within the DTSC specified limits, with the following accuracy:

- Methane +/- 0.3% to 0.5% at concentrations less than 70-15%
- Oxygen +/- 1% at concentrations less than 25%
- Carbon Dioxide +/- 0.3% to 0.5% at concentrations less than 60%.

These reporting limits and accuracy are documented in the Gem 5000 manufacturer's fact sheet included as **Attachment B.** Two GEM 5000 will be brought to the Site, to allow for confirmation measurements, if needed. Each of the hand-held meters will be calibrated using manufacturer's specification before their use in the field. As specified in the DTSC guidance document, if concentrations of methane in excess of 5,000 ppmV or 0.5% are detected, a second hand-held instrument will be used to confirm the detection.

Revised Workplan

With your approval Dudek will sample soil vapor from temporary vapor probes advanced to 6.5 feet below ground surface (ft bgs) in 3 locations surrounding the former USTs (see **Figure 1** – sample points SV1, SV2 and SV3). Following a 3 volume purge, soil vapor samples will be collected from the vapor probes and measured for methane, carbon dioxide and oxygen levels using a GEM 5000 meter. 3 soil vapor samples will also be collected in thermal desorption tubes for analysis for naphthalene using EPA Method TO-17 and shipped under chain of custody documentation to ALS Laboratories. At the time of collection of these soil vapor samples, a helium tracer will be used as a leak detection compound.

If elevated levels of methane are measured in these three soil vapor points, two additional vapor probes (DSVA and DSVB) will be installed and sampled at 2 locations far from the USTs to look for potential vapor impacts related to other known and unknown releases from neighboring properties. If you have any questions regarding this Workplan, please contact the undersigned at (949) 378-8448.

Respectfully submitted,

Gwen Tellegen, PE
Principal Engineer

Attachments:
Figure 1 – Soil Vapor Sample Locations
Attachment A – Previous Laboratory Data for Naphthalene in Soil at USTs
Attachment B – Excerpts of DTSC Active Soil Gas Advisory Document Describing Allowable Methane Measurement Methods

