



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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December 30, 2015

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

Subject: Contingent Approval of Remedial Action Work Plan, and Offsite Vapor Investigation; Site Cleanup Program (SCP) Case No. RO0003120 and GeoTracker Global ID T10000005063, Swiss Valley Cleaners, 1395 MacArthur Blvd, San Leandro, CA 94577

Dear Mr. Brooks:

Alameda County Environmental Health (ACEH) has reviewed the *Corrective Action Plan*, (CAP) dated October 16, 2015, the *Off-Site Soil-Vapor Assessment Work Plan*, dated October 29, 2015, and the *Indoor Air & Sub-Slab Monitoring Report*, dated December 11, 2015. Each was prepared and submitted on your behalf by Advanced GeoEnvironmental, Inc, (AGE). The CAP also included a *Remedial Action Work Plan* as an appendix to the report. Thank you for submitting the reports.

The CAP proposed soil vapor extraction (SVE), excavation, or natural attenuation as corrective actions, but selected SVE as the preferred corrective action at the site. The *Remedial Action Work Plan*, contained as an appendix in the CAP, recommended the installation of 17 SVE wells at the site, and the installation of a temporary SVE system compound at the rear of the dry cleaner unit. Piping from each SVE well will initially be installed in a shallow trench below the slab floor grade. Per subsequent communications, piping will exit the slab floor and will be fastened to structural supports (columns, walls, etc.) and will be plumbed to the SVE compound with PVC piping.

The *Off-Site Soil-Vapor Assessment Work Plan* proposes the installation of eight shallow, temporary, offsite vapor sampling locations in order to define the extent of offsite tetrachlorethene (PCE) vapor concentrations at a gap in the delineated extent of contamination.

The *Indoor Air & Sub-Slab Monitoring Report* documents the first concurrent collection of indoor air and sub-slab vapor concentrations after modifications to the ventilation system of three adjacent commercial suites at the subject site. Indoor air PCE concentrations were documented to have been reduced to below commercial Environmental Screening Levels (ESLs), promulgated by the San Francisco Bay Regional Water Quality Control Board (RWQCB) in the currently unoccupied dry cleaner suite. Indoor air PCE concentrations in the adjacent two suites were substantially reduced (reduced from a maximum of 19 $\mu\text{g}/\text{m}^3$ to maximum of 3.5 $\mu\text{g}/\text{m}^3$); however, remain above the commercial indoor ESL for PCE (2.1 $\mu\text{g}/\text{m}^3$).

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) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Contingent Remedial Action Work Plan Approval** – 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.
 - a. **Interim Mitigation Measure Approval** - As noted in the previous directive letter, final approval of the system cannot be provided until members of the public have been given the opportunity to provide comments to the proposed operation of the SVE system as public comments have, at a minimum, the potential to affect system operations. Due to elevated indoor air concentrations in two commercial suites, this letter provides system approval on an interim basis in order to provide additional mitigation of indoor air concentrations. Please submit a remediation progress (system startup) report by the date specified below.
 - b. **Amended Remedial Action Work Plan** – During telephone conversations on December 23, 2015, ACEH requested the submittal of an Amended Remedial Action Work Plan for the intended purpose of providing a single document for public review of proposed site activities. Please submit the amended report by the date identified below.
 - c. **Remedial Design Implementation Plan** – In accordance with the December 23, 2015 telephone conversation, please submit a Remedial Design Implementation Plan that in addition to other items, proposes a baseline vapor sampling event prior to system startup for the collection of concurrent indoor air and sub-slab vapor concentrations. Please submit the report by the date identified below.
2. **Conditional Approval of Off-Site Vapor Plume Delineation** – 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 vapor investigation report by the date identified below.
 - a. **Flexibility in Plume Delineation** - Delineation of the lateral extent of the PCE vapor plume was proposed offsite at the residential properties north of 993 Estudillo Avenue with the installation of eight temporary vapor wells and the use of a mobile laboratory. Existing investigation protocols will be used. While specific bore locations were identified, ACEH requests flexibility in bore placement, potentially including the installation of additional bores, in order to quickly define the vapor plume to appropriate goals. ACEH presumes the use of a mobile laboratory is intended to provide this flexibility.
3. **Public Notification** – The 30-day public comment period is anticipated to start about January 8, 2016. Previously forwarded draft documents have been reviewed and require modifications in the remaining time. ACEH requests that a list of interested parties, including any more recently identified parties, be submitted to ACEH in spreadsheet form in the interim period of time, and by the date identified below.

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 6, 2016** – Updated Interested Party List (spreadsheet form)
Email notification of case worker is preferred.
- **January 8, 2016** – Amended Remedial Action Work Plan
File to be named: RO3120_CAP_ADEND_R_YYYY-MM-DD
- **January 22, 2016** – Remedial Design Implementation Plan
File to be named: RO3120_RDIP_R_YYYY-MM-DD
- **March 11, 2016** – Offsite Investigation Report
File to be named: RO3120_SWI_R_YYYY-MM-DD

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- **April 8, 2016** – Remediation Progress Report
File to be named: RO3120_REM_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,

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 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.