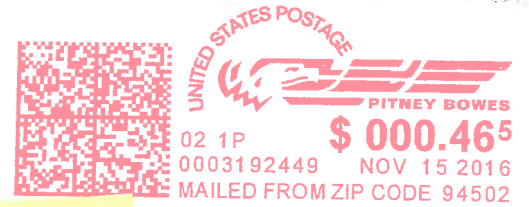




ALAMEDA COUNTY
HEALTH CARE SERVICES AGENCY
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 1131 Harbor Bay Parkway, Suite 250
 Alameda, CA 94502-6577

OAKLAND
 CA 945
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Ms. Regina Colbert
 James River Corporation
 2101 Williams Street
 San Leandro, CA 94577

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NR1: 93036107703055

NSN

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November 15, 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 Department of Environmental Health (ACDEH) staff has reviewed the case file including the *Sub-Slab Soil Gas Investigation Report (VP13 Through VP19)*, dated September 15, 2016. The report was prepared and submitted on your behalf by P & D Environmental, Inc (P & D). Thank you for submitting the report.

The report documents the installation of seven additional sub-slab vapor pins that were installed in an attempt to define the lateral limits of elevated tetrachlorethene (PCE) sub-slab concentrations to help identify potential soil, or other, sources of PCE at the site. Unfortunately the data extended the area of PCE concentrations significantly above soil gas Environmental Screening Level (ESL) for PCE of 2,100 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) as promulgated by the San Francisco Bay Regional Water Quality Control Board (RWQCB). Concentrations ranged between 36,000 and 410,000 $\mu\text{g}/\text{m}^3$ of PCE. The report recommended that feasibility study pilot testing be undertaken in order to determine necessary steps toward installing a sub-slab depressurization.

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. Request for Work Plan and Feasibility Study Pilot Testing** – ACDEH is in general concurrence with the recommendation to proceed with feasibility study pilot testing for corrective action measures which are likely to include a sub-slab vapor depressurization system. Consistent with recommendations in the October 30, 2015 *Subsurface Investigation Report (M1 to M6)*, the installation of soil bores to assess the potential for onsite sources of PCE, appears appropriate. At this time, onsite sources have not been identified, and it is undetermined if the PCE contamination is solely sourced from upgradient offsite contamination as is documented at other vicinity sites. Please submit a feasibility study work plan by the date identified below.
- 2. Additional Sub-Slab Vapor and / or Indoor Air Sampling** – Due to the more extensive area of elevated PCE sub-slab vapor concentrations, it additionally appears appropriate to request the investigation of sub-slab and / or indoor air PCE vapor concentrations in the multiple interior office spaces indicated on Figure 3 of the September 2016 report. Please be aware that worker notification procedures are appropriate. Please include this scope of work in the document requested below.