



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

June 20, 2011

Debbie Potter
Housing Authority of City of Alameda
701 Atlantic Avenue
Alameda, CA 94501-2161
(Sent via E-mail to dpotter@ci.alameda.ca.us)

Brian Saliman
Resources for Community Development
2220 Oxford Street
Berkeley, CA 94704
(Sent via E-mail to bsaliman@rcdev.org)

Mr. Robert Stahl
Stahl Woodridge Construction
105 2nd Street, Oakland, CA 94607

Subject: Conditional Work Plan Approval for SLIC Case No. RO0003075 and GeoTracker Global ID T10000003048, Alameda Islander Motel, 2428 Central Avenue, Alameda, CA 94601

Dear Ms. Potter, Mr. Saliman, and Mr. Stahl:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanup (SLIC) case file for the subject site including the recently submitted document entitled, "*Revised Site Conceptual Model and Additional Site Assessment Work Plan*," dated June 17, 2011 (Work Plan). The Work Plan, which was prepared on behalf of the City of Alameda by Strategic Engineering & Science, proposes an investigation to address data gaps in characterization of the horizontal and vertical extent of contamination at the site. A Chevron service station occupied the site from 1947 until 1970. Underground storage tanks (USTs) were reportedly removed from the site in 1970. Investigation and monitoring of the fuel leak was conducted at various times between 1993 and 1998. The fuel leak case was closed by ACEH on December 27, 2001 with risk management measures and a restriction on future land use. The purpose of the proposed investigation is to address data gaps in the previous investigations and to evaluate the site for residential use.

The proposed scope of work is conditionally approved and may be implemented provided that the technical comments below are incorporated during implementation of the proposed investigation. Submittal of a revised Work Plan or Work Plan Addendum is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

REQUEST FOR INFORMATION

We request that you submit copies of any reports you have documenting additional investigation activities or other work that are relevant to the fuel leak or other unauthorized releases and not currently in ACEH case files. This includes Phase I environmental site assessment reports and site investigations conducted for potential real estate transactions. ACEH case files may be reviewed online using the ACEH website (<http://www.acgov.org/aceh>).

TECHNICAL COMMENTS

- 1. Depth of Soil Borings.** The Work Plan proposes that soil borings will be advanced to a depth of 5 feet bgs or the top of the first water-bearing zone. We request that the borings be advanced a minimum of four feet below the top of the first water-bearing zone or 15 feet bgs (whichever is deeper) in order to collect grab groundwater samples from each soil boring and to characterize the vertical extent of contamination. Based on review of existing limited site data, we note that the highest concentrations of petroleum hydrocarbons were detected in soil samples collected at 10 feet bgs while soil samples collected from 5 feet bgs did not contain petroleum hydrocarbons at concentrations exceeding reporting limits. If staining, odor, or elevated PID readings are observed at the base of the boring, we request that the soil borings be advanced deeper until no evidence of contamination is observed.
- 2. Soil Boring Locations.** The proposed boring locations are consistent with the locations discussed during a site visit on June 15, 2011. However, we request one modification to the proposed boring locations based on the results from a report entitled, "*Geotechnical Investigation, Islander Motel Upgrade*," dated June 16, 2011. The Geotechnical Investigation Report indicates that fill material, which is suspected to be tank backfill material, was encountered in each of the four cone penetration test (CPT) borings advanced at the site. One of the CPT borings (DPT-1) was advanced in the location of the proposed development (Office Space) in the western portion of the site (see attached figure from Geotechnical Investigation Report). To investigate whether former USTs may have been present in the area of the proposed development, we request that one of the proposed boring locations be moved to the south as shown on the attached map which is labeled, "Revised Boring Location."
- 3. Soil Sampling.** We concur with the proposal to continuously samples soils for logging and screening purposes to the total depth of the boring. Soil samples are to be visually logged in the field for soil type, color, moisture content, odor, and other observed features and screened with a photoionization (PID) detector. We request that soil samples be collected for laboratory analysis from any interval where staining, odor, or elevated PID readings are observed. If no staining, odor, or elevated PID readings are observed, the proposal to collect soil samples at five-foot depth intervals is acceptable. Please present boring logs, screening results, and analytical data for soil samples in the Site Investigation Report below.
- 4. Laboratory Analyses for Soil Vapor Samples.** We request that the proposed analysis of the soil vapor samples using EPA Method TO-15 include chlorinated solvents as analytes in addition to BTEX, MTBE, and isopropyl alcohol.
- 5. GeoTracker Submittals.** As described in the attached Responsible Party(ies) Legal Requirements/Obligations, all technical reports must be submitted to both the ACEH ftp site and the State Water Resource Control Board (SWRCB) GeoTracker website. Therefore, please claim your site on GeoTracker and upload the Work Plan and all future reports to the GeoTracker website. Pursuant to CCR Sections 2729 and 2729.1, beginning July 1, 2005 for SLIC cases, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring

