



February 1, 2018

Haig's Delicacies, LLC
Attention: Mr. Steven Cherezian
25673 Nickel Place
Hayward, CA 94545
(Sent via electronic mail to: steven@haigsdelicacies.com)

Subject: Request for Additional Vapor Intrusion Investigation Work Plan for Site Cleanup Program No. RO0003246 and GeoTracker Global ID T10000010739, Haig's Delicacies, 25673 Nickel Place, Hayward, CA 94545, Assessor's Parcel Numbers 439-100-5-1 and 439-100-5-2

Dear Mr. Cherezian:

On June 22, 2017, Haig's Delicacies, LLC (Haig's) entered into a *Voluntary Remedial Action Program Agreement* with Alameda County Department of Environmental Health (ACDEH) to provide regulatory oversight for the subject site (the Site). In order to advance the Site towards closure ACDEH met with you and your environmental consultant on January 11, 2018 to discuss the results presented in the recent Phase I and II environmental investigations and proposed path forward at the Site.

ACDEH understands the Site is located in a commercial/light industrial area of Hayward and consists of two parcels (APNs above) currently developed as an office/warehouse which produces organic hummus and other similar types of dips and spreads. A railroad spur is located on APN 439-100-5-1 in the southern portion of the property. The warehouse is located on APN 439-100-5-2 with asphalt and concrete parking areas with modest landscaping located to the north and east, respectively. Historical records indicate the property remained structurally undeveloped until the late 1970s. Subsequent to site development operations at the Site included a trade school, printing company, and golf club manufacturing. ACDEH understands that building improvements including the installation of new piping and utilities was completed by the current property owner after the site was purchased from the golf manufacturing company in 2008.

To date the following documents have been submitted to ACDEH for review:

- *Phase 1 Environmental Site Assessment, 25673 Nickel Place, Hayward, CA*, prepared by ERAS Environmental, Inc., prepared for Haig's Delicacies by ERAS Environmental, Inc., dated May 19, 2008;
- *Phase 1 Environmental Site Assessment for Haig's Delicacies, 25673 Nickel Place, Hayward, CA, 94545*, prepared for Citibank, N.A. by Applied Water Resources (ADR) Environmental Group, Inc., dated September 20, 2016;
- *Groundwater Soil, & Soil Vapor Sampling Results, 25673 Nickel Place, Hayward, CA*, prepared for Haig's Delicacies by ADR, dated December 2, 2016;
- *Monitoring Well Installation and Sampling and Indoor Air Report, 25673 Nickel Place, Hayward, CA*, prepared for Haig's Delicacies by ADR, dated March 17, 2017;

- *Data Gap Investigation Work Plan and Focused Conceptual Site Model, Haig's Delicacies, 25673 Nickel Place, Hayward, CA, prepared by Applied Water Resources, dated October 13, 2017;*

Two Phase I environmental site assessments (ESAs) were prepared for the Site, dated May 19th 2008 and September 20th 2016, respectively. Based on discussions at our meeting on January 11, 2018, ACDEH understands the 2008 Phase I was performed prior to the property transaction between Orlimar Golf Company (Orlimar), a gold club manufacturing company and you. Results of the 2008 ESA prepared by ERAS Environmental, Inc. (ERAS) indicated Orlimar was documented under the RCRA hazardous waste generator database. However, conclusions presented by ERAS indicated that recognized environmental conditions (REC) were not identified for soil and groundwater and additional subsurface investigations were not warranted.

The second 2016 ESA was prepared by Applied Water Resources Environmental Group, Inc. (ADR) on behalf of Citibank as part of refinancing of the property. Results indicated Orlimar occupied the site from the early 1980s through the late 1990s and conducted operations which included the use and storage of hazardous materials (i.e. petroleum, lacquer thinner, and halogenated solvents), the operation of a degreaser, and the generation of hazardous waste. Additionally, inspection records from between the 1980s and 1990s indicated hazardous materials were stored inside and outside of the Site without secondary containment. ADR recommended additional subsurface investigations to determine if past tenants have environmentally impacted the site due to the former use of potential chemicals of concern, the presence of a waste water sump in the northern portion of the building, and a hazardous materials storage compound in the northwestern corner of the parcel.