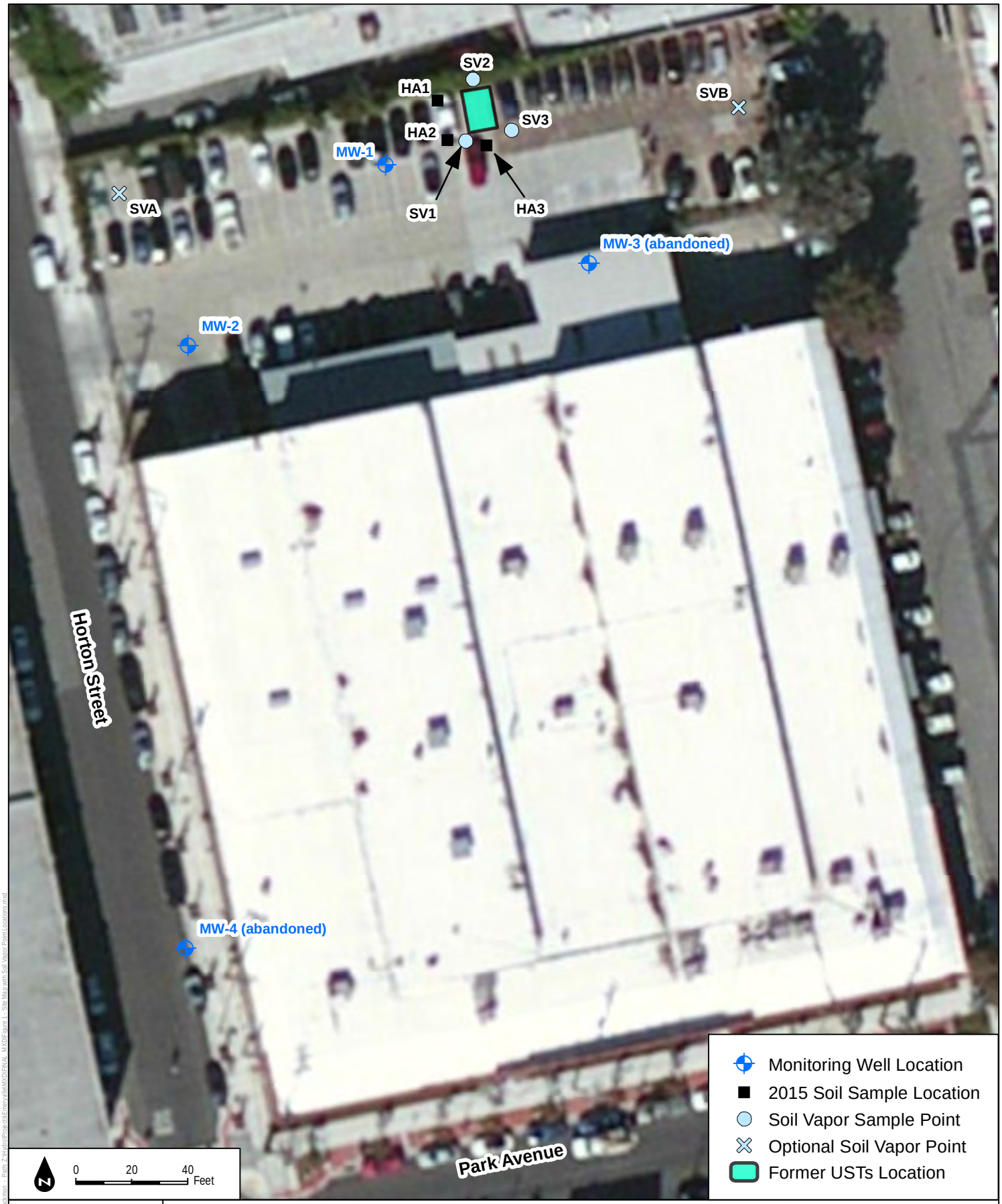

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FIGURE 1

Site Map with Soil Vapor Point Locations

1400 Park Avenue, Emeryville, California

May 2016

ATTACHMENT A
LABORATORY ANALYTICAL DATA FOR NAPHTHALENE IN SOIL AT USTS

CHROMALAB, INC.

Environmental Services (SDB)

November 17, 1995 *Submission #:* 9511222

MCCAMPBELL ANALYTICAL, INC.

Atten: Ed Hamilton

Project: A.S./E.P. *Project#:* 5271
Received: November 14, 1995

re: One sample for Semivolatile Organics (BNAs) analysis.
Method: EPA 3550/8270

SampleID: **STKP-11/13**
Sample #: 110472 *Matrix:* SOIL *Extracted:* November 14, 1995
Sampled: November 13, 1995 *Run:* 9371-A *Analyzed:* November 16, 1995

