



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

April 1, 2014

Mr. Tom McCoy 94612 (Sent via E-mail to: tmccoy@bbiconstruction.com)
Brush Street Group, LLC
1155 3rd Street, Suite 230
Oakland, CA 94607

Subject: Case File Review for SLIC Case RO0002586 and GeoTracker Global ID SL0600130797,
Francis Plating, 751-785 7th Street, Oakland, CA 94607

Dear Mr. McCoy:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigation, and Cleanup (SLIC) case file for the above referenced site including the recently submitted document entitled, "*Sub-Slab Vapor and Indoor Air Investigation Report, Former Francis Plating Site, 751-785 Seventh Street, Oakland, California,*" dated January 15, 2014 (Report). The Report, which was prepared on your behalf by The Source Group, Inc., (SGI) presents results from sub-slab and indoor air sampling conducted in December 2013. The Report concludes that data are consistent with previous sampling results. Benzene was detected in indoor air at concentrations that exceed the indoor air Environmental Screening Level (ESL). However, the ambient outdoor air and indoor air concentrations are similar, indicating that outdoor air is affecting the indoor air concentrations. Benzene was not detected in sub-slab vapor samples at concentrations exceeding the reporting limit. ACEH also received a "*Site Management Plan,*" dated February 3, 2014 for the eastern portion of the site. ACEH will provide comments on the SMP at a future date.

During a meeting on March 5, 2014 between Mr. Tom McCoy of the Brush Street Group, Mr. Matt Sutton of The Source Group, and Jerry Wickham of ACEH, splitting the site into two cases was discussed. The purpose of forming two cases is to allow the eastern portion of the site to proceed towards case closure more quickly while the western portion of the site containing the former Frog Pond will take a longer period of time because a significant level of investigation and remediation remains to be completed. The existing case (RO0002586) would apply to the eastern portion of the site, which is shown as Parcel 2 on the attached figure. A new case will be opened for the western portion of the site shown as Parcel 1 on the attached figure.

ACEH will consider this approach provided that progress is shown in moving forward with the next steps towards completing site characterization for the western parcel. ACEH requests that you submit a Work Plan no later than June 2, 2014 to complete delineation of the contaminant plume originating from the former Frog Pond area. The potential sampling of any existing off-site monitoring wells should be considered. Please include an updated well survey and a summary of potential off-site receptors for the plume in the Work Plan. In addition, please propose the collection of any data that may be required to screen and evaluate potential remedial alternatives for the former Frog Pond area.

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RO0002586
April 1, 2014
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Completion of a Site Management Plan and Covenant and Environmental Restriction on Property that are acceptable to ACEH would also be necessary prior to considering case closure for the eastern portion of the site. The Covenant and Environmental Restriction on Property will need to be in an approved standard format. Upon request, ACEH will provide an electronic version of the model ACEH Covenant and Environmental Restriction on Property.

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:

- **June 2, 2014** – Work Plan
File to be named: WP_R_yyyy-mm-dd RO2586
- **June 30, 2014** – Draft Covenant and Environmental Restriction on Property
Please provide a draft electronic version by emailing directly to Jerry Wickham

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: Figure 3 Showing Proposed Parcels
Responsible Party(ies) Legal Requirements/Obligations
Enclosure: ACEH Electronic Report Upload (ftp) Instructions

