



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

September 9, 2010

Mr. Harold Turner (Sent via E-mail to snowcleaners@sbcglobal.net)
Snow Cleaners, Inc.
38 Sonora Street W
Stockton, CA 95203

Subject: Fuel Leak Case No. RO0000357 and Geotracker Global ID T0600101294, Snow Cleaners, 2678 Coolidge Avenue, Oakland 94601 – Review of Draft Corrective Action Plan (DP1 through DP4 and VE1, VE2)

Dear Mr. Turner:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the report entitled, "*Draft Corrective Action Plan (DP1 through DP4 and VE1, VE2)*," dated June 29, 2010 (Draft CAP). The Draft CAP, which was prepared by P&D Environmental, Inc., presents background information and an assessment of impacts, proposes cleanup goals, evaluates remedial alternatives, and proposes remediation including confirmation sampling and monitoring. Based on the remedial technologies assessed, feasibility testing of soil vapor extraction and groundwater extraction is proposed.

The proposed scope of work is conditionally approved and may be implemented provided that the technical comments below are addressed and incorporated during the proposed actions. 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 reports described below.

TECHNICAL COMMENTS

1. **Cleanup Goals.** We concur with the proposed cleanup goals for soil and groundwater. We also concur with the proposal to perform remediation until the calculated indoor air cumulative incremental carcinogenic risk is less than 1.0E-06 and the calculated indoor air cumulative hazard quotient is less than 1. The use of Indoor Air Screening Levels for residential land use from the San Francisco Bay Regional Water Quality Control Board May 2008 Table E of the Environmental Screening Levels is acceptable. However, we note several of the proposed cleanup goals for indoor air on Page 12 of the Draft CAP are not consistent with Table E. For clarification, the indoor air cleanup goals should be 10 µg/m³ for TPH-ss, 0.084 µg/m³ for benzene, 63 µg/m³ for toluene, 0.98 µg/m³ for ethylbenzene, and 21 µg/m³ for xylenes.

2. **Schedule for Soil Vapor Extraction Testing.** In order to optimize the results, we request that soil vapor extraction testing be conducted during a period of lower water levels. Therefore, the schedule for soil vapor extraction will be contingent upon site conditions. Following well installation and groundwater extraction testing, we request that you propose a schedule for vapor extraction testing based upon current and projected water levels at the site.
3. **Fact Sheet.** ACEH has prepared a Fact Sheet to inform surrounding residents and land owners of the current status and proposed actions for investigation and cleanup at the site. A draft copy of the Fact Sheet is attached for your review. Please provide any comments on the draft Fact Sheet by September 21, 2010.

TECHNICAL REPORT REQUEST

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

- **December 1, 2010** – Well Installation Report
- **January 18, 2011** – Groundwater Extraction Feasibility Test Report

Thank you for your cooperation. If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Attachments: Draft Fact Sheet

Responsible Party(ies) Legal Requirements/Obligations

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Paul King, P & D Environmental, 55 Santa Clara Avenue, Suite 240, Oakland, CA 94610
(Sent via E-mail to PDKing0000@aol.com)

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

Donna Drogos, ACEH (Sent via E-mail to: donna.drogos@acgov.org)
Jerry Wickham, ACEH

GeoTracker, File

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.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml).

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: July 20, 2010
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: 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 dehloptoxic@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 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 @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.



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

DRAFT FACT SHEET
SNOW CLEANERS
September 21, 2010

Site Location: 2678 Coolidge Avenue, Oakland, CA 94566
SLIC Case #RO0000357 and Geotracker Global ID #T0600101294

Summary – This fact sheet has been prepared to inform community members and other interested parties of environmental site investigation activities conducted for a former dry cleaning facility located at 2678 Coolidge Avenue in Oakland, California (see map on back of page). This property was occupied by a dry cleaning plant from approximately 1907 until 1994 when dry cleaning operations were moved to an off-site facility. Currently, the site is used as a dry cleaning pick up and drop off facility with dry cleaning operations conducted at an off-site facility. A release of dry cleaning solvents (Stoddard solvent and tetrachloroethene [PCE]) has been identified at the site.

