

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

COLLEEN CHAWLA, Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP) FOR
HAZARDOUS MATERIALS RELEASES
1131 HARBOR BAY PARKWAY
ALAMEDA, CA 94502
(510) 567-6777
FAX (510) 337-9135

November 8, 2018

TRIPointe Homes
2010 Crow Canyon Place, Suite 380
San Ramon, CA 94583
Attn.: Mike Bowes (*Sent via electronic mail to: mike.bowes@tripointehomes.com*)

Subject: Conditional Approval- Soil Export, Site Cleanup Case No. RO0003206 and GeoTracker Global ID T10000009064, Wood St. Redevelopment, 1708 Wood and 1711 18th Avenue, Oakland, CA 94607

Dear Mr. Bowes:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the recently provided documents entitled *Non-Hazardous WAM Approval, 637083CA (83CA)* dated October 26, 2018 and *636886CA (86CA)* dated October 11, 2018. Both documents were prepared by Waste Management approving acceptance of the profiled materials to their Altamont Landfill and Recovery (ALR) facility. The documents were included as attachments to an electronic mail sent to ACDEH, Attention: Keith Nowell, dated November 6, 2018.

The 83CA document approves acceptance of approximately 2,000 cubic yards (cu. yds.) of soil profiled by samples EB-1 through EB-4, EB-6 and EB-7, characterizing material beneath the former warehouse/ loading dock structure. Material information contained in the document identifies the common material name as *Soil for ADC* and consisting of 95-100% soil with 0-5% debris including rocks and concrete.

The 86CA document approves acceptance of approximately 500 cu. yds. of petroleum hydrocarbon contaminated soil characterized by sample SP-CENTER. Material information contained in the document identifies the common material name as *High VOC soil for disposal* consisting of 95-100% soil with 0-5% debris including rocks and concrete.

ACDEH is in general agreement with the soil removal and offsite disposal to the ALR receiving facility. Please include a description of the activities surrounding the presence and removal of the off-hauled materials, including their associated disposal manifests, in the Corrective Action Completion Report for Soil Excavation and Construction Groundwater Dewatering following completion of remedial activities associated with this redevelopment project.

ACDEH notes that this case is not in compliance with regulations for the electronic submittal of information to the State Water Resources Control Board's (SWRCBs) GeoTracker site. Missing submittals include the Tank Removal Report for the underground storage tank (UST) removed along 17th Street near Willow Street and its associated supporting documentation (EDF and GEO_MAP), and the EDF and GEO_MAP files for the soil gas sampling event conducted on October 1, 2018. Please review the case file and submit missing documents to GeoTracker.

ACDEH requests submittal of the appropriate documents not on the GeoTracker site by the date specified below. Please notify ACDEH of the submittals by providing your list of submittals to our agency, Attention: Keith Nowell, via electronic mail.

TECHNICAL REPORT REQUEST

Please perform the requested work and submit technical reports to ACDEH (Attention: Keith Nowell) in accordance with Attachment 1 and the schedule below. Dates may be determined based on the project schedule.

- **Electronic Submittal of Information** – November 26, 2018; Overdue GeoTracker submittals and electronic mail notification to ACDEH, Attention: Keith Nowell
- **Tank Removal Report** – December 7, 2018; File to be named: RO3206_TNK_R_yyyy-mm-dd

Mr. Bowes
RO0003206
November 8, 2018, Page 2

- **Corrective Action Completion Report for Soil Excavation and Construction Groundwater Dewatering** – Date to be Determined; File to be named: RO3206_CACR_yyyy-mm-dd
- **GeoTracker Database Compliance** – ongoing as investigations and reports are concluded.

Thank you for your cooperation. ACDEH looks forward to working with you and your redevelopment team to advance the case toward closure. If you have any questions, please call me at (510) 567-6764 or send me an electronic mail message at keith.nowell@acgov.org.

Sincerely,



Keith Nowell
Hazardous Materials Specialist

Encl.: Attachment 1 – Responsible Party (ies) Legal Requirement/Obligations Instructions

cc:

Peter Morris, West Environmental Services & Technology, 711 Grand Avenue, Suite 220, San Rafael, CA, 94901

Dilan Roe, ACDEH, Chief Land, and Water Division (*Sent via electronic mail to: dilan.roe@acgov.org*)

Paresh Khatri, ACDEH, Managing Supervisor, Local Oversight Program (*Sent via electronic mail to: paresh.khatri@acgov.org*)

Keith Nowell, ACDEH (*Sent via electronic mail to: keith.nowell@acgov.org*)

Electronic File, GeoTracker

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

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 the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

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 and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsq.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.