

ALAMEDA COUNTY
HEALTH CARE SERVICES



AGENCY
DAVID J. KEARS, Agency Director

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

December 18, 2007

Mr. Bruce Burrows
The Burrows Company
6 South Point Road
Orinda, CA 94563

Mr. Gabriel Chiu
Gabriel H. Chui & Lai H. Trust
10898 Inspiration Circle
Dublin, CA 94568

Subject: Spills, Leaks, Investigations and Cleanup (SLIC) case file #RO0002863 (Global ID # T06019764784), Crow Canyon Cleaners, 7272 San Ramon Road, Dublin CA

Dear Mr. Burrows and Mr. Chiu:

Alameda County Environmental Health (ACEH) staff has reviewed the SLIC case file for the above-referenced site and the document entitled, "Indoor Air Sampling/Montessori School", dated November 7, 2007 prepared on your behalf by AEI Consultants. The results of the indoor air sampling indicate that tetrachloroethene (PCE) was detected in indoor air at concentrations of 1.3 parts per billion volume (ppbv) and 1.1 ppbv, which exceed the California Human Health Screening Levels in indoor air for a residential scenario.

ACEH is concerned the laboratory analytical method used during sample analysis did not detect PCE degradation products. The reductive dechlorination process would necessarily result in the generation of degradation products such as trichlorethene, cis 1-2 dichlorethene, trans 1-2 dichlorethene, and vinyl chloride. The lack of degradation products not detected in indoor air samples and soil vapor samples may indicate that the analytical method used during sample analysis is not representative of actual concentrations of PCE breakdown products. Furthermore, the absence of PCE degradation products in soil, groundwater, indoor air samples and soil vapor samples is a concern because the dry cleaning facility was in operation for several years prior to the discovery of the chlorinated solvent contamination, and the release of PCE very likely precedes the discovery of PCE contamination beneath your site. Please discuss in detail, in the report requested below, the lack of degradation products such as trichlorethene, cis 1-2 dichlorethene, trans 1-2 dichlorethene, and vinyl chloride, which were not detected in soil, groundwater, soil vapor, or indoor air.

On December 6, 2007, ACEH met with yourself and several other concerned parties to discuss the results of the indoor air sampling completed in November 2007. During this meeting, ACEH was informed of changes that were made to the HVAC system to mitigate the occurrence of PCE in indoor air. Please prepare a detailed review of the changes to the HVAC system and submit this review to ACEH by **December 28, 2007**. Additionally, in a correspondence dated November 13, 2007 ACEH requested that you prepare a draft fact sheet that details environmental contamination beneath your site and provide a schedule to complete work that was previously requested in July 2007. To date, ACEH has not received the draft fact sheet or any indication that the previously requested soil vapor investigation work has been scheduled.

Lastly, in conjunction with the previously requested soil vapor investigation and sub-slab soil vapor sampling, ACEH requested that interim remedial measures must be implemented to mitigate high concentrations of PCE in the vadoze zone beneath the dry cleaner and the adjacent Montessori school. In the Work Plan requested below, present your proposal to implement remedial measures to mitigate PCE contamination beneath your site.

We request that you perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to steven.plunkett@acgov.org) prior to the start of field activities.

TECHNICAL REPORT REQUEST

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

- **December 28, 2007** – Schedule for Work Plan Implementation, Draft Fact Sheet and Discussion of HVAC System Changes
- **January 1, 2008** – Work Plan for Soil Vapor Remediation

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) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy 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 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, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board 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 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, 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.

If you have any questions, please call me at (510) 383-1767.

Sincerely,



Steven Plunkett
Hazardous Materials Specialist

cc: Peter McIntyre
AEI Consultants
2500 Camino Diablo, Suite 200
Walnut Creek, CA 94105

Howard Wong
Lawrence Livermore National Laboratory
120 Benjamin Lane
Danville, CA 94506

Donna Drogos, ACEH, Steven Plunkett, ACEH File