

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

June 14, 2018

Mr. Mo Mashhoon
Mash Petroleum, Inc.
428 13th Street, Floor 10
Oakland, CA 94588
(Sent via electronic mail to:
momashhoon@mashpetroleum.com)

Mr. David Cropper
BA1 2201 Valley LLC
c/o TMG Partners
100 Bush Street, Suite 2600
San Francisco, CA 94104
(Sent via electronic mail to: dcropper@tmgpartners.com)

Subject: Revised Work Plans Request; Site Cleanup Program Case No. RO0003258 and Geotracker Global ID T1000010738, A+A Gas & Mart, 2200 Telegraph Avenue, Oakland, CA 94612

Dear Messrs. Mashhoon and Cropper:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the *Workplan for Further Investigation and Rebound Study*, dated May 24, 2018, and an *Addendum to "Workplan for Further Investigation and Rebound Study"*, dated June 14, 2018, by SOMA Environmental Engineering, Inc (SOMA) for work proposed at 2200 Telegraph Avenue and at 2201 Valley Street, in Oakland California. Additionally, the *Work Plan for Pre-Construction Soil Characterization Investigation*, dated May 29, 2018, by PES Environmental, Inc. (PES) was submitted for work proposed at 2201 Valley Street. Thank you for submitting the work plans and the addendum.

ACDEH understands that TMG is proposing to redevelop the two parcels as a multiuse property, currently owns 2201 Valley Street, and is in contract to purchase 2200 Telegraph Avenue from Mr. Mashhoon. The 2200 Telegraph Avenue parcel is an active fueling station and is associated with a former Leaking Underground Storage Tank (LUST) case (No. RO0002435; Global Id. No. T0600161613). The 2201 Valley Street is an asphalt paved parking lot and historical use was residential and paved parking. BART tunnels extend beneath portions of both properties at a depth of approximately 12 feet below grade surface (bgs) to the top of the tunnels. The proposed redevelopment is presented in conceptual plans dated March 28, 2018, and consists of subsurface infrastructure outside of the BART right-of-way, and cantilevered structures over the BART right-of-way.

These two work plans were prepared by consultants representing each of the separate property owners. It is our understanding that the scopes of work have been reviewed by each consultant as previously discussed in meetings.

The SOMA work plan proposes to install 10 Direct Push Technology (DPT) soil bores and 13 soil vapor probes to characterize the extent of, and evaluate risk from, the naphthalene plume associated with the former LUST case on 2200 Telegraph Avenue, at the 2201 Valley Street property. Additionally to pre-characterize soil proposed for excavation and offsite disposal, the SOMA work plan proposes to install seven shallow hand auger bores at 2200 Telegraph Avenue within proposed pile cap locations. The SOMA work plan also proposes to conduct a MPE remediation and rebound testing on both parcels associated with the redevelopment using existing extraction wells.

The PES work plan proposes the installation of 20 soil bores on a grid pattern at the 2201 Valley Street property to varying depths based on proposed redevelopment excavation depths, in order to pre-characterize soil proposed for excavation and offsite disposal at appropriate accepting facilities.

Based on ACDEH staff review of the above referenced documents and of the case file we generally concur with the recently proposed scope of work, provided that you address the following technical comments, submit the requested documents, and upon ACDEH approval, perform the proposed work, and send us the technical reports requested below. Please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