Two subsurface site investigation have been conducted without regulatory oversight per direction of Citibank. Reports from these investigations have been prepared by ADR and include: *Groundwater, Soil & Soil Vapor Sampling Results* dated December 2, 2016 and *Monitoring Well Installation and Sampling and Indoor Air Report*, dated March, 17, 2017. The first 2016 investigation documented the installation of soil bores SB-1 to SB-3, and soil vapor point SV-1, and the collection of soil, grab groundwater, and a soil vapor sample. Soil results indicated relatively low concentrations of Total Petroleum Hydrocarbons as diesel (TPH-d) and TPH as motor oil (TPH-mo) in soil samples (up to 1.7 milligrams per kilogram [mg/kg] TPH-d and 30 mg/kg TPH-mo). Grab groundwater samples indicated TPH-d was reported up to 150 micrograms per liter (μ l) and TPH-mo up to 3,100 μ l in sample SB-2-GW. Silica Gel Cleanup (SGC) does not appear to have been conducted on the extractable hydrocarbon analysis. A concentration of 64 μ l Trichloroethene (TCE) was also detected in grab groundwater sample SB-2-GW, located in proximity to the former hazardous materials storage compound location. Among other chemicals, TCE was also detected in soil vapor sample SV-1 at a very low concentration of 3.1 micrograms per cubic meter (μ g/m³). Vapor sample SV-1 was collected at the southern edge of the parcel, a substantial distance from the location of SB-2. During subsequent discussions with the bank regarding the grab groundwater results presented in the 2016 investigation report, the bank requested additional indoor air sampling and installation/sampling of one groundwater monitoring wells to further characterize subsurface conditions.

The second investigation was conducted in February 2017. Groundwater monitoring well MW-1 was installed at the reported location of the former hazardous material compound, and two indoor and one outdoor vapor samples were collected. Results indicated indoor air samples were all below applicable Environmental Screening Levels (ESLs) for commercial indoor air "Direct Exposure Human Health Risk Levels" as promulgated by the San Francisco Bay Regional Water Quality Control Board (RWQCB), but were above the residential "Direct Exposure Human Health Risk Levels" ESLs.

Soil samples collected during the installation of MW-1 detected up to 1,336 mg/kg TPH-mo at a depth of two feet below grade surface (bgs). Similar to the previous report, SGC was not used. In groundwater collected from well MW-1, concentrations up to 44.9 µ/l TCE and 11.4 µ/l cis-1,2-Dichloroethene (cis-1,2-DCE) were detected. Both concentrations are below applicable commercial "Groundwater Vapor Intrusion Human Health Risk Levels" ESLs; however, only a single groundwater sampling event has been conducted at the site, and it is uncertain the groundwater sample is representative of worst-case concentrations. This may be important due to the immediate presence of two adjacent commercial buildings on adjacent parcels. It is also uncertain if a regional TCE groundwater plume may be present in the site vicinity.

A *Data Gap Investigation Work Plan and Conceptual Site Model* dated October 13, 2017 was submitted by the RP/EC in response to a directive letter issued by ACDEH on August 4, 2017 prior to our recent meeting. During our meeting on January 11, 2018, ACDEH discussed bifurcating the investigation and having you focus on the evaluation of human health risk from vapor intrusion to the occupants of your building. As a result, preparation of vapor intrusion investigation work plan is being requested by ACDEH.

Results presented in the previous investigation reports suggest that past tenant operations may have environmentally impacted the site. The chemicals of concern reported from these investigations are indicative of hazardous materials stored and operated at the site based on inspection records from between the 1980s and 1990s. As a result, a site information request will be sent by ACDEH to the former tenants requesting they provide additional information on their operations and chemical inventory at the site. Based on the information provided, ACDEH will make a determination as to whether to name them as RPs for the investigation and cleanup of site contamination in soil and groundwater at the site.

