ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
ALEX BRISCOE, Agency Director

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

December 7, 2012

Michael von Wittenau, et al
4640 Admiralty Way, Suite 306
Marina del Rey, CA 90292

Yun Shik Kim
Bell Cleaners
Address Unknown

Subject: Report Addendum, SLIC Leak Case No. RO0003080 and Geotracker Global ID T10000003362, Bell Cleaners/ Wittenau Property, 1534 Park Street, Alameda, CA 94501

Dear Responsible Parties:

We have reviewed recently submitted documents entitled, *Revisions to the Site Investigation Work Plan*, and *Preferential Pathway Survey* for 1534 Park Street, Alameda, California, both of which were prepared by Bonkowski & Associates (B&A) for the subject site. Alameda County Environmental Health (ACEH) indicated in correspondence dated July 9, 2012, that submittal of a site figure showing the on-site through-floor fittings and associated piping was needed to complete the work plan review. In our directive letter dated August 2, 2012, we stated the initial workplan submittal, dated May 15, 2012, was rejected as it did not incorporate the results of the Preferential Pathway Study (PPS). The PPS submitted on August 8, 2012 did not include the locations of on-site through-floor fittings and associated piping. ACEH will not be able to approve the referenced revised work plan without first receiving a properly implemented PPS. The scope of work presented in the revised work plan has not been adequately justified and cannot be approved at this time; however a review of the revised work plan was performed to facilitate preparation of a work plan addendum requested below.

In our January 12, 2012 Directive Letter, ACEH requests included:

- A facility plan of the Bell Cleaners facility showing the location of the work stations, dry cleaning equipment, and material storage areas. This has not been included in either the PPS or the revised workplan.

- Copies of historical maps, such as Sanborn maps, aerial photographs, etc., when conducting the background research for the PPS. These have not been discussed or included in the PPS.

- Cross-sections illustrating the location and depth of all utility lines and trenches within and near the site as part of the PPS. No cross-sections were included in the PPS report.

- An extended site map utilizing an aerial photographic base showing the facility in relation to its' immediate surrounding properties. This has not been included in either the PPS or the revised workplan.

- Information requests for document upload of previous investigations conducted at the site. These documents have not been uploaded and no comment was forwarded as to the status of the document request.

The referenced revised work plan identified the need for a site conceptual model (SCM), and indicated a SCM would be submitted in September 2012. B&A stated in their revised work plan that the SCM would

be reviewed with ACEH prior to the initiating of fieldwork. If an SCM has been prepared it has not been submitted to ACEH for review. It would be prudent for B&A to provide the SCM and the previously requested items for ACEH review before the work plan outlining field work is finalized. Preparation of the SCM should provide for a more targeted field investigation, allowing for a phased investigative approach should additional investigation be identified. ACEH requests that you address the following technical comments and send us a work plan addendum as requested in the technical report request below.

TECHNICAL COMMENTS

1. **GeoTracker Compliance —** A review of GeoTracker indicates that site documents have not been uploaded to GeoTracker. Compliance with GeoTracker is a State requirement. Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs, including SLIC programs. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites was required in GeoTracker. Please see Attachment 1 for limited additional details, and the State GeoTracker website for full details. ACEH requests notification of, and a list of, the documents uploaded to Geotracker.

2. **Preferential Pathway Study —** As noted above, a number of deficiencies were present in the PPS. Please incorporate the following previously requested items into a revised PPS to address these deficiencies by the date identified below:

    a. **Facility Plan -** ACEH requests a facility plan of the Bell Cleaners facility showing the location of through-floor drains and restroom facilities within the dry cleaner suite. Please identify the layout of the piping associated with these lines.

    b. **Site Map -** Please include an extended site map utilizing an aerial photographic base showing the facility in relation to its' immediate surrounding properties. Utilities and other items identified in the PPS should also be identified on this map.

    c. **Cross Sections -** Please include cross-sections illustrating the location and depth of all utility lines and trenches within and near the site and plume areas(s) as part of your PPS. Identify on-site underground utilities and off-site joint trenches and the depth of the lowest utility.

    d. **Historical Documents -** The documents reviewed in the course of PPS preparation should be outlined in the main body of document and copies included as figures or in appendices. For reading clarity a listing of attachments and titles on each attachment cover page should be included in the document.

    e. **Pathways and Receptors -** Include in your findings a discussion of the pathways and identified sensitive receptors, including beneficial use water wells. Please refer to Technical Comment 5 for the rational for this request.

