



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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January 7, 2014

Mr. William Mathews Brooks  
4725 Thornton Avenue  
Fremont, CA 94536  
(Sent via electronic mail to [REWMB@aol.com](mailto:REWMB@aol.com))

Subject: Request for Interim Remediation Work Plan Addendum; Site Cleanup Program (SCP) Case No. RO0003120 and GeoTracker Global ID T10000005063, Swiss Valley Cleaners, 1395 MacArthur Blvd, Oakland, CA 94577

Dear Mr. Brooks:

Alameda County environmental health (ACEH) has reviewed the December 10, 2013 report entitled *Site Assessment Report*, that documents the installation of 40 approximately five foot deep soil bores for the collection of shallow soil vapor at the site, and 11 soil bores to a depth of approximately 15 feet below surface grade (bgs), to collect soil samples, to characterize soil at the site for potential chlorinated volatile organic compound (VOC) contamination, in particular tetrachlorethene (PCE) contamination. Only one vapor sample detected a concentration below the commercial PCE Environmental Screening Level (ESL) for soil gas (and the evaluation of potential vapor intrusion) set by the San Francisco Regional Water Quality Control Board (RWQCB). The commercial ESL for soil gas is 2,100  $\mu\text{g}/\text{m}^3$ . Concentrations of PCE beneath the site ranged between 1,200 and 400,000  $\mu\text{g}/\text{m}^3$ . ACEH notes that some of the highest concentrations of PCE are along the northern edge of the commercial unit, within feet of the adjacent commercial unit. This data indicates the lateral extent is undefined and the potential for vapor intrusion at adjacent units is a potential concern. The report also documented the collection of soil samples at 5, 10, and 15 feet below grade surface to characterize soil VOC concentrations. All concentrations of PCE were below the commercial PCE ESL for soil. Thank you for submitting the report.

The referenced report recommended a phased approach to additional future actions at the site. The first proposed step is the submittal of a work plan addendum to the previously submitted July 8, 2013 *Vapor Mitigation and Remedial Well Installation Work Plan* for the subject site. The intent of the work plan addendum is to document locations of proposed additional vapor extraction wells and to provide revised well construction details. The second step would be startup of the soil vapor extraction (SVE) system upon receipt of regulatory approval. The third proposed step is generation of a work plan for subslab vapor sampling, collection of indoor air quality samples, and additional assessment of the lateral extent of the vapor and soil (adsorbed-phase) plumes at the site.

ACEH concurs that interim remedial actions are required at the site. However, ACEH notes that the vapor concentrations detected warrant concurrent determination of the potential for an imminent vapor intrusion health risk to be present at the subject unit and at adjacent units at the site. Therefore, based on ACEH staff review of the case file, we request that you address the following technical comments and send us the reports described below.

### **TECHNICAL COMMENTS**

- 1. Request for Interim Remediation Work Plan Addendum with Site Investigation Work Plan** – In order to expedite actions at the site and determine the potential for imminent health risk to occupants of this and adjacent commercial units, ACEH requests the collection of indoor air quality vapor samples at the subject site (subject commercial unit), and for adjacent commercial units, generation of a work plan providing additional details of the SVE system, the construction of subslab vapor points, proposed pilot tests to

determine the radius of influence of SVE wells, revised well construction details, and potentially the locations of additional wells, as discussed above.

To minimize review time and expedite actions at the site, ACEH requests that the work plan also include the tasks associated with additional site investigation, including but not limited to, additional sampling locations to delineate the lateral extent of the vapor-phase and soil plumes. The collection of additional shallow soil samples beneath the site at critical locations, such as elevated PCE vapor sample results would likely assist in understanding the source and distribution of contamination beneath the site and in well design.

Please include Standard Operating Protocols (SOPs) for all proposed actions, such as subslab vapor point installation.

- 2. Draft Public Fact Sheet Notice** - Based on a review of site data, public participation activities are required at this site. The purpose of public participation is to facilitate communication and coordination with stakeholders potentially affected by, or concerned with, soil and groundwater contamination and potential vapor intrusion risks associated with chlorinated solvents in soil, groundwater, and soil vapor at the site at concentrations that exceed applicable regulatory screening levels used to judge the necessity of conducting corrective actions at the site.