Analyte	RESULT (mg/Kg)	REPORTING LIMIT (mg/Kg)	BLANK RESULT (mg/Kg)	BLANK SPIKE RESULT (%)
PHENOL	N.D.	1.0	N.D.	--
BIS(2-CHLOROETHYL)ETHER	N.D.	1.0	N.D.	--
2-CHLOROPHENOL	N.D.	1.0	N.D.	74
1,3-DICHLOROBENZENE	N.D.	1.0	N.D.	--
1,4-DICHLOROBENZENE	N.D.	1.0	N.D.	--
BENZYL ALCOHOL	N.D.	2.0	N.D.	--
1,2-DICHLOROBENZENE	N.D.	1.0	N.D.	--
o-METHYLPHENOL	N.D.	1.0	N.D.	--
BIS(2-CHLOROISOPROPYL)ETHER	N.D.	1.0	N.D.	--
m+p-METHYLPHENOL	N.D.	2.0	N.D.	--
N-NITROSO-DI-N-PROPYLAMINE	N.D.	1.0	N.D.	64
HEXACHLOROETHANE	N.D.	1.0	N.D.	--
NITROBENZENE	N.D.	1.0	N.D.	--
ISOPHORONE	N.D.	1.0	N.D.	--
2-NITROPHENOL	N.D.	1.0	N.D.	--
2,4-DIMETHYLPHENOL	N.D.	1.0	N.D.	--
BIS(2-CHLOROETHOXY)METHANE	N.D.	1.0	N.D.	--
2,4-DICHLOROPHENOL	N.D.	1.0	N.D.	--
1,2,4-TRICHLOROBENZENE	N.D.	1.0	N.D.	62
NAPHTHALENE	2.0	1.0	N.D.	--
4-CHLOROANILINE	N.D.	2.0	N.D.	--
HEXACHLOROBUTADIENE	N.D.	1.0	N.D.	--
4-CHLORO-3-METHYLPHENOL	N.D.	2.0	N.D.	89
2-METHYLNAPHTHALENE	3.2	1.0	N.D.	--
HEXACHLOROCYCLOPENTADIENE	N.D.	1.0	N.D.	--
2,4,6-TRICHLOROPHENOL	N.D.	1.0	N.D.	--
2,4,5-TRICHLOROPHENOL	N.D.	1.0	N.D.	--
2-CHLORONAPHTHALENE	N.D.	5.0	N.D.	--
2-NITROANILINE	N.D.	1.0	N.D.	--
DIMETHYL PHTHALATE	N.D.	5.0	N.D.	--
ACENAPHTHYLENE	N.D.	1.0	N.D.	--
3-NITROANILINE	N.D.	5.0	N.D.	--
ACENAPHTHENE	N.D.	1.0	N.D.	71
2,4-DINITROPHENOL	N.D.	5.0	N.D.	--
4-NITROPHENOL	N.D.	5.0	N.D.	--
DIBENZOFURAN	N.D.	1.0	N.D.	--
2,4-DINITROTOLUENE	N.D.	1.0	N.D.	--
2,6-DINITROTOLUENE	N.D.	2.0	N.D.	--
DIETHYL PHTHALATE	N.D.	5.0	N.D.	--

CHROMALAB, INC.

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November 17, 1995 *Submission #:* 9511222

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Sampled: November 13, 1995 *Run:* 9371-A *Analyzed:* November 16, 1995

Analyte	RESULT (mg/Kg)	REPORTING LIMIT (mg/Kg)	BLANK RESULT (mg/Kg)	BLANK SPIKE RESULT (%)
4-CHLOROPHENYL PHENYL ETHER	N.D.	1.0	N.D.	--
FLUORENE	N.D.	1.0	N.D.	--
4-NITROANILINE	N.D.	5.0	N.D.	--
4,6-DINITRO-2-METHYLPHENOL	N.D.	5.0	N.D.	--
N-NITROSO-DI-N-PHENYLAMINE	N.D.	1.0	N.D.	--
4-BROMOPHENYL PHENYL ETHER	N.D.	1.0	N.D.	--
HEXACHLOROBENZENE	N.D.	1.0	N.D.	--
PENTACHLOROPHENOL	N.D.	5.0	N.D.	68
PHENATHRENE	N.D.	1.0	N.D.	--
ANTHRACENE	N.D.	1.0	N.D.	--
DI-N-BUTYL PHTHALATE	N.D.	5.0	N.D.	--
FLUORANTHENE	N.D.	1.0	N.D.	--
PYRENE	N.D.	1.0	N.D.	55
BUTYL BENZYL PHTHALATE	N.D.	5.0	N.D.	--
3,3'-DICHLOROBENZIDINE	N.D.	2.0	N.D.	--
BENZO(A)ANTHRACENE	N.D.	1.0	N.D.	--
BIS(2-ETHYLHEXYL)PHTHALATE	6.6	5.0	N.D.	--
CHRYSENE	N.D.	1.0	N.D.	--
DI-N-OCTYL PHTHALATE	N.D.	5.0	N.D.	--
BENZO(B)FLUORANTHENE	N.D.	1.0	N.D.	--
BENZO(K)FLUORANTHENE	N.D.	2.0	N.D.	--
BENZO(A)PYRENE	N.D.	0.5	N.D.	--
INDENO(1,2,3 C,D)PYRENE	N.D.	2.0	N.D.	--
DIBENZ(A,H)ANTHRACENE	N.D.	2.0	N.D.	--
BENZ(G,H,I)PERYLENE	N.D.	2.0	N.D.	--