Responsible Parties
RO0003075
June 20, 2011
Page 3

wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports (LUFT or SLIC) is required in GeoTracker (in PDF format). Please upload all reports prepared after July 1, 2005 to the SWRCB's Geotracker database website in accordance with the above-cited regulation.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **September 21, 2011** – Site Investigation Report

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 2 – Site Plan from “Geotechnical Investigation,” dated June 16, 2011
Revised Boring Location Figure
Responsible Party(ies) Legal Requirements/Obligations

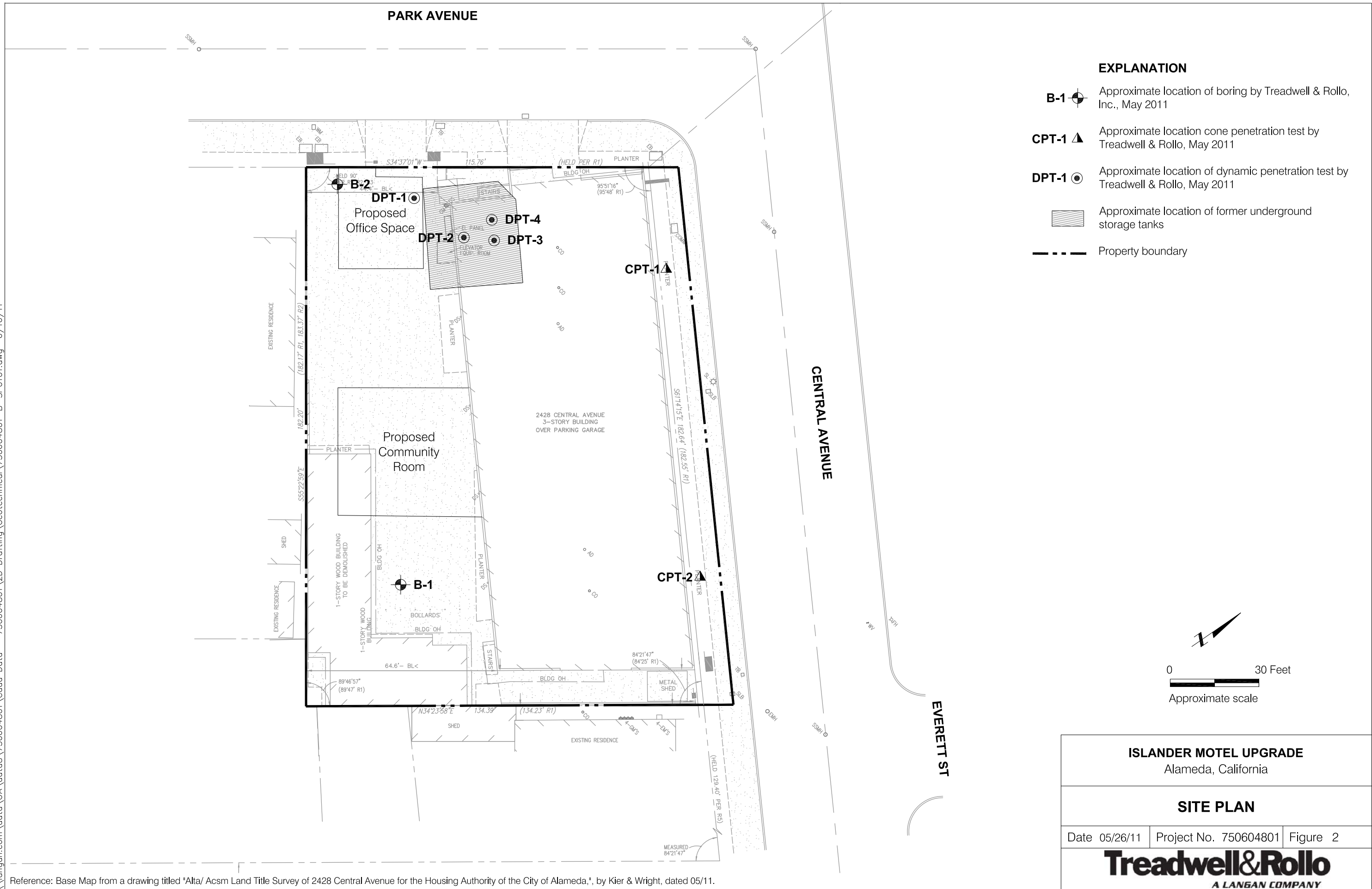
Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Mark Trevor, Strategic Engineering & Science, 110 11th Street, 2nd Floor, Oakland, CA 94607
(Sent via E-mail to mtrevor@sesinonline.net)

Donna Drogos, ACEH (Sent via E-mail to: donna.drogos@acgov.org)
Jerry Wickham, ACEH (Sent via E-mail to: jerry.wickham@acgov.org)

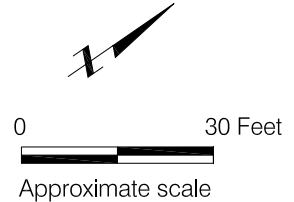
GeoTracker, eFile

\\langan.com\data\OA\data8\750604801\Cadd Data - 750604801\2D Drafting\Geotechnical\750604801-B-SP0101.dwg 6/16/11



