



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION

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October 5, 2016

Ready Family Partnership, LP
Mr. Major Brar
7104 Dublin Boulevard
Dublin, CA 94568

Subject: Request for Groundwater and Soil Vapor Investigation Work Plan; Site Cleanup Program (SCP)
Case No. RO0003113 and GeoTracker Global ID T1000004783, Dublin Crossroads Center & Park
Ave Cleaners, 7100 - 7120 Dublin Boulevard, Dublin, CA 94568

Dear Mr. Brar:

Alameda County Department of Environmental Health (ACDEH) has reviewed the *Sub-Slab Soil Gas Investigation Report*, dated July 25, 2016, which was prepared and submitted on your behalf by RPS Iris Environmental, (IRIS). Depending on the location, the report documented the second or third post-interim remediation sub-slab vapor sampling event at the site. Thank you for undertaking the work and submitting the report.

Based on the review of the case file ACDEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

- 1. Sub-Slab Vapor Sampling** – The referenced report recommends an additional sub-slab vapor sampling effort in order to verify continued post-interim remediation decreases in the sub-slab vapor concentrations at the site. ACDEH is in concurrence with this recommendation and requests the submittal of the report by the date indicated below. ACDEH additionally request the collection of shroud tracer concentrations in order to confirm sufficient tracer is present in the shroud, and to conform to Department of Toxic Substances Control (DTSC) guidance in the event of the detection of the tracer in the vapor samples.
- 2. Former Dry Cleaning Suite Layouts** – It appears reasonable to request the mapping of the layouts of the two former dry cleaning suites at the site. The intent of this effort is to identify former use areas beyond the location of the dry cleaning machines in order to help determine the proximity of existing soil bores or vapor wells to former use locations. This should include boiler or distillation rooms, storage rooms / areas, delivery locations, discharge piping on outside walls, cut-off lag bolts, use staining, other machine marks on the slab, etc. An initial review was conducted in the Basics Environmental *Phase 1 Environmental Site Assessment*, dated July 19, 2012, but the information was not plotted.
- 3. Work Plan for Groundwater Investigation** – In order to focus on vapor intrusion risks at the site and vicinity, an initial but limited investigation was conducted towards the delineation of the chlorinated volatile organic compound (VOCs) plume in groundwater currently documented beneath the site. ACDEH is concerned about the extent of plume delineation at the site. Depth to first water appears to vary significantly beneath the site. Specifically, ACDEH's concern is the detection of cis-1,2-Dichloroethene (cis-1,2-DCE) at B4 in shallow groundwater at a depth of approximately 11 feet below grade surface (bgs) at a concentration of 220 micrograms per liter ($\mu\text{g/l}$). This concentration is above the San Francisco Bay Regional Water Quality Control Board (RWQCB) Environmental Screening Level (ESL) of 6.0 $\mu\text{g/l}$ for groundwater, but is below 950 $\mu\text{g/l}$, the ESL for the risk of vapor intrusion to commercial establishments.

ACDEH notes that confirmation soil bore IE-28 installed at a later date at the same location did not document the presence of groundwater until a depth of approximately 48.5 feet bgs and did not detect cis-1,2-DCE at that depth. As stated in the September 6, 2013 *Subsurface Investigation Report* by IRIS, this appears to support the lack of vertical migration in groundwater. However, ACDEH is concerned that soil bore IE-28, in conjunction with bores IE-03 and IE-04, may not define the downgradient extent of the VOC plume in shallow groundwater. Downgradient bores IE-03 and IE-04 encountered groundwater at deeper levels, at 17.3 and 27.4 feet bgs, respectively; not at a shallow level. Additionally, the potential for an offsite groundwater contamination plume from sewer discharges is also present and has not been assessed.

To help illustrate sampling data collected to date, and first groundwater encounters, ACDEH requests the generation of a sufficient number of cross sections, with analytical data, to support the position that the extent of the groundwater plume has been adequately defined, or to support a proposed investigation. The installation of groundwater monitoring wells as discussed in the referenced *Subsurface Investigation Report* appears reasonable. ACDEH requests the submittal of a work plan to assess the groundwater plume, by the date identified below.

4. **Work Plan for Soil Vapor Delineation** – While sub-slab soil vapor concentrations appear to be declining, no further data has been collected to determine the status of soil vapor concentrations outside the building envelope, or to define the magnitude or extent of that vapor plume. These vapor concentrations appear to be related to either former sewer discharges (IE-26, IE-25, and potentially IE-05), or potentially the former storage of PCE drums, or delivery of PCE, at the rear of the facility. The concurrent generation of a sensitive receptor survey appears to be an appropriate action. ACDEH requests the submittal of a work plan, in conjunction with the previous technical comment, to assess the groundwater plume, by the date identified below.
5. **Sub-Slab Depressurization System** – Depending on the ultimate decision to activate or abandon the sub-slab depressurization system based on sub-slab, or other, vapor monitoring, a Long Term Site Management Plan (SMP) and Institutional Controls (ICs) may be required to prevent inappropriate activities and use of the property, with consideration of potential risk from existing soil vapor impacts and residual contamination. The SMP and ICs would provide legal and administrative controls and methods for the dissemination of information (location, depth, and etc.) to minimize risk and damage to the system during future tenant improvements, future below ground construction and maintenance, and long-term site occupancy and use. These documents would also be anticipated to detail appropriate operation and maintenance of the heating, ventilation, and air conditioning (HVAC) system in order to mitigate potential vapor intrusion concerns.
6. **Electronic Report and Data Upload Compliance** – A review of the case file and the State's Geotracker database indicates that the site is not in compliance with previous directive letters. Compliance 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 SCP programs. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites was required in GeoTracker. At present missing data and documents include, but may not be limited to, older reports, including Phase 1 reports, all EDF submittals, GEO_MAPS, GEO_WELL data, and all bore logs. Please see Attachment 1 for limited additional details, and the state GeoTracker website for full details. ACDEH requests notification of, and a list of, the documents uploaded to Geotracker. Please upload all submittals to GeoTracker by the date specified below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with Attachment 1 and the specified file naming convention below, according to the following schedule:

- **October 31, 2016** – Geotracker Upload Compliance
Please notify your case worker of the uploads.
- **January 13, 2017** – Work Plan for Groundwater and Vapor Investigations
File to be named: RO3113_WP_R_yyyy-mm-dd
- **January 20, 2017** – Seasonal Sub-Slab Vapor Investigation
File to be named: RO3113_SWI_R_yyyy-mm-dd

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Mark E. Detterman, P.G., C.E.G.

Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations

Electronic Report Upload (ftp) Instructions

cc: Ms. Sharlene Hassler, Shelter Bay Retail Group, 655 Redwood Highway, Suite 177, Mill Valley, CA 94941; (Sent via electronic mail to: shassler@shlterbay.com)

Steve Robertson, Shelter Bay Retail Group, 655 Redwood Highway, Suite 177, Mill Valley, CA 94941;
(Sent via electronic mail to: sroberts@shelterbay.com)

Craig Pelletier, RPS Iris Environmental, 1438 Webster Street, Suite 302, Oakland, CA 94612;
(Sent via electronic mail to craig@irisenv.com)

Dilan Roe, ACDEH, (Sent via electronic mail to: dilan.roe@acgov.org)

Mark Detterman, ACDEH, (Sent via electronic mail to: mark.detterman@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

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: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 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.