

WEINGARTEN REALTY

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Houston, TX 77008
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www.weingarten.com

RECEIVED

By Alameda County Environmental Health 2:52 pm, Apr 23, 2015

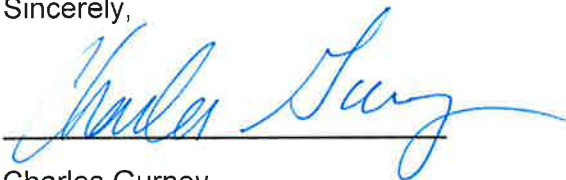
Mr. Gabe Stivala, P.G.
Cardno ATC
701 University Drive, Suite 200
Sacramento, CA 95825

SUBJECT **Response to Comments and Work Plan Addendum**
Exterior Additional Soil and Soil Vapor Assessment Work Plan
Dry Clean 580 and Adjacent Retail Units
3735 East Castro Valley Boulevard
Alameda County LOP No. RO 3097

Dear Mr. Stivala:

I have reviewed and approved the subject report. Please submit it to the regulatory agencies listed in the distribution section of the report. Should any of the agencies require it, I am prepared to declare, under penalty of perjury, that to the best of my knowledge, the information contained in the report is true and correct.

Sincerely,



Charles Gurney

Weingarten Realty Investors
2600 Citadel Plaza Drive, Suite 300
Houston, Texas 77008

Date:

April 22, 2015

People-to-People. Coast-to-Coast.

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April 22, 2015

Ms. Karel Detterman
Alameda County
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

Cardno ATC

701 University Ave
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Sacramento, CA 95825

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SUBJECT Response to Comments and Work Plan Addendum
Exterior Additional Soil and Soil Vapor Assessment Work Plan
Dry Clean 580 and Adjacent Retail Units
3735 East Castro Valley Boulevard
Alameda County LOP No. RO 3097

Ms. Detterman:

On behalf of Weingarten Realty Investors (Weingarten), Cardno ATC is conducting soil and soil vapor assessment at the subject site (see Site Vicinity Map, Figure 1). As part of additional assessment in the exterior parking lot southeast of the retail units, Cardno ATC prepared a Work Plan entitled *Exterior Additional Soil and Soil Vapor Assessment Work Plan*, dated December 19, 2014 (Work Plan). In electronic correspondence dated March 31, 2014 (Appendix A), Alameda County Environmental Health (ACEH) provided comments and requested clarification of specific items proposed in the Work Plan. On April 10, 2015, personnel of Cardno ATC and ACEH further discussed the comments and requested clarifications via conference call. This Addendum responds to the comments and proposes additional work.

Comment 1: Provide Rationale for Placement of Additional Dual-Completion Soil Vapor Sampling Wells

The scope of work proposed in the Work Plan was developed in response to Item 2 in ACEH's electronic correspondence dated September 30, 2014 (Appendix A), and subsequent verbal communications. The discussion presented in Item 2 concerns the potential source and extent of the petroleum hydrocarbon (predominantly benzene), and the potential impact to reductive dechlorination of the halogenated volatile organic compounds (HVOCs). The locations of soil vapor sampling wells (SVS) wells SV-16 through SV-

21 (Figure 2) were selected to delineate the lateral extent of the vapor-phase benzene, and to determine a potential source of benzene based on concentration gradients. The location of SVS well SV-22 was selected to evaluate the vertical extent of vapor-phase benzene in the area with highest previously reported concentration. The distribution of reported vapor-phase HVOCs and benzene concentrations overlap but are not coincident.

After discussion with ACEH, Cardno ATC concurs that vertical assessment within the laterally defined HVOC area will be beneficial and may provide useful data for remediation, if warranted. In addition, installation of the additional SVS wells will be most cost-efficient if done during the same mobilization as the vapor-phase benzene assessment. We therefore propose two additional dual-completion SVS wells at the locations shown on Figure 2. Well SV-23 will be installed midway between SV-1 and SV-6. Well SV-24 will be installed midway between wells SV-7 and SV-11. These locations coincide with the approximate areas of highest concentrations of vapor-phase perchloroethylene and vinyl chloride, and will provide data regarding the vertical concentration profiles, attenuation, and natural bioremediation potential.

The two additional dual-phase SVS wells will be drilled, constructed and sampled pursuant to the methods described in the original Work Plan.

