



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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June 18, 2009

Gabriel Chui
RR Retail Group
10698 Inspiration Circle
Dublin, CA 94568

Subject: SLIC Leak Case No. RO0002998 and GeoTracker Global ID T10000001068, Dry Clean Club of America, 2960 Castro Valley Boulevard, Castro Valley, CA 94546

Dear Mr. Chui:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "Phase II Subsurface Investigation," dated May 8, 2007, which was received on February 27, 2009 and prepared by AEI Consultants for the subject site. In August 2002, Property Solutions, Inc. conducted a Phase II Investigation at the Dry Clean Club of America site consisting of six borings to collect soil and "grab" groundwater samples and seven borings to collect soil vapor samples. Tetrachloroethylene (PCE), a dry cleaning solvent, was detected in soil samples at a maximum concentration of 0.14 mg/kg and detected in "grab" groundwater samples at a maximum concentration of 6.8 µg/L, indicating that soil and groundwater had been impacted with PCE. Soil vapor sample analytical results did not detect PCE above the laboratory detection limit of <5 µg/L.

In April 2007, AEI installed an additional six borings at the former Dry Clean Club of America to assess PCE impacts to the subsurface. Soil and "grab" groundwater samples detected PCE at maximum concentrations of 0.076 mg/kg in soil and 6.7 µg/L in groundwater confirming that soil and groundwater have been impacted with PCE.

At this time, ACEH requests that you address the following technical comments and send us the technical work plans and reports requested below.

TECHNICAL COMMENTS

1. **Sampling Locations and Preferential Pathways** – As mentioned above, PCE was detected in a Phase II Investigation conducted in 2002 as well as in a subsequent investigation conducted in 2007. There appears to be very limited information regarding the sampling locations in the 2002 investigation report to evaluate the appropriateness of the sampling locations in relation to the former source areas and locations of likely impact (i.e. floor drains, utility trenches, etc.). Although the sampling locations are better illustrated in the 2007 investigation report, it is still difficult to evaluate the appropriateness of the sampling locations in relation to former source areas and locations of likely impact. Based on the limited data, the site does not appear adequately assessed. Please propose a scope of work to address the above-mentioned concerns and submit a work plan due by the date specified below. Please include a figure that illustrates locations of former dry cleaning equipment, chemical

storage areas, floor drains utilities, and other preferential pathways to justify appropriateness of the previous and proposed sampling locations.

2. **Soil Vapor Sampling** – During the 2002 investigation, seven soil vapor samples were collected in Tedlar® bags. Soil vapor sample analytical results did not detect PCE above the laboratory detection limit of $<5.0 \mu\text{g/L}$, meaning that PCE was not detected in the sample at a concentration greater $5.0 \mu\text{g/L}$. To compare the concentrations of contaminants detected at the site to the Environmental Screening Level (ESL) listed in the California Regional Water Quality Control Board's Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater, Interim Final - November 2007 document, the analytical results reported in micrograms per liter ($\mu\text{g/L}$) must be converted to microgram per cubic meter ($\mu\text{g/m}^3$). The converted soil vapor sample analytical result is $<5,000 \mu\text{g/L}$, significantly above the RWQCB ESL for PCE (in a residential land-use risk scenario taking into account the DTSC attenuation factors) of $210 \mu\text{g/m}^3$. Therefore, there appears to be a potential contaminant volatilization to indoor air exposure pathway at the site. Please propose a scope of work to address the above-mentioned concerns and submit a work plan due by the date specified below. Please include a figure that illustrates locations of former dry cleaning equipment, floor drains utilities, and other preferential pathways to justify appropriateness of the proposed sampling locations.
3. **Site Conceptual Model** – At this juncture, it may be advantageous to develop a site conceptual model (SCM), which synthesizes all the analytical data and evaluates all potential exposure pathways and potential receptors that may exist at the site, including identifying or developing site cleanup objectives and goals. At a minimum, the SCM should include:
 - (1) Local and regional plan view maps that illustrate the location of sources (former facilities, piping, tanks, etc.) extent of contamination, direction and rate of groundwater flow, potential preferential pathways, and locations of receptors;
 - (2) Geologic cross section maps that illustrate subsurface features, man-made conduits, and lateral and vertical extent of contamination;
 - (3) Plots of chemical concentrations versus time;
 - (4) Plots of chemical concentrations versus distance from the source;
 - (5) Summary tables of chemical concentrations in different media (i.e. soil, groundwater, and soil vapor); and
 - (6) Well logs, boring logs, and well survey maps;
 - (7) Discussion of likely contaminant fate and transport.

If data gaps (i.e. potential contaminant volatilization to indoor air or contaminant migration along preferential pathways, etc.) are identified in the SCM, please include a proposed scope of work to address those data gaps in the work plan due by the date specified below. Please note that the work plan must address all technical comments presented in this correspondence and all data gaps identified in the SCM. Once all data gaps have been addressed, the site may be evaluated for case closure consideration.

TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH (Attention: Paresh Khatri), according to the following schedule:

- **August 17, 2009** – Site Conceptual Model with Soil and Water Investigation Work Plan

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) 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 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 Spills, Leaks, Investigations, and Cleanup (SLIC) 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 for more information on these requirements (http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml).

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

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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.

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) 777-2478 or send me an electronic mail message at paresh.khatri@acgov.org.

Sincerely,

Paresh C. Khatri
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Mehrdad Javaherian, 1534 Plaza Lane, #243, Burlingame, CA 94010 (sent via electronic mail to: mehrdad@endpoint-inc.com)

Donna Drogos, ACEH
Paresh Khatri, ACEH
GeoTracker
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: March 27, 2009
	PREVIOUS REVISIONS: December 16, 2005, October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

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.

REQUIREMENTS

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages 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)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

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 dehloptoxic@acgov.org
Or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of My Le Huynh.
 - 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) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) 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 dehloptoxic@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.