



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

August 31, 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](mailto: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](mailto:bsaliman@rcdev.org))

Mr. Robert Stahl  
Stahl Woodridge Construction  
105 2<sup>nd</sup> Street, Oakland, CA 94607

Subject: Case File Review 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, "*Additional Site Characterization Report*," dated August 10, 2011 (Report). The Report, which was prepared on behalf of the City of Alameda by Strategic Engineering & Science, presents the results of soil, soil vapor, and groundwater sampling conducted to address data gaps in characterization of the horizontal and vertical extent of contamination at the site.

A 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. Future plans for the site include the redevelopment and use of the existing three-story motel building for residential housing units above a first floor parking garage and construction of two additional buildings southwest of the existing motel building.

Based on the results of the additional characterization presented in the August 10, 2011 Report, the proposed future use of the existing three-story motel building for residential housing units is acceptable provided that the first floor of the existing motel building remains a parking garage. Redevelopment of the existing building may proceed as planned. The proposed construction of two slab-on grade buildings southwest of the parking garage above the locations where soil vapor samples SG-1 through SG-4 were collected (see attached Figure 5), is also acceptable and may proceed as planned. The additional steps necessary to complete case closure are outlined in the technical comments below. We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

## **TECHNICAL COMMENTS**

1. **Risk Management Plan.** Residual petroleum hydrocarbons were encountered in soil and groundwater at a depth of approximately 10 feet bgs below the parking garage covering the northern portion of the site. Although there does not appear to be a direct exposure route for the current and proposed future use of the site, the residual contamination could potentially be encountered during future excavation and construction activities. Therefore, we request that you submit an updated Risk Management Plan for the site by October 31, 2011. The Risk Management Plan is to include but not be limited to the following:
  - Site Background.
  - Summary of Site Conditions. This section is to include a summary of the extent of contamination including the most recent figures and tables from the Report dated August 10, 2011.
  - Description of conditions likely to be encountered during construction.
  - Summary of Potential Human Health Risks.
  - Requirement for ACEH notification and approval of proposed activities that potentially involve exposure to contaminated soil or groundwater.
  - Requirements for a health and safety plan for all subsurface work.
  - Protocols for excavation/grading and management of excavated materials (to include odor and dust control).
  - Procedures for screening and management of potentially contaminated soil during excavation.
  - Contingency plan for discovery of unknown features of environmental concern.
  - Reference to Covenant and Environmental Restriction on Property (see below).
2. **Elevator.** During redevelopment, the elevator area and underlying soil are expected to be exposed for visual inspection and sampling. Based on observations of the elevator equipment room, petroleum hydrocarbons may be encountered when the elevator subfloor is exposed. We request that you submit plans for addressing the elevator area as part of the updated Risk Management Plan or as a separate sampling plan.
3. **Covenant and Environmental Restriction on Property.** A Covenant and Environmental Restriction on Property will be necessary to prevent potential future exposure to residual contamination remaining in portions of the site. We request that you use the Alameda County template to prepare a draft Covenant and Environmental Restriction on Property for ACEH review. You may request an electronic copy of the Alameda County Covenant and Environmental Restriction on Property template by sending an email with your request to [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org).
4. **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.

Responsible Parties  
RO0003075  
August 31, 2011  
Page 3

Additionally, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring 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:

- **October 31, 2011** – Risk Management Plan

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org). Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. If your email address does not appear on the cover page of this notification ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297  
Senior Hazardous Materials Specialist

Attachments: Figure 5 from “*Additional Site Characterization Report*,” dated August 10, 2011  
Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

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

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

GeoTracker, eFile



SG-5	
TPH-G	11,000ug/m <sup>3</sup>
ISOPROPYL ALCOHOL	22,000ug/m <sup>3</sup>
MTBE	ND<0.0062
BENZENE	0.083ug/m <sup>3</sup>
TOLUENE	0.24ug/m <sup>3</sup>
ETHYLBENZENE	0.039ug/m <sup>3</sup>
O-XYLENE	0.065ug/m <sup>3</sup>
M,P-XYLENE	0.19ug/m <sup>3</sup>