Comment 2: Provide Rationale for Selection of Soil Samples for Laboratory Analyses

Selection of soil samples or laboratory analyses will be based on:

- Field observations during drilling and logging (including PID readings).
- The vertical soil horizon with highest residual HVOC and petroleum hydrocarbon concentrations in the nearest soil borings.
- The deepest sample collected.

Based on field conditions and PID readings, the sample frequency may be reduced to two per boring.

Comment 3: Updated Reference for CRWQCB ESLs

The CRWQCB-Bay Area reference is updated to the 2013 version, for both the sample protocol (User's Guide) and screening levels (ESLs). The other references are current.

Comment 4: Human Health Risk Assessment Note 5:

The Human Health Risk Assessment Note 5 (DTSC/HERO, August 2014) reference refers to indoor air and is not applicable to the exterior assessment, but will be used to recently collected indoor air and sub-slab data.

Please contact Mr. Gabe Stivala, Cardno ATC's senior project manager for this site, at (916) 923-1097 or at gabe.stivala@cardno.com or with any questions regarding this report.

Sincerely,



John Bobbitt
P.G. 4313, C.H.G. 938
for Cardno ERI
707 766 2000
Email: john.bobbitt@cardno.com

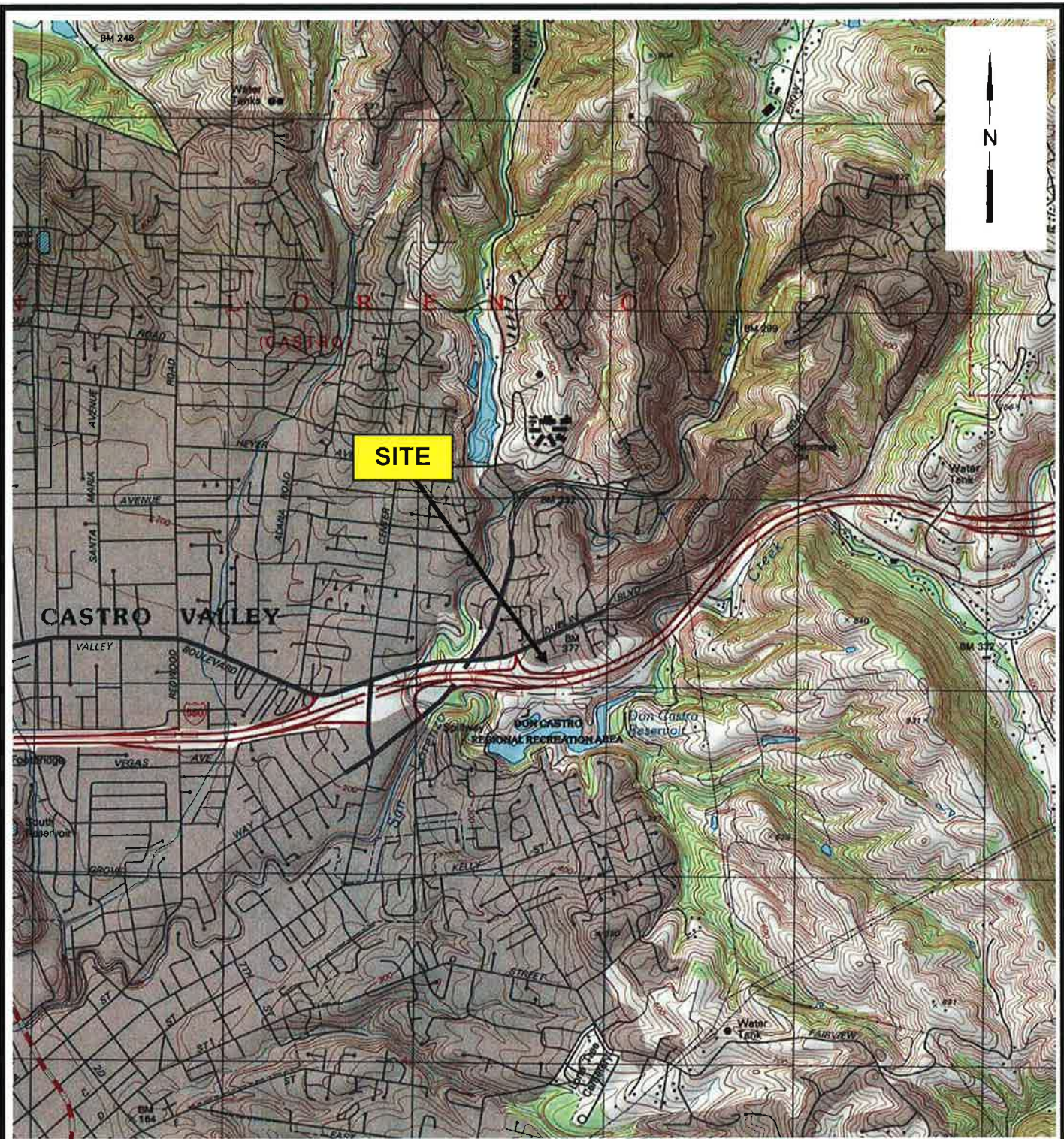


Gabe Stivala
Senior Project Manager
for Cardno ATC
916 923 1097
Email: gabe.stivala@cardno.com

