

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



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

February 27, 2007

Mr. Bill Sumski  
Eastmont Town Center, LLC  
7200 Bancroft Avenue  
Oakland, CA 94605-2403

Mr. Todd Gooding  
Scanlankemperbard Companies  
1211 SW Fifth, Suite 2600  
Portland, OR 97204

Subject: SLIC Case RO0002942 and Geotracker Global ID SLT19735483, Sparkle Cleaners, 7000 Bancroft Avenue, Oakland, CA 94605 – Work Plan Approval

Dear Mr. Sumski and Mr. Gooding:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above referenced site including the work plan entitled, "Remedial Action Workplan, Voluntary Soil Remediation, Sparkle Cleaners, Eastmont Town Center," dated January 5, 2007, and prepared by PES Environmental, Inc. Tetrachloroethene (PCE) is present at elevated concentrations in soil in the area of a former dry cleaning unit at Sparkle Cleaners. PCE was also detected in soil vapor and groundwater at concentrations that exceed applicable regulatory criteria. The Work Plan proposes excavation of soil beneath Sparkle Cleaners and groundwater monitoring following the soil remediation. The proposed scope of work is acceptable provided that the technical comments below are addressed and incorporated during the remedial action and groundwater monitoring. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan or technical comments below is proposed.

We request that you address the following technical comments, 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 [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org)) prior to the start of field activities.

**TECHNICAL COMMENT**

1. **Soil Excavation and Confirmation Sampling.** The Work Plan proposes the removal of soil from an area approximately 165 square feet in size to a depth of approximately 5.5 feet. The excavation is to be expanded laterally and vertically as necessary to remove visually stained or odor-impacted soil and soil with concentrations of PCE that exceed the proposed cleanup goal. The number and distribution of confirmation soil samples proposed in the work plan is acceptable; however, we wish to clarify several points. The sidewall samples are to be collected from the depths at which the greatest contamination is observed during excavation and screening of the soils. As an example, if the greatest visual staining, odor, and PID readings are observed at a depth of 3 feet bgs along a sidewall, the confirmation samples from the sidewall are to be collected from a depth of 3 feet bgs. Additional

confirmation soil samples beyond those proposed are to be collected if highly variable soil conditions are observed or the extent of contamination appears to be highly variable. In addition, confirmation samples are to be collected beneath the sanitary sewer line at the two locations where the sanitary sewer line exits the excavation in order to assess whether the sanitary sewer line is potential source of solvent releases. Confirmation soil samples are also to be collected along any other features such as backfilled utility trenches that could potentially act as preferential pathways. Please present the results of the soil excavation and confirmation soil sampling in the Soil Removal and Monitoring Well Installation Report requested below.

2. **Soil Vapor Sampling.** PCE was detected in nine of the ten soil vapor samples collected at the site. PCE was detected at concentrations that exceed the San Francisco Bay Regional Water Quality Control Board Shallow Soil Gas Screening Levels for Evaluation of Potential Vapor Intrusion Concerns (RWQCB, San Francisco Bay Region, Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater, February 2005) in four of the ten soil vapor samples collected. If soil contamination with concentrations that exceed the proposed cleanup goal are left in place due to structural features or utilities, soil vapor sampling may be required to confirm that the residual contamination does not pose a human health threat for indoor vapor intrusion. Soil vapor sampling may also be required if observations during excavation or confirmation sampling results indicate that the sanitary sewer line was a potential source of solvent releases.
3. **Groundwater Flow Direction and Proposed Well Locations.** The apparent hydraulic gradient (west-northwest) observed during previous investigations at the site does not appear to be consistent with the expected regional groundwater flow direction. A west-northwest hydraulic gradient is also not consistent with the hydraulic gradients observed at two nearby fuel release sites at 7225 Bancroft Avenue and 7210 Bancroft Avenue. Four monitoring wells are proposed in the area west of Sparkle Cleaners. Due to uncertainty in groundwater flow direction for the site, we request that the proposed locations for wells MW-03 and MW-04 be revised as shown on the attached Revised Figure 4.
4. **Proposed Monitoring Well Construction.** The Work Plan proposes to install 2-inch diameter monitoring wells to depths of approximately 50 feet bgs, which is assumed to be approximately 10 feet into the first encountered groundwater. The installation of wells to depths of approximately 10 feet below first encountered groundwater and following Alameda County Public Works Department Guidelines and State of California standards is acceptable. We request that the filter packs for the monitoring wells not exceed 15 feet in length. The Work Plan does not include plans for laboratory analysis of soil samples. We request that soil samples be collected for laboratory analysis if visible staining, odor, or elevated PID readings are observed during advancement of the soil borings. If visible staining, odor, or elevated PID readings are observed, a sufficient number of soil samples must be collected to characterize the vertical interval over which the contamination occurs. Please present boring logs, well completion diagrams, and all other results from the monitoring well installation in the Soil Removal and Monitoring Well Installation Report requested below.
5. **On-site Industrial Well.** A Site Map labeled Figure 2, which appears to be from a report by Artesian Environmental Consultants dated August 27, 1993 and is attached to the work

