



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

August 5, 2013

Mr. Anthony Kershaw  
Solano Group  
P.O. Box 9206  
Berkeley, CA 94709  
(sent via electronic mail to [tkershaw@kershawinvestments.com](mailto:tkershaw@kershawinvestments.com))

Subject: Modified Approval of Interim Remedial Action Plan; SCP Case RO0002857 and Geotracker Global ID T06019756124, Albany 1-Hour Cleaners, 1187 Solano Avenue, Albany, CA 94706

Dear Mr. Kershaw:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Interim Remediation Workplan* (IRAP) dated July 29, 2013. The document was prepared on your behalf by Pangea Environmental Services, Inc (Pangea). Thank you for submitting the IRAP.

The IRAP proposes to conduct an additional interim remedial overexcavation of an irregular area approximately 15 by 40 to 45 feet to a depth of 2 feet below grade surface (bgs). Additional depth will be determined based on PID and / or analytical testing of confirmation samples that will be collected. Two existing air inlet vents and associated piping will be excavated and replaced, and an additional three air inlet vents and piping are proposed to extend the vent system into new areas beyond the current configuration. Additional subslab sampling is also proposed from existing subslab probes, and from a new subslab probe proposed to collect data beyond the exiting subslab probe network. An initial Site Conceptual Model (SCM) was also included in the report.

ACEH concurs that it is appropriate to take immediate action to remove PCE impacted soil from beneath the building.

Based on ACEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org)) prior to the start of field activities.

## **TECHNICAL COMMENTS**

1. **Work Plan and Modifications** – The referenced IRAP proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH requests several modifications to the approach. Please submit a report by the date specified below.
  - a. **Compliance Sampling** – The referenced IRAP proposes the collection of compliance soil samples at an approximate interval one per 50 square feet of excavation floor; however, did not discuss compliance sampling of the excavation perimeter. ACEH requests the collection

of perimeter compliance samples at a minimum of every 20 linear feet, with positive bias to PID detections.

2. **Comprehensive Site Investigation Report, Updated Site Conceptual Model, and Feasibility Study / Corrective Action Plan** – Please submit a comprehensive site investigation report and updated Site Conceptual Model (SCM) that incorporates all data generated at the site to date by the date identified below. Please detail how DQOs for the site investigation were achieved during the investigation. In order to expedite review, ACEH requests the SCM be presented in a tabular format that highlights the major SCM elements and potential associated data gaps, which need to be addressed to progress the site to case closure. Please see the previously forwarded (June 28, 2013) “Site Conceptual Model Requisite Elements”.
3. **Itemized List of Public Comments and Responses** – As previously requested, please forward an itemized list of public comments and responses received by the date identified below.

### **TECHNICAL REPORT REQUEST**

Please 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 specified file naming convention below, according to the following schedule:

- **August 30, 2013** – Itemized List of Public Comments and Responses Received  
File to be named: RO2857\_CORRES\_L\_yyyy-mm-dd
- **October 7, 2013** – Site Investigation Report, SCM, and Feasibility Study / Corrective Action Plan  
File to be named: RO2857\_SWI\_SCM\_FSCAP\_R\_L\_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 party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

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  
Electronic Report Upload (ftp) Instructions

cc: Bob Clark-Riddell, Pangea Environmental Services, Inc, 1710 Franklin Street, Suite 200, Oakland, CA 94612 (sent via electronic mail to [bridell@pangeaenv.com](mailto:bridell@pangeaenv.com))

Donna Drogos, (sent via electronic mail to [donna.drogos@acgov.org](mailto:donna.drogos@acgov.org))  
Dilan Roe (sent via electronic mail to [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))  
Mark Detterman (sent via electronic mail to [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))  
Electronic File, GeoTracker