Enclosures

- | | |
|------------|---------------------------------------|
| Figure 1 | Site Vicinity Map |
| Figure 2 | Proposed Additional Soil Vapor Points |
| Appendix A | Regulatory Correspondence |

Cc: Mr. Chuck Gurney, Weingarten Realty Investors
Mr. Thomas J. Treacy, John Hancock Life Insurance Company USA



SOURCE: USGS 7.5 MINUTE TOPOGRAPHIC MAP
 CASTRO VALLEY QUADRANGLE, CALIFORNIA, DATED 1968, PHOTOREVISED 1987.

FIGURE 1
SITE VICINITY MAP

**580 MARKET PLACE SHOPPING CENTER
 3735-4065 EAST CASTRO VALLEY BOULEVARD
 CASTRO VALLEY, CALIFORNIA 94552**



Cardno
ATC

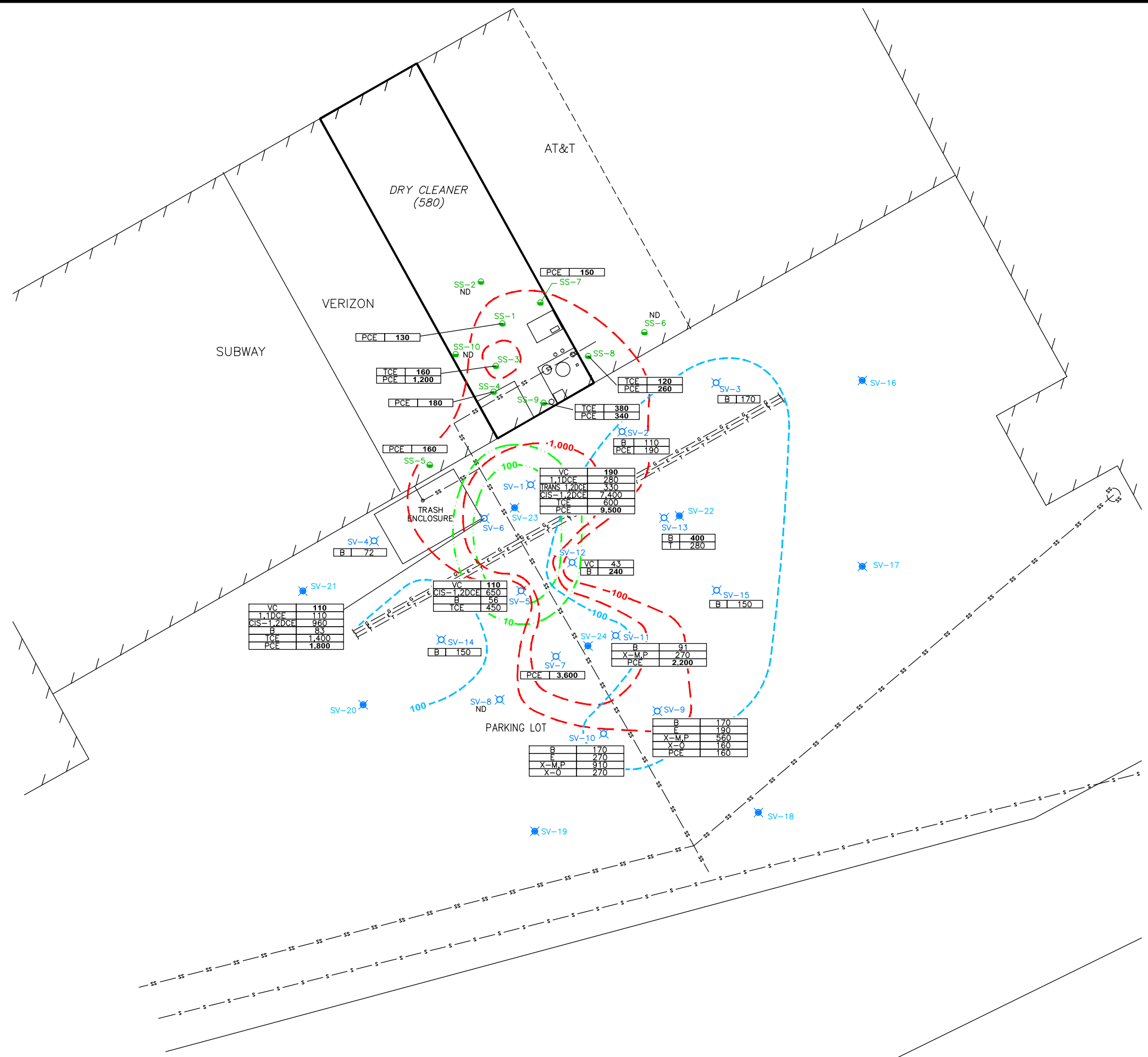
Shaping the Future

1117 Lone Palm Ave, Ste 201B
 Modesto, CA 95351
 (209) 579-2221

PROJECT NO: 075.75356.0002

DESIGNED BY: JK	SCALE: 1:24,000	REVIEWED BY: JH
DRAWN BY: JK	DATE: 10/12	FILE: LOCATION

PROPOSED ADDITIONAL SOIL VAPOR POINTS
 DRYCLEAN 580
 3735 E. CASTRO VALLEY BOULEVARD
 CASTRO VALLEY, CA



LEGEND

- SUBSLAB SAMPLE POINT
- ⊗ PROPOSED SOIL GAS SAMPLE POINT
- ⊗ SOIL GAS SAMPLE POINT
- g—g— GAS LINE
- e—e— ELECTRIC LINE
- t—t— TELEPHONE LINE
- ss—ss— SANITARY SEWER
- s—s— STORM SEWER
- PCE, $\mu\text{g}/\text{m}^3$
- BENZENE, $\mu\text{g}/\text{m}^3$
- VINYL CHLORIDE, $\mu\text{g}/\text{m}^3$

VC	190	VINYL CHLORIDE
1,1DCE	280	1,1-DICHLOROETHANE
TRANS-1,2DCE	330	TRANS-1,2-DICHLOROETHANE
CIS-1,2DCE	7,400	CIS-1,2-DICHLOROETHENE
B	400	BENZENE
T	280	TOULENE
E	270	ETHYLBENZENE
X-M,P	910	M,P, XYLENE
X-O	270	O XYLENE
TCE	600	TRICHLOROETHENE
PCE	9,500	TETRACHLOROETHENE

ALL CONCENTRATIONS IN $\mu\text{g}/\text{m}^3$
 ND NOT DETECTED ABOVE METHOD DETECTION LIMIT
BOLD CONCENTRATION EQUALS OR EXCEEDS CHHSL OR INDOOR AIR-BASED ESL SCREENING VALUE



NOTE: 1. SCALE AND LOCATIONS ARE APPROXIMATE.
 2. MAP SHOWS DETECTION ONLY.

APPENDIX A

CORRESPONDENCE

From: [Roe, Dilan, Env. Health](#)
To: [gabe stivala](#)
Cc: [Detterman, Karel, Env. Health](#); [Charles Gurney](#)