For above analyte: *REPORTING LIMITS RAISED BY 10X DUE TO MATRIX INTERFERENCE*

Alex Tam
Chemist

Eric Tam
Laboratory Director

McCAMPBELL ANALYTICAL INC.
110 2nd Avenue South, #D7, Pacheco, CA 94553
Tele: 510-798-1620 Fax: 510-798-1622

Aqua Science Engineers, Inc. 2411 Old Crow Canyon Rd., # 4 San Ramon, CA 94583	Client Project ID: # 2908; Emeryville Properties	Date Sampled: 11/13/95
		Date Received: 11/14/95
	Client Contact: David Allen	Date Extracted: 11/17/95
	Client P.O:	Date Analyzed: 11/17-11/19/95

Volatile Organics By GC/MS

EPA method 624 or 8240

Lab ID	58676
Client ID	STKP-11/13
Matrix	S

Compound	Concentration*	Reporting Limit W	Reporting Limit S	Compound	Concentration*	Reporting Limit W	Reporting Limit S
Acetone (b)	ND< 100	0.5	5	cis-1,3-Dichloropropene	ND< 100	0.5	5
Benzene	ND< 100	0.5	5	trans-1,3-Dichloropropene	ND< 100	0.5	5
Bromodichloromethane	ND< 100	0.5	5	Ethylbenzene	340	0.5	5
Bromoform	ND< 100	0.5	5	Methyl butyl ketone (d)	ND< 100	0.5	5
Bromomethane	ND< 100	0.5	5	Methylene Chloride(e)	ND< 100	0.5	5
Carbon Disulfide	ND< 100	0.5	5	Methyl ethyl ketone (f)	ND< 100	0.5	5
Carbon Tetrachloride	ND< 100	0.5	5	Methyl isobutyl ketone (g)	ND< 100	0.5	5
Chlorobenzene	ND< 100	0.5	5	Styrene (k)	ND< 100	0.5	5
Chloroethane	ND< 100	0.5	5	1,1,2,2-Tetrachloroethane	ND< 100	0.5	5
2-Chloroethyl Vinyl Ether(c)	ND< 100	0.5	5	Tetrachloroethene	ND< 100	0.5	5
Chloroform	ND< 100	0.5	5	Toluene (l)	ND< 100	0.5	5
Chloromethane	ND< 100	0.5	5	1,1,1-Trichloroethane	ND< 100	0.5	5
Dibromochloromethane	ND< 100	0.5	5	1,1,2-Trichloroethane	ND< 100	0.5	5
1,2-Dichlorobenzene	ND< 100	0.5	5	Trichloroethene	ND< 100	0.5	5
1,3-Dichlorobenzene	ND< 100	0.5	5	Trichlorofluoromethane	ND< 100	0.5	5
1,4-Dichlorobenzene	ND< 100	0.5	5	Vinyl Acetate (m)	ND< 100	0.5	5
1,1-Dichloroethane	ND< 100	0.5	5	Vinyl Chloride (n)	ND< 100	0.5	5
1,2-Dichloroethane	ND< 100	0.5	5	Xylenes, total (o)	5200	0.5	5
1,1-Dichloroethene	ND< 100	0.5	5	**Surrogate Recoveries (%)**			
cis-1,2-Dichloroethene	ND< 100	0.5	5	Dibromofluoromethane	112		
trans-1,2-Dichloroethene	ND< 100	0.5	5	Toluene-d8	98		
1,2-Dichloropropane	ND< 100	0.5	5	4-Bromofluorobenzene	108		

Comments: j

* water and vapor samples are reported in ug/L, soil samples in ug/kg and all TCLP extracts in ug/L

ND means not detected above the reporting limit; N/A means analyte not applicable to this analysis

(b) 2-propanone or dimethyl ketone; (c) (2-chloroethoxy) ethene; (d) 2-hexanone; (e) dichloromethane; (f) 2-butanone; (g) 4-methyl-2-pentanone or isopropylacetone; (h) lighter than water immiscible sheen is present; (i) liquid sample that contains greater than ~ 5 vol. % sediment; (j) sample diluted due to high organic content; (k) ethenylbenzene; (l) methylbenzene; (m) acetic acid ethenyl ester; (n) chloroethene; (o) dimethylbenzenes.

