

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

REBECCA GEBHART, Interim Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

April 20, 2017

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

Subject: Interim Remediation System Modifications and Utility Repair/Survey; Site Cleanup Program
Case No. RO0002981 and Geotracker Global ID T1000000416, Red Hanger Kleeners, 6235-
6239 College Ave., Oakland, CA 94618

Dear Responsible Party:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file, including the documents entitled *Site Investigation and Soil Vapor Extraction Report* (Investigation and SVE Installation Report), dated July 11, 2016, prepared by P&D Environmental, Inc. (P&D) on behalf of College Claremont Venture, LLC (CCV) and EFI Global, Inc. (EFI), and the *Interim Remedial Action Progress Report* (Progress Report), dated December 12, 2016 and prepared by LRM Consulting, Inc. (LRM) for CCV. These documents were prepared to address volatile organic compound (VOC) contamination, primarily tetrachloroethylene (PCE), in the subsurface at the site and in the immediate vicinity from historic dry cleaner operations.

The former Red Hanger Kleeners (RHK) store occupied the ground floor of the 6235-6239 College Ave. from 1987 until 2015 (approximately 28 years). The building to the north at 6251-6255 College Avenue was reported to have been occupied by dry cleaner businesses from 1953 to 1987 (approximately 34 years) with RHK ownership and operations identified at this location from at least 1970 to 1987. Prior to RHK, Kay Kleeners operated a dry cleaning operation at the 6251-6255 College Avenue location from 1953 until the change in operations to RHK.

The Investigation and SVE Installation Report prepared by P&D includes a discussion of a soil vapor extraction (SVE) system installed as an interim remedial action at 6235-6239 College Ave for the removal of VOCs from the subsurface. The report concludes that the system is working to reduce PCE concentrations in soil gas where elevated PCE vapor concentrations were identified beneath the building. P&D also concluded, based on vacuum measurements at SG5-7 and SG5-17 (located approximately 40 feet from SVE well SVE1), that the radius of influence of the SVE system likely extends beneath the adjacent residential property at 321/323 63rd Street.

Subsequent to the submittal of the Investigation and SVE Installation Report, EFI and P&D stopped work at the site and LRM took over on behalf of CCV. LRM evaluated the SVE system and presented its findings and recommendations in its Progress Report. In the report LRM recommends the following:

1. **Remediation System Modifications.** The existing SVE system should be transferred into a dual-phase extraction unit, allowing for the unit to accommodate water generated as a result of achieving the higher vacuum levels shown necessary to result in measurable vapor-phase mass removal. This transition also allows use of existing deep vapor extraction wells, which would otherwise be rendered useless and replaced by new shallower-screened wells to which higher vacuum may be applied without the increased threat of water being pulled into the system. Transition to a dual-phase extraction unit will require expansion of the system permit to include water treatment and discharge to the sewer. It is possible that additional extraction wells, likely screened within the shallower parts of the vadose zone, may be required to supplement existing extraction wells under operation via a dual-phase extraction system.
2. **Repair of the Sanitary Sewer Lateral.** A video survey of the sanitary sewer lateral running immediately adjacent and parallel to vapor extraction wells SVE1, SVE4, and SVE5 indicates that the clay pipe is high damaged. Such piping can serve to short-circuit vapor extraction operations from adjacent wells, not to mention serve as a potential conduct for migration of vapors; hence, it is recommended that this sewer lateral be repaired as part of IRA activities.
3. **Utility Line Survey.** A comprehensive storm and sanitary sewer line survey should be performed across and adjacent to the site in order to develop an understanding of all potential impacted sewer lines and their potential for serving as sources of subsurface impacts, and potential impacts on dual phase extraction operations.
4. **Supplemental Remedial Investigation.** A supplemental remedial investigation should be performed to characterize the occurrence and flow of groundwater beneath the site, including water level fluctuations, together with delineation of groundwater quality over time. The supplemental investigation should include additional soil gas investigation along potential leaking sewer line connections (see item 3 above), and at up gradient locations where independent offsite sources may be contributing PCE in soil gas to locations under the site.

