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PERJURY STATEMENT

Subject: **1395 MacArthur Boulevard, San Leandro, California**
Offsite Assessment Work Plan

I certify, under penalty of law, that I have personally examined and am familiar with the information submitted in this document and all attachments, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Mr. Sayed Hussain, agent for
ESC PARTNERS, L. P. and
Mr. William Matthew Brooks
4725 Thornton Avenue
Fremont, CA, 94536

Off - Site Soil-Vapor Assessment Work Plan

SWISS VALLEY CLEANERS
1395 MacArthur Boulevard, San Leandro, California

29 October 2015
AGE-Project No. 12 - 2461

PREPARED FOR:

Mr. William Matthew Brooks
ARDENBROOK

***PREPARED BY*:**

Advanced GeoEnvironmental, Inc.

Environmental • Industrial Hygiene • Geotechnical • Contracting
(800) 511-9300
www.advgeoenv.com

Off-Site Soil Assessment Work Plan
SWISS VALLEY CLEANERS
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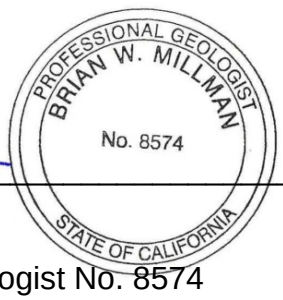
PREPARED BY:

Daniel J. Villanueva
Project Geologist

PROJECT MANAGER:

Daniel J. Villanueva
Project Geologist

REVIEWED BY:



Brian W. Millman
Senior Project Geologist
California Professional Geologist No. 8574

Off-Site Soil-Vapor Assessment Work Plan
SWISS VALLEY CLEANERS
1395 MacArthur Boulevard, San Leandro, California

TABLE OF CONTENTS

Off-Site Soil-Vapor Assessment Work Plan
SWISS VALLEY CLEANERS
1395 MacArthur Boulevard, San Leandro, California

1.0. INTRODUCTION

Advanced GeoEnvironmental, Inc. (AGE) has prepared this, *Offsite Assessment Work Plan,* for 1395 MacArthur Boulevard, San Leandro, California (site). The work plan details the advancement of eight (8) soil borings for collection of soil-vapor samples. Borings are proposed to delineate the lateral extent of soil-vapor impact to the subsurface off-site towards the west and northwest of the site. This work plan was prepared in accordance with the directives from Alameda County Environmental Health Department (ACEHD) by letter dating 11 August 2015 (Appendix A).

The location of the site and the surrounding area are illustrated in Figure 1; detailed maps showing the locations of historical soil boring and vapor sampling locations are included in Figures 2 and 3. The current known lateral extent of soil-vapor impact is illustrated in Figure 4. The proposed off-site soil-vapor sampling locations are presented in Figure 5.

2.0. SCOPE OF WORK

Based on analytical data collected during investigations performed in 1998, 2005, 2008, 2013 and 2014 additional investigation has been required to investigate and assess the lateral limits of chlorinated hydrocarbon impact to soil-vapor off-site to the west of the alley behind the strip mall. The proposed scope will include the following tasks:

- Permitting and pre-field work activities;
- Advancement of eight (8) soil borings for collection of soil-vapor samples;
- Report preparation.

Each of these tasks is described in greater detail below.

2.1. PERMITTING AND PRE-FIELD WORK ACTIVITIES

Applicable site assessment boring permits will be obtained from the Alameda County Public Works Agency - Water Resources Division (ACPWAWRD). An access agreement will be obtained from the off-site property owner(s). Additionally, a site-specific Health and Safety Plan will be prepared. Prior to mobilization, each soil probe location will be clearly marked and a utility clearance obtained through Underground Service Alert. The ACPWAWRD will be contacted a minimum of five days prior to conducting investigation activities to arrange for inspection.