DHS Certification No. 1644

Edward Hamilton, Lab Director

CV 2222 110 4th C

24994

McCAMPBELL ANALYTICAL

110 2nd AVENUE, # D7
PACHECO, CA 94553
(510) 798-1620 FAX (510) 798-1622

CHAIN OF CUSTODY RECORD

TURN AROUND TIME: ☐ RUSH ☐ 24 HOUR ☐ 48 HOUR ☐ 5 DAY

REPORT TO: Ed Hamilton BILL TO: MAI

COMPANY: McCampbell

TELE: ABOVE FAX #:

PROJECT NUMBER: 5271 PROJECT NAME: A.S./E.P.

PROJECT LOCATION: SAMPLER SIGNATURE:

SAMPLE ID	LOCATION	SAMPLING DATE	SAMPLING TIME	# CONTAINERS	TYPE CONTAINERS	MATRIX: WATER	SOIL	AIR	SLUDGE	OTHER	METHOD PRESERVED: HCL	HNO_3	OTHER	ICE
STKP-11/13	Emeryville	11-13-95	14:05	1	VOA		X							X

ANALYSIS REQUEST

BTEX & TPH as Gasoline (602/8020 & 8015)	THP as Diesel (8015)	Total Petroleum Oil & Grease (5520 E&F/5520 B&F)	Total Petroleum Hydrocarbons (418.1)	EPA 601/8010	EPA 602/8020	EPA 608/8080	EPA 608/8080 - PCBs Only	EPA 624/8240/8260	EPA 625/8270	CAM - 17 Metals	EPA - Priority Pollutant Metals	LEAD (7240/7421/239.2/6010)	ORGANIC LEAD	RCI	OTHER	COMMENTS
									X							586776

RUSH

SUBM #: 9511222 REP: GC
CLIENT: MCCAM
DUE: 11/17/95
REF #:24994

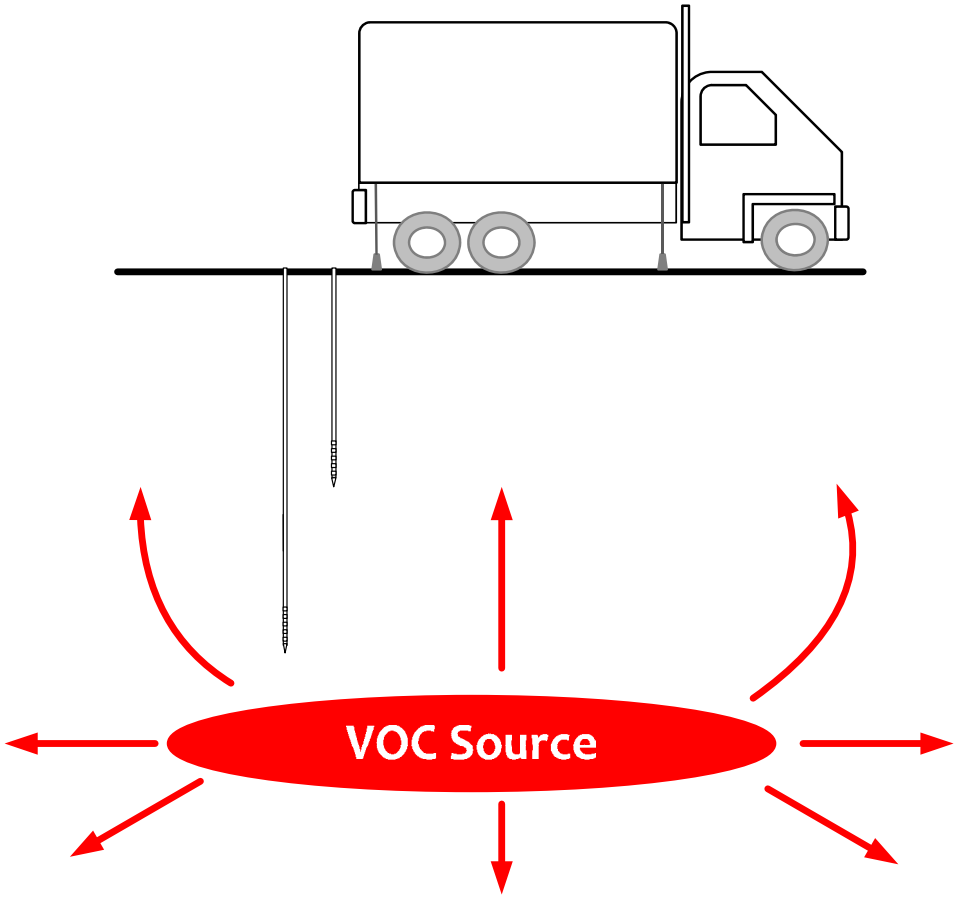
RELINQUISHED BY	DATE	TIME	RECEIVED BY
Heidi Rucker	11/14/95	1446	
RELINQUISHED BY	DATE	TIME	RECEIVED BY
Peter Hook	11-14-95	15:10	
RELINQUISHED BY	DATE	TIME	RECEIVED BY LABORATORY
			Mimie Pak 11/14/95 1510

