

ALAMEDA COUNTY  
**HEALTH CARE SERVICE AGENCY**

REBECCA GEBHART, Interim Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH  
LOCAL OVERSIGHT PROGRAM (LOP)  
For Hazardous Materials Releases  
1131 HARBOR BAY PARKWAY, SUITE 250  
ALAMEDA, CA 94502  
(510) 567-6700  
FAX (510) 337-9335

July 17, 2017

East Bay Asian Local Development Corporation  
1825 San Pablo Avenue, Suite 200  
Oakland, CA 94607-6527

Attention: Mr. Everett Cleveland (Sent via e-mail to: [ecleveland@ebaldc.org](mailto:ecleveland@ebaldc.org))

Subject: Technical Report Request for Site Cleanup Case No. RO0003153 and GeoTracker  
Global ID T10000006348, Bekins Redevelopment, 760 22<sup>nd</sup> Street, Oakland, CA 94612

Dear Mr. Cleveland:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file, including the June 28, 2017 *Work Plan, Groundwater and Methane Investigation (Work Plan)* and the October 17, 2016 *Remedial Action Plan (RAP)* both prepared on your behalf by Essel Environmental Engineering and Consulting (Essel). Thank you for submitting the documents.

Based on site investigations completed to date, total petroleum hydrocarbon impacts have been identified in the former UST area, the former fuel dispenser area, and the geophysical anomaly area. The Work Plan proposes grab groundwater sample collection for analysis of Total Petroleum Hydrocarbons as gasoline, diesel and motor oil (TPHg, TPHd, TPHmo), volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs) from soil borings in those three areas and installation of an additional soil vapor probe to assess soil vapor methane concentrations in the geophysical anomaly area.

Based on ACEDH staff review of the Work Plan, the proposed scope of work is approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or the technical comment is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org)) prior to the start of field activities.

### **TECHNICAL COMMENTS**

**A. Soil Vapor Evaluation.** TPHg, TPHd, TPHmo and naphthalene have been detected in soil and groundwater samples collected in the vicinity of the anomaly area as shown on the RAP Plates 2 through 6 located beneath the northeastern portion of the proposed Mechanical/Electrical room and to the northwest of the western puzzle lift. Naphthalene is a chemical of concern for potential vapor intrusion risk to building occupants while degradation of TPH has the potential to generate explosive levels of methane. The following table presents a summary of naphthalene detected in soil and groundwater samples in the vicinity of the geophysical anomaly area.

Soil Boring	Naphthalene in soil @ depth feet bgs	Naphthalene in groundwater
ECB-15 @ geophysical anomaly	15 mg/kg @ 12.5'	6.1 ug/L
ECB-16 @ property line	7.6 mg/kg @ 13'	25 ug/L
ECB-17 @ south of geophysical anomaly	4.9 mg/kg @ 13.5'	31 ug/L

1. **Request for an Additional Three Soil Vapor Probes:** ACDEH requests installation of a total of four semi-permanent soil vapor probes (proposed Work Plan probe plus three probes) to support the existence of a bioattenuation zone and to provide an understanding of remaining source with respect to potential vapor intrusion risk to adjacent residential structures and the proposed new building. ACDEH requests installation of semi-permanent soil vapor probes to ensure consistency with DTSC's *Advisory Active Soil Gas Investigations* (July 2015) and allow the collection of subsequent samples if suggested by the data

- a. **Evaluation of Soil Vapor Risk to Proposed Building Near Boring ECB-15:**

The maximum TPHg, TPHd, TPHmo, and naphthalene in soil samples collected in the anomaly area were detected in ECB-15 soil samples from 12.5 feet below ground surface (bgs) in a poorly graded/well graded (SP/SW) sand. Naphthalene was also encountered in groundwater in ECB-15 at 13 feet bgs. The work plan proposes to install a soil vapor probe at a depth between 6 to 10 feet near the location of boring ECB-15 in an attempt to locate a silt unit encountered at this depth interval in previous borings. In order to evaluate methane explosive potential and vapor intrusion risk to building occupants, soil vapor samples in the vicinity of boring ECB-15 should be collected at two depths: (1) five feet below the slab foundation in vicinity of the mechanical/electrical room, and (2) in the unsaturated zone as close as possible to the maximum TPH and naphthalene detections to evaluate the impact of remaining source material on the puzzle lift. ACDEH requests the installation of two soil vapor probes for collection of this data installed at adequate distance to prevent short circuiting during sample collection.

