



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

August 29, 2014

Ms. Paulette Satterly  
14601 Guadalupe Dr.  
Rancho Murieta, CA 95683  
(Sent via E-mail to: [lvsnooky@calweb.com](mailto:lvsnooky@calweb.com))

Ms. Paula Champion-Braig  
280 Mountain Blvd.  
Piedmont, CA 94611  
(Sent via E-mail to: [uschampion@aol.com](mailto:uschampion@aol.com))

Ms. Debbie Runyon  
PO Box 8722  
Emeryville, CA 94662

Subject: Request for Groundwater Chlorinated Solvent Evaluation and Landowner Identification for Case Closure Consideration; Fuel Leak Case No. RO0000133 and GeoTracker Global ID T0600100379, City of Paris Cleaners, 3516 Adeline Street, Oakland, CA 94608

Dear Mss. Satterly, Champion-Braig, and Runyon:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Updated Site Conceptual Model, Site Investigation Report, and No Further Action Request*, dated June 26, 2014 that was submitted on your behalf by Taber Consultants, Inc. Thank you for submitting the report.

As you are aware a site investigation and groundwater monitoring for underground storage tank leaks has been performed at the subject property to which you are named as the primary or active responsible parties.

ACEH's review of the referenced report and site data indicates that grab groundwater concentrations in soil bores GP-20 and GP-28, and groundwater samples from well MW-1, apparently installed through tank backfill, document concentrations up to 19,000 micrograms per liter ( $\mu\text{g/l}$ ) Total Petroleum Hydrocarbons as standard solvent (TPHss) and 4,500  $\mu\text{g/l}$  TPH as gasoline (TPHg); 49,000  $\mu\text{g/l}$  TPHss and 3,300  $\mu\text{g/l}$  TPHg; and 18,200  $\mu\text{g/l}$  TPHss and 7,900  $\mu\text{g/l}$  TPHg; respectively. These concentrations are substantially higher than the *Technical Justification for Vapor Intrusion Media-Specific Criteria* for the Low-Threat Closure Policy (LTCP) indicates is indirect evidence for Light Non-Aqueous Phased Liquids (LNAPL). The technical justification indicates that for diesel-range organics, concentrations greater than 5,000  $\mu\text{g/l}$  indicate indirect evidence of LNAPL. ACEH notes that grab groundwater benzene, toluene, ethylbenzene, and total xylenes (BTEX) concentrations are very limited; up to a maximum of 8  $\mu\text{g/l}$  benzene, 2.2  $\mu\text{g/l}$  toluene, and <1.0  $\mu\text{g/l}$  ethylbenzene and total xylenes. Concentrations in site wells appear to be lower.

ACEH's review of site data also indicates that the downgradient direction remains undefined. Figure 6 of the referenced site report indicates that the predominant groundwater flow direction is to the west-southwest, while the majority of downgradient delineation work has been focused to the west-northwest. As such, the extent of groundwater contamination and potential mobile or migrating LNAPL (as defined by the *Technical Justification for Groundwater Media-Specific Criteria*) is undefined downgradient (west-southwest).

Depth to first water appears to range between 14 and 17 feet below surface grade (bgs), but rises in completed wells, while the deepest utility in the site vicinity is reported to be installed to a depth of 13 feet bgs. Thus it appears that utilities may not provide a substantial preferential pathway for potential mobile or migrating LNAPL, and that potential mobile or migrating LNAPL is separated by a minimum of approximately 14 feet of soil from the surface environment.

In order to determine the potential risk undefined groundwater and LNAPL contamination presents to the local vicinity, ACEH relied on Table 1 that is contained in the *Technical Justification for Groundwater Media-Specific Criteria*. This document indicates that the average, 90<sup>th</sup> percentile, and maximum plume lengths for TPHg (100 µg/l) are 248, 413, and 855 feet. Heavier hydrocarbon plumes, including potential LNAPL, are expected to be shorter in length. Review of the vicinity well survey contained in the referenced site report, indicates that there are no known water supply wells within 1,000 feet of the subject site. Thus it appears that there are no downgradient sensitive receptors for the undefined groundwater contamination and potential mobile or migrating LNAPL. This includes potential half basements in the residential housing stock downgradient of the site. The previously mentioned very low groundwater concentration of BTEX also indicates that there is not an apparent risk of vapor intrusion from groundwater contamination at the site or in the downgradient direction.

In general these factors appear to indicate that case closure for the subject case may be appropriate under the LTCP; however, ACEHs evaluation does not indicate that this former dry cleaner site has been evaluated for chlorinated solvents other than a verbal evaluation of analytical test by the analytical laboratory for soil results in 1993. Consequently, prior to proceeding to closure, ACEH requests one additional groundwater monitoring event to evaluate the potential for chlorinated solvents in groundwater beneath the subject site.