Subject: RE: RO3097 SCP Program 580 Market Place Shopping Center, East Castro Valley Boulevard, Castro Valley, CA
Date: Tuesday, March 31, 2015 5:13:55 PM

Hi Gabe:

We have reviewed the Exterior Additional Soil and Soil Vapor Assessment Work Plan dated December 19, 2014 for the subject site and have several items that need clarification (listed below) and would like to discuss with you on a teleconference call.

1. Rationale for the placement of the 7 soil vapor sampling wells. 6 of the 7 proposed locations are on the perimeter of the vapor plume and therefore it appears the rationale is to define the lateral extent of the plume. Only 1 of the proposed locations (SV-22) is adjacent to a previous sample point (SV-13) with high concentrations of benzene. It is not clear to us why there are not more dual depth probes located in other areas with concentrations have been detected at previous sampling points above screening levels of PCE (SV-1, SV-6, SV-7, SV-11), TCE (SV-1, SV-5, SV-6) and benzene (SV-12, SV-13). It seems logical to us that one of the purposes of collection of additional soil gas samples at two depths is to help identify source areas in addition to collecting data on attenuation.
2. The work plan states that select soil samples and soil vapor samples will be submitted however does not define how they will be selected.
3. The RWQCB ESLs listed in the workplan the 2008 version rather than the current version. Please review all your screening level references to include the most current version
4. Also please reference Human Health Risk Assessment Note 5 – Indoor Air Action Levels for Trichloroethylene (TCE) in the work plan - Human Health Risk Assessment Note 5 describes how HERO recommends implementation of the TCE Action Levels contained in this EPA Region 9 guidance, specifically on the issues of: 1) applicability to all sites where VI is being evaluated; 2) interim measures; and, 3) response actions.

