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June 10, 2010

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318 Diablo Road, Ste. 255
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Subject: Work Plan Addendum for Soil Vapor Sampling for Spills, Leaks, Investigations, and Cleanup (SLIC) Case No. RO0002863 and GeoTracker Global ID T06019764784, Crow Canyon Cleaners, 7272 San Ramon Road, Dublin, CA 94568

Ladies and Gentlemen:

Thank you for the recently submitted document entitled, "Vapor Well Installation and Monitoring Work Plan," dated May 12, 2010, which was prepared by Endpoint Consulting, Inc. for the subject site. Alameda County Environmental Health (ACEH) staff has reviewed the case file including the above-mentioned work plan for the above-referenced site. The scope of work presented in the above-mentioned work plan details installation of three sub-slab vapor points as well as semi-annual sampling of existing vapor extraction wells (VM-4S, VE-1S/D, VE-2S, and VE-3S). The scope of work presented does not adequately address concerns identified in our April 15, 2010 correspondence. Therefore, scope of work submitted appeared incomplete and ACEH requests that you address the following technical comments and send us a work plan addendum as requested below.

TECHNICAL COMMENTS

1. **Adequacy of Sampling Locations** – Endpoint proposes to install three sub-slab sampling points along the utility corridor that transects the Montessori School and sampling existing vapor extraction wells. The proposed sub-slab vapor point locations would appear to leave data gaps in the vicinity of SB-15 where three sewer lines converge in the front of the structure as well as in the vicinity of SB-19 where utilities converge in the front of the structure.

Also, ACEH identified in our April 15, 2010 correspondence that areas potentially outside the radius of influence of the SVE system must be evaluated to ensure that system adequately remediated the sub-surface contamination at the site. These areas include SB-1, SB-5, SB-11, SB-21, SB-23, and between SB-3 and SB-4. Therefore, additional sampling locations between the proposed existing vapor wells are needed to adequately address these potential data gaps. Please submit a work plan addendum that addresses the above-mentioned concerns due by the date specified below.

2. **Site Cleanup Goals** – Endpoint proposed residential screening levels for the Montessori School and commercial screening levels for the dry cleaner. ACEH required that a single conservative (i.e. residential land-use risk scenario) is adopted site-wide, since it is difficult to control the sensitivity of land-uses at the shopping center. In response to ACEH request, Endpoint proposed screening levels corresponding to a school exposure scenario to be applied the Montessori School and the dry cleaner facility.

“Specifically, Endpoint proposes to adjust the exposure parameters used by the RWQCB to develop the residential ESLs as follows:

Reduce adult exposure duration and frequency to 25 years and 250 days per year, respectively; these values correspond to commercial exposure parameters adopted by the RWQCB (2008) and remain a highly conservative representation of the actual time spent at the school and at the dry cleaners; and

Adjust the child exposure duration and frequency to 3 years and 250 days per year, respectively. Since the subject Montessori School is a pre-school catering to kids ranging in age from 3 to 6 years old, the 3-year exposure duration is consistent with the maximum amount of time that kids may be enrolled at the subject school.

In addition to the above revisions to the exposure parameters, Endpoint proposes to use site-specific values for soil porosity and moisture content. To this end, three soil samples (one from each of the proposed sub-slab wells) will be collected and sent to the laboratory for estimation of porosity and moisture content. These values will be used to represent site-specific estimates of porosity and moisture content into the ESL calculations.

With the exception of the above, all other highly conservative exposure parameters used by RWQCB (2008) in developing the ESLs will be remain unchanged. The revised ESLs reflecting school exposure will be documented in the initial Semi-Annual Vapor Monitoring Report.”

In order to adequately evaluate the proposed cleanup goals, please prepare and submit the site-specific cleanup goals for all the chemicals of concern for the site. You may install geotechnical borings to obtain soil parameters (i.e. soil porosity, moisture content, etc.) you deem necessary to calculate the cleanup goals. Please submit the cleanup goals in the work plan addendum, due by the date specified below.

TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH (Attention: Paresh Khatri), according to the following schedule:

- **August 9, 2010** – Soil and Water Investigation Work Plan Addendum
- **Due within 30 Days of Sampling** – Quarterly/Semi-annual Monitoring Report (2nd Quarter 2010)
- **Due within 30 Days of Sampling** – Quarterly/Semi-annual Monitoring Report (4th Quarter 2010)

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 777-2478 or send me an electronic mail message at paresh.khatri@acgov.org.

Sincerely,

Paresh C. Khatri
Hazardous Materials Specialist

Enclosure: Responsible Party(ies) Legal Requirements/Obligations
ACEH Electronic Report Upload (ftp) Instructions

cc: Mehrdad Javaherian, Endpoint Consulting, Inc., 98 Battery Street, Suite 200, San Francisco, CA 94111 (*Sent via e-mail to: mehrdad@endpoint-inc.com*)
Jing Heisler, Endpoint Consulting, Inc., 98 Battery Street, Suite 200, San Francisco, CA 94111
Cheryl Dizon (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551 (*Sent via e-mail to: cdizon@zone7water.com*)
Donna Drogos, ACEH (*Sent via E-mail to: donna.drogos@acgov.org*)
Paresh Khatri, ACEH (*Sent via E-mail to: paresh.khatri@acgov.org*)
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)	ISSUE DATE: July 5, 2005
	REVISION DATE: March 27, 2009
	PREVIOUS REVISIONS: December 16, 2005, October 31, 2005
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

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- 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)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

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
 - Or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of My Le Huynh.
 - 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 and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - 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.