

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Tuesday, September 24, 2013 2:45 PM
To: Tony Kershaw; 'Bob Clark-Riddell'
Cc: Roe, Dilan, Env. Health
Subject: Request for Additional Clarification; Albany A-1 Cleaners (RO2857); 1187 Solano Ave, Albany, CA

Tony and Bob,

Alameda County Environmental Health (ACEH) has reviewed the case file including the *Workplan for Preliminary Assessment of Indoor Air*, dated September 9, 2013 and generated by Pangea Environmental Services, Inc. The work plan was submitted in response to an ACEH email directive dated August 7, 2013. Thank you for submitting the work plan. The work plan proposes the collection of four 8-hour indoor air vapor samples, and the collection of one outdoor air background vapor sample, and provided a copy of a draft fact sheet to be distributed to tenants prior to the collection of the data.

Based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below.

TECHNICAL COMMENTS

- 1. Work Plan Clarifications** – The referenced work plan proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH seeks further clarification of several proposed actions prior to approval and work initiation.
 - a. Length of Indoor Air Vapor Sampling Event** – ACEH is in agreement that an 8-hour sampling is useful to evaluate exposures to workers at a site during a standard work day schedule; however, DTSC guidelines recommend a 24 hour sampling period for the first sampling event to capture diurnal fluctuations. The DTSC guidelines also indicate that where feasible, 24- and 8-hour sampling events can be conducted concurrently. Because DTSC guidelines are recognized in California as the state of (vapor intrusion) practice, ACEH generally adheres to the guidelines. However, ACEH is amenable to the use of industry accepted alternative guidelines with the submittal and acceptance of an appropriate regulatory guidance reference. At this time, please notify ACEH of the intended plan of action by the date identified below.
 - b. Additional Indoor Air Sampling Location** – Four indoor air sampling locations were identified on Figure 2 of the work plan. ACEH is in agreement with these locations; however, it appears appropriate to include an additional location in the rear room labeled “W.C.” near sub-slab location SSPO-4 due to presumed limited air flow of the room and the elevated subslab detection of PCE at that location.
 - c. Request for Fact Sheet in Word Format** – As you are aware, the Fact Sheet is intended to be supplied to the tenants of the occupied units prior to collection of the indoor air samples. ACEH is in general agreement with the general format of the Fact Sheet submitted with the work plan; however, judges it appropriate to make modifications to it. Consequently, ACEH requests the submittal of the document(s) in a Word format in order to do so, by the date identified below. Therefore ACEH also judges it appropriate to utilize the DTSC sample cover letter to occupants in order to explain the intent of the indoor air sampling. ACEH also requests that the DTSC sample cover letter be forwarded in Word format by the date identified below.
- 2. Results of Public Responses to the First Fact Sheet** – ACEH does not recall that the results of public responses to the first Fact Sheet have been submitted as previously requested. These were to be submitted by August 30, 2013. Please forward either a tabulation of the responses, or identify the date of the earlier submittal 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:

- **September 30, 2013** – Indoor Air Sampling Plan of Action (Length of Sampling Event) and Word Formatted Fact Sheet and Cover Letter
File to be named: RO2857_CORRES_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 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.

If you have any questions, please call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Regards,

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PDF copies of case files can be downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>