- 1) **SOMA Work Plan Requested Modifications** – The referenced SOMA work plan and addendum proposes a series of actions with which ACDEH is in general agreement of undertaking; however, ACDEH requests modifications to the approach as discussed below. Please submit a revised work plan incorporating the comments below by the date specified below.
 - a) **Soil Vapor Sampling** – It is understood that the soil vapor probes proposed to be installed will be permanent for the life of the project, and are proposed to be destroyed at the end of the project, and thus have been called temporary.
 - i) **Additional Soil Vapor Data Collection Locations** – Based on communications between SOMA and ACDEH, the referenced work plan addendum proposed the addition of six soil vapor locations (SG-14 to SG-19) at the 2200 Telegraph Avenue property. These were requested and proposed to investigate the presence, or absence, of residual soil vapor at the currently active commercial service station relative to the future proposed building slab. ACDEH additionally requests the installation of two additional soil vapor probes. The first downgradient of the current USTs at 2200 Telegraph Avenue, but on the 2201 Valley Street parcel, in the vicinity of DP3, SB-3, or SB-7, in order to investigate potential residual vapor concentrations from the extant USTs, and the second in the southeastern corner of 2201 Valley Street, outside the pile cap area, to investigate potential residual vapor in the area.
 - ii) **Elimination of Soil Vapor Probe Locations** – ACDEH does not approve the installation of soil vapor probes SG-4, SG-5, SG-6, SG-8, SG-9, SG-10, and SG-12, which are located within areas proposed for excavation to a depth of 10 to 18 feet bgs. Vapors within these future excavations will be mitigated through excavation. Soil vapor probes outside areas proposed to be excavated (SG-1, SG-10, SG-2, SG-11, SG-3, and SG-13) appear appropriate for investigating residual vapor concentrations relative to the proposed future 12-inch thick slab. Additional vapor probes outside the proposed excavation areas may be appropriate for determining residual vapor concentrations beneath the future slab. These can be proposed in the requested revised work plan.
 - iii) **Depth of Vapor Probe Installation** – As modified in the work plan addendum, ACDEH is in agreement that soil vapor probes, except in limited situations, are to be installed to a depth of 6 feet bgs, in order to ensure the vapor samples are collected five feet below the slab. It is understood that soil vapor probes proposed to be installed in the BART right-of-way will be installed to a maximum of four feet in depth due to BART permit limitations. Additionally the work plan proposed deeper vapor probes (SG-10, SG-11, and SG-13) closer to the depth of groundwater. These also appear reasonable.
 - iv) **Analytical Testing** – The referenced work plan by SOMA proposes to analyze soil vapor for all current Chemicals of Concern (COC), including Total Petroleum Hydrocarbons as gasoline (TPHg), benzene, toluene, ethylbenzene, and total xylenes (BTEX), methyl tert butyl ether (MTBE), and all volatile organic compounds (VOCs), including naphthalene, by sorbent tube sampling and analysis by Method TO-17. While generally defined as acceptable in the Department of Toxic Substances Control (DTSC) *Active Soil Gas Investigation Advisory* (July 2015), due to the expedited nature of these investigations and potential data quality issues during data collection, ACDEH requests collection of the soil vapor samples with Summa Canisters and analysis by TO-15. In accordance with the DTSC guidance, confirmation analysis of naphthalene by TO-17 remains appropriate.
 - v) **Atmospheric Gases** – The referenced SOMA work plan proposes the collection of atmospheric gases, including oxygen, carbon dioxide, and carbon monoxide. ACDEH additionally requests the collection of nitrogen and methane.
 - vi) **Shroud Tracer Concentrations** – The referenced work plan proposes the use of helium, or equivalent, as a tracer compound. ACDEH requests the use of helium as a tracer in order

to quickly assess in the field the presence of a leak and modify the sampling train immediately. ACDEH requests that the helium concentration in the shroud be maintained at a constant concentration greater than 20% during all purge leak detection events and during sampling. ACDEH requests tabulated documentation of shroud and tracer concentrations in the results table(s) in order that quick comparisons can be made.