Based on our review of the above listed documents and discussion presented during the meeting on January 18, 2018, ACDEH requests that you (re) submit the requested deliverables to the State Water Resources Control Board's GeoTracker website and ACDEH ftp site (Attention: Drew York) in accordance with the compliance schedule provided below and the *Electronic Report Upload (ftp) Instructions and File Naming Conventions* which are included as Attachments 1 and 2 respectively. ACDEH requests email notification verifying the requested deliverables have been uploaded to the requisite databases (e-mail preferred to: andrew.york@acgov.org)

DELIVERIBLES

1. **Additional Vapor Intrusion Work Plan** – ACDEH requests preparation of a figure showing proposed locations of sub-slab vapor pins to evaluate subsurface soil gas conditions under the building footprint and evaluate human health risk from vapor intrusion to indoor air.

In order to expedite review, ACDEH requests the figure illustrate the location of the proposed vapor pins, the current floor plan of the building footprint (including office, bathroom, production line ,etc locations) and new piping and utilities installed after the property was purchased.

2. **Correct Case Number and Resubmission of Soil and Groundwater Investigation Reports** – A review of the case file has indicated some documents have recorded the wrong RO number. The RO case Number for this site is RO-0003246. Please provide the correct RO number on all future correspondence.

Additionally, as required by the State of California, a registered Professional Engineer or Geologist (PE/PG) is required to sign and stamp all reports documenting subsurface environmental investigations including *Groundwater, Soil & Soil Vapor Sampling Results* dated

December 2, 2016 and *Monitoring Well Installation and Sampling and Indoor Air Report*, dated March, 17, 2017. Both these investigation reports are currently signed and stamped by a principle consultant and does not include a PE/PG signature. As a result, ACDEH is rejecting both reports in GeoTracker and requesting the documents be re-submitted to GeoTracker with a PE/PG stamp. If a PE/PG did not oversee the work as required by the State of California and therefore cannot sign and stamp the reports then the data presented in these reports will only be considered as qualitative data and would need to be validated through additional field investigations and sample collection.

- 3. GeoTracker Database Compliance** – Site data and documents are maintained in the State Water Board's GeoTracker website. The database acts as repositories for Portable Document Format (PDF) files of regulatory directives and reports and has the functionality to store electronic compliance data in Electronic Deliverable Format (EDF) including analytical laboratory data for soil, vapor, and groundwater samples, monitoring well depth-to-water measurements, and surveyed location and elevation data for sampling locations.

A review of the State Water Board's GeoTracker database indicates that this site is not in compliance with the State's electronic submittal requirements. As a result, ACDEH requests Haig's upload all historical environmental documents related to the subject site including but not limited the missing soil and groundwater analytical data, documents and reports, maps, and boring logs to GeoTracker. See Attachment 1 regarding electronic submittal requests to GeoTracker. Notification of, and a list of, the documents uploaded to GeoTracker can be emailed to my attention (Attention Drew York). File naming conventions for Geotracker uploads is included in Attachment 2. Please upload all submittals to GeoTracker by **February 28, 2018** and furthermore as environmental site data and reports are submitted.

Thank you for your cooperation. If you have any questions, please call me at (510) 639-1276 or send me an email message at andrew.york@acgov.org.

Sincerely,



Drew J. York
Senior Hazardous Materials Specialist



Dilan Roe, PE, C73703
Chief - Land Water Division

Encl.: Attachment 1 – Responsible Party (ies) Legal Requirement/Obligations
Attachment 2 – Electronic File Naming Conventions

cc: Ken Price, Applied Water Resources Corp. (Sent via E-mail to: kprice@awrcorp.net)
Dilan Roe, ACDEH, Chief Land, and Water Division (Sent via E-mail to: dilan.roe@acgov.org)
Paresh Khatri, ACDEH (Sent via E-mail to: paresh.khatri@acgov.org)
Drew York, ACDEH (Sent via E-mail to: andrew.york@acgov.org)
Electronic File, GeoTracker

ATTACHMENT 1

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| 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

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| 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.