2.2. SOIL PROBE BORINGS AND SAMPLING

A total of eight (8) soil borings will be advanced off-site on the St. James Lutheran Church property; borings will be advanced on the north, south, east and west sides of the building (Figure 5). Soil borings will be advanced to a depth of 5 feet bsg for collection of shallow soil-vapor. Borings will be advanced using either a direct push drilling rig, limited access direct push drilling unit or hand tooling to collect soil-vapor samples.

The total boring depths may vary based on site conditions. Soil-vapor sample collection procedures are provided below.

2.3. LABORATORY ANALYSIS

Soil-vapor samples will be analyzed by a California Department of Public Health (CDPH)-certified laboratory for full scan volatile organic compounds (VOC's) by EPA method 8260B.

2.5. REPORT PREPARATION

An *Off-site Assessment Report* will be submitted to ACEHD on completion of the investigation. The report will include field observations, sampling methodology, sample location maps, laboratory reports for soil and soil-vapor sample analyses (including testing methods, laboratory quality assurance/quality control (QA/QC) reports, and sample chain-of-custody documentation), conclusions, and applicable recommendations. The report will be in a format acceptable by the local agency and will be reviewed and signed by a California Professional Geologist.

3.0 FIELD PROCEDURES

All field procedures will be conducted by an AGE representative working under the supervision of a California Professional Geologist. Procedures for advancing soil probe borings, collection and analysis of soil-vapor samples, equipment decontamination, and sample handling are presented below.

3.1. SOIL BORING ADVANCEMENT & TEMPORARY WELL INSTALLATIONS

Proposed soil borings will be advanced to a total depth of five (5) feet bsg using truck-mounted, limited-access hydraulic direct-push drill rigs or hand tooling. For borings advanced with probing rigs, 1.25-inch probing rods will be used to advance the boring to total depth. The truck mounted/limited access drill rigs advance soil probe borings using

a hydraulic hammer to drive sampling tools to specified depths. For samples collected with hand tooling, ½-inch rods will be advanced with a roto-hammer to create the boring void for soil vapor sample collection.

At each location temporary sampling points will be installed following the advancement of the borings. A seven foot section of Teflon tubing will be attached to a vapor sampling implant. The tubing and implant will be lowered to the base of the boring and then one-foot of #2/12 sand will be poured around the implant to create a filter pack (from 4 to 5 feet bsg). Thereafter, one foot of dry granular bentonite will be poured down the borehole from 3 to 4 feet bsg. The remainder of the borehole will be filled with granular bentonite that will be hydrated until it reaches surface grade. The hydrated bentonite is used to create a seal to prevent ambient air intrusion into the sample.

3.2. SOIL-VAPOR SAMPLING

For borings advanced for soil-vapor sample collection, an onsite mobile lab will be used for sample collection and analysis. The mobile lab will determine the purge volume and use a tracer gas of either IPA or 1,1-difluouroethane (1,1-DFE) during field sampling activities. All samples will be run onsite following sample collection, using EPA Method 8260B.

Following sample collection the total VOC concentration in the sample probes will be measured using a hand-held photo-ionization detector (PID; Mini-Rae).

3.3. EQUIPMENT DECONTAMINATION

Prior to use, all sampling tools used for sample collection will be thoroughly rinsed with clean water after being washed with a solution of Alconox. All probe tooling and rods will be cleaned prior to advancement at each probe boring location.

3.4. BORING ABANDONMENT

All soil borings will be permanently sealed to prevent vertical migration of potential contaminants. Soil borings shall be abandoned by backfilling with cement grout from the total depth to surface grade. The top three to six inches of the boring abandonments will be completed flush to surface grade with native soils or concrete. The ACPWAWRD will be notified for grout inspection at least five days prior to conducting grouting procedures.

