

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

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ENVIRONMENTAL PROTECTION
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February 14, 2008

Mr. Norman Foss
Foss Lampshade Studios, Inc.
1340 East 12th Street
Oakland, CA 94606

Elizabeth A. Foss Trust
5914 Zinn Drive
Oakland, CA 94611-2654

Subject: SLIC Case RO0002476, Foss Lampshade Studios, 1353 International Blvd., Oakland, CA 94606

Dear Mr. Foss and Elizabeth A. Foss Trust:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above referenced site including the most recently submitted document entitled, "*Soil Vapor Investigation Report*," dated January 18, 2008. The *Soil Vapor Investigation Report* presents the results from soil vapor sampling at eight soil borings. Tetrachloroethene (PCE) was detected in each of the eight soil vapor samples and trichloroethene (TCE) was detected in two of the eight soil vapor samples. The concentration of PCE in soil vapor was greater than the Environmental Screening Level (*San Francisco Bay Regional Water Quality Control Board November 2007*) for potential vapor intrusion to indoor air in 7 of the 8 soil vapor samples collected. As discussed in technical comments 1 and 2 below, the elevated concentrations of PCE detected in soil vapor samples indicate that further evaluation of potential vapor intrusion is needed. Therefore, we request that you address the following technical comments and submit a Work Plan for Additional Site Characterization.

TECHNICAL COMMENTS

- Potential Vapor Intrusion at 1353 International Boulevard.** Two soil vapor samples were collected beneath the International Aquarium facility at 1353 International Boulevard. PCE was detected in soil vapor at concentrations of 7.3 and 17 micrograms per liter ($\mu\text{g/L}$), respectively. Both concentrations exceed the ESL for potential vapor intrusion to indoor air of 1.4 $\mu\text{g/L}$. Therefore, we request that you submit a Work Plan for further evaluation of potential vapor intrusion at 1353 International Boulevard. The *Soil Vapor Investigation Report* indicates that the floor of the building is wooden with a crawl space separating the floor from the ground cement slab. In the Work Plan requested below, please include plans for subslab sampling or air sampling within the crawl space of the building to evaluate potential vapor intrusion at 1353 International Boulevard.
- Extent of Elevated Concentrations of PCE in Soil Vapor.** The extent of elevated concentrations of PCE in soil vapor was defined to the northeast but was not delineated in

other directions. In the Work Plan requested below, please propose additional soil vapor sampling to define the lateral extent of elevated concentrations of PCE in soil vapor.

3. **Potential Vapor Intrusion to Adjacent Buildings.** An evaluation of the potential for vapor intrusion to indoor air will be required for adjacent buildings to 1353 International Boulevard. You may conduct the evaluation of potential vapor intrusion for adjacent buildings during a future phase of investigation following delineation of the lateral extent of elevated concentrations of PCE in soil gas and subsurface or air sampling in the crawlspace of 1353 International Boulevard. Alternatively, you may propose some investigation of potential vapor intrusion to adjacent buildings in the Work Plan requested below. At a minimum, we request that you discuss the building construction and current uses of the adjacent structures. For the Foss Lampshade Studio Building, please present a figure in the Work Plan requested below showing the locations of interior walls and uses of interior rooms. For the building located southeast of the asphalt driveway, please show an outline of the building on future site plans. Please also discuss the current use of the building and building construction.
4. **Well Designations.** Figure 3 of the *Soil Vapor Investigation Report* labels the well located in the asphalt driveway east of the International Aquarium as MW-1. However, previous reports have designated this well AE-1. The designation MW-1 has been used for a well located on the adjacent property to the southeast. Table 1 of the report present results for wells AE-1, MW-1, and MW-2. In order to avoid discrepancies between the tables and figures, please use the designation AE-1 on future figures for the well located in the asphalt driveway immediately east of 1353 International Boulevard.
5. **Groundwater Quality.** During groundwater sampling events between July 31, 1997 and June 15, 1998, PCE was not detected in groundwater samples collected from well AE-1. However, PCE was detected at a concentration of 1,100 µg/L in a grab groundwater sample collected from BH-1, which is less than 5 feet west of well AE-1. PCE was also detected at a concentration of 220 µg/L in a grab groundwater sample collected from BH-4, which is approximately 5 feet east of well AE-1. Borings BH-1 and BH-4 extended to a depth of 8 feet bgs and well AE-1 extends to a depth of 15 feet bgs. These results may indicate that the most contaminated groundwater beneath the site is within 8 feet of ground surface. In order to define the vertical extent of contamination, we request that you present plans to collect depth-discrete groundwater samples from one soil boring to be located in the vicinity of well AE-1. Please include this proposed scope of work in the Work Plan requested below.

TECHNICAL REPORT REQUEST

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

- **April 18, 2008** – Work Plan for Additional Site Characterization

These reports are being requested pursuant to California Health and Safety Code Section 25296.10.

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 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 case meet this requirement.

AGENCY OVERSIGHT

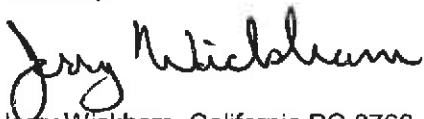
If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including

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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) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,

A handwritten signature in black ink that reads "Jerry Wickham". The signature is written in a cursive style with a large initial "J".

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

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Peter McIntyre, AEI Consultants, 2500 Camino Diablo, Suite 200, Walnut Creek, CA 94597

Donna Drogos, ACEH
Jerry Wickham, ACEH
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