



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
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February 3, 2016

Mr. Todd Wiederhold
Printpack, Inc.
2800 Overlook Parkway
Atlanta, GA 30339

Ms. Regina Colbert
James River Corporation
2101 Williams Street
San Leandro, CA 94577

Ms. Carey Andre
2101 Williams Associates LLC
2228 Livingston Street
Oakland, CA 94606
(sent via electronic mail to:
carey@jonesdevelopers.com)

Subject: Request for Work Plan; SLIC Case RO0002468 and Geotracker Global ID T06019771096,
James River Corporation, 2101 Williams Street, San Leandro, CA 94577

Dear Mr. Wiederhold and Mesdames Colbert and Andre:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Indoor Air Investigation Report (IA1 to IA3, and AA1)*, dated October 29, 2015, and the *Subsurface Investigation Report (M1 to M6)*, dated October 30, 2015. The reports were prepared and submitted on your behalf by P & D Environmental, Inc (P & D). Thank you for submitting the reports. The results of the two recent investigations have documented the collection of three indoor air and one outdoor air vapor samples and the installation of multiple soil bores at six locations (M1 to M6) to vertically profile groundwater tetrachlorethene (PCE) concentrations at multiple depths beneath the site.

Indoor air concentrations of PCE were detected at the two of the three indoor air sampling locations above the San Francisco Bay Regional Water Quality Control Board (RWQCB) Environmental Screening Level (ESL) for commercial indoor air PCE concentration of 2.1 $\mu\text{g}/\text{m}^3$. Concentrations of PCE in indoor air ranged between 1.7 to 7.9 $\mu\text{g}/\text{m}^3$. Based on these results, P & D calculated the incremental increase in carcinogenic risk and hazard quotient using equations contained in the RWQCB User Guide associated with the ESLs. Based on these calculations the hazard quotient was calculated to be substantially less than 1.0 (varied between 0.02 and 0.05), whereas the cumulative incremental carcinogenic risk at two indoor air sampling locations were determined to be 1.1E-06 and 3.8E-06. These are greater than the established one in one million (or 1.0E-06) excess cancer risks that requires further evaluation in accordance with Department of Toxic Substance Control (DTSC) guidance. However, the calculated cumulative incremental carcinogenic risks at the locations do not appear to represent a short term, or imminent, health concern.

Additionally, and in general, soil bore locations M1 to M6 documented the presence of four to six feet of granular fill beneath the building at the site, encountered PCE in shallower (approximately 20 feet below grade surface [bgs]) upgradient groundwater at generally non-detectable concentrations, whereas deeper (approximately 35 feet bgs) upgradient groundwater PCE concentrations were higher (up to 330 micrograms per liter [$\mu\text{g}/\text{l}$]) PCE. Concentrations of PCE in shallower groundwater in the downgradient direction were generally higher, including over groundwater ESLs, whereas deeper downgradient groundwater PCE concentrations were generally lower. The reasons for shallower groundwater in the downgradient direction to contain higher PCE concentrations could not be determined, but may include an onsite source. Both reports recommended an additional sub-slab vapor investigation to identify areas with higher concentrations of PCE vapor beneath the building for subsequent followup with a soil bore investigation in order to characterize potential PCE sources, and to define an effective remediation strategy.

Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below.

TECHNICAL COMMENTS

1. **Request for Work Plan** – ACEH is in general concurrence with the recommendation to initially proceed with an additional sub-slab vapor investigation in order to identify areas beneath the building with higher concentrations of PCE vapor. An additional followup soil bore investigation for the purpose of characterizing potential PCE sources, and to define an effective remediation strategy is likely. The addition of a contingency for potential source characterization soil bores, after the submittal of tabulated sub-slab vapor data and figures may be an appropriate method to eliminate the submittal and review of multiple work plans. Please submit a work plan to address the comments above, by the date identified below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below, according to the following schedule:

- **April 15, 2016** – Work Plan
File to be named: RO2468_WP_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 is not listed on the first page of this letter, or in the list of cc's listed below, ACEH is requesting your email address to help expedite communications and to help lower overall costs.

Should you have any questions, please contact 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
Electronic Report Upload (ftp) Instructions

cc: Paul King, P & D Environmental, Inc, 55 Santa Clara Avenue, Suite 240, Oakland, CA 94610, (sent via electronic mail to: pdking0000@aol.com)

Tom Graff, GrafCon, P.O. Box 1105, Tiburon, CA 94920, (sent via electronic mail to Tom@grafcon.us)

Cherie D'Andrea McCaulou, San Francisco Bay Region, State Water Resources Control Board, 1515 Clay Street, Suite 1400, Oakland, CA 94612; (sent via electronic mail to cmccaulou@waterboards.ca.gov)

Dilan Roe, ACEH (sent via electronic mail to dilan.roe@acgov.org)

Mark Detterman, ACEH (sent via electronic mail to mark.detterman@acgov.org)
Electronic File, Geotracker

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.