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HEALTH CARE SERVICES
AGENCY
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March 11, 2014

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

Subject: Modified Approval of Work Plans; 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 *Site Assessment and Soil Vapor Extraction Pilot Test Work Plan,* dated January 24, 2014 and the *Indoor Air Quality Sampling Work Plan,* dated February 4, 2014, prepared and submitted on your behalf by Advanced GeoEnvironmental, Inc, (AGE). Thank you for submitting the reports. The January work plan proposed the installation of one soil-vapor extraction (SVE) well, three SVE observation wells, an 8-hour pilot test of the SVE wells, four shallow soil bores to investigate the potential of shallow contamination beneath the site, and four intermediate depth soil bores with shallow vapor sampling to investigate the lateral extent of contamination beneath the site. The February work plan proposed the collection of indoor air quality samples in the subject unit, and the two adjacent units on a seasonal basis (summer / winter). A building screen and inventory are also proposed for the units using standard DTSC forms.

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

TECHNICAL COMMENTS

1. **Subsurface Work Plan Modification –** The referenced subsurface work plan proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH requests several modifications to the approach. Please submit the results of the investigation in a site investigation report as requested below.

    a. **Shallow Soil Bores –** Four shallow soil bores are proposed to be installed in order to characterize tetrachlorethene (PCE) concentrations in shallow soil. Each location appears appropriate; however, ACEH requests additional bores in the two areas identified on Figure 3 of the work plan as "vapor phase PCE greater than 100,000 µg/m^3". It appears that the two areas relate to the former building layout, rather than the current building layout. Because the location of equipment in the former building does not appear to be sufficiently known, it appears appropriate to install a series of shallow soil bores to characterize the extent and magnitude of contaminated shallow soil in the former use areas. Thus in the smaller western area it appears prudent that a minimum of two soil bores be installed in the vicinity of VP-11 and VP-16. In the larger eastern area, due to the lack of the known locations of the former equipment, it appears prudent to install additional soil bores on an approximately 5 foot center grid pattern to help determine former use areas and associated contamination, as generally recommended in the April 2012 DTSC *Soil Gas Investigations Advisory*. At a minimum these bores should be in the vicinity of VP-22, VP-25, and VP-31 where higher PCE soil vapor concentrations were detected as these locations may correlate with former use areas. This strategy is consistent with recommendations contained in

the October 2010 *Conducting Contamination Assessment Work at Drycleaning Sites* report issued by the State Coalition for Remediation of Dry Cleaners.

ACEH requests that particular attention to potentially very shallow soil contamination, including base course, or other granular materials, beneath the slab or pavement, be observed, and multiple soil samples and photo-ionization detection (PID) readings be collected within these materials. Consequently, please submit a revised Figure 2, as a Work Plan Addendum, to document proposed revised bore locations, by the date referenced below.

b. **Intermediate Depth Bores –** Four bores are proposed to be installed to 15 feet below surface grade (bgs) and will be used to provide initial lateral delineation of soil and soil vapor concentrations to the north and south /southwest of likely release areas. ACEH notes that the locations appear appropriate; however, also notes that PCE soil contamination directly beneath the site has not found soil contamination above Regional Water Quality Control Board (RWQCB) Environmental Screening Levels (ESLs) for residential use, at this commercial property. As described in Technical Comment 1, ACEH thus judges the shallow soil zone and the soil vapor component of these four bores to be more critical components. Consequently, unless significant soil contamination is detected by the onsite mobile lab, ACEH requests that investigative efforts be limited to a depth of five feet bgs, rather than the proposed 15 feet.

c. **Determination of Lateral Extent of Vapor Contamination –** Initial determination of the lateral extent of PCE soil vapor contamination is proposed with the installation of four lateral soil bores. ACEH is in agreement with this initial determination; however, confirmation of the lateral limits will require the installation of permanent soil vapor probes in order to obtain seasonal repeatable analytical data.

d. **Shroud Tracer Gas Analysis –** The work plan proposes the use of isopropyl alcohol as a tracer gas in order to determine if outside air has diluted soil vapor concentrations. Please be aware that laboratory analysis for any tracer is required to be collected from inside the shroud as well as from the soil vapor sample for this to be determined. The determination of the lateral as well as the vertical extent of PCE contamination will require this analysis.

e. **Soil Vapor Extraction Wells –** Four wells are proposed for a soil vapor extraction pilot test (one extraction, three observation wells). Based on telephone conversations, ACEH understands that while one bore has been marked as the vapor extraction well, and three wells have been marked as observation wells, on Figure 2 of the work plan, all wells will be tested as extraction wells during the pilot test. This appears appropriate.