Once you have reviewed these items and formulated responses please send via email prior to scheduling a teleconference call with us.

Thanks,

Dilan Roe, P.E.
Program Manager - Land Use & Local Oversight Program
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
510.567.6767; Ext. 36767
QIC: 30440
dilan.roe@acgov.org

PDF copies of case files can be reviewed/downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>

-----Original Message-----

From: [gabe stivala \[mailto:gabe.stivala@cardno.com\]](mailto:gabe.stivala@cardno.com)
Sent: Tuesday, March 31, 2015 2:37 PM
To: Roe, Dilan, Env. Health
Cc: Detterman, Karel, Env. Health; Charles Gurney
Subject: RE: RO3097 SCP Program 580 Market Place Shopping Center, East Castro Valley Boulevard, Castro

Valley, CA

Great. Thanks.

Gabe Stivala, P.G.
SENIOR PROJECT MANAGER/SENIOR GEOLOGIST
CARDNO ATC

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-----Original Message-----

From: Roe, Dilan, Env. Health [<mailto:Dilan.Roe@acgov.org>]
Sent: Tuesday, March 31, 2015 8:51 AM
To: gabe stivala
Cc: Detterman, Karel, Env. Health
Subject: Re: RO3097 SCP Program 580 Market Place Shopping Center, East Castro Valley Boulevard, Castro Valley, CA

Hi Gabe

I will discuss with Karel tomorrow

Dilan

Sent from my iPhone

On Mar 30, 2015, at 4:43 PM, gabe stivala <gabe.stivala@cardno.com<<mailto:gabe.stivala@cardno.com>>> wrote:

Hi Karel,
When can we expect a response on our Exterior Additional Soil and Soil Vapor Assessment Work Plan? You mentioned you would be sending a response on March 20. Please let me know.

Best regards,

Gabe Stivala, P.G.
SENIOR PROJECT MANAGER/SENIOR GEOLOGIST
CARDNO ATC

<image001.gif>

Phone (+1) 916-923-1097 Fax (+1) 916-923-6251 Direct (+1) 916-386-3870 Mobile (+1) 925-223-7123 Address 701 University Avenue, Suite 200, Sacramento, CA 95825 Email gabe.stivala@cardno.com<<mailto:gabe.stivala@atcassociates.com>> Web www.cardnoatc.com<<http://www.cardnoatc.com/>> - www.cardno.com<<http://www.cardno.com/>>
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From: [Detterman, Karel, Env. Health](#)
To: "gabe stivala"
Cc: [Charles Gurney; Roe, Dilan, Env. Health](#)
Subject: RE: RO3097 SCP Program 580 Market Place Shopping Center, East Castro Valley Boulevard, Castro Valley, CA
Date: Thursday, January 08, 2015 4:55:03 PM
Attachments: [Attachment 1 and ftpUploadInstructions 2014-05-15.pdf](#)

Hello Gabe:

Alameda County Environmental Health (ACEH) staff has reviewed the Site Cleanup Program (SCP) case file for the above-referenced site including the recently submitted document entitled "Sub-Slab Vapor and Indoor Air Work Plan Addendum," dated December 5, 2014 (Addendum). The Addendum was revised in response to ACEH Directive Letter dated November 17, 2014 for the *Scope of Work for the Indoor Air Quality Assessment and Additional Sub-Slab Sampling* (Scope of Work) e-mailed to ACEH on October 31, 2014. The Scope of Work was submitted as a Work Plan in response to ACEH's September 30, 2014 Directive Letter. Thank you for submitting the documents.

Approval of the Addendum is contingent upon submittal of the following documents to ACEH:

1. Finalization of the October 31, 2014 Scope of Work and submittal to ACEH and Geotracker;
2. Word document of the *Fact Sheet* included in the Addendum. A brief description of the work outlined in the Addendum should be included the *Next Steps* section of the *Fact Sheet*;
3. Word documents of the four letters: *Notification to Tenants*, *Letter to Occupants/Owner*, *Fact Sheet for VOCs in Household Products*, and *Instructions to Occupants*, found in Appendix C, *Indoor Air Sampling*, California Department of Toxic Substances Control's "Vapor Intrusion Public Participation Advisory," dated March 2012. The four letters should each be revised to reflect tenant names, addresses, and commercial use instead of residential use.

