



ENVIRONMENTAL HEALTH SERVICES  
ENVIRONMENTAL PROTECTION  
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November 14, 2014

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

Subject: Modified Work Plan Approval; 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 *Soil Vapor Extraction Pilot Test Report & Interim Remedial Action Work Plan*, dated October 10, 2014 and the *Site Assessment & Sub-Slab Well Installation Work Plan*, dated November 12, 2014, prepared and submitted on your behalf by Advanced GeoEnvironmental, Inc, (AGE). Thank you for submitting the reports.

The referenced pilot test reported on the installation and construction of four seven foot deep vapor extraction wells, the results of an 8-hour pilot test on vapor well VW-1, and estimated the well radius-of-influence to be approximately 17.25 feet. As a result of these activities and findings, four additional vapor wells were proposed for the subject dry cleaner suite. The referenced interim remediation work plan proposed the installation of a remedial system and connection of the seven vapor wells to the system.

The site assessment and sub-slab vapor well installation work plan proposes the installation of 18 soil bores to a total depth of 10 feet below grade surface (bgs). Five bores are proposed on a downgradient offsite property, three to four are proposed in lateral or upgradient locations, and the remaining bores are proposed to be installed along the estimated location of the onsite sanitary sewer lateral that services and interconnects each commercial suite at the building. Both soil and soil vapor are proposed to be collected in each bore location.

Based on ACEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: [mark.detterman@acgov.org](mailto:mark.detterman@acgov.org)) prior to the start of field activities.

## **TECHNICAL COMMENTS**

1. **Site Assessment Work Plan Modifications** – The referenced site assessment 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 soil and soil vapor investigation report by the date identified below.
  - a. **Installation of Vapor Probes in Adjacent Suites** – In order to verify the extent of soil vapor concentrations in adjacent commercial suites at the site, ACEH requests the installation of one additional five foot deep vapor probes in the three adjacent commercial suites at the site, in conjunction with the installation of the sub-slab vapor wells and the proposed soil bores in the two adjacent suites. The vapor points are requested to be installed using the same protocols the vapor

probes onsite were installed with. The locations are expected to help determine the extent remedial efforts may be required at the site. Similar to sub-slab vapor wells (see Comment e below), the installation and sampling of these vapor probes is requested to occur prior to remedial actions in order to scope a system. Therefore ACEH requests the submittal of a work plan addendum (revised figure 3) with proposed locations of the vapor probes in the adjacent suites, by the date requested below.

- b. **Soil Vapor Sample Depth** – The referenced work plan does not mention a depth interval for the collection of soil vapor in the proposed soil bores. In order to remain consistent with past sampling practices at the site ACEH requests that soil vapor samples be collected at a depth of 5 feet prior to extending the bore depth to the proposed depth of 10 feet bgs.
  - c. **Soil Sample Selection** - The work plan proposes the collection of soil samples for analytical analysis at the depths of 5 and 10 feet bgs. Rather than the collection of soil samples at static depth intervals, ACEH requests that these soil samples be collected at signs of contamination (staining, odors, PID responses, etc.) at significant changes in lithology, and at the bottom of the bore. Please ensure that the fill soil around the sewer lateral is sampled as elevated tetrachlorethene (PCE) concentrations may be concentrated adjacent or below to the lateral.
  - d. **Additional Sub-Slab Vapor Well** – The installation of four sub-slab vapor wells as proposed appears appropriate; however, ACEH requests the installation of an additional sub-slab well near elevated PCE soil contamination in the vicinity of soil bore B25, as the location would allow repeated sampling of sub-slab vapor concentrations in the vicinity of a hot spot in soil and soil vapor.
  - e. **Sub-Slab Vapor Sampling** – To reiterate previous communications, ACEH requests that the initial sub-slab vapor sampling occur prior to implementation of the remedial actions in order to obtain initial sub-slab vapor concentrations prior to significant remedial efforts have been undertaken.
2. **Draft Corrective Action Plan** – Because the lateral extent of the vapor cloud has not been defined within adjacent commercial suites at the site, it is not appropriate to approve the proposed Interim Remedial Action Plan. As described in the July 18, 2014 directive letter, a Draft Corrective Action Plan (Draft CAP) is required to evaluate feasible alternatives for the site, to incorporate the results of the proposed pilot test, and to recommend final alternatives in accordance with DTSC guidelines.

Consequently, ACEH requests that you prepare a Draft CAP that includes the following minimum information:

- Proposed cleanup goals and the basis for cleanup goals.
- Summary of site characterization data.
- Receptor information including likely future land use scenarios, adjacent land use and sensitive receptors, and potential groundwater receptors.
- Evaluation of a minimum of three active remedial alternatives including discussion of feasibility, cost effectiveness, estimated time to reach cleanup goals, and limitations for each remedial alternative.
- Detailed description of proposed remediation including confirmation sampling and monitoring during implementation.
- Post-remediation monitoring.
- Schedule for implementation of cleanup.

Public participation is a requirement for the Corrective Action Plan process. Therefore, we request that you submit a Draft CAP for ACEH review by the date identified below. Upon ACEH approval of a Draft CAP, ACEH will notify potentially affected members of the public who live or own property in the surrounding area of the proposed remediation described in the Draft CAP. Public comments on the proposed remediation will be accepted for a 30-day period.

3. **Public Notification of Tenants** – ACEH has reviewed the draft *Swiss Valley Cleaners Investigation Update*, and draft *Fact Sheet on Environmental Assessment* that will be used during a meeting to update tenants of the shopping center on the progress of the case, and to address the potential for chemical

exposure and health risks from the PCE release. ACEH has slightly modified the documents and will transmit them under separate cover; however, it is appropriate now to schedule and hold meetings with the tenants. Please notify ACEH by the date identified below of proposed meeting dates.

### **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:

- **December 5, 2014** – Work Plan Addendum (Revised Figure 3 with technical justification for locations)  
File to be named: RO3120\_WP\_ADEND\_R\_yyyy-mm-dd
- **December 5, 2014** – Proposed Meeting Dates (email preferred)
- **January 30, 2015** – Site Assessment Report  
File to be named: RO3120\_SWI\_R\_yyyy-mm-dd
- **January 30, 2015** – Draft Corrective Action Plan (can be combined with report above)  
File to be named: RO3120\_RAP\_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

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 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/](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.

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)</b>	<b>REVISION DATE:</b> May 15, 2014
	<b>ISSUE DATE:</b> July 5, 2005
	<b>PREVIOUS REVISIONS:</b> October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
<b>SECTION:</b> Miscellaneous Administrative Topics & Procedures	<b>SUBJECT:</b> 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](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.