

ALAMEDA COUNTY
**HEALTH CARE SERVICES
AGENCY**

COLLEEN CHAWLA, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP) FOR
HAZARDOUS MATERIALS RELEASES
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Subject: Conditional Work Plan Approval for 309 63rd Street Property- Site Cleanup Case RO0002981 and GeoTracker Global ID T10000000416, 6235-6239 College Avenue, Oakland, CA 94618

Dear Ms. Gordon and Messrs. Gordon:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the document entitled *Work Plan for Vapor Intrusion Evaluation for 309 63rd Street Property* (Work Plan), dated July 17, 2018, a revised work plan prepared by Roux Inc. (Roux) on behalf of Ila Gordon.

The 309 63rd street building (Site) is a three-story structure adjacent to two former dry-cleaning operations- the former Kay Kleeners at 6251-6255 College Avenue and Red Hanger Kleeners which operated at both 6251-6255 College Avenue and 6235-6239 College Avenue locations. The ground floor of the Site is used for storage with northern portion having a concrete floor and the southern portion having a dirt floor. Roux subdivides the ground floor into 4 quadrants with the northern quadrants used for storage for a neighboring retail store.

As outlined, the purpose of the Work Plan is to provide a scope of work to evaluate soil vapor concentrations in the subsurface beneath the Site for impacts associated with former dry cleaning operations. Roux proposes advancing two pairs of soil vapor bores, with each pair constructed as a 5- and a 10-foot deep well. Roux states the investigation will be conducted in accordance with the July 2015, California Environmental Protection Agency (Cal/EPA), DTSC, and San Francisco Regional Water Quality Control Board (SF RWQCB), Advisory, Active Soil Gas Investigations (Advisory). The soil vapor wells (SVWs) are proposed to be installed in the two southern quadrants (SG-15 and SG-16) and two soil vapor pins are proposed in the two northern quadrants (SS-01 and SS-02). The SG-16 location was chosen to assess the potential of a preferential pathway from a sewer line. Roux indicates that, if the vapor pins are infeasible based on floor construction, then 1.5-foot deep SVWs will be installed.

As presented in the Work Plan, vapor sample analysis will be for volatile organic compounds (VOCs) by EPA Test Method TO-15 and the tracer gas helium using ASTM Test Method D1946. If vapor concentrations exceed the limits of TO 15, Roux proposes VOC analysis will be by EPA Test Method 8260.

Based on ACDEH staff review of the referenced document we generally concur with the recently proposed scope of work, provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. Submittal of a revised Work Plan is not requested unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed. We request that you address the following technical comments, perform the proposed work, and send us the technical report requested below. Please provide 3-working-day advance written notification to this office, electronic mail preferred, to: keith.nowell@acgov.org prior to the start of field activities.

TECHNICAL COMMENTS

- 1. Photoionization Detector** – The Work Plan does not indicate if boring logs provided with the soil vapor assessment report will include photoionization detector (PID) soil screening readings. ACDEH requests inclusion of the PID readings on the soil bore logs in the report requested below.
- 2. Soil Sample Collection** – Collection of soil samples is not discussed in the Work Plan. As a secondary line of evidence for potential soil vapor concentrations, ACDEH requests recovery and analysis of a soil sample from the bottom of each of the SVWs. Please analyze the samples for VOCs by Test Method 8260. Based on the historic dry cleaning operations at the 6251-6255 College Avenue location and the possible use of Stoddard solvent at the cleaner facilities, we request Stoddard solvent be included in the scope of analysis for the soil samples. Please analyze the soil samples prior to initiating the soil vapor analyses. See Technical Comment 5 below.
- 3. Sampling Point Construction** – The Work Plan states Roux will install temporary SVWs finished with a flush to grade traffic-rated well. The schematic of the vapor probe construction provided as Figure 1 does not depict a flush to grade traffic-rated well. Neither destruction nor temporal monitoring of the SVWs is addressed, hence the disposition of the SVWs is unclear. ACDEH requests retaining the SVWs and vapor pins for possible temporal monitoring over the next several months. Please construct/ complete the SVWs in accordance with the Advisory.
- 4. Alternative SVWs** – As indicated above, Roux proposes to install 1.5-foot deep SVWs in lieu of vapor pins if ground surface conditions make the pins infeasible due to floor condition. ACDEH notes the 1.5-foot SVW construction is not addressed in the vapor probe construction schematic of Figure 1.