Well screens are proposed to be installed between 2.5 and 12 feet bgs; however, ACEH notes that a soil source has not been found at the site. As such while ACEH judges the pilot test will be useful, significant effort to locate the soil source(s) may provide alternative, more cost effective or appropriate corrective action methods. Consequently, ACEH requests that well design be confirmed and then installed after the results of the soil grid sampling investigation are available. To help expedite site progress, please present the results of the gridding (tabulated data, figures, and bore logs as needed) to ACEH with final extraction well design confirmation.

f. **Bore Logs –** A review of all bore logs generated to date by AGE indicates that no lithologic details from the upper five feet have been reported either in the text of the report or on submitted bore logs. This is not acceptable for multiple reasons; however, especially because a soil source has not been located beneath the site it is particularly important to focus on this depth interval. Therefore please log the full depth of all bores.

2. **Indoor Air Sampling Work Plan Modifications –** The referenced indoor air work plan proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH requests several modifications to the approach. Please submit the results of the investigation in a site investigation report as requested below.

a. **Fact Sheet Modifications –** The Fact Sheet attached to the *Indoor Air Quality Sampling Work Plan*, does not contain sufficient information to inform occupants of the adjacent units of the importance of, and what will happen during, the indoor air sampling work that has been requested. Examples of this type of communication are contained in the March 5, 2012 DTSC *Vapor Intrusion*

Public Participation Advisory (especially pages 76 to 83). Consequently, ACEH requests the submittal of a draft Indoor Air Sampling Fact Sheet intended for units in which indoor air will be sampled, by the date identified below. The draft version will be reviewed quickly for appropriateness.

b. **Fact Sheet Distribution –** After ACEH approval of the draft indoor air fact sheet, please ensure that the indoor air sampling fact sheet be distributed a minimum of 1 week prior to site interviews and observations. Please also ensure that the occupants of the three units have not used chemicals that contain or could confuse PCE vapor sampling results (for example that contain PCE, TCE, or other potential breakdown products etc.) are not used for a minimum of one week prior to the indoor air sampling effort. Finally, please ensure that the heating, ventilation, and air conditioning (HVAC) systems are not operating during the 24 hour sampling events in each unit (*EPA Region 9 Guidelines and Supplemental Information Needed for Vapor Intrusion Evaluations at the South Bay National Priorities List (NPL) Sites*, December 3, 2013, US EPA).

c. **Indoor Air Sampling –** Two seasonal indoor air sampling events are proposed in the subject unit, and the two adjacent units. Following each event a report is proposed to be generated and submitted to ACEH. ACEH requests that should indoor air results exceed indoor air RWQCB ESLs for commercial facilities, ACEH is to be informed immediately (verbally and in writing) and mitigation measures, such as high speed fan ventilation, be implemented at each occupied unit.

d. **Residual Summa Canister Vacuum –** Please ensure that each vapor sampling summa canister contains a residual vacuum at the end of the sampling period. This ensures the ability to calculate the rate of filling and sampling.

e. **Laboratory Certification –** The referenced work plan proposes to analyze the samples by standard method TO-15 at a State of California Department of Public Health Services-certified laboratory. The California Environmental Laboratory Accreditation Program (ELAP) does not certify toxic organic (TO) methods; however, other accepted accreditation programs do. ACEH requires all vapor analytical work to be conducted by a laboratory that has been accredited by an appropriate program.

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:

- **March 31, 2014 –** Work Plan Addendum (Revised Figure 2, Draft Indoor Air Sampling Fact Sheet)
  File to be named: RO3120_WP_ADEND_R_yyyy-mm-dd

- **April 25, 2014 –** Results of Indoor Air Sampling
  File to be named: RO3120_ANALYT_R_yyyy-mm-dd

- **May 2, 2014 –** Results of Soil Gridding
  File to be named: RO3120_MISC_R_yyyy-mm-dd

- **June 6, 2014 –** Site Investigation Report
  File to be named: RO3120_SWI_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.

Sincerely,

Digitally signed by Mark E. Detterman
DN: cn=Mark E. Detterman, o, ou, email, c=US
Date: 2014.03.11 11:03:22 -07'00'

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

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

Dilan Roe (sent via electronic mail to dilan.roe@acgov.org)
Mark Detterman, ACEH, (sent via electronic mail to 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/).

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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	**REVISION DATE:** July 25, 2012
	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 (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
   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.