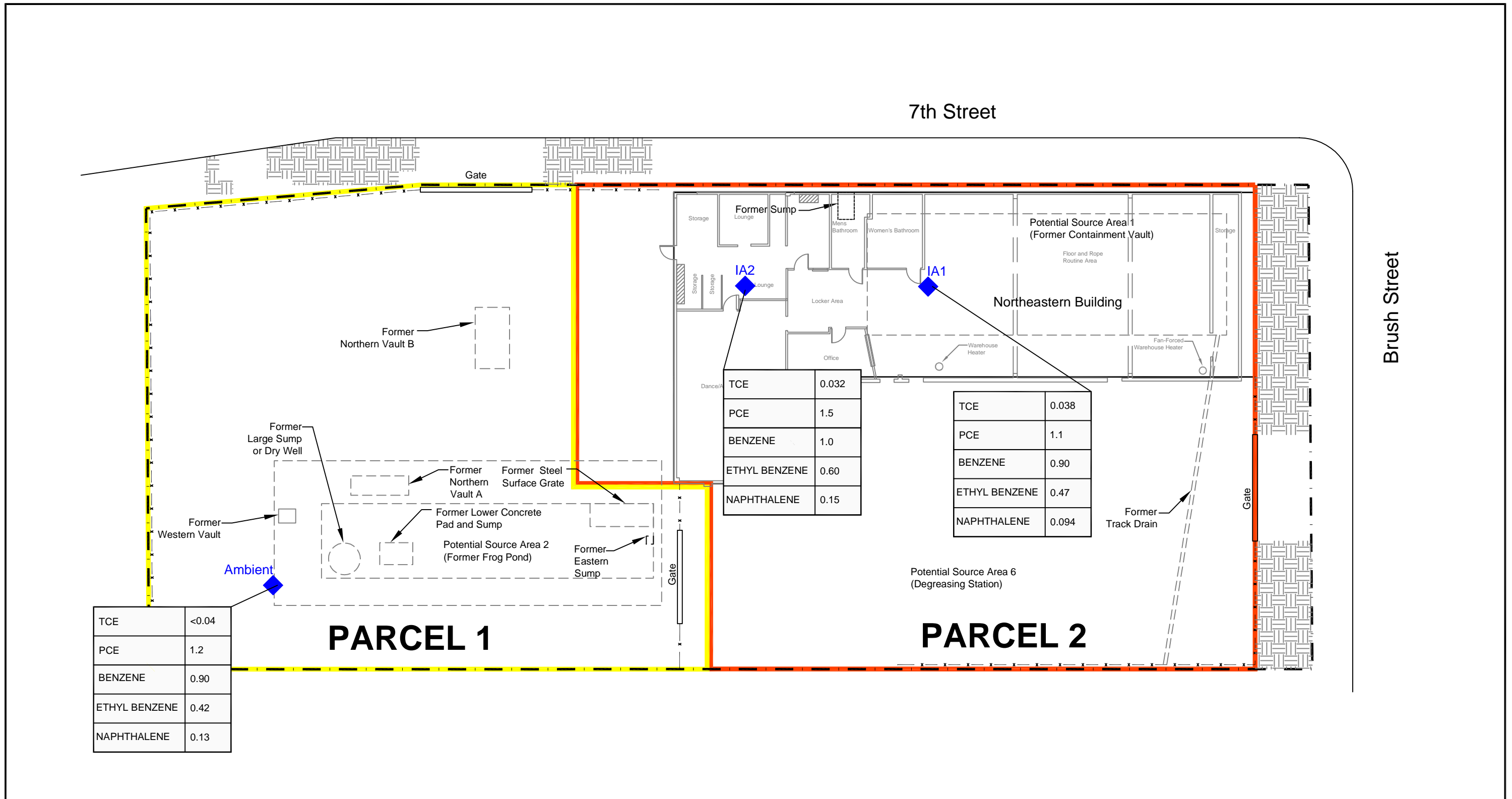
cc: Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (*Sent via E-mail to: lgriffin@oaklandnet.com*)

Margot Lederer Prado, City of Oakland Economic Development Division, Brownfields Management, 250 Frank H. Ogawa Plaza, Suite 3315, Oakland, CA 94612 (*Sent via E-mail to: MPrado@oaklandnet.com*)

Matthew Sutton, The Source Group, Inc., 3478 Buskirk Avenue, Suite100, Pleasant Hill, CA 94523 (*Sent via E-mail to: msutton@thesourcegroup.net*)

Markus Niebanck, Amicus, 580 Second Street, Suite 260, Oakland, CA 94607 (*Sent via E-mail to: markus@amicusenv.com*)