The Advisory states soil vapor sample depths should be chosen to minimize the effects breakthrough of ambient air from the surface, of changes in barometric pressure and temperature, and to ensure that representative samples are collected. The Advisory notes that soil vapor samples collected at less than 5 feet below ground surface (bgs) may be subject to these effects. It is unclear if ground conditions unsuitable for vapor pins would be adequate to minimize the effects for representative sample collection at 1.5 feet. Additionally, the leak test helium shroud measures 18- by 12-inches and may not provide adequate coverage to evaluate ambient air breakthrough.

- 5. Analysis Scope** – ACDEH requests the fixed gasses oxygen and nitrogen be included in the scope of analysis during the initial round of soil vapor sampling to aid in the evaluation of the probe seal effectiveness and ambient air break through. Additionally, if a Stoddard solvent concentration is reported in soil (Technical Comment 2 above) at a concentration above the method reporting limit, we request the addition of carbon dioxide and methane to the analysis scope for all soil vapor samples. If Stoddard solvent is present in soil beneath the Site, carbon dioxide and methane soil vapor concentrations may indicate the presence of bioattenuation processes.
- 6. Chemical Storage** – The ground floor space of the Site is used for material storage, including miscellaneous building products. As part of the soil vapor investigation, ACDEH requests an inventory of the storage space be conducted for the presence of volatile chemicals, particularly in the vicinity of the vapor pins. Please present the inventory results in the soil vapor assessment report requested below.
- 7. Coordination of Field Activities** – On-going work is being conducted for Red Hanger Kleaners, an open site cleanup program case managed by ACDEH as case number RO0002891, 6235-6239 College Avenue. ACDEH requests an attempt to coordinate field activities with those of case RO0002981. Coordination of field work should not result in appreciable delays for activities at either site.

TECHNICAL REPORT REQUEST

Please upload technical reports to the State Water Resources Control Board's GeoTracker website, in accordance with the following specified file naming convention and schedule. ACDEH requests notification of the submittal via electronic mail, Attention: Keith Nowell.

- **January 21, 2019** – Soil Vapor Assessment Report
(Report to be named RO0002981_SWI_YYYY-MM-DD)

If your electronic mail address does not appear on the cover page of this notification ACDEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

Thank you for your cooperation. ACDEH looks forward to working with you and your consultants on this project. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Regards,

Keith Nowell PG, CHG
Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations

Ccs:

Christine Pilachowski, Roux Associates, Inc., 555 12th Street, Suite 250, Oakland, California 94607 (*Sent via electronic mail to cpilachowski@rouxinc.com*)

Natalie Mehta, 6036 Rockwell Street, Oakland, CA 94618, (*Sent via electronic mail to natalie.mehta@yahoo.com*) (Mehta property owner)

Donald Sobelman, Downey Brand LLP, 455 Market Street, Suite 1500, San Francisco, CA 94105 (*Sent via electronic mail to dsobelman@downeybrand.com*)

College Claremont Venture LLC, 1345 Grand Ave., Piedmont, CA 94610 Attention: Mr. Ronald Elvidge (*Sent via electronic mail to: ronpatelvidge@gmail.com*)

Bouzos Family Living Trust, Attention: Dan Bouzos and Harry Bouzos, 6697 Byrnes Road, Vacaville, CA 95687
(*Sent via electronic mail to: danbouzos@gmail.com*)
(*Sent via electronic mail to: harrybous@yahoo.com*)

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(*Sent via electronic mail to jredding@wendel.com*)

John Till, Paladin Law Group® LLP, 1176 Boulevard Way, Walnut Creek, CA 94595 (*Sent via electronic mail to jtill@PaladinLaw.com*)

Erin Poppler, BEHB, 500 Washington Street, San Francisco, CA 94111 (*Sent via electronic mail to epoppler@behblaw.com*)

George Kong (*Sent via electronic mail to: gkongwashworld@comcast.net*)

Dilan Roe, ACDEH, (*Sent via electronic mail to: dilan.roe@acgov.org*)

Paresh Khatri, ACDEH; (*Sent via electronic mail to: paresh.khatri@acgov.org*)

Keith Nowell, ACDEH, (*Sent via electronic mail to: keith.nowell@acgov.org*)

Electronic File; GeoTracker

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6731, 6735, and 7835) 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 licensed or certified professional and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.