REMARKS: 72 HR. TAT

ATTACHMENT B
DTSC ACCEPTED METHANE SAMPLING METHODS IN SOIL VAPOR FROM

Department of Toxic Substances Control, California Regional Water Quality Control Board Los Angeles/San Francisco Regions, Advisory – Active Soil Gas Investigations, April 2012.

ADVISORY
ACTIVE SOIL GAS INVESTIGATIONS



California Environmental Protection Agency
Department of Toxic Substances Control
Los Angeles Regional Water Quality Control Board
San Francisco Regional Water Quality Control Board

April 2012

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FIGURES

TABLES

APPENDICES

7.0 METHANE AND HYDROGEN SULFIDE SAMPLING PROGRAMS

7.1 METHANE

There are several analytical methods appropriate for methane, including:

- USEPA Methods 8015B modified;
- TO-3, 3C;
- ASTM Method D1945; or
- ASTM Method D1946.

Methane may also be measured with a hand held gas emissions monitor or analyzer. The RLs for methane analysis should be determined by project-specific DQOs.

7.1.1 Methane Field Collection

The following procedures should be followed when collecting samples for methane analysis:

- Methane should be collected in gas-tight sample containers such as passivated stainless steel canisters or polymer gas sampling bags.

- Fixed and biogenic gases such as oxygen, carbon dioxide, methane and ethylene should be analyzed to determine whether methanogenesis is occurring. The RL for oxygen and carbon dioxide should be one percent or less.

- Prior to sampling, tubing or probe pressure should be recorded in the field logs and reported along with the methane concentration to determine if the area is pressurized.

7.1.2 Methane Laboratory Analysis

GC calibration curves for analytes such as methane should be recorded and reported. Hand-held instruments should be calibrated in accordance with the manufacturer's specifications. At least 10 percent of all positive detections with concentrations more than 5,000 parts per million by volume (ppmv) should be confirmed by another hand-held instrument (either different unit or a different brand) or by a GC method when a hand-held instrument is used.

7.2 HYDROGEN SULFIDE

Hydrogen sulfide may be analyzed using:

- South Coast Air Quality Management District Method 307-91;
- ASTM D5504;
- USEPA Method 16;
- Draeger™ tubes; or
- Other equivalent methods.

LANDTEC

GEM™5000

PORTABLE GAS ANALYZER INSTRUMENTATION

The Next Generation of GEM™ Instrument

The GEM™5000 is designed specifically for use on landfills to monitor Landfill Gas (LFG) Collection & Control Systems. The GEM™5000 samples and analyzes the methane, carbon dioxide and oxygen content of landfill gas with options for additional analysis.

