



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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March 4, 2009

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

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

Nam Sun and Seung Hee Park
Crow Canyon Cleaners
7242 San Ramon Road
Dublin, CA 94568

Mr. Dwight and Mr. Carleton Perry
PO Box 20610
Castro Valley, CA 94546

Lee Family
20117 Forest Avenue #3
Castro Valley, CA 94546

Messrs. William Karkozian, Robert
Wiebe and Robert Jeha
Dublin Town & Country Assoc.
318 Diablo Road, Suite 255
Danville CA, 94526

Subject: Spills, Leaks, Investigations and Cleanup (SLIC) case file #RO0002863 (Global ID #T06019764784), Crow Canyon Cleaners, 7272 San Ramon Road, Dublin, CA 94568

Ladies and Gentlemen:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site and the documents entitled, "Letter Addendum to the Soil Vapor Extraction Pilot Test Work Plan", dated February 11, 2009 and prepared on your behalf by Endpoint. Endpoint has proposed a soil vapor extraction pilot test to evaluate the efficacy of the soil vapor extraction (SVE) remediation method. ACEH generally concurs with the proposed soil vapor extraction pilot test work plan provided the comments below are implemented. 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 COMMENTS

- 1. Soil Vapor Extraction Pilot Test.** ACEH generally concurs with the recommendations in the work plan for 1, 3 and 7 purge volumes for vapor monitoring wells, soil vapor sample flow rates of 100 to 200 ml/min, the use of summa canister for the collection of soil vapor samples and the proposed soil vapor sample analysis using EPA method TO-15. We concur with the proposal to perform leak tests during sampling of soil vapor extraction and vapor monitoring wells using isobutene. ACEH generally concurs with the proposed short-term and long-term pilot test recommendations by Endpoint including sampling frequency, vacuum flow and extraction rates and conclusion of the long term test once asymptotic conditions are reached. Please present results from the pilot test in the report requested below.
- 2. Soil Vapor Extraction Wells and Monitoring Well Installation.** ACEH generally concurs with the proposed construction of the soil vapor extraction wells and vapor monitoring wells at two discrete depths. However, we request that one additional vapor monitoring well be installed in the bathroom of the recently vacated part of the Montessori School (see attached figure) and one vapor monitoring well should be installed next to VE-2. In addition, we request that you perform leak detection tests on the vapor extraction wells and the vapor monitoring wells according to the 2003 DTSC "Advisory-Active Soil Vapor Investigation." Please present results from the pilot test in the report requested below.

- 3. Public Participation.** Public notification regarding the environmental contamination and remedial actions associated with the site is currently underway. The responsible party has compiled a distribution list and a fact sheet, which has been issued to notify building tenants, parents of students attending the Montessori school and residents of the adjacent residential condominium complex regarding remedial activities associated with the site. Upon completion of the SVE pilot test, the fact sheet will be revised to include the results of the pilot test, and we request that you submit a copy of the draft fact sheet for our review by the date specified below.

TECHNICAL REPORT REQUEST

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

- **April 24, 2009** – Interim Remedial Action Report and Draft Revised Fact Sheet

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](http://www.swrcb.ca.gov/ust/cleanup/electronic%20reporting)).

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

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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.