FIGURES

N

SCALE
0 2000 4000
FEET

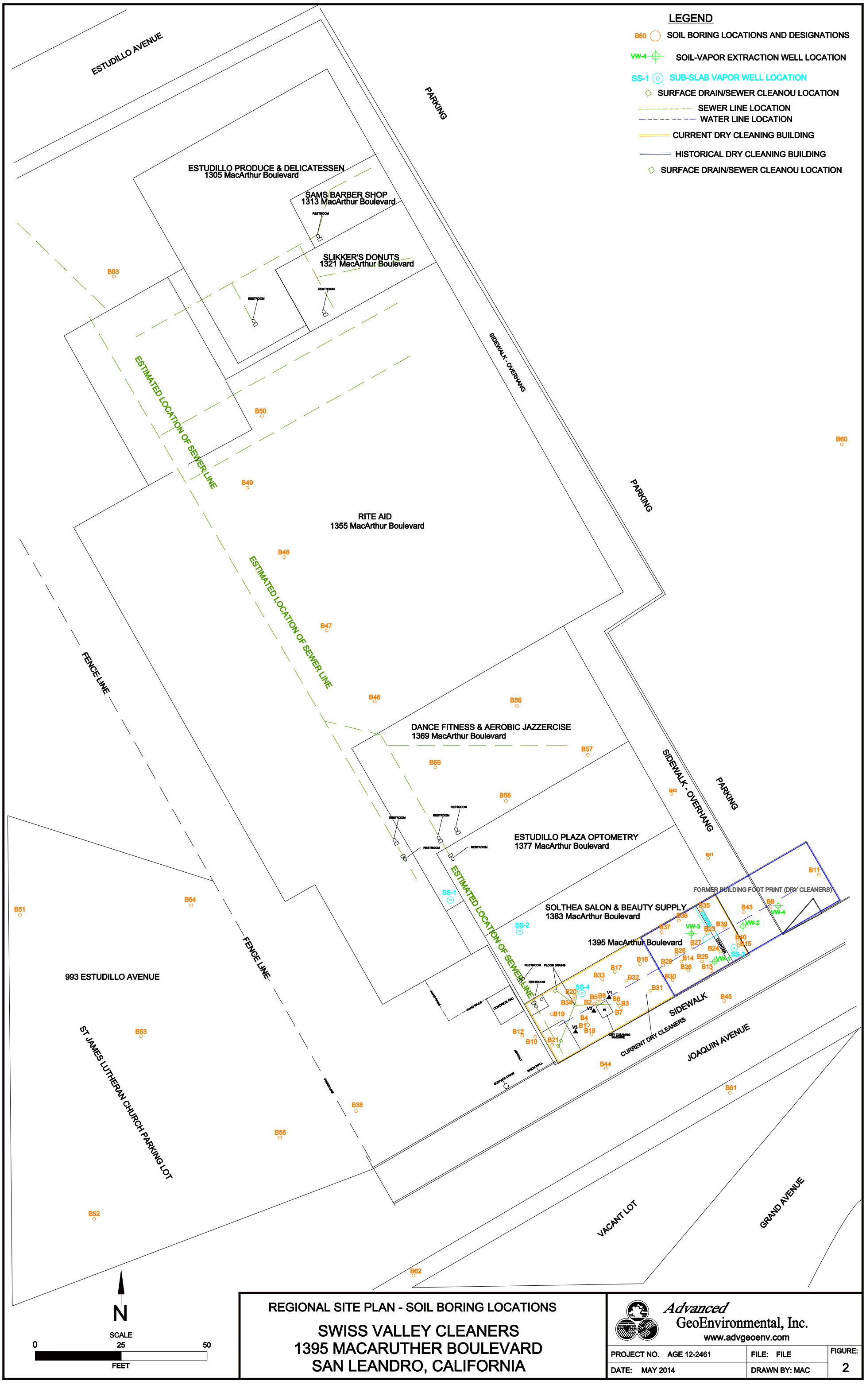
SAN LEANDRO QUADRANGLE, CALIFORNIA
7.5 MINUTE SERIES (U.S. GEOLOGICAL SURVEY)

