



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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December 27, 2013

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

Subject: Modified Data Gap Work Plan Approval; 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 *Site Data Gap Workplan*, dated December 16, 2013. The document was prepared on your behalf by Pangea Environmental Services, Inc (Pangea). Thank you for submitting the report.

The referenced report documents the recent collection of additional data at the site, including a December 3rd survey of site wells, a December 4th groundwater monitoring event, and a December 4th vapor sampling event. The well survey confirms the presumed groundwater direction of flow, the groundwater monitoring event documented a relatively minor increase in groundwater concentrations of tetrachlorethene (PCE) and trichloroethene (TCE) in the wells, and modest fluctuations in PCE vapor concentrations (both up and down in concentration) but with notably increased TCE vapor concentrations attributed to degradation of PCE. With one exception for PCE concentrations (3,600 $\mu\text{g}/\text{m}^3$ PCE at SS-PO-4), both PCE and TCE remain below commercial vapor intrusion Environmental Screening Levels (ESLs) of 2,100 $\mu\text{g}/\text{m}^3$ PCE and 3,000 $\mu\text{g}/\text{m}^3$ TCE, as published by the Regional Water Quality Control Board (RWQCB).

The work plan proposes to survey the existing wells (completed), conduct additional groundwater monitoring (started), survey vicinity water supply wells and sensitive receptors (the latter within 250 feet of the site), conduct short-term feasibility testing of vent piping to evaluate the benefit of contingent active or passive ventilation of vents, and investigate the extent of the shallow groundwater plume.

Pangea conducted three well tests (bail down) to determine if shallow groundwater could be classified as a potential source of municipal water supply (MUN) by criteria listed in the RWQCBs *San Francisco Bay Basin Water Quality Control Plan (Basin Plan)*. The test of three of the wells (MW-1, MW-2, and MW-3) determined that shallow groundwater could not supply the minimum 200 gallons per day, would produce an estimated maximum of 0.4 to 1.0 gallons per day, and thus could not be classified as MUN. Consequently Pangea proposes to use a groundwater goal protective of residential vapor intrusion risk as defined by RWQCB ESLs; 63 micrograms per liter ($\mu\text{g}/\text{l}$) rather than drinking water standards. Deeper groundwater does not appear to be impacted based on previous Hydropunch grab groundwater sampling of a thin water-bearing zone at an approximate depth of 30 feet bgs and thus has been considered to be defined. As this zone required several hours to supply sufficient groundwater for the purpose of sampling it is also likely not considered a source of MUN groundwater.

In order to delineate the shallow groundwater plume, Pangea proposes the installation of five hand augered soil bores to collect grab groundwater samples, as well as the potential installation of up to six contingency soil bores, should the delineation of the groundwater plume not be achieved with the initial

five soil bores. The installation of an undefined number of followup wells was discussed, but was proposed to be based on the results of the soil bore program.

Finally, provided the proposed investigation does not indicate a concern, the recommended remedial alternative for groundwater was Monitored Natural Attenuation (MNA). A Corrective Action Plan (CAP) Implementation Plan was proposed should a potential concern for vapor intrusion to residential indoor air at offsite properties be documented by the data to be collected.

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) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Work Plan and Modifications** – The referenced *Data Gap Work Plan* proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH requests a modification to the approach. Please submit a report by the date specified below.
 - a. **Plume Delineation Soil Sampling** – The referenced work plan did not propose the collection of soil from the soil bores proposed to be installed for the purpose of groundwater plume delineation. ACEH is in general agreement with this approach; however, requests that soil from each soil bore be monitored at multiple intervals with a Photoionization Detector (PID) and in the event of a response above background readings, requests that soil be collected and submitted for laboratory analysis of the target compound list.

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:

- **March 7, 2014** – Soil, Soil Vapor, and Groundwater Investigation
File to be named: RO2857_SWI_R_yyyy-mm-dd

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at 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 briddell@pangeaenv.com)
Dilan Roe (sent via electronic mail to dilan.roe@acgov.org)
Mark Detterman (sent via electronic mail to mark.detterman@acgov.org)
Electronic File, GeoTracker

Attachment 1

Responsible Party(ies) Legal Requirements/Obligations

REPORT/DATA REQUESTS

These reports/data are being requested pursuant to Division 7 of the California Water Code (Water Quality), Chapter 6.7 of Division 20 of the California Health and Safety Code (Underground Storage of Hazardous Substances), and Chapter 16 of Division 3 of Title 23 of the California Code of Regulations (Underground Storage Tank Regulations).

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (Local Oversight Program [LOP] for unauthorized releases from petroleum Underground Storage Tanks [USTs], and Site Cleanup Program [SCP] for unauthorized releases of non-petroleum hazardous substances) require submission of reports in electronic format pursuant to Chapter 3 of Division 7, Sections 13195 and 13197.5 of the California Water Code, and Chapter 30, Articles 1 and 2, Sections 3890 to 3895 of Division 3 of Title 23 of the California Code of Regulations (23 CCR). Instructions for submission of electronic documents to the ACEH FTP site are provided on the attached "Electronic Report Upload Instructions."

Submission of reports to the ACEH FTP site is in addition to requirements for electronic submittal of information (ESI) to the State Water Resources Control Board's (SWRCB) Geotracker website. In April 2001, the SWRCB adopted 23 CCR, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1 (Electronic Submission of Laboratory Data for UST Reports). Article 12 required electronic submittal of analytical laboratory data submitted in a report to a regulatory agency (effective September 1, 2001), and surveyed locations (latitude, longitude and elevation) of groundwater monitoring wells (effective January 1, 2002) in Electronic Deliverable Format (EDF) to Geotracker. Article 12 was subsequently repealed in 2004 and replaced with Article 30 (Electronic Submittal of Information) which expanded the ESI requirements to include electronic submittal of any report or data required by a regulatory agency from a cleanup site. The expanded ESI submittal requirements for petroleum UST sites subject to the requirements of 23 CCR, Division, 3, Chapter 16, Article 11, became effective December 16, 2004. All other electronic submittals required pursuant to Chapter 30 became effective January 1, 2005. Please visit the SWRCB website for more information on these requirements: (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

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, 7835, 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, late 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 SCP)	REVISION DATE: July 25, 2012
	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 (petroleum UST and SCP) 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 deh.loptoxic@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 deh.loptoxic@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.