

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, SUITE 250  
ALAMEDA, CA 94502  
(510) 567-6700  
FAX (510) 337-9335

July 27, 2018

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

Subject: Conditional Approval of *Vapor Intrusion 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:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the site cleanup case file in conjunction with the additional subsurface vapor investigation outlined in the *Vapor Intrusion Work Plan* (the Work Plan), dated May 16, 2018, prepared by Applied Water Resources (AWR) on your behalf and electronically received by ACDEH on May 29, 2018.

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 the Site included a trade school, printing company, and golf club manufacturing company 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. 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.

Subsurface investigation activities conducted by AWR in February 2017 included the advancement of one groundwater monitoring well installed at the reported location of the former hazardous material compound, and two indoor and one outdoor vapor locations. Results indicated groundwater concentrations up to 44.9 micrograms per liter ( $\mu\text{l}$ ) of trichloroethylene (TCE) and 11.4  $\mu\text{l}$  of cis-1,2-Dichloroethene (cis-1,2-DCE) were detected. Both concentrations are below applicable San Francisco Bay Regional Water Quality Control Board environmental screening levels (ESLs) for commercial Groundwater Vapor Intrusion Human Health Risk Level; 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. Results from the indoor air samples indicated concentrations of methylene chloride were above Direct Exposure Human Health Risk Levels ESLs for residential use. Additionally, results presented in the previous subsurface investigation reports and Phase I environmental site assessments 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 review of historical inspection records from between the 1980s and 1990s.

Following AWR's February 2017 subsurface investigation activities an additional *Data Gap Investigation Work Plan and Focused Conceptual Site Model* dated October 13, 2017 was submitted by AWR on your behalf. A response to the work plan was issued in a directive letter by ACDEH on August 4, 2017 prior to our recent meeting. Based on discussions held during our most recent 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. Subsequent to the meeting, ACDEH issued a directive letter dated February 1, 2018 requesting a work plan for additional soil vapor investigation activities.

The proposed scope of work presented in the above-mentioned Work Plan consists of the advancement of six sub-slab vapor pins to evaluate potential chemicals of concern (PCOCs) and human health risk from vapor intrusion to the occupants of your building. Three sub-slab vapor pins are proposed at locations outside of the Site building in the vicinity of the former hazardous waste storage area and adjacent to the offsite properties. Three additional sub-slab vapor pins are proposed inside the Site building including outside of the former paint booth area (outside the designated current food prep area) and inside the building office and bathroom to evaluate human health risk and preferential pathway migration from building utilities. Additionally, the Work Plan also incorporates the scope of work previously proposed in the *Data Gap Investigation Work Plan and Focused Conceptual Site Model* dated October 13, 2017, including the advancement of 3 soil borings, installation of 2 groundwater wells, and 3 additional soil vapor samples. The location of the 3 subsurface vapor samples are proposed in general vicinity of the proposed sub-slab vapor pins mentioned above and are located outside of the Site building to evaluate subsurface vapor near the former hazardous waste storage area and adjacent offsite properties. The proposed location of the soil borings and groundwater wells were selected to delineate the extent of PCOCs at the site boundaries near the former hazardous waste storage area, (2) evaluate soil and groundwater from potential offsite sources, and (3) evaluate subsurface lithology near the former hazardous waste storage area.

Based on our review of the Work Plan, ACDEH is in general concurrence with the proposed scope of work to collect soil, soil vapor, and groundwater data and evaluate subsurface conditions. Therefore, ACDEH conditionally approves the proposed scope of work provided that you address the *Technical Comments* regarding the Work Plan below, conduct the work, and submit the requested *Deliverables* to the State Water Resources Control Board's GeoTracker website in accordance with the compliance schedule provided below and the *Responsible Party (ies) Legal Requirement/Obligations 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 GeoTracker (e-mail preferred to: [andrew.york@acgov.org](mailto:andrew.york@acgov.org)).

## **TECHNICAL COMMENTS**

1. **Soil Gas Laboratory Analysis** – The Work Plan states that soil gas sampling will be performed in accordance with the *Advisory– Active Soil Gas Investigations* dated April 2012, prepared by the California Department of Toxic Substances Control (DTSC) California Environmental Protection Agency and San Francisco & Los Angeles Regional Water Quality Control Board as presented in Appendix B of your previous work plan - *Data Gap Investigation Work Plan and Focused Conceptual Site Model* dated October 13, 2017. ACDEH requests that soil gas sampling be performed in accordance with the updated *Advisory– Active Soil Gas Investigations* dated July 2015.