3. **Site Conceptual Model —**The revised work plan identified the need for a site conceptual model (SCM) and indicated a SCM would be prepared in September 2012. B&A indicated in their revised work plan that field work would not be initiated prior to review by ACEH. To date an SCM has not been submitted. We concur with B&A's recommendation for preparation of an SCM. The

SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new data are collected. Please submit an initial SCM by the date specified below. At a minimum, the SCM should include:

a. **Plan View Maps -** 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;

b. **Cross Sections -** Geologic cross section maps that illustrate subsurface features, man-made conduits, and lateral and vertical extent of contamination;

c. **Chemical Plots -** Plots of chemical concentrations versus distance from the source;

d. **Summary tables -** Summary tables of chemical concentrations in different media (i.e. soil, groundwater, and soil vapor);

e. **Wells and Borings -** Well logs, boring logs, and well survey maps; and

f. **Fate and Transport -** Discussion of likely contaminant fate and transport.

4. **Work Plan Addendum —** As noted above, a number of deficiencies were present in the work plan. Please incorporate the following items into a work plan addendum, by the date identified below, to address these deficiencies by the date identified below:

a. **Site Plan -** Please include a depiction of the building layout, including underground utility conduits, doors, bathrooms, offices, or other structures on a figure, and that sub-slab vapor probe locations justified within that context. Boring locations recommended in the work plan should also be plotted on the figure:

b. **Facility Details and Sampling Frequency -** Include in your discussion and site plan the type and the condition of the existing foundation, staining, and identify areas used for chemical storage. Please include the storage areas and areas of staining on the site plan. Based on the presence of building layout, utility conduits, bathrooms, equipment locations, and material storage areas, please evaluate and determine if additional dry cleaner suite borings may be needed. Please ensure that the number of samples proposed for the building interior are adequate to address primary release locations. The greater the uncertainty of the locations of these features may require an increase in the number of soil gas samples recovered from the building interior.

c. **Appropriate Vapor Protocol Guidelines -** Please conduct the proposed soil gas investigation following the guidelines presented in: *Final- Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance)* prepared by Cal/EPA, dated October 2011 and *Advisory- Active Soil Gas Investigations* prepared by Cal/EPA, LARWQCB, and San Francisco RWQCB, dated April 2012, not the referenced ASTM Method D6234-04(2010) *Standard Practices for Expedited Site Characterization of Vadose Zone and Groundwater Contamination at Hazardous Waste Sites* identified in the revised work plan. The DTSC guidance documents can be reviewed at the following web addresses: http://www.dtsc.ca.gov/AssessingRisk/upload/Final_VIG_Oct_2011.pdf and http://www.dtsc.ca.gov/SiteCleanup/upload/VI_ActiveSoilGasAdvisory_FINAL_043012.pdf. Soil

vapor work plan elements outlined in Section 2.3 of the 2012 DTSC guidance document are requested to be utilized. Include in your revised work plan addendum a discussion of sample collection techniques for EPA test methods 8260 and TO-15 (including but not limited to sample probe construction and installation, equilibration time, shut-in testing and purging, and shroud for leak detection) for each laboratory sampling method if both continue to be an option for use at the site.

d. Sample Collection - A goal of this investigation is to determine the lateral and vertical extent of solvent contamination in soil, groundwater, and soil vapor beneath the site. Please collect and analyze soil samples at maximum intervals of not more than five feet, at signs of obvious contamination, at the soil/groundwater interface, and at significant changes in lithology. A sufficient number of soil samples should be submitted for laboratory analyses to define the vertical extent of contamination.

e. Designed Boring Depth - The previously submitted work plan indicates the depth of the soil borings will be to the top of the shallowest groundwater or 15 feet, whichever occurs first. Please justify the boring depth for definition of the vertical extent of contamination as it relates to an investigation for dry cleaning solvents. The dry cleaner suite boring(s) should continue advancement to at least 20 feet below the ground surface to aid in the vertical delineation of contaminants in soil. See Items h and i for additional sample depth guidance.

f. Chemicals of Concern - The work plan identifies six targeted chemicals of concern (COCs). Compounds other than those identified in the work plan have been previously identified at the site. Please ensure other compounds, including 1,2,4-trimethylbenzene and tertiary butyl alcohol, are included in the analytical suite using an appropriate test method (e.g. EPA 8260 or TO-15) with reporting limits below the regulatory screening levels.

g. Laboratory -The work plan indicates either a mobile or a stationary analytical laboratory will be used and that different analyses methods would be used dependant on the type of laboratory. Include in your revised work plan addendum a discussion and comparison of the laboratory reporting limits for EPA test method 8260 and TO-15. Include the leak check tracer gas in the scope of analysis. Selection of the tracer gas should not interfere with the targeted analytes.

h. Soil Gas Sample Depth – Please conduct soil gas sampling at a depth of 5 feet below the ground surface for interior and exterior sample locations.