SG-6	
TPH-G	540ug/m <sup>3</sup>
ISOPROPYL ALCOHOL	280ug/m <sup>3</sup>
MTBE	ND<0.0062
BENZENE	0.15ug/m <sup>3</sup>
TOLUENE	0.77ug/m <sup>3</sup>
ETHYLBENZENE	0.24ug/m <sup>3</sup>
O-XYLENE	0.35ug/m <sup>3</sup>
M,P-XYLENE	0.98ug/m <sup>3</sup>

**LEGEND**

- Approximate Location of Property Line
- ⬢ Soil Gas Subsurface Sample Locations
- Existing Structures
- Past and Proposed Structures
- Locations of Former USTS and Dispenser Island are Approximate

CENTRAL AVENUE

PARK AVENUE

Former Underground Storage Tanks

Former Dispenser Island

Existing Hotel

Former Station Building

Existing Office Building  
(To be demolished)

Proposed Development

SG-1	
TPH-G	330ug/m <sup>3</sup>
ISOPROPYL ALCOHOL	ND<0.016
MTBE	ND<0.0062
BENZENE	0.14ug/m <sup>3</sup>
TOLUENE	2.2ug/m <sup>3</sup>
ETHYLBENZENE	2.2ug/m <sup>3</sup>
O-XYLENE	4.5ug/m <sup>3</sup>
M,P-XYLENE	12ug/m <sup>3</sup>

SG-4	
TPH-G	ND<230
ISOPROPYL ALCOHOL	ND<0.016
MTBE	ND<0.0062
BENZENE	ND<0.034
TOLUENE	0.55ug/m <sup>3</sup>
ETHYLBENZENE	0.26ug/m <sup>3</sup>
O-XYLENE	0.42ug/m <sup>3</sup>
M,P-XYLENE	1.3ug/m <sup>3</sup>

SG-2	
TPH-G	690ug/m <sup>3</sup>
ISOPROPYL ALCOHOL	ND<1.6
MTBE	ND<0.0062
BENZENE	0.60ug/m <sup>3</sup>
TOLUENE	22ug/m <sup>3</sup>
ETHYLBENZENE	23ug/m <sup>3</sup>
O-XYLENE	30ug/m <sup>3</sup>
M,P-XYLENE	89ug/m <sup>3</sup>

SG-3	
TPH-G	ND<240
ISOPROPYL ALCOHOL	4.5ug/m <sup>3</sup>
MTBE	ND<0.0062
BENZENE	0.27ug/m <sup>3</sup>
TOLUENE	1.0ug/m <sup>3</sup>
ETHYLBENZENE	0.39ug/m <sup>3</sup>
O-XYLENE	0.58ug/m <sup>3</sup>
M,P-XYLENE	1.6ug/m <sup>3</sup>

California Human Health Screening Levels in Evaluation of Contaminated Properties, January 2005/September 2009(CHHSL's)

Total Petroleum Hydrocarbons as Gasoline (TPH-G)	NE
Isopropyl Alcohol	NE
MTBE	4000ug/m <sup>3</sup>
Benzene	36.2ug/m <sup>3</sup>
Toluene	135,000ug/m <sup>3</sup>
EthylBenzene	NE
m,p-Xylene	319,000ug/m <sup>3</sup>
o-Xylene	315,000ug/m <sup>3</sup>

NE=Not Established

Site Plan Showing Soil Gas Sampling Locations & Selected Analytical Results  
2428 Central Avenue  
ALAMEDA, CALIFORNIA

Figure 5

06/16/11

APPROXIMATE  
GRAPHICAL SCALE (FEET)

## 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/](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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> July 20, 2010
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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](mailto: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](mailto: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.