



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

March 10, 2009

Ms. Linda Champion
9441 Laguna Lake Way
Elk Grove, CA 95758

Subject: Fuel Leak Case No. RO0000133 and Geotracker Global ID T0600100379, City of Paris Cleaners, 3516 Adeline Street, Oakland, CA 94608

Dear Ms. Champion:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the recently submitted document entitled, *Third Quarter 2008 Quarterly Monitoring Report*, dated November 7, 2008 prepared by Western Resource Management and the request to perform no purge sampling using the HydraSleeve™ groundwater sampler as requested by Taber Consultants in December 2008. The groundwater monitoring report indicates that petroleum hydrocarbon contamination increased in well MW-1 to a maximum concentration of 110,000 micrograms per liter (µg/L) total petroleum hydrocarbons as gasoline (TPHg) and 45,000 µg/L total petroleum hydrocarbons as Stoddard Solvent (TPHss) in December 2007.

ACEH requests that you address the following technical comments, perform the requested work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1. **Source Area Soil Definition** – Soil samples collected from between 6.5 and 14 feet below ground surface (bgs) contained a maximum concentration of 1,000 milligrams per kilogram (mg/Kg) TPHg. Soil samples collected from 10 feet bgs contained a maximum concentration of 210 mg/Kg TPHss. No other volatile organic compounds (VOC) analysis was performed. Please present your plan to evaluate the lateral and vertical extent of the contamination in source area soils in the report requested below. This may include collecting samples from inside the building. Please include analysis for VOCs by EPA Method 8260 in your work plan to determine the presence of additional dry cleaning solvents.
2. **Preferential Pathway Evaluation** – The purpose of the preferential pathway study is to locate potential migration pathways and conduits and determine the probability of the NAPL and/or plume encountering preferential pathways and conduits that could spread contamination. We request that you perform a preferential pathway study to locate potential migration pathways and conduits and determine the probability of the plume encountering preferential pathways and conduits that could spread contamination. We request that you perform a preferential pathway study that details the potential migration pathways and

potential conduits (wells, utilities, pipelines, etc.) for vertical and lateral migration that may be present in the vicinity of the site.

Discuss your analysis and interpretation of the results of the preferential pathway study (including the detailed well survey and utility survey requested below) and report your results in the report requested below. The results of your study shall contain all information required by California Code of Regulations, Title 23, Division 3, Chapter 16, §2654(b).

a. Utility Survey

An evaluation of all utility lines and trenches (including sewers, storm drains, pipelines, trench backfill, etc.) within and near the site and plume area(s) is required as part of your study. Please include maps and cross-sections illustrating the location and depth of all utility lines and trenches within and near the site and plume areas(s) as part of your study.

b. Well Survey

The preferential pathway study includes a well survey of all wells (monitoring and production wells: active, inactive, standby, decommissioned (sealed with concrete), abandoned (improperly decommissioned or lost); and dewatering, drainage, and cathodic protection wells) within a 1000-foot radius of the subject site. One industrial well has been identified on-site. Please identify all wells within 1,000 foot radius to complete this survey.

3. **Site Conceptual Model.** At this juncture, it may be advantageous to develop a site conceptual model (SCM), which synthesizes all the analytical data and evaluates all potential exposure pathways and potential receptors that may exist at the site, including identifying or developing site cleanup objectives and goals. At a minimum, the SCM should include:

- Local and regional plan view maps that illustrate the location of sources (former facilities, piping, tanks, etc.) extent of contamination, direction and rate of groundwater flow, potential preferential pathways, and locations of receptors;
- Geologic cross section maps that illustrate subsurface features, man-made conduits, and lateral and vertical extent of contamination;
- Plots of chemical concentrations versus time;
- Plots of chemical concentrations versus distance from the source;
- Summary tables of chemical concentrations in different media (i.e. soil, groundwater, and soil vapor); and
- Well logs, boring logs, and well survey maps;
- Discussion of likely contaminant fate and transport.