ATTACHMENT 2

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| Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) | REVISION DATE: August 1, 2017 |
| | PREVIOUS REVISIONS: July 17, 2017, November 8, 2016, December 15, 2015, December 16, 2014, June 19, 2013, June 15, 2011, March 26, 2009, April 29, 2008 |
| | ISSUE DATE: June 16, 2006 |
| SECTION: Miscellaneous Administrative Topics & Procedures | SUBJECT: File Names for Electronic Reports |

Format: REPORT_NAME_R_YYYY-MM-DD
Ex: SWI_R_VOL1_2006-05-25

| LOP and SCP (VRAP) INCOMING REPORTS AND LETTERS | |
|---|---|
| Document Name | Abbreviation File Name= Abbreviation + Date (yyyy- mm-dd) |
| Abandoned Well Information/Water Supply Well Information | ABWELLINF_R |
| Addendum | ADEND_R (added after report name) |
| Additional Information Report | ADD_R |
| Analytical Reports (Loose data sheets not in report) | ANALYT_R |
| As Built Drawings (or Plans) | AS_BUILT |
| Case File Scanned By OFD | CASE_FILE |
| Cleanup and Abatement Report | CAO_R |
| Case Transfer Form (from CUPA) | CASE_TRNSFR_F |
| Conduit Study/Well Search/Sensitive Receptor/Well Survey/Preferential Pathway Study | COND_WELL_R |
| Corrective Action Plan (CAP) | CAP_R |
| Correspondence | CORRES_L |
| Court Injunctions | INJ_L |
| Development Plans (Includes Plan Set, Cross-sections, and Related Drawings) | DEV_PLAN_date |
| Development Schedule (Project Schedule, Gant Chart, etc.) | DEV_SCHD_date |
| DWR Confidential Well Logs (Report containing) | report name_R_CONFIDENTIAL_YYYY-MM-DD (Ex: SWI_R_CONFIDENTIAL_YYYY-MM-DD) |
| DWR Well Completion Report-Confidential (Loose well logs) | DWR_WELL_CONFIDENTIAL_YYYY-MM-DD (Date of Well Log) |
| ESI/DAR (Environmental Site Investigation, Data Assessment Report) | ESI_R |
| Excavation Report | EX_R |
| Extension Request Letter | EXT_RQ_L |
| Fact Sheet | FACT_SHT |

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|--|-----------------|
| Feasibility Study | FEASSTUD_R |
| Groundwater Monitoring/Quarterly Summary Report | GWM_R |
| Financial Assurance/Letter of Credit | FNCL_ASSRNC_LOC |
| Interim Remedial Action Plan | IRAP_R |
| Interim Remediation Results (Includes Pilot Test Reports, Vapor Mitigation Reports, Soil Reports, Free Product Removal Reports, & Dual-Phase Extraction Reports) | IR_R |
| Lawsuit | LAWSUIT_R |
| Migration Control Report | MIG_R |
| Miscellaneous Report/Soil Sample | MISC_R |
| Miscellaneous Sample Report (analytical results) | MISC_SAMP_R |
| Notification Letter | NOT_L |
| NPDES Miscellaneous Reports | NPDES_R |
| Operations & Maintenance Plan | OM_P |
| Operations & Maintenance Report | OM_R |
| Pay for Performance | PFP_R |
| Petition | PETITION_R |
| Phase 1 Environmental Assessment Report | PHASE1_R |
| Photos | PHOTO_date |
| Preliminary Site Assessment Report/Phase 2 (historic reports only) | PSA_R |
| Remedial Action Plan | RAP_R |
| Remedial Design & Implementation Plan | RDIP_R |
| Remediation Progress Report | REM_R |
| Request for Closure | RFC(_L or _R) |
| Risk Assessment Report | RISK_R |
| Risk Based Corrective Action | RBCA_R |
| List of Landowners Forms | LNDOWNR_F_DATE |
| SB2004 Letter of Commitment | LOC_L |
| Site Conceptual Model/Conceptual Site Model | SCM_R |
| Site Health & Safety Plan | SFTY_PLAN_R |
| Site Management | SITE_MANAGE_R_ |
| Site Management Plan | SMP_R |
| Site Summary Report | SITE_SUM_R |

