

Jakub, Barbara, Env. Health

From: Akisha Bolton [a.bolton@d3g.biz]
Sent: Thursday, October 13, 2011 11:24 AM
To: Cleet Carlton
Cc: Jakub, Barbara, Env. Health; Mary Rose Cassa
Subject: RE: Response to questions on 5321 Telegraph Avenue, Oakland, CA

Thank you very much for your time and review regarding this issue. It is much appreciated. I will update our client regarding the information that has been provided and hopefully this is what they are looking for.

Akisha Bolton – Environmental Team Manager

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From: Cleet Carlton [mailto:CCarlton@waterboards.ca.gov]
Sent: Wednesday, October 12, 2011 6:37 PM
To: Akisha Bolton
Cc: barbara.jakub@acgov.org; Mary Rose Cassa
Subject: Response to questions on 5321 Telegraph Avenue, Oakland, CA

Akisha,

With respect to the PCE detected in groundwater at the site, you state that the maximum concentration detected is 150 ug/L, located in a corner closest to an adjacent property that has past uses that could have resulted in the release, and that there are no past uses of the property in question that could have resulted in the release. In general, the Regional Water Board does not pursue enforcement action against a property owner whose land overlies contaminated groundwater if that contamination is solely the result of the migration of groundwater contaminants from an off-site source or sources. Accordingly, the Regional Water Board would not name current or future owners of the subject property as dischargers with respect to groundwater pollution from off-site sources. However, the Regional Water Board may hold such a property owner responsible for investigation or cleanup tasks if he or she refuses to provide reasonable access to an upgradient discharger attempting to investigate and cleanup off-site groundwater pollution.

There may be cause for requiring mitigation at the property if the contamination poses a health hazard for occupants. In this case, the hazard would be from vapor intrusion to indoor air. You mentioned that the 150 ug/L detection was from a deeper water-bearing zone, and shallower zones were not impacted (or as impacted). If it can be demonstrated that there is no viable pathway for PCE to reach indoor air, then mitigation for vapor intrusion could likely be ruled out.

Regarding potential off-site sources, it appears that this site is too far away (and upgradient of) the Dollar Cleaners (Site Cleanup Program case) site at 4860-4868 Telegraph Avenue, which is the closest Regional Water Board lead site that could have been a source. You mentioned that an adjacent site has a LUST case associated with it. If that case is the former Autopro site at 5200 Telegraph, please note that 4 monitoring wells there have also been sampled for VOCs and no chlorinated VOCs were detected. However, I noticed in Geotracker that Telegraph Business Park, at 5427 Telegraph Avenue, is another LUST case, just NW of the site. There have been no detections of chlorinated VOCs in the monitoring wells at that site, but noticed in their monitoring reports that solvent USTs may have been at that site. If your data presents a different perspective on the potential for a PCE plume emanating from that site, I strongly recommend you contact Barbara Jakub of Alameda County Environmental Health, who is the case manager for that site. I have cc'ed

her in this e-mail. Lastly, I also noticed what appears to be a dry cleaners next door at 5425 Telegraph Avenue. However I have no information on whether solvents are, or ever have been used there.

I hope this information provides you what you needed. Let me know if you have any other questions. I would appreciate a copy of any soil/groundwater data along with boring logs and a location map for our future reference.

Thanks,
Cleet

Cleet Carlton, P.G.
Engineering Geologist
San Francisco Bay Regional Water Quality Control Board
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(510) 622-2374

>>> Akisha Bolton <a.bolton@d3g.biz> 10/12/2011 5:58 AM >>>
5321 telegraph avenue, Oakland, CA

Akisha Bolton – Environmental Team Manager

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From: Cleet Carlton [mailto:CCarlton@waterboards.ca.gov]
Sent: Tuesday, October 11, 2011 6:39 PM
To: Akisha Bolton
Subject: Re: FW: Telegraph Road in Oakland Property

Akisha,

Before I can respond with site-specific circumstances, I will need to know the address of the site.

Thanks,
Cleet

Cleet Carlton, P.G.
Engineering Geologist
San Francisco Bay Regional Water Quality Control Board
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Oakland, California 94612
(510) 622-2374

>>> Akisha Bolton <a.bolton@d3g.biz> 10/6/2011 10:55 AM >>>
Cleet,

As we discussed yesterday, I was asked by our client to get e-mail documentation regarding the fact that enforcement action will not be taken for the on-site contamination that was identified from an off site source as that is the Water Board's General Policy. As we discussed on the phone, elevated levels of PCE were detected at the property that are not attributed to the former activities on the subject property. A Cleaning Works including a Steam Laundry, Rug Building, Boiler Room, Cleaning Room, Curtain Department, Drying Room and Garage was previously located in the

northern adjacent structure (in the vicinity of the one boring that identified contamination) from approximately 1951 to at least 1969. Concentrations of PCE detected at the subject property are suspected to be relic from the previous operations at the northern adjacent property; however, the northern adjacent property is not listed in any environmental databases or in any State environmental regulatory program with the exception of the LUST incident.

Please let me know if additional information is needed or if you have any questions.

Thank you for your assistance.

Akisha Bolton – Environmental Team Manager

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