### **TECHNICAL COMMENTS**

- 1. Chlorinated Solvent Evaluation of Groundwater** – As discussed above, ACEH requests one groundwater monitoring event of wells MW-1 to MW-3 in order to evaluate the potential for chlorinated solvents to have been used at this former dry cleaner site. A work plan is not necessary, provided standard groundwater sampling and monitoring protocols are utilized to collect the groundwater samples and the samples are submitted to an accredited analytical laboratory for a full scan EPA 8260 analysis. Please submit a report by the date identified below.
- 2. List of Landowners Form** - Pursuant to Section 25297.15 (a) of the California Health and Safety Code, Alameda County Environmental Health (ACEH), the local agency, shall not consider cleanup or site closure proposals from the primary or active responsible party, issue a closure letter, or make a determination that no further action is required with respect to a site upon which there was an unauthorized release of hazardous substances from an underground storage tank subject to this chapter unless all current record owners of fee title to the site of the proposed action have been notified of the proposed action by the primary or active responsible party. ACEH is required to notify the primary or active responsible party of their requirement to certify in writing to the local agency that the notification requirement in the above-mentioned regulation has been satisfied and to provide the local agency with a complete mailing list of all record fee title owners.

To satisfy this requirement, please complete the enclosed *List of Landowners Form*, and mail it back to ACEH by the date identified below.

### **TECHNICAL REPORT REQUEST**

Please submit reports to ACEH (Attention: Mark Detterman), and upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule.

- **October 3, 2014** – Return of *List of Landowner Form*  
File to be named: RO133\_CORRES\_L\_yyyy-mm-dd
- **November 17, 2014** – Groundwater Monitoring Report  
File to be named: RO133\_GWM\_R\_yyyy-mm-dd

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

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party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

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

If your email address does not appear on the cover page of this notification ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org).

Sincerely,

Mark E. Detterman, PG, CEG  
Senior Hazardous Materials Specialist

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

Attachment 2 - *List of Landowners Form*

cc: Ellen Pyatt, Taber Consultants, 3911 W Capitol Avenue, West Sacramento, CA 95691 (Sent via  
E-mail to: [EPyatt@taberconsultants.com](mailto:EPyatt@taberconsultants.com))

Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA  
94612-2032 (Sent via E-mail to: [lgriffin@oaklandnet.com](mailto:lgriffin@oaklandnet.com))

Dilan Roe, ACEH, (sent via e-mail to [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))

Mark Detterman, ACEH, (sent via electronic mail to [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))  
Geotracker, Electronic File

## Attachment 1

### Responsible Party(ies) Legal Requirements / Obligations

#### REPORT REQUESTS

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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to 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 Instructions." 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. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all 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 monitoring wells, and other data to the GeoTracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)).

#### 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, 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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> May 15, 2014
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

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

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- 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)

## 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 [deh.loptoxic@acgov.org](mailto:deh.loptoxic@acgov.org)
  - 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, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
  - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
  - 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 [deh.loptoxic@acgov.org](mailto:deh.loptoxic@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 @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) If site is a new case without an RO#, use the street address instead.
  - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.

# LIST OF LANDOWNERS FORM

County of Alameda  
Environmental Health Services  
Environmental Protection  
1131 Harbor Bay Parkway, Suite 250  
Alameda, CA 94502-6577

## CERTIFIED LIST OF RECORD FEE TITLE OWNERS FOR:

Site Name: City of Paris Cleaners  
Address: 3516 Adeline Street  
City, State, Zip: Oakland, CA 94608  
Record ID #: RO0000133

Please fill out item 1 if there are multiple site landowners (attach an extra sheet if necessary). If you are the sole site landowner, skip item 1 and fill out item 2.

1. In accordance with Section 25297.15(a) of Chapter 6.7 of the California Health & Safety Code, I, \_\_\_\_\_ (name of primary responsible party), certify that the following is a complete list of current record fee title owners and their mailing addresses for the above site:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

E-mail \_\_\_\_\_

Address: \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

E-mail \_\_\_\_\_

Address: \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

E-mail \_\_\_\_\_

Address: \_\_\_\_\_

2. In accordance with Section 25297.15(a) of Chapter 6.7 of the California Health & Safety Code, I \_\_\_\_\_, certify that I am the sole landowner for the above site.

Sincerely,

\_\_\_\_\_  
Signature of Primary Responsible Party      Printed Name      Date      E-mail Address