plan, identified an industrial water well southeast of Sparkle Cleaners. A review of a Water Well Driller's report in ACEH files, indicates that an industrial well was installed at the site in 1951. The well, which was perforated from 90 to 393 feet bgs, was 12 inches in diameter. A notation on the Well Driller's Report indicates that the well was located 250 feet east of Bancroft Avenue and 650 feet north of 73<sup>rd</sup> Avenue, which would place the well south of Sparkle Cleaners. Please indicate whether this well was decommissioned and discuss the potential for this well to be a receptor for groundwater contamination from the site.

6. **Assembly Plant USTs.** A Phase II Limited Subsurface Investigation Report, dated December 22, 2004 and prepared by EBI Consulting, indicates that a Chevrolet Fisher Body Plant occupied the site from 1916 to 1965 and that five USTs were in use at the site. Please describe the locations of the former assembly plant USTs in relation to Sparkle Cleaners.
7. **Boring Logs and Cross Sections.** The workplan prepared by PES Environmental, Inc. does not include boring logs. Please submit boring logs for the soil borings completed during the 2006 investigation. Preparation of boring logs is a fundamental step required in the characterization of site geology and hydrogeology and is required for the proposed monitoring wells. Please include soil boring logs for the monitoring wells in the Soil Removal and Monitoring Well Installation Report requested below.
8. **Geotracker EDF Submittals.** Pursuant to CCR Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports (LUFT or SLIC) is required in Geotracker (in PDF format). In order to remain in regulatory compliance, please upload all SLIC analytical data and copies of reports post July 1, 2005, to the SWRCB's Geotracker database website in accordance with the above-cited regulation.

#### **TECHNICAL REPORT REQUEST**

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

- **July 12, 2007** – Soil Removal and Monitoring Well Installation Report
- **90 Days following the end of each quarter** – Groundwater Monitoring Report

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

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website for more information on these requirements ([http://www.swrcb.ca.gov/ust/cleanup/electronic\\_reporting](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.

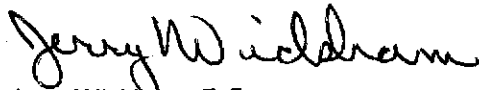
Mr. Bill Sumski  
Mr. Todd Gooding  
February 27, 2007  
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**AGENCY OVERSIGHT**

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) 567-6791.