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

Sincerely,

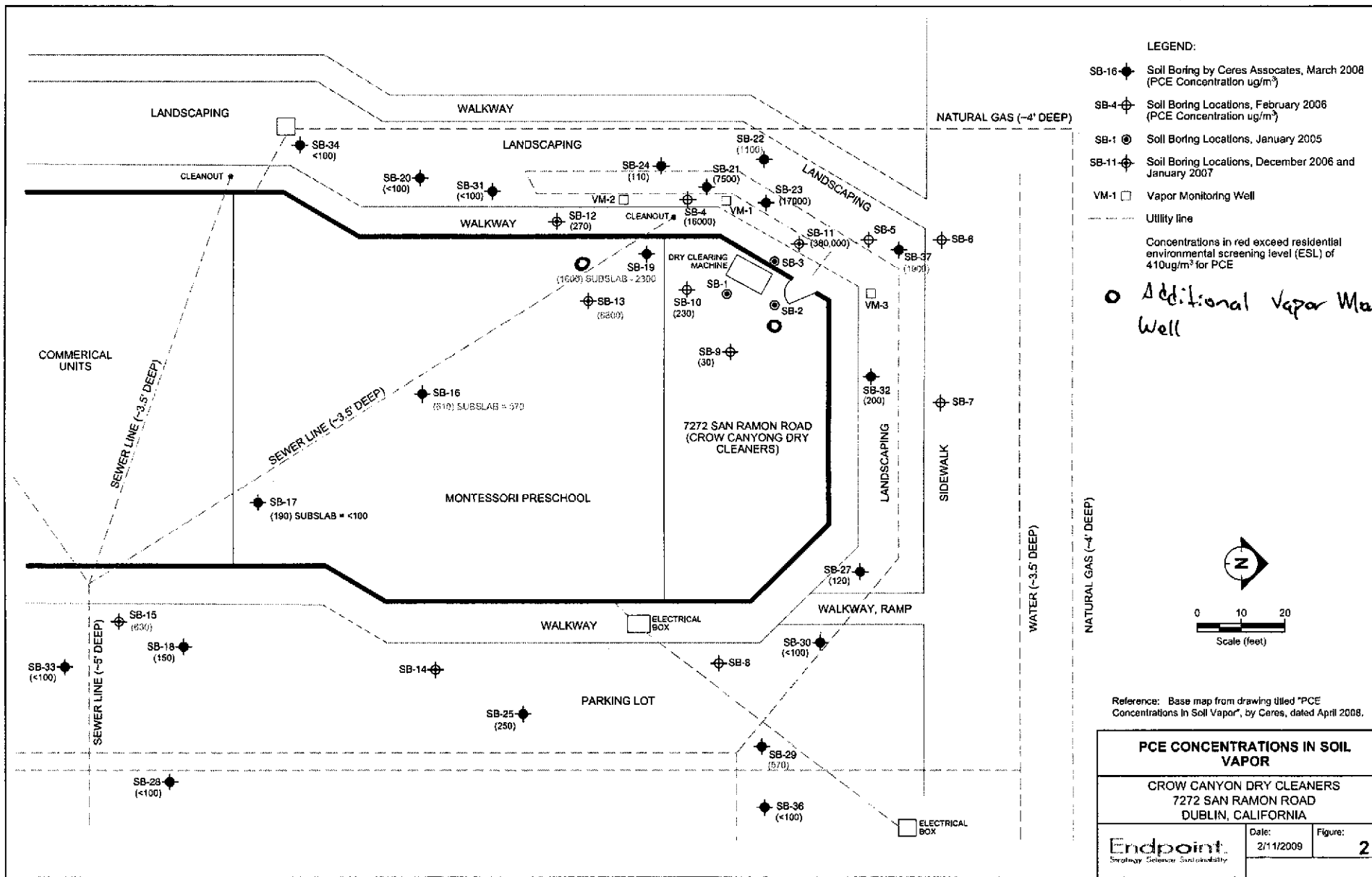


Steven Plunkett
Hazardous Materials Specialist



Donna L. Drogos P.E.
Supervising Hazardous Materials Specialist

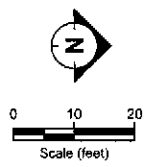
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Donna Drogos, Steven Plunkett, File



LEGEND:

- SB-16 ◆ Soil Boring by Ceres Associates, March 2008 (PCE Concentration ug/m³)
- SB-4 ⊕ Soil Boring Locations, February 2006 (PCE Concentration ug/m³)
- SB-1 ⊙ Soil Boring Locations, January 2005
- SB-11 ⊕ Soil Boring Locations, December 2006 and January 2007
- VM-1 □ Vapor Monitoring Well
- Utility line
- Concentrations in red exceed residential environmental screening level (ESL) of 410ug/m³ for PCE

○ Additional Vapor Monitoring Well



Reference: Base map from drawing titled "PCE Concentrations In Soil Vapor", by Ceres, dated April 2008.

PCE CONCENTRATIONS IN SOIL VAPOR		
CROW CANYON DRY CLEANERS 7272 SAN RAMON ROAD DUBLIN, CALIFORNIA		
Endpoint <small>Soil Vapor Science and Technology</small>	Date: 2/11/2009	Figure: 2