- b) **Additional Soil and Groundwater Analytical** – The work plan proposes investigation activities that are limited to the delineation of the historic release of petroleum UST at 2200 Telegraph Avenue. Due to unknown previous configurations of the service station prior to installation of the BART tube, and the potential for related automobile repair infrastructure and other historic unidentified land use at 2200 Telegraph Avenue, and the expedited timeframe of the redevelopment, ACDEH requests additional soil and groundwater analysis for other potential chemicals of concern. Potential COCs (PCOCs) that may be associated with automotive repair facilities include but are not limited to TPH as diesel (TPHd), TPH as motor oil (TPHmo), hydraulic oil, PCBs, and hydrocarbon and chlorinated solvents. The revised work plan must include analysis for all PCOCs unless documentation of historic uses is submitted that provides justification for exclusions.
 - c) **Additional MPE and Rebound Testing** – A four week MPE pilot study was approved by ACDEH for implementation in 2018. The pilot study consisted of the installation of four extraction wells and three observation wells on both parcels. The pilot study was terminated at the request of ACDEH due to exceedance of the approved length of time and a request to conduct rebound testing. The SOMA work plan proposes to implement additional MPE events and conduct subsequent rebound testing on two week on and off intervals after the collection of a baseline groundwater monitoring event of all wells and the collection of soil vapor from existing wells EX-2, EX-3, EX-4, OB-2, and OB-4. Additional MPE events are not approved by ACDEH as ACDEH considers conducting additional MPE events as remediation and these should be included in the CAP for the site, if appropriate. As previously discussed in meetings, ACDEH requests equilibrium rebound testing (groundwater and soil vapor) to establish equilibrium conditions subsequent to the termination of the MPE pilot test in March 2018. It is appropriate to include equilibrium rebound testing in the revised work plan.
- 2) **PES Work Plan Requested Modifications** – The referenced PES work plan proposes a series of actions with which ACDEH is in general agreement of undertaking; however, ACDEH requests modifications to the approach as discussed below. Please submit a revised work plan incorporating the comments below by the date specified below.
- a) **Discrete Sampling** – In ACDEH's reading of the PES work plan, all samples have been proposed for discrete sampling and analysis. ACDEH is in agreement with this approach.
 - b) **Proposed Sample Collection Depths** – The PES work plan proposes to collect soil samples at 1, 4, 10, and 18 feet bgs, depending on the location of the bores. ACDEH additionally requests the collection of discrete soil samples below the base of proposed basement excavations in order to determine residual contaminants, if any, at the slab depth (thus at 11 and 19 feet bgs).
- 3) **Draft Corrective Action Plan** – As detailed in the Gantt Chart submittal a draft Corrective Action Plan (CAP) is due to ACDEH by June 15, 2018.

TECHNICAL REPORT REQUEST

Please submit the following technical reports and deliverables to the State Water Board's Geotracker website and notify your case worker by electronic mail (mark.detterman@acgov.org), in accordance with the following specified file naming convention and schedule, as provided below, and in the Responsible Party(ies) Legal Requirements/Obligations which is included as Attachment 1. Please note ACDEH no longer accepts reports on the ftp site.

Messrs. Mashhoon and Cropper
RO0003258
June 14, 2018, Page 4

- **June 15, 2018** – Draft Corrective Action Plan
File to be named RO3258_CAP_R_YYYY-MM-DD
- **June 19, 2018** – Revised Work Plans
File to be named RO3258_WP_R_YYYY-MM-DD
- **November 14, 2018** – Site Investigation and Rebound Study Report
File to be named RO3258_SWI_R_YYYY-MM-DD

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

If you have any questions, please do not hesitate to call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,



Mark E. Detterman, PG 4799, CEG 1788
Senior Geologist
Senior Hazardous Materials Specialist

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

cc: Mansour Sepehr, SOMA Environmental Engineering, 6620 Owens Dr., Suite A, Pleasanton, CA 94588; (Sent via electronic mail to: msepehr@somaenv.com)

Denise Pinkston, BA1 2201 Valley LLC; c/o TMG Partners; 100 Bush Street, Suite 2600, San Francisco, CA 94104; (Sent via electronic mail to: dpinkston@tmgpartners.com)

William Mast, PES Environmental, Inc, 7665 Redwood Blvd, Suite 200, Novato, CA 94954; (Sent via electronic mail to: wmast@pesenv.com)

Rob Crepes, PES Environmental, Inc, 7665 Redwood Blvd, Suite 200, Novato, CA 94954; (Sent via electronic mail to: rcrepes@pesenv.com)

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

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

Mark Detterman, ACDEH, (Sent via electronic mail to: mark.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.