- b. **Evaluation of Soil Vapor Risk to Adjacent Residential Structure.**

Naphthalene was also detected in soil samples and grab groundwater samples collected at ECB-16 and ECB-17 located in the vicinity of the anomaly area. Based on adjacent cases, the groundwater gradient direction appears to range from the west to northwest. Therefore, it is appropriate to evaluate potential vapor intrusion risk to occupants of the adjacent downgradient multi-residential house. ACDEH requests installation of two soil vapor probes in the following locations: 1) along the property line and midway between location of ECB-16 and ECB-11; and (2) along the property line and at location of ECB-16. Soil vapor samples must be collected from a depth of 5 feet below the bottom of the adjacent multi-residential house foundation.

2. **Soil Vapor Probe Analyses:** Essel proposes using EPA Method TO-15 to analyze the soil vapor samples for volatile organic compounds (VOCs). However, due to the challenges noted in DTSC's *Advisory Active Soil Gas Investigations* (July 2015) Appendix E using EPA Method TO-15 for analysis of naphthalene, we request either using TO-17 to analyze all soil vapor samples or additionally request that all soil vapor samples be analyzed by EPA Method TO-17 as confirmation samples

- B. **Updated Site Conceptual Model and ACPWA Well Survey:** ACDEH acknowledges that the well survey performed for the RAP using the Department of Water Resources (DWR) well data base, but requests review of Alameda County Public Works Agency (ACPWA) well data base for a complete inventory of vicinity water supply wells. The ACPWA and DWR data bases provide considerably different results to warrant review of both data bases.

ACDEH requests the identification and location on a site vicinity figure of all domestic, water supply, irrigation, and industrial wells within a 1,500-foot radius of the site. Please include the ACPWA table and site vicinity figure with the report requested below.

- C. Waste Management Documentation:** Please include documentation describing characterization and disposal of investigation-derived soil and groundwater waste with the Report requested below.

### **TECHNICAL REPORT REQUEST**

Please upload the technical report to the ACDEH ftp site (Attention: Karel Detterman), and to the Geotracker website, in accordance with the following specified file naming convention and schedule:

- **September 18, 2017:** Soil and Groundwater Investigation and Updated SCM Report  
File to be named: RO3153\_SWI\_SCM\_R\_yyyy-mm-dd

Should you have any questions, please contact me at (510) 567-6708 or send me an electronic mail message at [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org)

Sincerely,

Karel Detterman, PG  
Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party(ies) Legal Requirements / Obligations  
Electronic Report Upload (ftp) Instructions

cc: Joshua Simon, EBALDC, (Sent via E-mail to: [jsimon@ebaldc.org](mailto:jsimon@ebaldc.org))  
Jason Vargas, EBALDC, (Sent via E-mail to: [jvargas@ebaldc.org](mailto:jvargas@ebaldc.org))  
Jared Wright, EBALDC, (Sent via E-mail to: [jwright@ebaldc.org](mailto:jwright@ebaldc.org))  
Nik Lahiri, Essel Environmental and Engineering, (Sent via E-mail to: [nlahiri@esseltek.com](mailto:nlahiri@esseltek.com))  
Roger Witham, Essel, (Sent via E-mail to: [roger@esseltek.com](mailto:roger@esseltek.com))

Karel Detterman, ACDEH, (Sent via E-mail to: [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org))  
Dilan Roe, ACDEH, (Sent via E-mail to: [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))  
Paresh Khatri, ACDEH, (Sent via E-mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org))  
Electronic File, GeoTracker

## 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

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) 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 File Transfer Protocol (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 SCP 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 ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)) for more information on these requirements.

#### ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the SWRCB's GeoTracker website." 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 6731, 6735, and 7835) 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 licensed 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 case meet this requirement. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

#### 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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> December 1, 2016
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions


The Alameda County Environmental Cleanup Oversight Programs (LOP 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 [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) Open File Explorer using the Windows  key + E keyboard shortcut.
    - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
  - b) On the address bar, type in ftp://alcoftp1.acgov.org.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
  - d) Click Log On.
  - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - f) 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.