ACEH will finalize and distribute the Fact Sheet to addresses in the immediate vicinity and Notifications to the Dry Cleaner and the two adjacent tenants.

TECHNICAL REPORT REQUEST

- **January 23, 2015** – Word document of the Fact Sheet and Word document Notifications to the two adjacent tenants e-mailed to karel.detterman@acgov.org

Please upload the requested document to the ACEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with Attachment 1 and the following specified file naming convention and schedule:

- **February 13, 2015** – *Indoor Air Quality Assessment and Additional Sub-Slab Work Plan*
File to be named: RO3097_WP_R_yyyy-mm-dd

Thank you,

Karel Detterman, PG
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
Direct: 510.567.6708
Fax: 510.337.9335
Email: karel.detterman@acgov.org

PDF copies of case files can be downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>

From: gabe stivala [mailto:gabe.stivala@cardno.com]
Sent: Wednesday, January 07, 2015 10:17 AM
To: Detterman, Karel, Env. Health
Cc: Charles Gurney; Roe, Dilan, Env. Health
Subject: RE: RO3097 SCP Program 580 Market Place Shopping Center, East Castro Valley Boulevard, Castro Valley, CA

Hi Karel,

Hope you had a great holiday. When can we expect a response to our Dec 5th addendum to the indoor air and subslab sampling work plan?

Gabe Stivala, P.G

SENIOR PROJECT MANAGER/SENIOR GEOLOGIST
CARDNO ATC



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From: gabe stivala
Sent: Friday, October 31, 2014 1:42 PM
To: 'Detterman, Karel, Env. Health'
Cc: Charles Gurney; Roe, Dilan, Env. Health; 'John Bobbitt'
Subject: RO3097 SCP Program 580 Market Place Shopping Center, East Castro Valley Boulevard, Castro Valley, CA

Hi Karel,

Attached for your review is the SOW for the indoor air quality assessment and additional sub-slab sampling. Per your request we will be installing subslab vapor pins that can be resampled. Also, please note that we are still developing a scope to further address source areas including under the building and in the parking lot. This will include and evaluation of the potential effects of benzene and naphthalene on the chlorinated hydrocarbons. However, we feel the indoor air risks are the most urgent issue to address, so we would like to move forward as soon as possible with indoor air and subslab sampling, ahead of addressing the other issues.

Once you have reviewed the attachment, please let me know if we can proceed.

Best regards,

Gabe Stivala, P.G

SENIOR PROJECT MANAGER/SENIOR GEOLOGIST
CARDNO ATC



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From: Detterman, Karel, Env. Health [<mailto:Karel.Detterman@acgov.org>]
Sent: Friday, October 17, 2014 2:33 PM
To: gabe stivala
Cc: Charles Gurney; Roe, Dilan, Env. Health
Subject: RO3097 SCP Program 580 Market Place Shopping Center, East Castro Valley Boulevard, Castro Valley, CA

Hello Gabe:

Attached is a copy of an EPA document that discusses the effect of benzene on PCE degradation for your use.

Thank you,

Karel Detterman, PG
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
Direct: 510.567.6708
Fax: 510.337.9335
Email: karel.detterman@acgov.org

PDF copies of case files can be downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>

From: [Roe, Dilan, Env. Health](#)
To: [Charles Gurney](#)
Cc: [Detterman, Karel, Env. Health](#); [gabe stivala](#)
Subject: Site Cleanup Case No. R00003097 Revised Data Gap Work Plan Implementation, Site Cleanup Program 580 Market Place Shopping Center, Geotracker Global ID T10000004345, 3735-4065 East Castro Valley Boulevard, Castro Valley, CA
Date: Tuesday, September 30, 2014 7:27:48 PM

Good Evening Chuck:

Alameda county Environmental Health (ACEH) has completed a preliminary review the Revised Data Gap Assessment Report dated July 30, 2014 submitted on your behalf by Cardno ATC. Karel and I spent four hours this afternoon combing over the report and data and writing this directive. We are concerned with analysis and conclusions presented in the report with respect to the following:

- 1) During the June 11, 2014 meeting, ACEH spent considerable time going over data quality issues related to the previous submittal including the use of appropriate screening levels for evaluation of risk to indoor air. Our guidance was not incorporated into this revised submittal. Of most concern is the continued use of inappropriate screening levels (i.e., DTSC CHHSLs) instead of the screening levels provided in the DTSC Human Health Risk Note No. 3 (dated May 21, 2013 and subsequently revised on July 14, 2014). As discussed in the meeting, the DTSC no longer considers the CHHSLs valid. Additionally, as discussed in the meeting, PCE and TCE should also be evaluated using the criteria presented in EPA Region 9 Interim Action Levels and Response Recommendation to Address Potential Developmental Hazards Arising from Inhalation Exposures to TCE in Indoor Air from Subsurface Vapor Intrusion (dated December 3, 2013 and subsequently revised on June 30, 2014).

Subslab samples SS-1 through SS-10 should be evaluated using an attenuation factor of 0.05 (for existing commercial buildings). Using the appropriate calculations (i.e., Indoor air concentration = attenuation factor times subslab vapor concentration) the calculated indoor air concentrations ranged from 5 to 340 micrograms per cubic meter (ug/m³) for PCE, all exceeding the screening level of 2.08 ug/m³. Similarly the calculated TCE concentrations ranged from 5 to 19 ug/m³ all exceeding the screening level of 3.0 ug/m³. Please note, the low end of the calculated indoor air values (5 ug/m³) utilized the analytical laboratory detection limits of 100 ug/m³ for both TCE and PCE. These detection limits are too high and render the data unusable.

The ACEH approved work plan included installation of up to four permanent subslab vapor wells in order to collect seasonal and temporal data. The report indicates that with the exception of SS-3, all sub-slab vapor samples were collected from temporary sampling points. This is unfortunate and costly as additional data is required to be collected to assess the risk to building occupants.

A calculated concentration of 19 ug/m³ of TCE in sub-slab SS-9 exceeds the EPA Region 9 Accelerated Response Action level of 8 ug/m³ for a commercial 8-hour workday and 7 ug/m³ for a 10-hour work day. In the event of an exceedance of the Accelerated Response Action levels, the EPA recommends early or interim mitigation measure be evaluated and

implemented quickly and their effectiveness confirmed promptly (i.e., all actions completed and confirmed within a few weeks). Potential early or interim measures include increasing building pressurization and/or ventilation, sealing potential conduits where vapors may be entering, treating indoor air (carbon filtration or air purifiers), installing and operating engineered exposure controls like subslab depressurization systems, or temporarily relocating the occupants.

The 15 outdoor soil gas samples collected from 5 feet below ground surface should also be evaluated in a similar manner however using an attenuation factor of 0.0005 for future commercial buildings. Using the same methodology as described above, none of the calculated values for the SV samples exceeded the screening levels due to the assumption that future buildings have better foundations and therefore better attenuation factors. The data indicates that there is source area outside of the building, however does not eliminate the need for further assessment of source beneath the building.

Additionally the explanation provided for the high leak detection compounds in the samples is insufficient and based purely on conjecture. If a shroud was used, the shroud concentration should have been measured in accordance with DTSC guidance rather than assumed as presented in the revised report.

- 2) Benzene concentrations in the SS soil gas data clearly indicate a petroleum hydrocarbon related release at the site. A release is additionally supported by a Napthalene concentration in soil at boring location CB-8 at 10 to 10.5 feet below ground surface of 18 milligrams per kilogram (mg/kg). The vertical and lateral extent of the benzene plume in soil gas is not defined and is not accurately presented in the plume map submitted with the revised report. Additionally it is not clear whether Napthalene was analyzed in in the soil gas samples. The source of this petroleum related hydrocarbon release and its effect on the degradation of the chlorinated hydrocarbons has not been assessed as requested by ACEH. An evaluation of the effect of anthropogenic carbon (i.e., BTEX source) should be conducted to evaluate the natural attenuation of the chlorinated solvent plume and ability of vinyl chloride (VC) to continue on the path of reductive dechlorination. This request was dismissed by Cardno ATC as being inconsequential to understanding the potential risks at the site.