Sincerely,



Jerry Wickham, P.G.  
Hazardous Materials Specialist

Attachment: Revised Figure 4 with Proposed Monitoring Well Locations

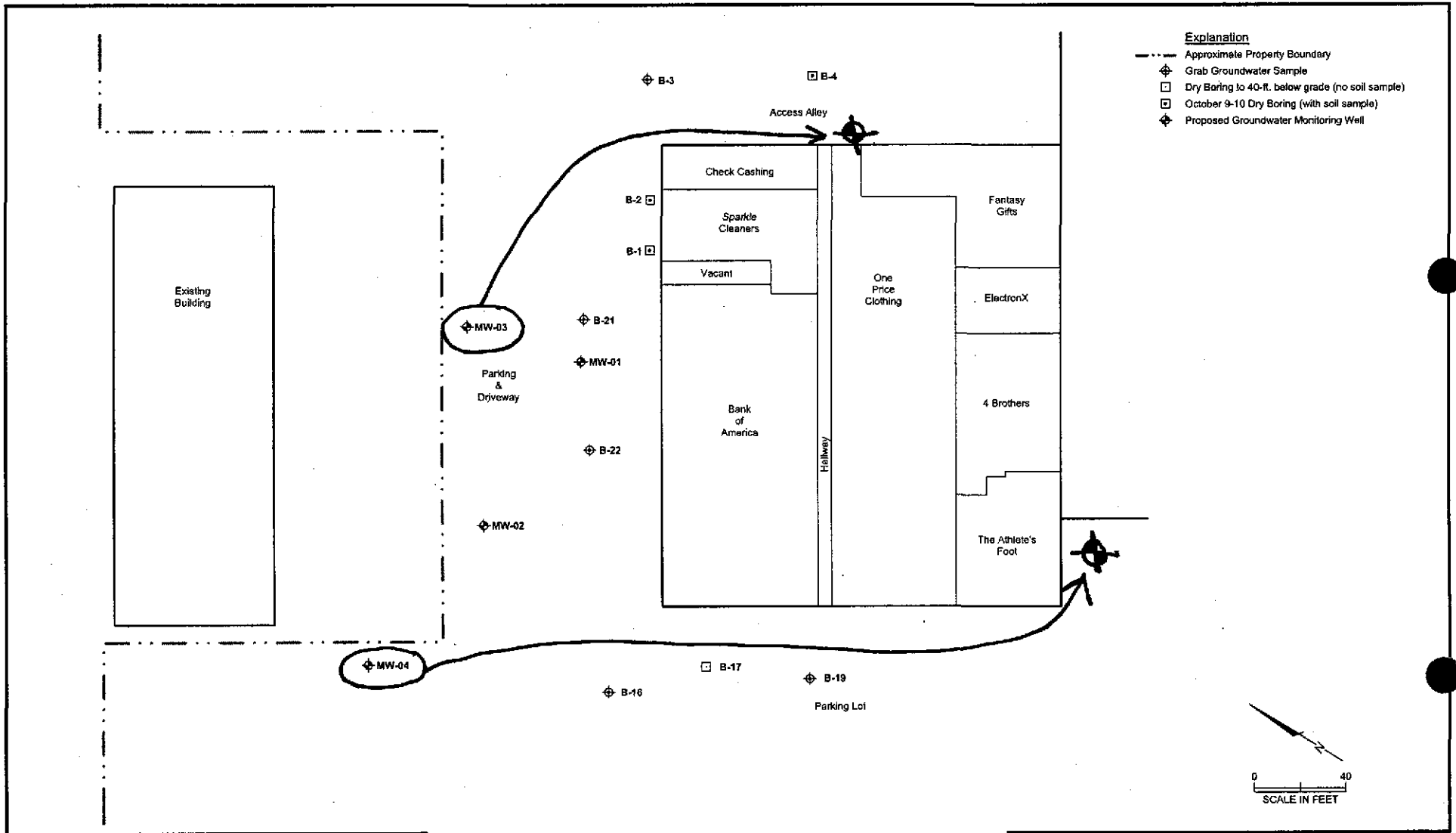
Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Mr. Bob Bridwell  
Eastmont Town Center, LLC  
7200 Bancroft Avenue  
Oakland, CA 94605-2403

Mr. Will Mast  
PES Environmental, Inc.  
1682 Novato Boulevard, Suite 100  
Novato, CA 94947-7021

Donna Drogos, ACEH  
Jerry Wickham, ACEH  
File

# Revised Figure 4



**PES Environmental, Inc.**  
Engineering & Environmental Services

881.080.01.003 881-06001003\_1206-03 *WWM*  
JOB NUMBER DRAWING NUMBER REVIEWED BY

Post-It™ brand fax transmittal memo 7671 # of pages **1**

To <i>Will Mast</i>	From <i>Jerry Witham</i>
Co. <i>PES</i>	Co. <i>ACEM</i>
Dept.	Phone # <i>510-567-6791</i>
Fax # <i>415-899-1601</i>	Fax # <i>510-337-9335</i>

Groundwater Sample Locations and  
Proposed Groundwater Monitoring Wells  
Sparkle Cleaners  
Eastmont Town Center  
Oakland, California

PLATE

**4**

1/07  
DATE

ALAMEDA COUNTY  
HEALTH CARE SERVICES

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DAVID J. KEARS, Agency Director



