



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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September 23, 2014

Stephen Boyd
Pacific Electric Motor Company
137 Fiesta Circle
Orinda, CA 94563-4350

Mala Batra
Aspire Public Schools
1001 22nd Avenue, Suite 100
Oakland, CA 94606
(Sent via E-mail to: Mala.Batra@aspirepublicschools.org)

Richard R. Anderson
Modad Properties, LLC
561 4th Street
Oakland, CA 94607-3558

Subject: Case File Review for Fuel Leak Case No. RO0000411 and GeoTracker Global ID T0600101950, Pacific Electric Motors, 1009 66th Avenue, Oakland, CA 94621

Dear Responsible Parties:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted document entitled, "*Revised Vapor Intrusion Evaluation Work Plan, Former Pacific Electric Motors Site, 1009 66th Avenue, Oakland, California*" dated September 12, 2014 (Work Plan). The Work Plan, which was prepared on your behalf by ARCADIS, presents plans to conduct soil vapor sampling and crawl space air sampling for existing Building 200.

Based on our review of the Work Plan, the proposed soil vapor sampling is acceptable as proposed. However, we request that additional information be presented in a Work Plan Addendum regarding the proposed crawl space sampling. Please see the Technical Comments below regarding the specific additional information that is requested regarding the crawl space sampling. The Work Plan Addendum is to be submitted no later than November 21, 2014.

ACEH also reviewed the recently submitted report entitled, "*Soil Vapor Assessment Report for Proposed Gymnasium, Former Pacific Electric Motors Site, 1009 66th Avenue, Oakland, California*" dated September 23, 2014 (Assessment Report). The Assessment Report presents results from sampling of soil vapor probes SVP-1 through SVP-5 within the footprint of the planned gymnasium. Total petroleum hydrocarbons as gasoline were detected at concentrations ranging from 12,000 to 490,000 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). Benzene was detected at concentrations ranging from 98 to 4,300 $\mu\text{g}/\text{m}^3$. The Assessment Report recommends an evaluation as to whether remediation is necessary to reduce soil gas concentrations and the design of a vapor mitigation system. ACEH has no objection to this proposed approach at this time pending review of the evaluation and mitigation system design. Please submit the evaluation and design no later than November 3, 2014.

In order to provide opportunities for public participation regarding the vapor intrusion assessment for Building 200 and the proposed vapor mitigation for the future gymnasium, we also request that you submit a Public Participation Plan for the site. The Public Participation Plan is to incorporate elements from the California Department of Toxic Substances, "*Vapor Intrusion Public Participation Advisory*," dated March 2012 that are relevant based on the results to date and the proposed actions for the site. Please submit the Public Participation Plan no later than November 3, 2014.

TECHNICAL COMMENTS ON WORK PLAN

1. **Soil Vapor Sampling.** The proposed soil vapor sampling locations (SVP-6 through SVP-10) are acceptable. The proposed sampling and analytical protocol also appear to be acceptable.
2. **Crawl Space Sampling.** The Work Plan currently proposes the collection of one crawl space sample beneath Building 200. We request that the number of crawl space samples be increased to adequately characterize air quality throughout the crawl space. The locations of the crawl space samples are to be shown on a figure in the Work Plan Addendum that includes the locations of any partitions or other structural elements that may act as barriers to air flow within the crawl space. Please also include on the site figure, the locations of interior walls and show the use of the various rooms over the crawl space. We suggest that you complete a building reconnaissance that includes the crawl space prior to completing the Work Plan Addendum and present the results of the reconnaissance in the Work Plan Addendum.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Jerry Wickham), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **November 3, 2014** – Public Participation Plan
File to be named: WP_R_YYYY-mm-dd RO0411
- **November 3, 2014** – Evaluation and Design for Proposed Gymnasium
File to be named: RISK_RDIP_R_YYYY-mm-dd RO0411
- **November 21, 2014** – Work Plan Addendum for Vapor Intrusion Evaluation of Existing Building
File to be named: WP_ADEND_R_YYYY-mm-dd RO0411

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.

Responsible Parties
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If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org. Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Attachments: Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (*Sent via E-mail to: lgriffin@oaklandnet.com*)

Carmen Santos, USEPA Region 9 (LND-4-1), 75 Hawthorne Street, San Francisco, CA 94105,
(*Sent via E-mail to: santos.carmen@epa.gov*)

Tim Simon, Aspire Public Schools (*Sent via E-mail to: Tim.Simon@aspirepublicschools.org*)

Erica Kalve, ARCADIS, 2000 Powell Street, Suite 700, Emeryville, CA 94608-1827 (*Sent via E-mail to: Erica.Kalve@arcadis-us.com*)

Jerry Wickham, ACEH (*Sent via E-mail to: jerry.wickham@acgov.org*)
GeoTracker, eFile

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

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.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) GeoTracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the GeoTracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) 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 registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional 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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- **Signature pages and perjury statements must be included and have either original or electronic signature.**
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Submission Instructions

- 1) Obtain User Name and Password
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to deh.loptoxic@acgov.org
 - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses**, and the **Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to deh.loptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.