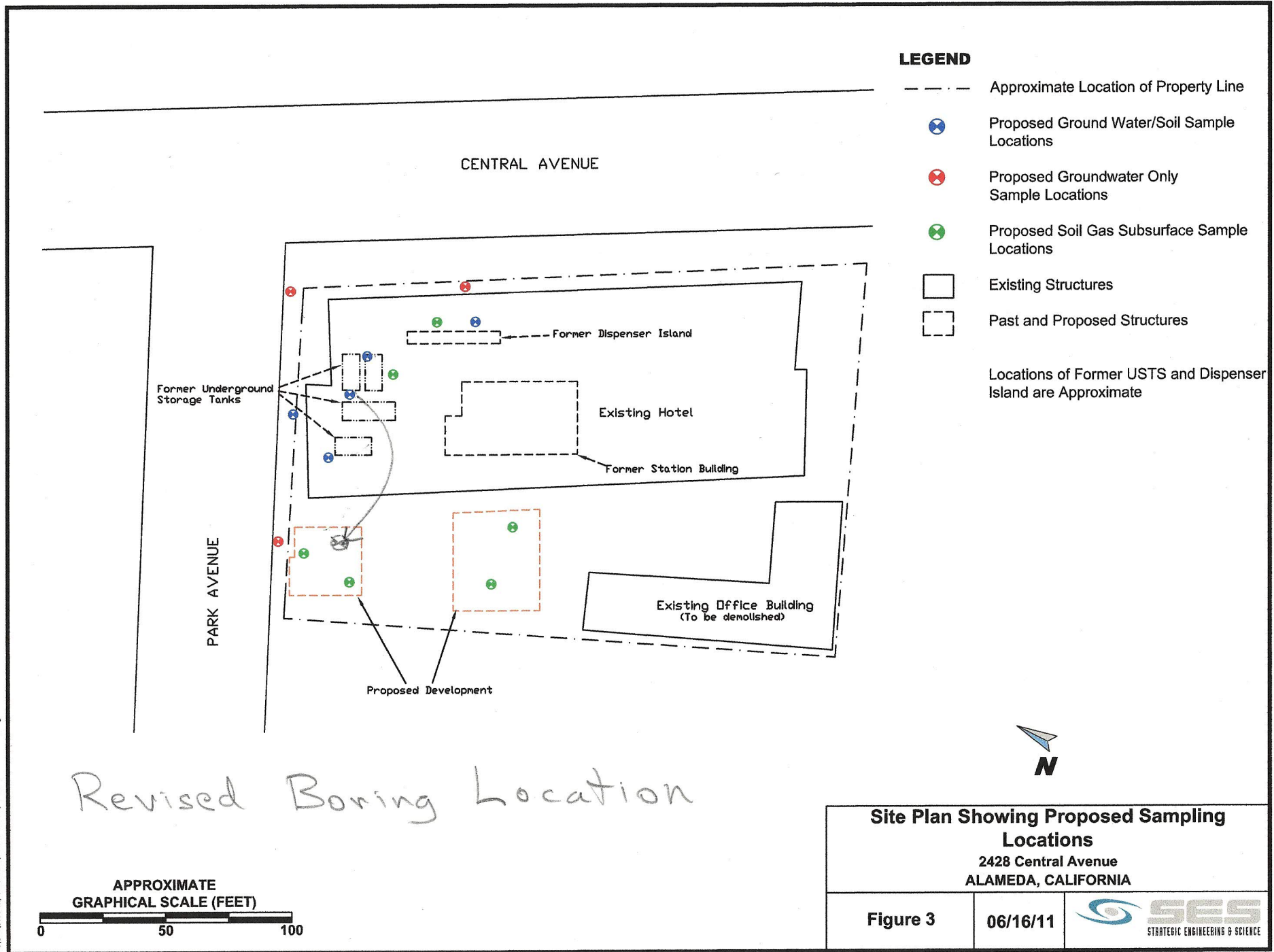
EXPLANATION

- B-1** Approximate location of boring by Treadwell & Rollo, Inc., May 2011
- CPT-1** Approximate location cone penetration test by Treadwell & Rollo, May 2011
- DPT-1** Approximate location of dynamic penetration test by Treadwell & Rollo, May 2011
- Approximate location of former underground storage tanks
- Property boundary



ISLANDER MOTEL UPGRADE Alameda, California		
SITE PLAN		
Date 05/26/11	Project No. 750604801	Figure 2
Treadwell & Rollo <small>A LANGAN COMPANY</small>		

Reference: Base Map from a drawing titled "Alta/ Acsm Land Title Survey of 2428 Central Avenue for the Housing Authority of the City of Alameda," by Kier & Wright, dated 05/11.



Revised Boring Location

P:\CD\0218 City of Alameda\2428CentralAve\2428CentralAlameda.dwg

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: July 20, 2010
	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 (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.