Site investigation activities have detected petroleum hydrocarbons as Stoddard solvent, PCE, and other volatile organic compounds (VOCs), in soil, soil vapor, and groundwater in the area of the former dry cleaning operations and six underground storage tanks. Prior to removal of the tanks in August 1990, the tanks were located beneath the sidewalk adjacent to Davis Street on the south side of the property. Extensive soil, soil gas, and groundwater sampling has been conducted at the site since 2003 to define the extent of contamination. Soil and groundwater cleanup is required to restore the site and reduce off-site contaminant migration.

Possible cleanup alternatives for the site were evaluated in a recent document entitled, “*Draft Corrective Action Plan (DP1 through DP4 and VE1, VE2)*,” dated June 29, 2010. The Draft Corrective Action Plan proposes cleanup goals for site restoration and proposes the use of soil vapor extraction and groundwater extraction for site cleanup. Soil vapor extraction is a process that physically separates contaminants from soil in a vapor form by exerting a vacuum through the soil formation. Groundwater extraction is the pumping of groundwater to remove contaminants dissolved in the groundwater.

Next Step – Feasibility testing will be conducted to assess whether soil vapor extraction and groundwater extraction will be effective in restoring the site. A total of six vapor extraction and groundwater extraction wells will be installed for use in the feasibility testing. Following well installation, groundwater will be pumped and water levels monitored for a period of 5 days to help assess the feasibility of groundwater extraction. Soil vapor extraction will be applied and monitored using several different wells over a period of several days to assess the area of influence and potential removal rates.

More Information – Planned cleanup activities are described in a report prepared by P&D Environmental, Inc. on behalf of Mr. Harold Turner, entitled, “*Draft Corrective Action Plan (DP1 through DP4 and VE1, VE2)*,” dated June 29, 2010. The public is invited to review this report and entire case file, which can be viewed over the Internet on the ACEH website (<http://www.acgov.org/aceh/lop/ust.htm>) or the State of California Water Resources Control Board Geotracker website (<http://geotracker.swrcb.ca.gov>).

General comments or inquiries:

Mr. Jerry Wickham, Case worker, Alameda County Department of Environmental Health, 1131 Harbor Bay Parkway, Alameda, CA 94502
510-567-6791 or by email at jerry.wickham@acgov.org

Questions regarding plans for future work:

Mr. Paul King, Environmental Consultant, P&D Environmental, Inc.
510-658-6916 or by email at PKing0000@aol.com

LEGEND

- (510) PCE Concentration in Groundwater (ug/L)
- ND Not Detected
- - - PCE Isoconcentration Contour
- SG18 ⊕ Soil Gas Sample Collected by P&D, 2008
- SG23 ⊗ Soil Gas Sample Collected by P&D, 2010
- MW4 ⊕ Existing Monitoring Well Location
- B28 ⊕ Borehole Drilled by P&D, 2008
- H6 ⊕ Existing Borehole Location
- B36 ⊕ Proposed Borehole Location
- DP4 ⊕ *Proposed Dual-Phase Extraction Well*
- VE2 ⊕ *Proposed Vapor Extraction Well*
- ▨ Planters and Landscaped Areas Containing UST Pit Soil
- ⊗ Composite Soil Sample Collection Location
- G — G' Geologic Cross Section Location