Technical Report and Actions Required:

1. **Risk Characterization and Uncertainty Analysis** – Consistent with the October 2011 DTSC *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance)*, ACEH requests that a Risk Characterization and an Uncertainty Analysis be conducted in order to preliminarily determine health risks at the subject site. If the estimated risk is greater than 10^{-4} or the Hazard Index is less than 1, response actions are needed (vapor intrusion mitigation and source remediation).
2. **Public Outreach to Building Occupants.** In accordance with DTSC guidance, when people have been exposed to contamination, providing them with accurate and timely information is extremely important. Timely sharing of information should be balanced against having enough information to answer the questions likely to be asked. Subsequent to completion of the Risk Characterization and Uncertainty Analysis public notification fact sheets must be generated to

communicate the results of the sub-slab sampling to building occupants and proposed mitigation measures and additional data collection including indoor air sampling in conjunction with sub-slab sampling. The fact sheets must conform to the requirements of the March 2012 DTSC *Vapor Intrusion Public Participation Advisory*. Consistent with the referenced October 2011 DTSC *Vapor Intrusion Guidance* this should be done individually or in small groups.

- 3. Interim Mitigation Measures** – Submittal of a work plan for interim mitigation measures which may include modification of the Heating, Ventilation, and Air Conditioning (HVAC) system in the affected tenant spaces, and the installation of fresh air and exhaust fans. The work plan must be prepared in accordance with the October 2011 DTSC *Vapor Intrusion Guidance*. Consistent with this guidance, ACEH does not consider mitigation to be a long-term solution. ACEH considers remediation and mitigation as complimentary components of a response action for Volatile Organic Compounds (VOCs).
- 4. Indoor Air, Subslab, and Soil Investigation Work Plan.** Submittal of a work plan with proposed indoor air sampling to be conducted in conjunction with additional sub-slab soil gas sampling in order to assess the risk to building occupants and evaluate a site specific attenuation factor across the slab. Include standard operating procedures for soil gas and indoor air sampling, quality control and quality assurance methods including specification of appropriate analytical laboratory limits.
- 5. Remedial Actions** – A Remedial Action Plan will be required to evaluate feasible remedial alternatives for the site and to recommend final alternatives in accordance with DTSC guidelines. The Remedial Action Work Plan must include an assessment of the petroleum hydrocarbon release at the site.

Compliance Dates:

Immediate action is required to address Items 1 through 4 above. Please submit the Risk Characterization and Uncertainty Analysis, Public Outreach Fact Sheet, and Interim Mitigation Measures Work Plan by Friday October 17, 2014. Submittal of the Indoor Air, Sub-slab Soil Gas, and Soil Investigation Work Plan must be submitted by October 24, 2014.

Please submit these document as draft to ACEH via email to (dilan.roe@acgov.org) in order to facilitate timely review and response and contact me with questions as Karel Detterman, the primary caseworker, will be on vacation during the next two weeks.

Dilan Roe, P.E.

Program Manager - Land Use & Local Oversight Program

Alameda County Environmental Health

1131 Harbor Bay Parkway

Alameda, CA 94502

510.567.6767; Ext. 36767

QIC: 30440

dilan.roe@acgov.org

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<http://www.acgov.org/aceh/lop/ust.htm>

From: Charles Gurney [mailto:CGurney@Weingarten.com]

Sent: Tuesday, September 30, 2014 6:55 AM

To: gabe stivala; Detterman, Karel, Env. Health; Roe, Dilan, Env. Health

Subject: RE: RO0003097 Revised Data Gap Work Plan Implementation, Site Cleanup Program 580 Market Place Shopping Center, Geotracker Global ID T10000004345, 3735-4065 East Castro Valley Boulevard, Castro Valley, CA

Karel and Dilan, I am asking that you review the Revised Data Gap Work Plan at your earliest convenience and provide comments. I sent in the additional fees as requested and it was received by the County. We have been working on this site for 2 years with very little progress. I know this is not a concern of yours, but we have a substantial amount of money tied up in escrow until we get closure and would really like to move toward closure. We will be happy to meet with you or address your comments in your review immediately in an effort to move toward closure. I appreciate your help on this.

Chuck Gurney
713-866-6855
832-372-3815 (cell)

From: gabe stivala [<mailto:gabe.stivala@cardno.com>]

Sent: Friday, September 26, 2014 6:35 PM

To: Detterman, Karel, Env. Health; Roe, Dilan, Env. Health

Cc: Charles Gurney

Subject: RE: RO0003097 Revised Data Gap Work Plan Implementation, Site Cleanup Program 580 Market Place Shopping Center, Geotracker Global ID T10000004345, 3735-4065 East Castro Valley Boulevard, Castro Valley, CA

Hi Karel and Dilan,

Just checking in. Do you have a feel for when you may have comments to us on the Revised Data Gap Work Plan?

Please let me know.

Thanks,

Gabe Stivala, P.G

SENIOR PROJECT MANAGER/SENIOR GEOLOGIST
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