LOCATION MAP

SWISS VALLEY CLEANERS
1395 MacArthur Boulevard
SAN LEANDRO, CALIFORNIA

Advanced GeoEnvironmental, Inc.
www.advgeoenv.com

PROJECT NO. AGE-NC-12-2461	FILE: LOCATION	FIGURE: 1
DATE: 21 MAY, 2013	DRAWN BY: MAC	

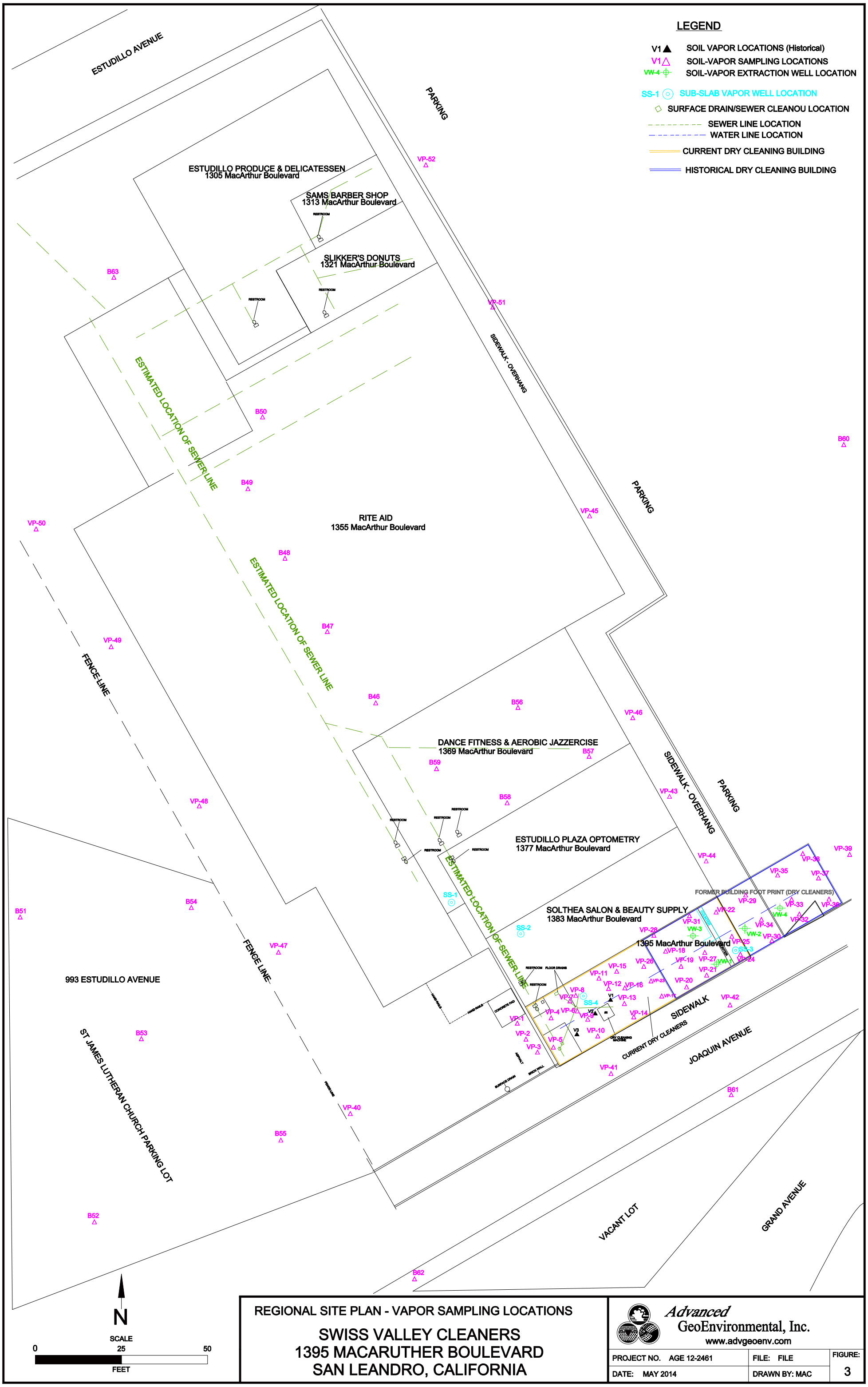


REGIONAL SITE PLAN - SOIL BORING LOCATIONS

SWISS VALLEY CLEANERS
1395 MACARUTHER BOULEVARD
SAN LEANDRO, CALIFORNIA

Advanced GeoEnvironmental, Inc.
www.advgeoenv.com

PROJECT NO. AGE 12-2461	FILE: FILE	FIGURE: 2
DATE: MAY 2014	DRAWN BY: MAC	

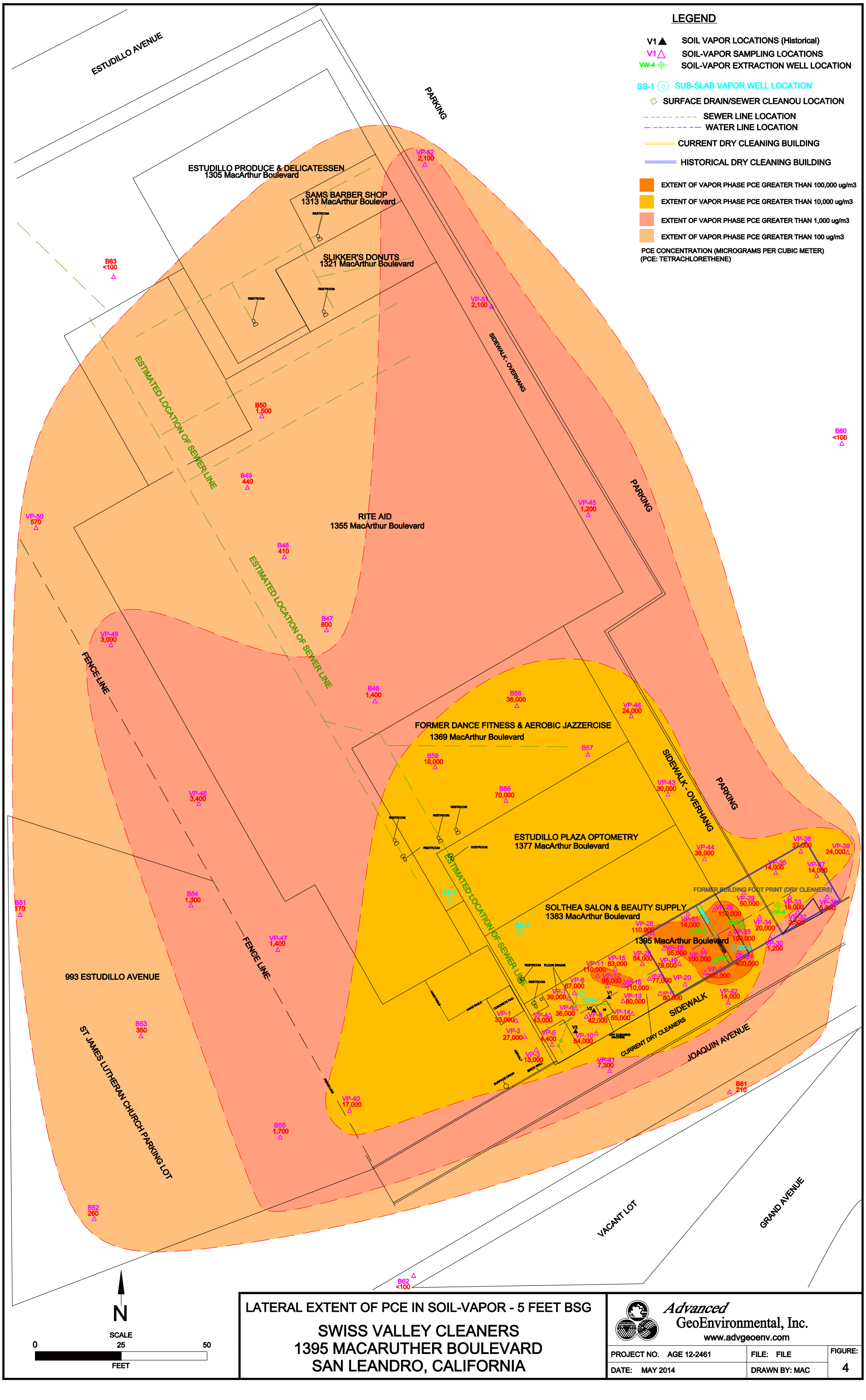


REGIONAL SITE PLAN - VAPOR SAMPLING LOCATIONS

SWISS VALLEY CLEANERS
1395 MACARUTHER BOULEVARD
SAN LEANDRO, CALIFORNIA

Advanced GeoEnvironmental, Inc.
www.advgeoenv.com

PROJECT NO. AGE 12-2461	FILE: FILE	FIGURE: 3
DATE: MAY 2014	DRAWN BY: MAC	


LEGEND
V1 SOIL VAPOR LOCATIONS (Historical)
V1 SOIL-VAPOR SAMPLING LOCATIONS