Based on a review of the documents referenced above and the case file, ACDEH is of the opinion that the distribution of contaminants related to dry cleaning operations at the site and adjacent former dry cleaner locations have not been adequately delineated to assess all sources and necessary remedial actions and human health risk exposure related to contaminant release.

Therefore, ACDEH requests preparation of Work Plan to implement items 1 through 3 listed above. A request for a Supplemental Remedial Investigation Work Plan has been issued to all Responsible Parties by ACDEH under a separate cover. Please submit the Work Plan by the date specified below.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

Please note that ACDEH has updated it's Attachment 1 with regard to report submittals. ACDEH will now be requiring a Submittal Acknowledgement Statement, replacing the perjury statement, as a cover letter signed by the Responsible Party. The language for the Submittal Acknowledgement Statement is as follows:

"I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the SWRCB's GeoTracker website."

Please make this change to your submittals to ACDEH.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH FTP site (Attention: Keith Nowell), and to the California State Water Resources Control Board (SWRCB) GeoTracker website, in accordance with the following specified file naming convention by the date specified below:

- **June 27, 2017** – Remediation System Modifications Work Plan (file to be named RO0002981_WP_R_yyyy-mm-dd)
- **June 27, 2017** – Utility Survey/Repair Report (file to be named RO0002981_MISC_R_yyyy-mm-dd)

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 567-6764 or send me an electronic mail message at keith.nowell@acgov.org.

Sincerely,

Keith Nowell, PG, CHG
Hazardous Materials Specialist

Enclosure: Attachment 1- Responsible Party(ies) Legal Requirements/Obligations
ACDEH Electronic Report Upload (ftp) Instructions

cc:

Todd Borst, Trustee, Ila Lynn Gordon Investment Trust, 2305 Little Ben, Lincoln, CA 95648

Ila Lynn Gordon, Trustee of SIRILA Living Trust, Ila Lynn Gordon Investment, Trust of Gordon Family Trust, 554 Red Arrow Trail, Palm Desert, CA 92211

Ila Lynn Gordon, Trustee of SIRILA Living Trust, Ila Lynn Gordon Investment, Trust of Gordon Family Trust, 827 Mesa Grande Drive, Palm Desert, CA 92211

Ila Lynn Gordon, Trustee of SIRILA Living Trust, Ila Lynn Gordon Investment, Trust of Gordon Family Trust, PO Box 13214, Palm Desert, CA 92255

Brian J. Gordon, PO Box 13214, Palm desert, CA 92255

David B. Gordon, 9 Calle, San Clemente, CA 92673

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

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Jonathan W. Redding, Wendel, Rosen, Black & Dean LLP, 1111 Broadway, 24th Floor, Oakland, CA 94607
(Sent via electronic mail to jredding@wendel.com)

Mehrdad Javaherian, LRM Consulting, 1534 Plaza Lane, #145, Burlingame, CA 94010 (Sent via electronic mail to: mehrdad@lrm-consulting.com)

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)

Geotracker, Electronic File

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

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

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of reports in electronic form. The electronic copy replaces paper copies 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 File Transfer Protocol (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 all 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, these same reporting requirements were added to SCP sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/) for more information on these requirements.

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 ACDEH's FTP server and the SWRCB's GeoTracker website." 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 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. 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 case meet this requirement. 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

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 1, 2016
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions


The Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) 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.

REQUIREMENTS

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- **Signature pages and acknowledgement and perjury statements must be included and have either original or electronic signature.**
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Submission Instructions

- 1) Obtain User Name and Password
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to deh.loptoxic@acgov.org.
 - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses**, and the **Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
 - a) Open File Explorer using the Windows  key + E keyboard shortcut.
 - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) On the address bar, type in ftp://alcoftp1.acgov.org.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
 - d) Click Log On.
 - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - f) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to deh.loptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.