If data gaps (i.e. potential contaminant volatilization to indoor air or contaminant migration along preferential pathways, etc.) are identified in the SCM, please include a proposed scope of work to address those data gaps in the SCM due by the date specified below.

4. **Concentration Vs. Time Graphs** – Please adjust your graphs to plot TPHss, TPHg and water elevations on one graph for each individual well using a second y-axis for the water elevations. Include an evaluation of concentrations versus time in the SCM report requested below.

5. **Wellhead Elevation Resurvey** – Data from nearby sites indicate that the groundwater flow direction in the area flows to the southwest. In addition, your consultant suggests that the groundwater gradient at the site has been anomalously steep since the wells were redeveloped and recommends resurveying the top of casing elevations. We concur that a well resurvey is needed. Please resurvey all wells including the industrial well to NAVD88 as per Geotracker regulations.
6. **Industrial Well.** The industrial well was reported as being 97 feet deep in a report but the sampler reported the well as 27.71 feet deep with a diameter of 2 inches, a description more consistent with monitoring well construction. Please explain why the depth of the industrial well was reported 70 feet shallower than originally reported, inform us as to the current use of the well, and include a well log in the SCM requested below.
7. **Request to Use No Purge Device For Quarterly Monitoring** – Use of a HydraSleeve™ sampler to collect no purge groundwater samples at the site is proposed. Please demonstrate that the no purge method is appropriate by ensuring that the following conditions are met.
 - The wells are installed in an unconfined aquifer.
 - The well has been properly developed.
 - The wellhead completion is competent.
 - The well log and construction details must be included in our files.
 - The top of the screened interval is above the groundwater level.
 - All constituents of concern are LNAPLs (no DNAPLs).

In addition, the Interstate Technology & Regulatory Council (ITRC) document called *Protocol for Use of Five Passive Samplers to Sample for a Variety of Contaminants in Groundwater* that is referenced on the HydraSleeve™ website suggests that an initial study be performed to determine if sampling using HydraSleeve™ gives comparable results to purging the wells. Also, the depths of deployment should be determined by evaluating vertical contaminant distribution, well construction and ambient flow within the well. If no previous studies have been performed, provide sampling with the HydraSleeve™ at different depths within the well screen interval and compare to previous sample results to evaluate sample representativeness.

Please specify your HydraSleeve protocol in a standard operating procedure including the amount of recovery time needed for the on-site wells, depths of the HydraSleeve samplers vs. screen depths and how you will correlate your results to your historical results.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Barbara Jakub), according to the following schedule:

- **May 25, 2009** – SCM with Wellhead Resurvey Data and Work Plan
- **April 20, 2009** – First Semi-Annual Groundwater Monitoring Report (GWM)

- **October 20, 2009 – Second Semi-Annual GWM**

These reports are being requested 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 in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

Submission of reports to the Alameda County ftp site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) Geotracker website. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.swrcb.ca.gov/ust/cleanup/electronic_reporting).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) 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 registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature,

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and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

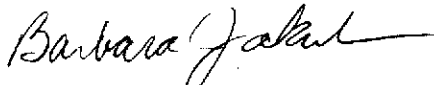
Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional 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.

If you have any questions, please call me at (510) 639-1287 or send me an electronic mail message at barbara.jakub@acgov.org.

Sincerely,



Barbara Jakub, P.G.
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Tom Ballard, Taber Consultants, 3911 W Capitol Avenue, West Sacramento, CA 95691
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032
Donna Drogos, ACEH,
Barbara Jakub, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: December 16, 2005
	PREVIOUS REVISIONS: October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

Effective January 31, 2006, the Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:
RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

Submission Instructions

1) Obtain User Name and Password:

- a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to dehloptoxic@acgov.org
or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
- b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker)** you will be posting for.

2) Upload Files to the ftp Site

- a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>.
 - (i) Note: Netscape and Firefox browsers will not open the FTP site.
- b) Click on File, then on Login As.
- c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
- d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
- e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.

3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs

- a) Send email to dehloptoxic@acgov.org notify us that you have placed a report on our ftp site.
- b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., firstname.lastname@acgov.org)
- c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload)