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Subject: RO0003265 - 229-255 International Blvd
Date: Monday, January 08, 2018 10:25:00 AM

Good Morning Mr. Zhang,

Alameda County Department of Environmental Health (ACDEH) is in the process of reviewing the case file in conjunction with the Phase II Investigation Report and proposed Soil, Groundwater, and Soil Gas Work Plan for your site (229-255 International Blvd.) as presented in the following documents prepared by Phase-1 Environmental Services and Almar Environmental (Almar), respectively, on your behalf.

- *Limited Phase II Investigation (the Phase II Report)*, dated August 30, 2017
- *Soil, Groundwater, and Soil Gas Investigation Workplan (the Work Plan)*, dated November 29, 2017, and electronically received by ACDEH on January 1, 2018.

While reviewing the above listed documents, several discrepancies were noted which will require follow up action items. As a result, we are requesting a meeting with you and your environmental consultants to discuss the proposed redevelopment activities and path forward at this site. Would you and your environmental consultants be available for a meeting at our ACDEH offices this **Friday, January 12 at 10:00am-12:00pm?**

Included below is a summary of the main items noted during our initial review relating to the the documents mentioned above.

Phase II Report

- 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. The Phase II ESA is signed and stamped by ASTM Phase I and II Environmental Professional and does not include PE/PG signature. As a result, ACDEH is rejecting the Phase II ESA and the document will need to be re-submitted 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 report then the data in this report will only be considered as qualitative data and would need to be validated through additional field investigations and sample collection.
- Due to the past historic land use of this property including a commercial fueling facility, auto repair, and printing facility, the laboratory analytical assessment documented in this report appears to be inadequate. Benzene, toluene, ethylbenzene, and xylene and a full suite of total petroleum hydrocarbons compounds were analyzed, however, other chemicals of concern (COCs) related to the historic land uses including but not limited to halogenated hydrocarbons, metals, and SVOC were not analyzed.

The Work Plan

- The Work Plan scope of work indicates the purpose of the investigation is to further assess the extent of subsurface contamination and adequately characterize hazards at the site as it pertains to the proposed residential redevelopment. However, no conceptual

redevelopment plans have been submitted to ACDEH or shown on the Work Plan figures to determine if the additional assessment is adequate.

- The Opinions and Recommendations section presented in the Phase II Report, indicate tank probing conducted during this investigation was inconclusive and additional tank location measures will need to be taken after the building has been demolished to assure that none exist. ACDEH's review of the Work Plan does not indicate that an additional tank probe or geophysical investigation will be conducted during field activities related to this Work Plan.
- As discussed above in the comments for the Phase II Report, laboratory analysis of COCs related to historic land uses appears to be inadequate. Additional samples may be required to be obtained to verify the data presented in the Phase II Report if the work was not conducted under the oversight of a PE/PG.

Please let me know if you and your environmental consultants are available on Friday to discuss the path forward on this case.

Thanks,
Drew

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PDF copies of case files can be reviewed/downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>