

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY

REBECCA GEBHART, Interim Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY, SUITE 250
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

April 28, 2017

Mr. William Mathews Brooks
4725 Thornton Avenue
Fremont, CA 94536

(Sent via electronic mail to: REWMB@aol.com)

Subject: Corrective Action Plan Addendum Request; 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 Department of Environmental Health (ACDEH) has reviewed the *Remedial Well / System Installation & Startup Report*, dated February 1, 2017, the *Cone Penetration Report*, dated February 28, 2017, the *Indoor Air & Sub-Slab Monitoring Report – First Quarter 2017*, dated March 8, 2017, and the *Remedial Status Report – First Quarter 2017*, dated April 6, 2017. The reports were prepared and submitted on your behalf by Advanced GeoEnvironmental, Inc. (AGE). Thank you for undertaking the work and submitting the reports.

The *Remedial Well / System Installation & Startup Report* documented the installation of vapor extraction wells VW-5 to VW-21, and the startup of the Soil Vapor Extraction (SVE) System. Based on influent concentrations, the system was determined to have removed approximately 2 pounds of tetrachlorethene (PCE) between November 11, and December 15, 2016. The *Cone Penetration Report* documented the installation of Cone Penetration Test (CPT) bores CPT-1 to CPT-8 for the purpose of determining the extent of groundwater contamination from the release at the site. First groundwater was in general encountered at an approximate depth of 46 to 48 feet below grade surface (bgs). The maximum concentration of PCE detected was 3.0 micrograms per liter (ug/l) downgradient of the release; however, the southern extent of potential contamination was not defined. The *Indoor Air & Sub-Slab Monitoring Report – First Quarter 2017* documented the initial indoor air and sub-slab vapor monitoring since startup of the SVE system. Both indoor air and sub-slab vapor concentrations were lower than previous sampling events. The *Remedial Status Report – First Quarter 2017* documented the operations of the SVE system between December 27, 2016 and March 15, 2017, and documented lower vapor influent concentrations. Based on influent concentrations, the system was determined to have removed approximately 4.6 pounds of PCE during the period, and recommended rebound testing of the system with a 30 day system shut down.

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. Rebound Testing** – ACDEH is in agreement that a 30 day system shut down to initiate rebound testing may be appropriate; however, ACDEH notes that although system influent has maintained relatively stable concentrations, the mass-volume calculations indicate an approximately similar amount of PCE was extracted during the period compared to the previous period (allowing for the difference in the reporting time length). This can suggest potentially substantial residual mass might be present beneath the site in the fine-grained sediments. ACDEH views this rebound test as an initial test of the contaminant load at the site and it is intended to in part inform the next Technical Comment.
- 2. Corrective Action Plan Addendum** – The existing Corrective Action Plan (CAP) did not include protocols for rebound testing; identify soil vapor, sub-slab, or indoor air trigger levels for further actions; an exit strategy for shutting the system down at the subject site; or define longer term monitoring to

preclude long-term rebound from the fine-grained sediments. Trigger levels can be based on a site specific risk assessment or Environmental Screening Levels (ESLs) as promulgated by the San Francisco Bay Regional Water Quality Control Board (RWQCB). Should a site specific risk assessment be selected, please be aware that ACDEH requires risk assessments to be conducted by individuals with appropriate education and experience, consistent with Department of Toxic Substances (DTSC) guidance, such as certification as a Diplomat of the American Board of Toxicology. Should ESLs be selected, please note that the site currently does not contain appropriately constructed permanent soil vapor wells to a depth of five feet below grade surface (bgs) for the purpose of collecting requisite and seasonal data. A solution to this specific lack of infrastructure can be incorporated into the next Technical Comment. Please submit the requested document by the date identified below.

3. **Data Gaps** – In an effort to collect data as the site progresses, ACDEH has identified a minimum of three data gaps in data collection at the site. Additional data gaps may be present. Please submit a data gap work plan by the date identified below. Data gaps identified by ACDEH include the following:
 - a. **Extent of Groundwater Plume** - As observed above, the extent of the groundwater plume appears to be defined to the west to northwest, but has not been defined to the southwest. ACDEH is in agreement that based on the nearby former Haber Oil site the groundwater gradient in general appears to be to the west northwest. However channelized flow also appeared to be present at that site; thus it appears reasonable to verify that there is not a significant component of flow to the southwest at the subject site.
 - b. **Vertical Extent of Vapor Contamination** – Elevated vapor concentrations have been extensively found at the site; however, the vertical extent has not. It appears appropriate to additionally define the vertical extent in order to eliminate a potential unsuspected source beneath the site.
 - c. **Soil Vapor Collection** – As noted above, at present standard five foot deep vapor wells have not been installed at the site for comparison to RWQCB ESLs or, if needed, for long term monitoring and assessment.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

Please note that ACDEH has updated Attachment 1 with regard to report submittals to ACDEH. ACDEH will now be requiring a Submittal Acknowledgement Statement, replacing the Perjury Statement, as a cover letter signed by the Responsible Party (RP). The language for the Submittal Acknowledgement Statement is as follows:

I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the SWRCB's Geotracker Website.

Please make this change to your submittals to ACDEH.

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:

- **June 23, 2017** – Data Gap Work Plan
File to be named: RO3120_WP_R_yyyy-mm-dd
- **June 30, 2017** – CAP Addendum
File to be named: RO3120_CAP_ADDEND_R_yyyy-mm-dd

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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,

A handwritten signature in blue ink, appearing to read "Mark E. Detterman", with a stylized flourish extending to the right.

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, ACDEH, (Sent via electronic mail to: dilan.roe@acgov.org)
Paresh Khatri, ACDEH; (Sent via electronic mail to: paresh.khatri@acgov.org)
Mark Detterman, ACDEH, (Sent via electronic mail to: mark.detterman@acgov.org)
Electronic File; GeoTracker

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

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) 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 File Transfer Protocol (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 SCP 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 (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/) for more information on these requirements.

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the SWRCB's GeoTracker website." 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 6731, 6735, and 7835) 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 licensed 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 case meet this requirement. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

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: December 1, 2016
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions


The Alameda County Environmental Cleanup Oversight Programs (LOP 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) Open File Explorer using the Windows  key + E keyboard shortcut.
 - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) On the address bar, type in ftp://alcoftp1.acgov.org.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
 - d) Click Log On.
 - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - f) 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.