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| Soil and Water Investigation Report (Includes soil gas/vapor reports, indoor, additional site investigation, well installation, site characterization, cross section, indoor air, additional onsite investigation, Phase II/preliminary site assessment) | SWI_R |
| Soil Disposal Report | SOIL_DSPL_R |
| Source Area Characterization | SOURCAREA_R |
| State Information | STATE_INFO (no date) |
| Status Report(monthly remediation status reports addressed to sanitary district requires no stamp/perjury) | STAT_R |
| Tank/Tank System Removal Report | TNK_R |
| Tentative Order Report | TENT_R |
| Unauthorized Release Form | URF_R |
| UST Sampling Report | UST_SAMP_R |
| USTCF 5 Year Review | USTCF_5YR |
| USTCF issued Public Notice | USTCF_PP_L |
| Well Construction Report (limited to water supply wells) | WELL_CST_R |
| Well Decommissioning Report/Letter (well destruction/abandonment) | WELL_DCM_R |
| Work Plan | WP_R |

**LOP and SLIC
ACEH OUTGOING LETTERS AND CASE FILE DOCUMENTATION**

| Document Name | Abbreviation File Name= Abbreviation + Date (yyyy-mm-dd) |
|---|---|
| 90 Day Letter | 90D_L |
| CAP Approval | CAP_AP_L |
| RP Certification of Public Notice | CAP_CERT_L |
| CAP Public Participation Letter | CAP_PP_L |
| CAP Public Participation Letter to RP | CAP_PPRP_L |
| Certified Mail Receipt | CERT_MAIL_RECEIPT |
| Cleanup and Abatement Order | CAO_L |
| Closure Public Participation Letter | CL_PP_L |
| Closure Package (Letter, RACC, Summary, Deed Restriction) | CLOS_L |
| Correspondence | CORRES_L |
| Deed Restriction | DEED_L_ (Copied from CLOS_L_) |
| Directive Letter containing Public Notice and/or Landowner request form | DIR_PP_L |
| Directive Letter (Landowner form, site management requirements, well decommission scheduling prior to closure of PP, copy of PP to all RPs) | DIR_L |
| Enforcement | ENF_L |
| Enforcement Referral Letter | ENF_REF_L |
| Extension Approval Letter | EXT_AP_L |
| Extension Denial Letter | EXT_DNY_L |
| Fund Requests | FUND_REQ_L |
| Final Voluntary Remedial Action Agreement | FVRAA_date |
| GeoTracker info | GEOTRACK_R |
| Late Letter | LATE_L |
| List of Landowners Forms | LNDOWNR_F_DATE |
| Mailing List for Public Notice in Excel Format | MAIL_PP_DATE |
| Maps & Assessor's Parcel Information | MAPS_ASSESSOR (no date) |
| Meeting Agenda, Minutes, Sign in Sheet | MEETING |
| Miscellaneous Letter | MISC_L |
| New Landowner Letters | LNDOWNR_REQ_L |
| Notice of Responsibility | NOR_L |
| Notice of Violation | NOV_L |
| Phone Log | PHONE_LOG |
| Photos | PHOTO_date |
| Post Closure Monitoring | PCMP_L |
| QA/QC Checklist (confidential) | QAC_report name_date |
| Responsible Parties Information | RPINFO_L_DATE OF THE LETTERHEAD |
| Returned Mail | RTN_MAIL_date |

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|--|-------------|
| Site Visit/Inspection Report | SITEVISIT_R |
| Transfer Letter | TRANS_L |
| UST Permit | UST_PRMT |
| Voluntary Remedial Action Notice to State Agencies | VRA_NOTICE |
| Voluntary Remedial Action Request Form from RP | VREQ_F |