



May 4, 2018

The LEMR Trust
P O Box 511
Alamo, CA 94507
Attention: Ms. Erin Tamer (Sent via E-mail to: erintamer@gmail.com)

Subject: Site Cleanup Program (SCP) Case No. RO0003214 and GeoTracker Global ID T10000009956, 295 139th Avenue, San Leandro, CA 94578

To the LEMR Trust:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file for the above referenced site including the *Soil and Groundwater Investigation, 139th Avenue Property, 295 139th Avenue, San Leandro, CA*, dated June 12, 2017 (Report). The Report was prepared by Environmental Risk Assessors (ERA) on your behalf. Based on e-mail communications earlier this week, ACDEH staff understands that in the immediate future, the LEMR Trust is not planning on selling the property, redevelopment is not planned for the property, but all tenants have vacated, the building is empty, and some construction is occurring.

ACDEH staff has evaluated the case file including the following documents:

- *Phase I Environmental Site Assessment (Phase I)*, December 4, 2015, prepared by BASICS Environmental (BASICS) for Cassidy Turley BT Commercial;
- *Limited Phase II Environmental Site Assessment Report (Phase II)*, March 3, 2016, prepared by Environmental Risk Assessors (ERA) for BASICS;
- *Soil and Groundwater Investigation Work Plan (Work Plan)*, February 8, 2017, prepared by ERA for the LEMR Trust;
- *Soil and Groundwater Investigation (Report)*, June 12, 2017, prepared by ERA for the LEMR Trust.

The site is comprised of one building that has been subdivided into 5 units since the 1980's and has been occupied by auto painting and auto body repair businesses. Chemicals of potential concern (COPCs) identified at the site include tetrachloroethene (PCE), benzene, ethylbenzene, and diesel. Historical and current uses of the building appear to have contributed to the presence of COPCs in subslab (SS), soil gas, soil, and groundwater. The site appears to be located in proximity of the Davis Street-Washington Avenue-Alvarado Street (DWA) Plume, a regional trichloroethene (TCE) groundwater plume originating from the Hudson property located at 400 Hudson Lane, San Leandro located approximately 1,900 feet cross gradient from the site.

The objective of the environmental work is to assess the potential of vapor intrusion to indoor air to building occupants from volatile organic compounds (VOCs) and petroleum hydrocarbons in soil, soil vapor, and groundwater beneath the site from past and current site activities.

Based on ACDEH staff review of the case file, we request that you prepare a Work Plan that is supported by a Site Conceptual Model (SCM) to address the Technical Comments provided below.

TECHNICAL COMMENTS:

1. **Soil Gas, Sub-Slab, and Indoor Air Soil Gas Work Plan:** Please submit a work plan with proposed indoor air sampling to be conducted in concurrently with sub-slab and soil gas sampling

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 well installation and sampling, quality control and quality assurance methods including specification of appropriate analytical laboratory limits in an appendix in the work plan requested below. ACDEH requests installation of permanent soil vapor wells and subslab probes to allow sample collection to assess temporal and seasonal variability in subslab and soil gas concentrations. Please ensure consistency with DTSC's *Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air* (Vapor Intrusion Guidance) dated October 2011 and DTSC's *Advisory Active Soil Gas Investigations*, July 2015.

- a. PCE was detected during the April 2017 sampling event in all temporary subslab and soil vapor samples SB-6, SB-8, SB-9, and SB-10 ranging between 240 to 4,700 micrograms per liter (ug/L) and the 0.5-foot subslab PCE concentration exceeded the 5.5-foot soil gas concentration, indicating a near surface on-site PCE source instead of impacts from the DWA plume. Because plumbing penetrations can provide preferential pathways, please revise all site figures to indicate the locations of all plumbing fixtures including sinks, toilets, and associated underground lines.
 - b. TCE concentrations were not detected above the laboratory detection limit of 100 microgram per cubic meter (ug/m³) during the April 2017 sampling event; however, indoor air TCE concentrations 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 revised June 30, 2014). This request requires a lower analytical detection limit and must be communicated to the analytical laboratory in advance.
 - c. Please submit a figure with the Work Plan indicating the modifications currently being made to the building, especially subsurface trenching, modifications to plumbing, and/or any subsurface work.
2. **Geophysical Survey Report:** The Phase II Report refers to a geophysical survey report that had reportedly been conducted in the past which did not reveal evidence of an underground storage tank (UST) on site. Please submit the Geophysical Report or include a proposal to conduct a geophysical survey in the Work Plan requested below.

TECHNICAL REPORT SCHEDULE

Please upload technical reports to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **June 8, 2018 – Underground Storage Tank Geophysical Report**
File to be named: RO3214_MISC_R_YYYY-mm-dd
- **July 9, 2018 – Work Plan and Site Conceptual Model**
File to be named: RO3214_WP_SCM_R_YYYY-mm-dd

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

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Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please send me an e-mail message at karel.detterman@acgov.org or call me at (510) 567-6708.

Sincerely,

Karel Detterman, PG
Senior Hazardous Materials Specialist

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

cc: Lita D Freeman, ERA (Environmental Risk Assessors), 1420 East Roseville Parkway, Suite 140-262, Roseville, CA 95661 (Sent via E-mail to: litafreeman@gmail.com)

James Tamer (Sent via E-mail to: jtamer2@yahoo.com)

Dilan Roe, ACDEH (Sent via E-mail to: dilan.roe@acgov.org)

Paresh Khatri, ACDEH (Sent via E-mail to: paresh.khatri@acgov.org)

Karel Detterman, ACDEH (Sent via E-mail to: karel.detterman@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.bpelsg.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.