

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

COLLEEN CHAWLA, Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY, SUITE 250
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

December 3, 2018

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 Addendum, with Conditional Work Plan Approval; SLIC Case RO0002468 and Geotracker Global ID T06019771096, James River Corporation, 2101 – 2125 Williams Street, San Leandro, CA 94577

Dear Mr. Wiederhold and Mesdames Colbert and Andre:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the *Vapor Intrusion Evaluation Work Plan*, dated November 13, 2018. The work plan was prepared and submitted on your behalf by West Environmental Services & Technology. Thank you for submitting the work plan.

The work plan proposed to collect subslab or crawl space soil vapor at three tentative locations beneath the building at 2125 Williams Street. The identification of final sampling locations are pending a building survey to identify plumbing and piping systems, power and communication conduits, sumps, floor drains; evaluate structural elements of the building; review the HVAC system layout and intakes; building use schedules; and areas used for chemical or waste storage. Additionally, the location of onsite utility laterals, and offsite utility mains will be identified and located, and may affect placement of the vapor samples.

Based on ACDEH 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. **Work Plan Addendum Request** – Because of the importance of the input of a building and utility survey in selecting vapor sample locations, prior to final approval of the work plan, ACDEH requests the submittal of a Work Plan Addendum (Results of building and utility surveys, with revised vapor sample locations; Figure 2-1). ACDEH requests the figure include existing interior plans as well as future proposed locations of utilities including bathrooms (available online). The building is additionally reported to have contained a chemical laboratory at one time for research in unknown ink technologies at an unknown location in the building. Please ensure to locate the former laboratory on the figure(s).
2. **Conditional Work Plan Approval** - The referenced work plan proposes a series of actions with which ACDEH is in general agreement of undertaking; however, ACDEH requests modifications to the approach. Upon approval of the revised sample location figure requested in Technical Comment 1 above, ACDEH will provide final approval for soil vapor sampling, and identify a date for report submittal.
 - a. **Subslab Vapor Sample Collection** – One Liter (1 L) Summa canisters are proposed for subslab vapor samples. Please ensure these smaller containers are appropriate to achieve a detection limit below appropriate (residential) Environmental Screening Levels (ESLs).
 - b. **Appropriate Environmental Screening Levels (ESLs)** - ACDEH has been advised by the City of San Leandro that the Adult Day Care facility can have the ability to change operations to a 24-hour basis in the future. Thus, please ensure that Detection Limits for residential ESLs can be met by the sampling media.

- c. Analytical Methods** – The work plan proposes to analyze the vapor samples by either TO-15 or TO-15 SIM. Please ensure that the appropriate analytical Detection Limits are achieved for residential in all vapor samples. This may require analysis by TO-15 SIM exclusively.

TECHNICAL REPORT REQUEST

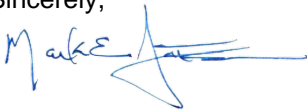
Please upload technical reports to the ACDEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the specified file naming convention below, according to the following schedule:

- **February 1, 2019** – Building and Utility Survey (with revised vapor sample locations)
File to be named: RO2468_COND_R_YYYY-MM-DD
- **60 Days After Approval of Revised Sample Locations** – Vapor Intrusion Report
File to be named: RO2468_SWI_R_YYYY-MM-DD

If your email address is not listed on the first page of this letter, or in the list of cc's listed below, ACDEH 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: Peter Krasnoff, West Environmental Services & Technology, 711 Grand Avenue, Suite 220, San Rafael, CA 94901; (Sent via electronic mail to: peterk@westenvironmental.com)

Sharon Squire, West Environmental Services & Technology, 711 Grand Avenue, Suite 220, San Rafael, CA 94901; (Sent via electronic mail to: sharons@westenvironmental.com)

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

Cherie 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, ACDEH, (Sent via electronic mail to: dilan.roe@acgov.org)
Paresh Khatri, ACDEH; (Sent via electronic mail to: paresh.khatri@acgov.org)
Mark Detterman, ACDEH, (Sent via electronic mail to: mark.detterman@acgov.org)
Electronic File; GeoTracker

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6731, 6735, and 7835) 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 licensed or certified professional and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.