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



TCE	<0.04
PCE	1.2
BENZENE	0.90
ETHYL BENZENE	0.42
NAPHTHALENE	0.13

TCE	0.032
PCE	1.5
BENZENE	1.0
ETHYL BENZENE	0.60
NAPHTHALENE	0.15

TCE	0.038
PCE	1.1
BENZENE	0.90
ETHYL BENZENE	0.47
NAPHTHALENE	0.094

LEGEND

- ◆ IA2 Ambient or Indoor Air Sampling Location
- Site Boundary
- Fence
- Chemical Storage Area
- Exposed Soil Area
- Location of Historical Features Since Removed or Sealed and Capped
- Parcel 1 Boundary
- Parcel 2 Boundary

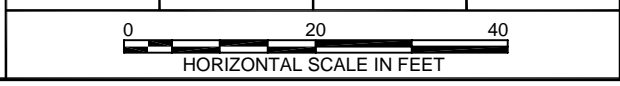
- TCE Trichloroethene
- PCE Tetrachloroethene
- <0.04 Compound Not Detected at or Above Laboratory Reporting Results

Notes:
1. All concentration reported in micrograms per cubic meter ($\mu\text{g}/\text{m}^3$)

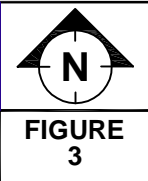
**FORMER FRANCIS PLATING SITE
751-785 BRUSH STREET
OAKLAND, CA**

**AMBIENT AND INDOOR AIR SAMPLE
LOCATIONS AND DECEMBER 2013
RESULTS**

PROJECT NO.	DATE	DRAWN BY:	APP. BY:
01-FP-001	12/18/2013	ZA	MC



SGI THE SOURCE GROUP, INC.
environmental
3478 BUSKIRK AVENUE, SUITE 100
PLEASANT HILL, CA 94523



Attachment 1

Responsible Party(ies) Legal Requirements/Obligations

REPORT/DATA REQUESTS

These reports/data are being requested pursuant to Division 7 of the California Water Code (Water Quality), Chapter 6.7 of Division 20 of the California Health and Safety Code (Underground Storage of Hazardous Substances), and Chapter 16 of Division 3 of Title 23 of the California Code of Regulations (Underground Storage Tank Regulations).

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (Local Oversight Program [LOP] for unauthorized releases from petroleum Underground Storage Tanks [USTs], and Site Cleanup Program [SCP] for unauthorized releases of non-petroleum hazardous substances) require submission of reports in electronic format pursuant to Chapter 3 of Division 7, Sections 13195 and 13197.5 of the California Water Code, and Chapter 30, Articles 1 and 2, Sections 3890 to 3895 of Division 3 of Title 23 of the California Code of Regulations (23 CCR). Instructions for submission of electronic documents to the ACEH FTP site are provided on the attached "Electronic Report Upload Instructions."

Submission of reports to the ACEH FTP site is in addition to requirements for electronic submittal of information (ESI) to the State Water Resources Control Board's (SWRCB) Geotracker website. In April 2001, the SWRCB adopted 23 CCR, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1 (Electronic Submission of Laboratory Data for UST Reports). Article 12 required electronic submittal of analytical laboratory data submitted in a report to a regulatory agency (effective September 1, 2001), and surveyed locations (latitude, longitude and elevation) of groundwater monitoring wells (effective January 1, 2002) in Electronic Deliverable Format (EDF) to Geotracker. Article 12 was subsequently repealed in 2004 and replaced with Article 30 (Electronic Submittal of Information) which expanded the ESI requirements to include electronic submittal of any report or data required by a regulatory agency from a cleanup site. The expanded ESI submittal requirements for petroleum UST sites subject to the requirements of 23 CCR, Division, 3, Chapter 16, Article 11, became effective December 16, 2004. All other electronic submittals required pursuant to Chapter 30 became effective January 1, 2005. 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, 7835, 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, late 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 SCP)	REVISION DATE: July 25, 2012
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (petroleum UST and SCP) 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 .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 <://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 .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.