VW-4 SOIL-VAPOR EXTRACTION WELL LOCATION
SS-1 SUB-SLAB VAPOR WELL LOCATION
SURFACE DRAIN/SEWER CLEANOU LOCATION
SEWER LINE LOCATION
WATER LINE LOCATION
CURRENT DRY CLEANING BUILDING
HISTORICAL DRY CLEANING BUILDING
EXTENT OF VAPOR PHASE PCE GREATER THAN 100,000 ug/m3
EXTENT OF VAPOR PHASE PCE GREATER THAN 10,000 ug/m3
EXTENT OF VAPOR PHASE PCE GREATER THAN 1,000 ug/m3
EXTENT OF VAPOR PHASE PCE GREATER THAN 100 ug/m3
PCE CONCENTRATION (MICROGRAMS PER CUBIC METER)
(PCE: TETRACHLORETHENE)
ESTUDILLO AVENUE
PARKING
ESTUDILLO PRODUCE & DELICATESSEN
1305 MacArthur Boulevard
SAMS BARBER SHOP
1313 MacArthur Boulevard
SLIKKER'S DONUTS
1321 MacArthur Boulevard
RESTROOM
B63 <100
VP-52 2,100
VP-51 2,100
SIDEWALK - OVERHANG
ESTIMATED LOCATION OF SEWER LINE
B50 1,500
B49 440
B60 <100
VP-50 570
RITE AID
1355 MacArthur Boulevard
B48 410
VP-45 1,200
PARKING
B47 800
VP-49 3,000
FENCE LINE
B46 1,400
B56 36,000