i. Sub Slab Vapor Sample - DTSC recommends collection of soil gas samples near the contaminant source for vapor intrusion evaluation. Please collect sub-slab vapor samples following the protocol outlined in the referenced DTSC guidance documents for all sample points located within the building suites.

j. Sample Probe Equilibrium Time - The work plan identifies sample probe equilibrium time as 20 to 30 minutes. Please note the DTSC 2012 guidance document indicates a minimum of 2 hours of equilibration time for direct push drilling methods. Please make this correction in your work plan addendum.

k. Leak Test - The work plan sampling protocols indicate that a tracer gas will be applied to the soil gas sample probe without identifying the tracer used or the method for applying/ monitoring the tracer gas. To preclude miscommunication, ACEH requests that a shroud be

used; and that tracer gas-enriched atmosphere exist around the sampling train at all times. The shroud should remain in place for the duration of the test to maintain that atmosphere. To allow "real-time" monitoring of the shroud tracer atmosphere with an appropriate monitoring device, the shroud should be fitted with a minimum of one port. The port can be used to access the sampling train without removal of the shroud if a gas impermeable (e. g. plastic) curtain is used.

l. **Tracer Compound Selection -** The work plan did not identify the tracer gas. The trace gas selected should not interfere with or raise the laboratory reporting limits of the target analytes, and be detectable to permit "real-time" monitoring. Please make this correction in your work plan addendum.

m. **Risk Evaluation -** In Task 4 of the work plan, B&A states "Regardless, if the concentration of PCE in soil gas samples collected adjacent to the building exceed the DTSC prescribed indoor air exposure pathway screening levels, a risk assessment will be performed according the guidelines in the DTSC *Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air,* October 2011"*.* By making this statement B&A presupposes several details, including that PCE is the only COC, that the data is of sufficient statistical significance to make such a determination, that the data quality is of sufficient quality to make an accurate determination, and their risk assessment will target the appropriate receptors. Please note any risk evaluation would need to consider all COCs at the site.

n. **Data Gaps –** 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 addendum.

5. **Groundwater as a Receptor —** Please note that all groundwater in the City of Alameda which is located in the East Bay Plain Groundwater Sub Basin is classified as 'MUN' (potentially suitable for municipal or domestic water supply). According to the San Francisco Regional Water Quality Control Board (SFRWQCB) Water Quality Control Plan (Basin Plan), dated January 18, 2007, for the San Francisco Bay Basin, "the term 'groundwater' includes all subsurface waters, whether or not these waters meet the classic definition of an aquifer or occurs within identified groundwater basins.' The Basin Plan also states that 'all groundwaters are considered suitable, or potentially suitable, for municipal or domestic water supply (MUN)." Therefore, the groundwater beneath the subject site must be considered beneficial for these uses unless shown to be non-beneficial using criteria presented in the Basin Plan. Please adjust your evaluation to reflect this in future reports. However, please also be aware that case closure does not necessarily require cleanup to MUN cleanup goals, only that those goals can be met within a reasonable timeframe.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Keith Nowell), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

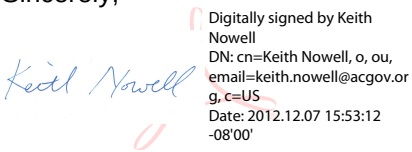
- **January 11, 2013** – Report uploads to GeoTracker
- **February 5, 2013** –Site Conceptual Model with Revised Preferential Pathway Study and Work Plan Addendum addressing data gaps identified in SCM:

  File to be named: RO3080_ SCM_COND_WELL_WP_R _yyyy-mm-dd

ACEH case files do not contain contact information for the last tenant to operate the Bell Cleaners dry cleaning establishment. Please provide the contact information, including email addresses if known, for these individuals. Please include the email address for the cc listed below, if not present, in order to expedite future communications.

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

cc: Marcia Breese, 706 Registery Run, Kennesaw, GA 30152(*Sent via E-mail to: marcia.breese@turner.com*)
Jamie Wittenau, 1349 Running Springs Road, #8 E10, Walnut Creek, CA 94595
Cynthia Dittmar, Bonkowski & Associates, Inc., 6400 Hollis Street, Suite 4, Emeryville, CA 94608 (*Sent via E-mail to: cindy@bonkowski.com*)
Donna Drogos, ACEH (*Sent via E-mail to: donna.drogos@acgov.org*)
Keith Nowell, ACEH (*Sent via E-mail to: keith.nowell@acgov.org*)
GeoTracker
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

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.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

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)	**REVISION DATE:** July 20, 2010
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
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

- **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 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) Using Internet Explorer (IE4+), go to ftp://alcoftp1.acgov.org
      (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
   b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
   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.