The Work Plan also states that a shroud with Helium tracer gas will be used to monitor for system leaks. The purpose of this leak check method is to provide a quantifiable means of evaluating the data quality effects of ambient air intrusion into the soil gas sample. In order to ensure that the quality of helium data is sufficient and adequate for this purpose, ACDEH requests that (1) the encapsulating shroud entirely encompass the sample apparatus and surface completion of the soil gas well or vapor pin; (2) an at least 20% helium atmosphere is maintained within the encapsulating shroud throughout the duration of purging and sampling; and (3) shroud helium concentrations be monitored, recorded, and reported in field logs. Helium monitoring may be conducted using a field meter as long as the detector is capable of reporting Helium detections between 100% and 0.1% with a precision of at least +10% at 0.1%. Lastly ACDEH requests that soil gas samples be analyzed for helium using ASTM D1946.

## **DELIVERIBLES**

1. **Subsurface Investigation Report** – A technical report documenting the results of the scope of work presented in the approved Work Plan and Addendum.
  - **September 25, 2018** – Subsurface Investigation Report  
File to be named: RO3246\_SWI\_R\_2018-09-25
2. **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 requested in our meeting on January 11, 2018 and directive letter dated February 1, 2018. In this directive letter were requested submittals to GeoTracker by February 28, 2018. ACDEH requests you upload all historical environmental documents related to the subject site including but not limited the missing soil and groundwater analytical data, documents, maps, and boring logs to GeoTracker. Please upload all submittals to GeoTracker by **Monday, August 27, 2018** and furthermore as environmental site data and reports are submitted.

Mr. Cherezian  
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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) 639-1276 or send me an email message at [andrew.york@acgov.org](mailto: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 Instructions  
Attachment 2 – Electronic File Naming Conventions

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

ATTACHMENT 1

|  |  |
|--|--|
| <b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b> | <b>REVISION DATE:</b> December 14, 2017  |
|  | <b>ISSUE DATE:</b> July 25, 2012   |
|  | <b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016 |
| <b>SECTION:</b> ACDEH Procedures   | <b>SUBJECT:</b> 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/](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 values<sup>1</sup> 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                      |
|---|---------------|------------|----------|-----------|--------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <b>2016 Subsurface Investigation Report</b> | 2016 S1       | ✓          | ✓        | Effluent  | SO     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ✓                        |
| <b>2012 Site Assessment Work Plan</b>       | 2012          | ✓          | ✓        |           |        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <b>2010 GW Investigation Report</b>         | 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      | ✓                        | ✓                        | ✓                        | ✓                        | ✓                        |

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

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|--|--|
| <b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b> | <b>REVISION DATE:</b> NA   |
|  | <b>ISSUE DATE:</b> December 14, 2017   |
|  | <b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016 |
| <b>SECTION:</b> ACDEH Procedures   | <b>SUBJECT:</b> 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/](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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|--|---|
| <b>Alameda County Environmental<br/>Cleanup Oversight Programs<br/>(LOP and SCP)</b> | <b>REVISION DATE:</b> August 1, 2017  |
|  | <b>PREVIOUS REVISIONS:</b><br><br>July 17, 2017, November 8, 2016, December 15, 2015, December 16, 2014, June 19, 2013, June 15, 2011, March 26, 2009, April 29, 2008 |
|  | <b>ISSUE DATE:</b> June 16, 2006  |
| <b>SECTION:</b> Miscellaneous Administrative Topics & Procedures                     | <b>SUBJECT:</b> File Names for Electronic Reports   |

Format: REPORT\_NAME\_R\_YYYY-MM-DD  
Ex: SWI\_R\_VOL1\_2006-05-25

| <b>LOP and SCP (VRAP)<br/>INCOMING REPORTS AND LETTERS</b>                          |   |
|---|---|
| <b>Document Name</b>  | <b>Abbreviation<br/>File Name= Abbreviation + Date (yyyy- mm-dd)</b>      |
| 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  |

|  |                 |
|--|-----------------|
| 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      |

|  |                      |
|--|----------------------|
| 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**

| <b>Document Name</b>  | <b>Abbreviation<br/>File Name= Abbreviation + Date (yyyy-mm-dd)</b> |
|---|---|
| 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   |

|  |             |
|--|-------------|
| 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      |