



December 5, 2017

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

(Sent via E-mail to: vwittenau@gmail.com)

Marcia Breese
1020 Via Colusa
Palm Springs, CA 92262

(Sent via E-mail to: mbreese123@gmail.com)

Subject: Conditional Approval of Site Investigation Workplan II, Site Cleanup Program Case No. RO0003080 and GeoTracker Global ID T10000003362, Bell Cleaners, 1534 Park St., Alameda, CA 94501

Dear Mr. von Wittenau and Ms. Breese:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file for the above-referenced site, including the *Site Investigation Workplan II*, prepared by Bonkowski and Associates, Inc., and dated 13 October 2017. BAI proposes to investigate the lateral extent of impacts to groundwater, further assess potential release areas from the former dry cleaner operations, and to collect additional indoor air and sub-slab samples to further assess potential occupant exposure concerns.

BAI proposes 6 soil borings (GP-1 through GP-6) outside of the former dry cleaning unit to collect groundwater samples. Three boring locations will be in public right of ways, two proposed locations are on private property southeast of the former dry cleaner, and one location is outdoors on the property in an area where the former dry cleaner may have stored equipment or cleaning products. Four soil gas samples (V-1, V-2, V-5 and V-6) are proposed in locations adjacent to corresponding soil borings. The soil gas sample results will be used to assess vapor intrusion concerns and to evaluate potential migration pathways including nearby sewer lines. To evaluate vapor intrusion concerns, three sub-slab soil gas samples will be collected beneath commercial units adjacent to the former dry cleaner, one indoor air sample will be collected from the adjoining restaurant, one indoor air sample will be collected from the nail salon, and two ambient air samples will be collected from the roof of the site structure, near the heating system intakes. Following implementation of the proposed investigation, the ACDEH anticipates additional sampling will be needed, including inside the former dry cleaner unit, to collect data needed to develop a remedial action plan.

Based on our review of the case file, ACDEH conditionally approves the workplan provided that you address the technical comments listed below as part of the implementation. Submittal of a revised workplan or a workplan addendum is not required. We request that you address the following technical comments, perform the proposed work, and send us the reports described below. Provide 72-hour written notification to robert.schultz@acgov.org prior to the start of field activities.

TECHNICAL COMMENTS

1. **Groundwater Sampling.** Groundwater samples will be collected using hydropunch or dual-tube sampling equipment. To reduce the potential for cross-contamination, groundwater samples will not be collected from open boreholes, including those drilled using a Geoprobe macrocore sampler.

2. **Soil Gas Sampling.** Soil gas samples V-1, V-2, V-5, and V-6 will be collected from soil gas wells, installed using the procedures for “permanent soil gas wells” described in Section 3.2 of the Advisory - Active Soil Gas Investigations, prepared by the Cal EPA Department of Toxic Substances Control, Los Angeles Regional Water Quality Control Board (RWQCB), and the San Francisco RWQCB, and dated July 2015. Although the wells will be removed at the completion of corrective action activities, or possibly sooner, wells are required and data from push probes will not be accepted. Based on the site lithology and on ACDEH experience with other similar sites, the drive point method is unlikely to meet data quality objectives. Soil gas samples will be collected no sooner than 48 hours following vapor probe installation.
3. **Sub-slab Soil Gas Sampling.** Sub-slab sampling methods will comply with Section 3.6 of the Advisory. Each purge volume must include the internal volume of the tubing and probe tip, the void space of the sand pack around the probe tip, and the void space of the dry bentonite in the annular space. Purging should commence after the shut-in test, and a “T”-fitting must be used so that the sampling train is not altered after a successful shut-in test.
4. **Indoor Air Sampling.** Indoor air samples will be collected from between 3 and 5 feet above ground surface. Sample collection methods will comply with Step 9: Indoor Air Sampling of the DTSC Vapor Intrusion Guidance Document, October 2011. Indoor air and ambient samples will be analyzed for the full list of 42 VOCs specified in EPA Method 8260.
5. **Data Evaluation and Reporting.** Analytical laboratory results for soil, groundwater, soil gas and indoor air will be compared to the SF-RWQCB Environmental Screening Levels (Feb. 2016, Rev. 3). Indoor air concentrations should be compared to Commercial/Industrial Direct Exposure Risk Levels: Final Screening Levels (Table IA-1). In addition, indoor air sample results will be compared to the results for ambient air. Detected indoor air concentrations less than or equal to ambient concentrations may not be indicative of vapor intrusion. Evaluation of the sub slab and indoor air results collected during this evaluation will follow the step-by-step approach described in Step 10 of the DTSC Vapor Intrusion Guidance.
6. **Potential Responses and Future Remedial Actions.** Based on the results of previous investigations within the former dry cleaner space, remedial action to reduce soil gas, including sub-slab, concentrations beneath the former dry cleaner is anticipated as a future project phase. Immediate action will be required if TCE concentrations in indoor air exceed the USEPA Urgent Response Action Levels (URALs). Immediate action may include relocation of building occupants until additional testing demonstrates that vapor intrusion of TCE has been sufficiently mitigated. Based on data collected by BAI in July 2017, TCE impacts to indoor air are not anticipated. Potential application of mitigation measures described in the US EPA 2008 Engineering Issue, Indoor Air Vapor Intrusion Mitigation Approaches, will be evaluated.
7. **Permits and HASP.** Prior to drilling, all required permits for the work will be obtained, including those required by the Alameda County Public Works Agency (ACPWA) and the City of Alameda, and a health and safety plan will be prepared to protect site workers and the public during field activities.

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SUBMITTAL ACKNOWLEDGEMENT STATEMENT

The ACDEH requires a Submittal Acknowledgement Statement, signed by the Responsible Party (RP), as a cover letter to technical reports and submittals. The requirement is described in Attachment 1. 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 State Water Resources Control Board's (SWRCB) GeoTracker website."

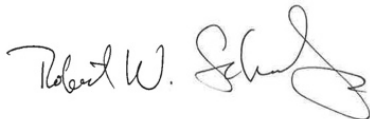
TECHNICAL REPORT REQUEST

Please submit technical reports to the ACDEH ftp and Geotracker sites using the designations indicated below according to the following schedule and file-naming convention:

- **April 20, 2018** – Additional Investigation Report
File to be named: RO0003080_SWI_R_yyyy-mm-dd

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at robert.schultz@acgov.org. Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

Sincerely,



Robert W. Schultz, CHG
Senior Hazardous Materials Specialist

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

cc: Michael Bonkowski (Sent via E-mail to: mike@bonkowski.com)
Dilan Roe, ACEH (Sent via E-mail to: dilan.roe@acgov.org)
GeoTracker, eFile

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.