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ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
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October 4, 2007

Mr. Bill Sumski  
Eastmont Town Center, LLC  
7200 Bancroft Avenue  
Oakland, CA 94605-2403

Mr. Todd Gooding  
Scanlankemperbard Companies  
1211 SW Fifth, Suite 2600  
Portland, OR 97204

DIR - L  
2007-10-04

Subject: SLIC Case RO0002942 and Geotracker Global ID SLT19735483, Sparkle Cleaners, 7000 Bancroft Avenue, Oakland, CA 94605

Dear Mr. Sumski and Mr. Gooding:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above referenced site including the recently submitted reports entitled, "Post-Remediation Report, Voluntary Soil Remediation, Sparkle Cleaners, Eastmont Town Center," dated September 9, 2007 and "Response to ACEH Comments in Letter, Sparkle Cleaners, Eastmont Town Center," dated September 9, 2007. Both reports were prepared by PES Environmental, Inc.

Dry cleaning operations appear to have resulted in soil and groundwater contamination beneath the site. During site investigation activities, tetrachloroethene (PCE) was detected at elevated concentrations in soil in the area of a former dry cleaning unit at Sparkle Cleaners. PCE was also detected in soil vapor and groundwater at concentrations that exceed applicable regulatory criteria.

The "Post-Remediation Report," describes the results from removal of soil with elevated concentrations of VOCs in the area of a former dry cleaning unit. Based on verification sampling results, excavation and off-site disposal appears to have removed soil with VOC concentrations exceeding cleanup goals. No further verification soil sampling or investigation in the interior of the building is required at this time pending results of groundwater monitoring. Groundwater monitoring is to be conducted using the four recently installed monitoring wells for a period of one year.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

### TECHNICAL COMMENTS

1. **Groundwater Monitoring.** The four groundwater monitoring wells installed at the site on July 23 and 24, 2007 are to be sampled quarterly for a minimum period of four quarters. The water samples are to be analyzed by a California state-certified laboratory for VOCs using EPA method 8260B. The target analyte list for EPA Method 8260B is to include chlorinated solvents, benzene, toluene, ethylbenzene, xylenes, fuel oxygenates, and naphthalene. We also request that the groundwater samples collected during two of the four quarters be analyzed for total petroleum hydrocarbons (TPH) as gasoline using EPA Method 8260B or EPA Method 8015 and TPH as diesel using EPA Method 8015. Please present the results in the Quarterly Monitoring Reports requested below.
2. **Boring Logs.** Please present boring logs, well completion diagrams, and all other results from the monitoring well installation in the Third Quarter 2007 Groundwater Monitoring Report requested below. Preparation of boring logs is a fundamental step required in the characterization of site geology and hydrogeology and is required for the completed monitoring wells.
3. **Geotracker EDF Submittals.** Pursuant to CCR Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, beginning January 1, 2002, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports (LUFT or SLIC) is required in Geotracker (in PDF format). In order to remain in regulatory compliance, please upload all SLIC analytical data and copies of reports post July 1, 2005, to the SWRCB's Geotracker database website in accordance with the above-cited regulation.

### TECHNICAL REPORT REQUEST

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

- **October 31, 2007** – Third Quarter 2007 Groundwater Monitoring Report
- **January 31, 2008** – Fourth Quarter 2007 Groundwater Monitoring Report
- **April 30, 2008** – First Quarter 2008 Groundwater Monitoring Report
- **July 31, 2008** – Second Quarter 2008 Groundwater Monitoring Report



Mr. Bill Sumski  
Mr. Todd Gooding  
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#### ELECTRONIC SUBMITTAL OF REPORTS

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#### 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.

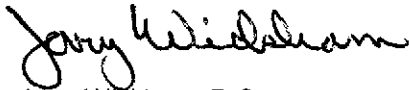
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**AGENCY OVERSIGHT**

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If you have any questions, please call me at (510) 567-6791.

Sincerely,



Jerry Wickham, P.G.  
Hazardous Materials Specialist

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cc: Mr. Bob Bridwell  
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Mr. Will Mast  
PES Environmental, Inc.  
1682 Novato Boulevard, Suite 100  
Novato, CA 94947-7021

Donna Drogos, ACEH  
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