

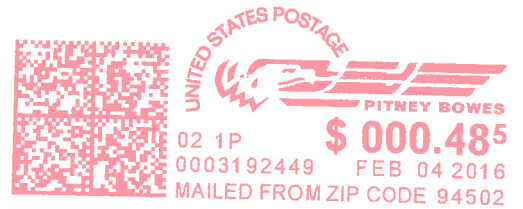


ALAMEDA COUNTY
 HEALTH CARE SERVICES AGENCY
 Environmental Health Services
 1131 Harbor Bay Parkway, Suite 250
 Alameda, CA 94502-6577

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Ms. Regina Colbert

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ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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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.