VP-46 24,000
FORMER DANCE FITNESS & AEROBIC JAZZERCISE
1369 MacArthur Boulevard
B57
B59 18,000
VP-43 30,000
SIDEWALK - OVERHANG
PARKING
VP-48 3,400
B58 70,000
ESTUDILLO PLAZA OPTOMETRY
1377 MacArthur Boulevard
VP-44 38,000
VP-38 37,000
VP-39 24,000
VP-35 14,000
VP-37 14,000
FORMER BUILDING FOOT PRINT (DRY CLEANERS)
B54 1,300
SB-1
SB-2
SOLTHEA SALON & BEAUTY SUPPLY
1383 MacArthur Boulevard
1395 MacArthur Boulevard
B51 170
VP-47 1,400
993 ESTUDILLO AVENUE
FENCE LINE
ST JAMES LUTHERAN CHURCH PARKING LOT
B53 350
B52 260
B55 1,700
VP-40 17,000
CURRENT DRY CLEANERS
SIDEWALK
JOAQUIN AVENUE
VACANT LOT
GRAND AVENUE
B61 210
B62 <100
N
SCALE
0 25 50
FEET
LATERAL EXTENT OF PCE IN SOIL-VAPOR - 5 FEET BSG
SWISS VALLEY CLEANERS
1395 MACARUTHER BOULEVARD
SAN LEANDRO, CALIFORNIA
Advanced GeoEnvironmental, Inc.
www.advgeoenv.com
PROJECT NO. AGE 12-2461
FILE: FILE
DATE: MAY 2014
DRAWN BY: MAC
FIGURE: 4

