

ALAMEDA COUNTY  
**HEALTH CARE SERVICES  
AGENCY**

REBECCA GEBHART, Interim Director



DEPARTMENT OF ENVIRONMENTAL HEALTH  
LOCAL OVERSIGHT PROGRAM (LOP)  
For Hazardous Materials Releases  
1131 HARBOR BAY PARKWAY, SUITE 250  
ALAMEDA, CA 94502  
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September 20, 2017

Mr. Mike Adams  
Huntleigh Development, Inc.  
101 Linden Street  
Oakland, CA 94607

East Oakland International LLC &  
MRSBJ LLC  
Barbara Norton & Janice Storey  
P.O. Box 6124  
Moraga, CA 94566

Subject: Non-Case Information No. RO0003261, Burger King Property, 4200 International Boulevard,  
Oakland, California 94601

Dear Mr. Adams, Ms. Norton & Ms. Storey:

It is Alameda County Department of Environmental Health's (ACDEH) understanding that a parcel split for the Burger King portion is in process to facilitate a property transaction. To that end, a Phase II Investigation was conducted to determine whether past uses at the site have resulted in environmental contamination. A Phase II Report was submitted to ACDEH to determine whether a Site Cleanup Program (SCP) case would be opened to investigate environmental contamination. Based on a request to review the Phase II Report, a "Non-Case Information" site has been opened. However, in a meeting at our office on August 22, 2017, we concluded that additional data is necessary prior to determining whether an SCP would be opened. ACDEH staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "Work Plan for a Phase II ESA Data Gaps Investigation," dated September 14, 2017, which was prepared by Environmental Risk Assessors (ERA) for the subject site. The purpose of ACDEH's review is to ensure that data collected will meet data quality objects and provide sufficient information to adequately assess current site conditions to determine whether an SCP case will be necessary.

ERA proposes to install 10 borings (SB-1a and SB-5 through SB-13) to collect soil, soil vapor, and groundwater samples to address data gaps identified at the site. However, it is not clear whether soil vapor samples will be collected from the same boring as soil and groundwater samples. Additionally, soil vapor sampling methodology was not discussed in the work plan. Therefore, sufficient detail was not included to approve the scope of work as presented. In an effort to expedite site characterization and health risk evaluation at the site, and since ACDEH generally concurs with the concept of the proposed scope of work, ACDEH does not oppose implementing the scope of work provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed.

We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

**TECHNICAL COMMENTS**

1. **Borings for Soil Vapor, Soil, and Groundwater Sampling** – As stated above, it is not clear whether samples from all three media will be collected from the same boring. Please locate the soil vapor boring at a sufficient distance from the boring proposed for soil and groundwater collection, to avoid potential short-circuiting. All three media should not be collected from the same boring.

2. **Soil Vapor Sampling Protocol** – As mentioned above, little detail was presented regarding the soil vapor sampling methodology. Therefore, the following protocol, in addition to the applicable portions of DTSC guidance documents cited in the work plan, must be adhered to in order to ensure that representative soil vapor samples are collected.
- a. **Equipment Vacuum Test** – An equipment vacuum test will reduce the connections requiring a tracer gas atmosphere during sampling. To minimize the potential for ambient air (and tracer gas) intrusion from connections in the sampling train during sample collection, please perform a vacuum test on the connections between the summa canisters and valve on the downhole side of the flow regulator. This may be conducted by opening and closing the purge canister valve to place a test vacuum on the assembly. The vacuum on the sampling train must be maintained for at least 10 minutes. This should ensure that the sampling train is “tight” with no obvious leaks.
  - b. **Tracer Gas Atmosphere** – It is recommended that the soil vapor well, sampling device, and all fittings are placed under a shroud with pliable weather-stripping along its base with a tracer (e.g. helium) placed inside the shroud, which results in a tracer gas atmosphere. The shroud should ensure that there is tracer gas around all sampling connections. The shroud should have a port for inserting a monitoring and sampling device (e.g. Helium Gas Detector) to ensure that tracer gas atmosphere is maintained.
  - c. **Vapor Flow Rate** – High vapor purge and sampling rates may increase the possibility of short-circuiting or driving hydrocarbon-affected soil into the vapor phase, whereas low flow rates may not adequately capture the vapor and potentially affect the percent of sample due to leakage. Therefore, an appropriate vapor flow rate of 150 to 200 milliliters per minute is recommended.

#### **NOTIFICATION OF FIELDWORK ACTIVITIES**

Please schedule and complete the fieldwork activities by the date specified below and provide ACDEH with at least three (3) business days notification prior to conducting the fieldwork.

#### **TECHNICAL REPORT REQUEST**

Please submit technical reports to ACEH (Attention: Paresh Khatri), according to the following schedule:

- **November 17, 2017** – Data Gap Report

These reports are being requested pursuant to California Health and Safety Code Section 101480.

If you have any questions, please call me at (510) 777-2478 or send me an electronic mail message at [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org).

Sincerely,

Paresh C. Khatri  
Supervising Hazardous Materials Specialist  
Local Oversight & Site Cleanup Program Manager

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Lita D. Freeman, PG (Sent via E-mail to: [litafreeman@gmail.com](mailto:litafreeman@gmail.com))  
Jay Hagglund, (Sent via E-mail to: [jay.hagglund@cushwake.com](mailto:jay.hagglund@cushwake.com))  
Dilan Roe, Chief, ACDEH (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))  
eFile, GeoTracker