- **Six Times More Accurate and Twice as Fast**
- **NEW Annual recommended factory service**
- **Available with GPS and additional gas detection**

Details on back

Used For

Landfill Gas Collection & Control Systems
Environmental Compliance
Landfill Gas to Energy
Subsurface Migration Probes

WWW.LANDTECNA.COM

GEM™5000

PORTABLE GAS ANALYZER INSTRUMENTATION

Features

- Measures % CH_4, CO_2 and O_2 Volume, static pressure and differential pressure
- Calculates balance gas, flow (SCFM) and calorific value
- CO and H_2S (on Plus models only)
- High Accuracy and Fast Response Time
- Lighter and More Compact
- Certified intrinsically safe for landfill use
- Annual recommended factory service
- Calibrated to ISO/IEC 17025
- 3 year warranty with optional service plan

Applications

- Landfill Gas Collection & Control Systems
- Environmental Compliance
- Landfill Gas to Energy
- Subsurface Migration Probes

Key Benefits

- Designed specifically for use on landfills to monitor landfill gas (LFG) extraction systems, flares, and migration control systems.
- No need to take more than one instrument to site
- Can be used for monitoring subsurface migration probes and for measuring gas composition, pressure and flow in gas extraction systems
- The user is able to set up comments and questions to record information at site and at each sample point
- Ensures consistent collection of data for better analysis
- Streamlined user experience reduces operational times

Technical Specification

Gas Ranges

Gases Measured	CH_4	By dual wavelength infrared cell with reference channel		
	CO_2	By dual wavelength infrared cell with reference channel		
	O_2	By internal electrochemical cell		
	CO	By internal electrochemical cell		
	H_2S	By internal electrochemical cell		
Ranges	CH_4	0-100% (vol)		
	CO_2	0-100% (vol)		
	O_2	0-25% (vol)		
	CO	0-2000ppm***		
	H_2S	0-500ppm***		
Gas Accuracy*	CH_4	0-5% ± 0.3% (vol)	0-70% ± 0.5% (vol)	70-100% ± 1.5% FS
	CO_2	0-5% ± 0.3% (vol)	0-60% ± 0.5% (vol)	60-100% ± 1.5% FS
	O_2	0-25% ±1.0% (vol)		
	$CO(H_2)$**	0-2000ppm ± 1.0% FS		
	H_2S	0-500ppm ± 2.0% FS		

* Typical accuracy after calibration as recommended in the operations manual.
**Hydrogen compensated Carbon Monoxide measurement.
***Additional ranges available, contact LANDTEC for more information

Other Parameters

	Unit	Resolution	Comments
Energy	BTU/hr	1000 BTU/hr	Calculated from specific parameters
Static Pressure	in. H_2O	0.1 in. H_2O	Direct Measurement
Differential Pressure	in. H_2O	0.001 in. H_2O	Direct Measurement

Important Note: The information in this document is correct at the time of generation. We do, however, reserve the right to change the specification without prior notice as a result of continuing development.

Pump

Flow	Typically 550cc/min
Flow with 80 in. H2O vacuum	Approximately 80cc/min

Environmental Conditions

Operating Temperature Range	14°F – 122°F (-10°C - 50°C)
Operating Pressure	-100 in. H_2O, +100 in. H_2O (-250mbar, +250mbar)
Relative Humidity	0-95% non condensing
Barometric Pressure	± 14.7 in.Hg (±500mbar) from calibration pressure
Barometric Pressure Accuracy	± 1% typically

Power Supply

Battery Life	Typical use 8 hours from fully charged
Charge Time	Approximately 3 hours from complete discharge

Certification Rating

ATEX	II 2G Ex ib IIA T1 Gb (Ta= -10°C to +50°C)
ISO17025	ISO/IEC17025:2010 Accreditation #66916
CSA	Ex ib IIA T1 (Ta= -10°C to +50°C) (Canada), AEx ib IIA T1 (Ta= -10°C to +50°C) USA

Associations

SWANA MEMBER
ISWA International Solid Waste Association
The Climate Registry
American biogas Council

Certifications

BSI
Ex
SP US
IEC
Ex SIR 002

Contacts

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LANDTEC