



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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June 10, 2011

Jimmy Koo
Sunny Piedmont Cleaners
4364 Piedmont Ave.
Oakland, CA 94611
(via electronic mail: jimmykoo9@yahoo.com)

Harvey J. and Donna J. Clar Trust
230 Moraga Way
Orinda, CA 94563-3837

Subject: Spills, Leaks, Investigations and Cleanup (SLIC) case file #RO0003013 and Geotracker Global ID T10000001597 Sunny Piedmont Cleaners, 4364 Piedmont Avenue, Oakland, CA 94611

Dear Mr. Koo, and Mr. and Mrs. Clar:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the recently submitted correspondence entitled; *Technical Comments* dated March 22, 2011 and received on April 8, 2011, which was prepared by Innovative and Creative Environmental Solutions (ICES) for the subject site. The above-mentioned correspondence presents ICES' response to ACEH's request for a work plan dated March 2, 2011. Some remaining data gaps appear to be unaddressed.

TECHNICAL COMMENTS

1. **Boring B-3** – Boring B-3 was not referenced on the map or the boring log of the *Supplementary Site Characterization Report*, dated August 6, 2010 as being an angle boring. Please submit an addendum to this report with a corrected boring log, and corrected map showing the location of both the entry and terminal point of boring B-3 with the angle of the boring noted, the plane the angle is referenced against, the actual sample and depths, etc. and include a discussion and analysis including this new information.
2. **Downgradient Groundwater Samples** – It appears that groundwater from beneath the dry cleaning machines has still not been evaluated. Contrary to ICES' statement in the technical comments correspondence that "An angled boring was drilled at boring B-3 to gain access to the groundwater beneath the dry cleaning machine" it appears that a boring advanced at 60 degrees (depending on the reference plane) could bring the terminal end of the boring to beneath the front of the building and not near the dry cleaning machine at the rear of the building. While the sample results from this location were below the detection limit for solvents, the groundwater gradient has not been established hence the requirement for a sample directly beneath the dry cleaning machines or along a transect. Groundwater was not encountered in boring B-1 and a transect was not advanced as requested in the May 21, 2010 ACEH work plan approval letter. A single groundwater sample was obtained at some location between the dry cleaning machines and up to 75 feet away from the source area,

leaving the potential for contaminants in groundwater undelineated and leaving the approved scope of work incomplete. Please provide a work plan by the due date requested below to address this data gap. The work plan should include your proposal to advance borings along transects on the perimeter of the southern and western sides of the building as originally requested in ACEH's approval letter.

3. **Evaluation of Soil Vapor** – From discussions with ICES, it was ACEH's understanding that plans to upgrade the dry cleaning machines were pending and that tetrachloroethylene (PCE) contaminated soil would be removed prior to evaluating the vapor intrusion pathway. Barring remediation or removal of the soil, an evaluation of vapor intrusion into the building is needed. Please submit a plan to evaluate the potential for vapor intrusion to the building by the due date below.
4. **Preferential Pathway Survey** – A preferential pathway survey was requested for the site which included a utility survey and a well survey within ¼-mile radius of the site. ICES contacted Underground Service Alert and a local utility identification company to identify utilities on-site. However, they did not contact the City of Oakland and other utilities to determine the depth and location of off-site utilities so the potential for migration of contaminants can be evaluated. ACEH requested that migration along the sanitary sewer be evaluated where the line exits the building.

Also, a ¼-mile radius well survey was requested. This typically involves contacting the Department of Water Resources and the well permitting agency (Alameda County Public Works) for a search of wells in the area. Please complete these tasks and submit a work plan to evaluate if contamination is migrating along the sanitary sewer line where the line exits the building by the due date requested below.

TECHNICAL REPORT REQUEST

Please submit technical reports to ACEH (Attention: Barbara Jakub), according to the following schedule:

- **August 10, 2011** – Addendum to the Supplementary Site Characterization Report
- **August 10, 2011** – Work Plan with Preferential Pathway Evaluation

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Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 639-1287 or send me an electronic mail message at barbara.jakub@acgov.org.

Sincerely,

Barbara J. Jakub, P.G.
Hazardous Materials Specialist

Enclosures: Responsible Party(ies) Legal Requirements/Obligations
ACEH Electronic Report Upload (ftp) Instructions

cc: Derek Wong, ICES, 3300 Powell St. #109, Emeryville, CA 94608 (via electronic mail: derek_ices@yahoo.com)
Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032 (Sent via E-mail to: lgriffin@oaklandnet.com)
Donna Drogos, ACEH (Sent via E-mail to: donna.drogos@acgov.org)
Barbara Jakub, ACEH (Sent via E-mail to: barbara.jakub@acgov.org)
GeoTracker
File

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

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 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.

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 deh.loptoxic@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 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.