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By Alameda County Environmental Health 10:13 am, Nov 02, 2015

091715 Proposed Mitigation Measures and Timeline

From: PDKing0000@aol.com  
To: Dilan.Roe@acgov.org  
CC: Keith.Nowell@acgov.org, Gary\_Bates@efiglobal.com, ron\_holt@efiglobal.com, patrick@ellwoodcommercial.com, ronpatelvidge@gmail.com  
Sent: 9/17/2015 19:00:34 Pacific Daylight Time  
Subj: Re: RO2981 - Red Hanger Kleeners - Proposed Mitigation Measures and Timeline

Hi Dilan,

In response to your request for proposed mitigation measures and timeline for TCE in air at the subject site, the following activities will be scheduled and performed.

- o Modify five of the six HVAC units on the roof to allow atmospheric air to be added to the building for ventilation. One of the six units has already been modified to allow atmospheric air to be added to the building. The modifications will include cutting the HVAC units, and adding sheet metal.
- o Adjusting dampers in all of the HVAC units to result in increased atmospheric air flow into the building.
- o Installation of one air filtration unit on each of the second and third floors in the hallway near the elevator, and also one air filtration unit in each of the front and back stairwells on the second floor.
- o Installation of one air filtration unit in each of the Symmetry Health Center (Suite 201) and the Kumon Learning Center (Suite 301).

All of the air filtration units will be properly sized for the spaces, and will use Granular Activated Carbon for filtration.

- o Interim post-mitigation air sampling in the hallways on the second and third floors near the elevator using 24-hour flow controllers and SIM-certified 6-liter Summa canisters with TO-15 analysis of the samples.

The HVAC system modifications and adjustments will be performed during the week of 9/21/15, with the specific dates during the week of 9/21/15 still not yet provided by the HVAC company that maintains the HVAC systems for the building.

The air filtration units will be delivered and installed during the week of 9/21/15, with the specific dates during the week of 9/21/15 still not yet available based on pending verification of shipping dates by equipment suppliers.

The interim post-mitigation air sampling in the hallways on the second and third floors near the elevator will occur approximately 36 hours after completion of HVAC ventilation adjustment and air filtration equipment installation, with analysis of the samples on an expedited basis.

Following receipt of satisfactory interim post-mitigation air sample results and review of the results with Alameda County Environmental Health, comprehensive post-mitigation air sampling that includes tenant spaces will be performed.

Please let me know if you have any questions or need any additional information.

Thank you!

Paul

Paul H. King  
Professional Geologist

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In a message dated 9/15/2015 18:34:13 Pacific Daylight Time, Dilan.Roe@acgov.org writes:

Gentleman:

Keith and I phoned Paul King this afternoon to get a status update on the implementation of mitigation measures at the subject site due to the exceedances of the Accelerated Response Action Level (ARAL) for trichloroethylene (TCE) of 8.0 micrograms per cubic meter in indoor air samples collected on September 3 and 4.

Paul indicated that he sent the lab results from this most recent sampling event to you on September 9, and recommendations for mitigation measures including increasing the ventilation in the tenant spaces and installing air filtration units in suites where ventilation cannot be adjusted.

Although some mitigation measures have been implemented (sealing the annular space in the elevator shaft, foundation, and pipe, shampooing the carpet, etc.), the recent indoor air sampling results indicate the need for additional measures to mitigate air quality.

Additional measures should be implemented immediately. Therefore, please provide Alameda County Environmental Health (ACEH) with a scope and timeline providing details with the proposed mitigation measures by the **close of business on Thursday September 17**.

Additionally, as previously requested in an email correspondence on August 21, please also submit a draft Fact Sheet to ACEH by the **close of business on Thursday September 17**, notifying tenants of the TCE exceedances in indoor air and proposed mitigation measures, and the next steps in the ongoing investigation of the tetrachloroethylene (PCE) release from the former Red Hanger Cleaners. The fact sheet should be prepared in accordance with the Department of Toxic Substances Control (DTSC) Vapor Intrusion Public Participation Advisory (March 2012) including but not limited to Appendix C – Indoor Air Sampling and the San Francisco Bay Regional Water Quality Control Board's draft document entitled Interim Framework for Assessment of Vapor Intrusion at TCE-Contaminated Sites in the San Francisco Bay Region, dated October 16, 2014.

The last formal report received by ACEH for the subject site on September 1, 2015 was the Phase II Environmental Site Assessment Soil Gas Investigation prepared by Youngdahl Consulting Group Inc. dated August 25, 2015 and submitted on behalf of EFI Global Inc and Mr. Ron Elvidge. A review of GeoTracker indicates that no GEO\_MAPS or EDF data was uploaded in conjunction with this report. Therefore you are currently out of compliance with the State Water Resources Control Board GeoTracker submittal requirements.

Since the submittal of the Phase II Site Assessment in which exceedances of the Urgent Response Action Level (URAL) for TCE were reported, ACEH has worked with Paul King and Gary Bates to assess the risk to building occupants, collect additional indoor air samples, and implement mitigations measures. Although this data has been submitted to ACEH via email correspondence, an interim remedial action report has not been formally submitted. Therefore, please submit an Interim Remedial Action Report to ACEH by October 2, 2015.

Lastly, please submit a work plan for additional assessment of the PCE release from the former dry cleaner by October 16, 2015.

Thank you for your cooperation.

**Dilan Roe, P.E.**

*Program Manager - Land Use & Local Oversight Program*

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PDF copies of case files can be reviewed/downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>

**From:** Nowell, Keith, Env. Health  
**Sent:** Friday, September 11, 2015 4:46 PM  
**To:** Roe, Dilan, Env. Health <Dilan.Roe@acgov.org>  
**Subject:** RO2981 - Red Hanger Kleeners

Dilan,

I just spoke (very) briefly with Paul King and Gary Bates. Results of an interim sampling of the common areas still show ARAL exceedances. The samples were collected in the 3<sup>rd</sup> floor men's room and 2<sup>nd</sup> floor hallway. The next steps will include increasing the ventilation.

They will get back to us early next week.

Keith

Keith Nowell PG, CHG

Hazardous Materials Specialist

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