



April 14, 2017

Mr. Speed Thomas
Education for Change
303 Hegenberger Road, Suite 301
Oakland, CA 94621 (Sent via E-mail to: sthomas@efcps.net)

Subject: Voluntary Remedial Action Program (VRAP) Case No. RO0003204 and GeoTracker Global ID T10000006491, Pacific Thomas Corporation, 0 29th Avenue, Oakland, CA 94621

Dear Mr. Thomas:

Alameda County Environmental Health (ACDEH) has reviewed the case file including the *Work Plan for Limited Phase II Subsurface Investigation (Work Plan)*, prepared and submitted on your behalf by ERAS Environmental, Inc. (ERAS) and submitted on October 19, 2016.

During a meeting held on July 6, 2016 at ACDEH's office, ACDEH learned that Education for Change (EFC) purchased the property (APN 25-693-8) in November 2015 with the intent of building office space for approximately 40-60 employees on the parcel, and child care facilities were not anticipated to be included in the development. The property is currently undeveloped, but according to a 1950 Sanborn Fire Insurance Map, railroad tracks existed on the parcel. Soil samples collected in 2007 from three soil borings B-3, B-4, and B-5 in the southeastern portion of the parcel detected elevated concentrations of polychlorinated biphenyls (PCBs). Soil sampling has not been conducted in the northwestern portion of the parcel. Based on this information, the purpose of the meeting was to determine if there were potential environmental impacts at the parcel which could pose a risk to future building occupants.

Based on ACEDH staff review of the draft 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 comments are proposed. We request that you address the following technical comments, perform the proposed work, and upload it to ACDEH's ftp site and to Geotracker. Please provide 72-hour advance written notification to this office (e-mail preferred to: karel.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- 1. Soil Vapor Sample Depth:** ERAS proposed collection of soil vapor samples from a depth of 4 feet below ground surface (bgs) at seven locations across the parcel, but did not provide the rationale supporting a four-foot sample depth. To ensure that your sampling strategy is consistent with the Department of Toxic Substances Control's (DTSC's) *Advisory – Active Soil Gas Investigations* (July 2015) which states that soil gas samples collected at less than 5 feet bgs may be subject to barometric pressure effects and prone to breakthrough of ambient air through the soil column and hence, samples are not typically collected from depths of less than five feet unless site specific conditions dictate otherwise. Therefore ACDEH requests that these soil vapor samples be collected at a depth of five to five feet bgs. Additionally, please reference the updated February 22, 2016 San Francisco Bay Regional Water Quality Control Board Environmental Screening Levels (ESLs) on all soil and soil vapor summary tables.

2. **Confirmation of Naphthalene Analyses:** ERAS proposed using EPA Method TO-15 to analyze the soil gas 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 gas samples or additionally request that all soil gas samples be analyzed by EPA Method TO-17.
3. **Standard Operating Procedures:** The Standard Operating Procedure (SOP) for Soil Gas Sampling in Appendix C describes performance of the leak test, but a description of performing leak testing and purge volume testing are not included. ACDEH requests revision of the Soil Gas Sampling SOP to include a description of both leak testing and purge volume testing.
4. **Soil Vapor Analytes:** To ensure consistency with DTSC's *Advisory Active Soil Gas Investigations* (July 2015) ACDEH requests analyses of each of the soil vapor samples for oxygen, methane, and carbon dioxide in addition to the chosen tracer gas. The analytical results should be included as percentages in the summary table of soil gas analytical results.
5. **Soil Sample Samples and Depths:** Soil samples have not been collected from the northwestern portion of the site and soil samples collected in 2007 from B-3, B-4, and B-5 in the southeastern portion of the site ranged in total depth from 8 feet to 14 feet below ground surface. Consequently, to determine if there is a potential risk from direct contact, ACDEH requests the installation of soil borings to a depth of 10 feet located immediately adjacent to each of the soil vapor points. Soil samples should be collected and analyzed from the 0 to 5 and 5 to 10 foot depth intervals bgs, at the groundwater interface, lithologic changes, and at areas of obvious impact. Due to the historic presence of rail road tracks, please include the requisite analysis for Poly-Aromatic Hydrocarbons (PAHs) with the Selected Ion Monitoring (SIM) mode to ensure that the detection levels of PAHs are below ESLs. Additionally, please include analysis for wear metals and polychlorinated biphenyl (PCBs).
6. **Electronic Submittal of Information (ESI) Compliance:** Currently, site data and documents are maintained in two separate electronic databases – ACDEH's File Transfer Protocol (FTP) site and the SWRCB's Geotracker website. Both databases act as repositories for Portable Document Format (PDF) files of regulatory directives and reports, but only Geotracker has the functionality to store electronic compliance data in Electronic Deliverable Format (EDF) including analytical laboratory data for soil, vapor and water samples, monitoring well depth-to-water measurements, and surveyed location and elevation data for permanent sampling locations. Although the SWRCB is responsible for the overall operation and maintenance of the Geotracker System, ACDEH, as lead regulatory agency, is responsible to ensure that the Geotracker database is complete and accurate for sites regulated by ACDEH under the Local Oversight Program (LOP) and Site Cleanup Program (SCP) (SWRCB March 2011 document entitled *Electronic Reporting Roles and Responsibilities*).

A review of the case file indicates that the SWRCB Geotracker database and/or the ACDEH database is not complete, thus rendering the site to a non-compliant status pursuant to California Code of Regulations, Title 23, Division 3, Chapter 30, Articles 1 and 2, Sections 3890 to 3895. At present missing data and documents include, but may not be limited to:

- complete copies of reports, in pdf format, including the signed transmittal letter and professional certification (GEO_REPORT files);
- analytical data for soil, water and vapor samples collected for the purpose of subsurface investigation or remediation, including influent/effluent water samples from remediation systems (EDF files);

- surveyed elevation measurements to the top of well casings (GEO_Z files);
- the latitude and longitude (GEO_XY files) of any permanent monitoring well for which data is reported in EDF format;
- depth-to-water information for permanent sampling points whenever the data is collected, even if the well is not sampled during the sampling event (GEO_WELL files);
- stand alone site maps displaying tank locations, streets bordering the facility, and sampling locations for all soil, water and vapor samples (GEO_MAP files);
- stand alone boring logs with depth to the screened interval and the length of screened interval for any permanent monitoring well installed (GEO_BORE files);

TECHNICAL REPORT REQUEST

Please upload the technical report to the ACDEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's GeoTracker website, in accordance with the following schedule and file naming convention:

- **June 16, 2017: Soil and Groundwater Investigation Report**
RO0003204_SWI_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

Sincerely,

Karel Detterman, PG
Hazardous Materials Specialist

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

cc: Andrew Savage, ERAS, 1533 B Street, Hayward, CA 94541, (Sent via E-mail to: andrew@eras.biz)
Karel Detterman, ACDEH, (Sent via E-mail to: karel.detterman@acgov.org)
Dilan Roe, ACDEH, (Sent via E-mail to: dilan.roe@acgov.org)
Paresh Khatri, ACDEH, (Sent via E-mail to: 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/) 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.

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