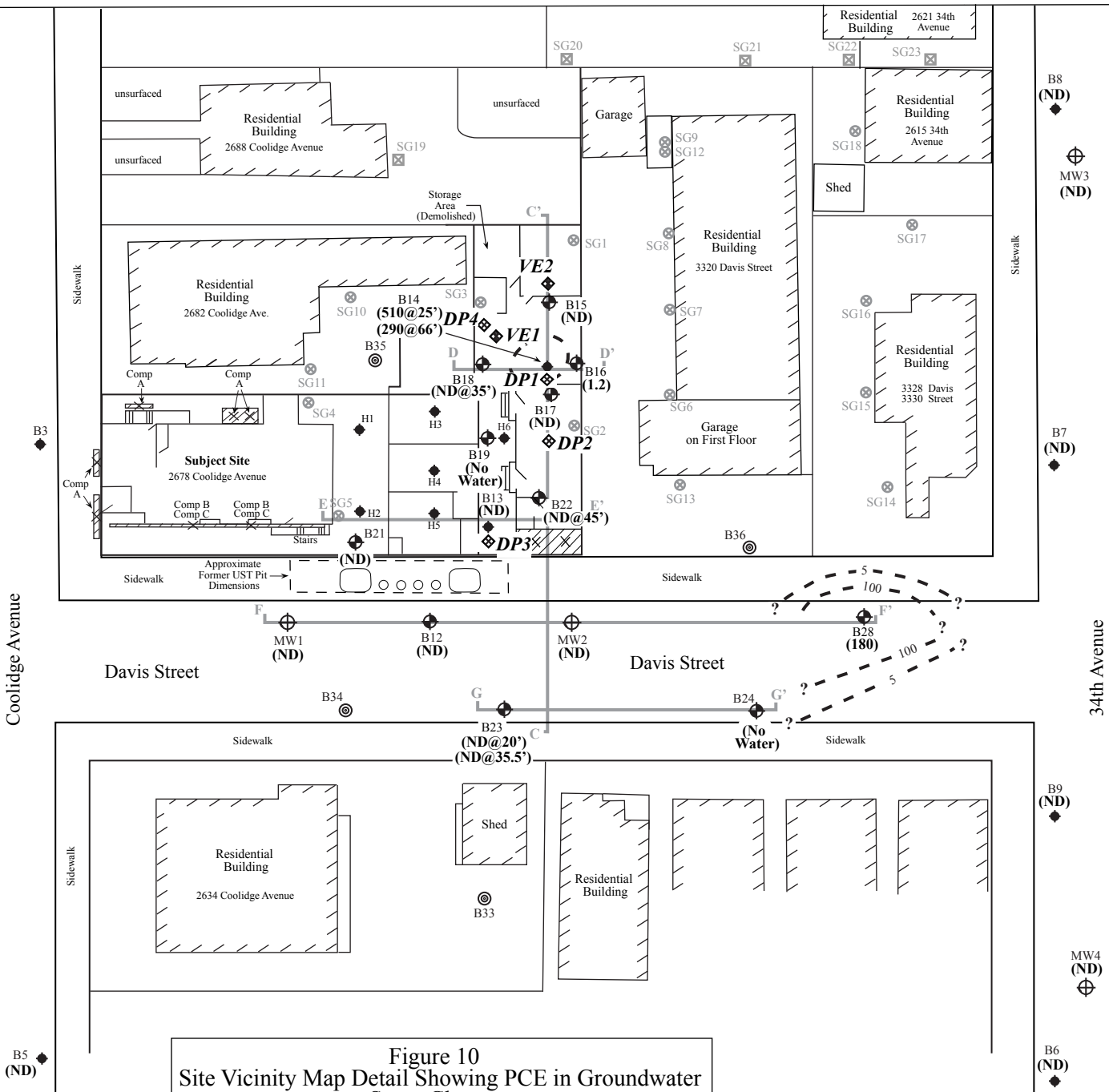


Figure 10
Site Vicinity Map Detail Showing PCE in Groundwater
Snow Cleaners
2678 Coolidge Avenue
Oakland, California

Base Map from:
 Kier & Wright Engineers Surveyors, Inc.
 September 2008 survey

P&D Environmental, Inc.
 55 Santa Clara Ave., Suite 240
 Oakland, CA 94610