As part of the public participation process, you must notify potentially affected stakeholders who live or own property in the surrounding area of the site conditions through a mailing of a fact sheet. Please establish an initial mailing list of property owners and tenants who are located within 200 feet of the parcel boundaries for the property. The mailing list should also include other stakeholders who have interest in tenant improvements, have political jurisdiction within or adjacent to the potential vapor intrusion area, represent community leadership or advocacy, or need to be aware of planned activities.

Please submit a draft distribution list and draft informational fact sheet about the site and planned investigation and characterization activities (MS Word format) for agency review by the date specified below. Please see the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) Vapor Intrusion Public Participation Advisory, dated March 2012 for examples.

### **TECHNICAL REPORT REQUEST**

Please upload technical reports to the ACEH 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:

- **January 31, 2014** – Draft Public Fact Sheet (in MS Word format) with List of Fact Sheet Recipients (Please initially email to ACEH case worker only); file to be named: RO3120\_PP\_yyyy-mm-dd
- **February 21, 2014 (January 10, 2014)** – Site Investigation Work Plan  
File to be named: RO3120\_WP\_R\_yyyy-mm-dd

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>. If your email address does not appear on the cover page of this notification, ACEH is requesting you provide your email address so that we can correspond with you quickly and efficiently regarding your case.

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

Sincerely,

Mark E. Detterman, P.G., C.E.G.  
Senior Hazardous Materials Specialist

Mr. William Mathews Brooks  
RO0003120  
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Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations  
Electronic Report Upload (ftp) Instructions

cc: Daniel Villanueva, Advanced GeoEnvironmental, Inc, 837 Shaw Road, Stockton, CA 95215  
(sent via electronic mail to [DVillanueva@advgeoenv.com](mailto:DVillanueva@advgeoenv.com))

William Little, Advanced GeoEnvironmental, Inc, 837 Shaw Road, Stockton, CA 95215  
(sent via electronic mail to [WLittle@advgeoenv.com](mailto:WLittle@advgeoenv.com))

Dilan Roe (sent via electronic mail to [dilan.roe@acgov.org](mailto:dilan.roe@acgov.org))

Mark Detterman, ACEH, (sent via electronic mail to [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org))  
Geotracker, Electronic File

# Attachment 1

## Responsible Party(ies) Legal Requirements/Obligations

### REPORT/DATA REQUESTS

These reports/data are being requested pursuant to Division 7 of the California Water Code (Water Quality), Chapter 6.7 of Division 20 of the California Health and Safety Code (Underground Storage of Hazardous Substances), and Chapter 16 of Division 3 of Title 23 of the California Code of Regulations (Underground Storage Tank Regulations).

### ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (Local Oversight Program [LOP] for unauthorized releases from petroleum Underground Storage Tanks [USTs], and Site Cleanup Program [SCP] for unauthorized releases of non-petroleum hazardous substances) require submission of reports in electronic format pursuant to Chapter 3 of Division 7, Sections 13195 and 13197.5 of the California Water Code, and Chapter 30, Articles 1 and 2, Sections 3890 to 3895 of Division 3 of Title 23 of the California Code of Regulations (23 CCR). Instructions for submission of electronic documents to the ACEH FTP site are provided on the attached "Electronic Report Upload Instructions."

Submission of reports to the ACEH FTP site is in addition to requirements for electronic submittal of information (ESI) to the State Water Resources Control Board's (SWRCB) Geotracker website. In April 2001, the SWRCB adopted 23 CCR, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1 (Electronic Submission of Laboratory Data for UST Reports). Article 12 required electronic submittal of analytical laboratory data submitted in a report to a regulatory agency (effective September 1, 2001), and surveyed locations (latitude, longitude and elevation) of groundwater monitoring wells (effective January 1, 2002) in Electronic Deliverable Format (EDF) to Geotracker. Article 12 was subsequently repealed in 2004 and replaced with Article 30 (Electronic Submittal of Information) which expanded the ESI requirements to include electronic submittal of any report or data required by a regulatory agency from a cleanup site. The expanded ESI submittal requirements for petroleum UST sites subject to the requirements of 23 CCR, Division, 3, Chapter 16, Article 11, became effective December 16, 2004. All other electronic submittals required pursuant to Chapter 30 became effective January 1, 2005. Please visit the SWRCB website for more information on these requirements: ([http://www.waterboards.ca.gov/water\\_issues/programs/ust/electronic\\_submittal/](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, 7835, 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, 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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> July 25, 2012
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (petroleum UST 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 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](mailto: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](mailto: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.