LEGEND

▲ PROPOSED SOIL-VAPOR SAMPLING LOCATIONS

PROPOSED OFFSITE BORING LOCATIONS

SWISS VALLEY CLEANERS
1395 MacArthur Boulebard
SAN LEANDRO, CALIFORNIA

Advanced GeoEnvironmental, Inc.
www.advgeoenv.com

PROJECT NO. AGE 12-2461	FILE:	FIGURE: 5
DATE: OCTOBER 2015	DRAWN BY: MAC	

TABLES

TABLE 1

ANALYTICAL RESULTS OF SOIL-VAPOR SAMPLES
Swiss Valley Cleaners
1395 MacArthur Boulevard, San Leandro, California
(micrograms per cubic meter)

Sample ID	Date	Depth (feet bsg)	EPA Method 8260B						
			PCE	TCE	1,1-DCE	Trans 1,2-DCE	Cis 1,2-DCE	VC	Chloroform
V-1	05-08-2013	5	**29,000**	<2	<2	<2	<2	<2	<1
V-2	05-08-2013	5	**23,000**	<2	<2	<2	<2	<2	<1
V-3	05-08-2013	5	**15,000**	<2	<2	<2	<2	<2	<1
VP-1 (1 puge volume)	10-15-2013	5	**33,000**	<100	<100	<100	<100	<100	<100
VP-1 (3 purge volumes)	10-15-2013	5	**33,000**	<100	<100	<100	<100	<100	<100
VP-1 (10 purge volumes)	10-15-2013	5	**33,000**	<100	<100	<100	<100	<100	<100
VP-2	10-15-2013	5	**27,000**	<100	<100	<100	<100	<100	<100
VP-3	10-15-2013	3	**13,000**	<100	<100	<100	<100	<100	<100
VP-4	10-15-2013	5	**43,000**	<100	<100	<100	<100	<100	<100
VP-5	10-15-2013	5	**4,400**	<100	<100	<100	<100	<100	**240**
VP-6	10-15-2013	5	**36,000**	<100	<100	<100	<100	<100	<100
VP-7	10-15-2013	5	**39,000**	<100	<100	<100	<100	<100	<100
VP-7 (dup)	10-15-2013	5	**37,000**	<100	<100	<100	<100	<100	<100
VP-8	10-15-2013	5	**67,000***	<100	<100	<100	<100	<100	<100
VP-9	10-16-2013	5	**42,000**	<100	<100	<100	<100	<100	<100
VP-10	10-16-2013	5	**54,000***	<100	<100	<100	<100	<100	<100
VP-11	10-16-2013	5	**110,000**	<100	<100	<100	<100	<100	<100
VP-12	10-16-2013	5	**95,000**	<100	<100	<100	<100	<100	<100

TABLE 1

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Sample ID	Date	Depth (feet bsg)	EPA Method 8260B						
			PCE	TCE	1,1-DCE	Trans 1,2-DCE	Cis 1,2-DCE	VC	Chloroform
VP-13	10-16-2013	5	**80,000**	<100	<100	<100	<100	<100	<100
VP-14	10-16-2013	5	**55,000**	<100	<100	<100	<100	<100	<100
VP-14 (dup)	10-16-2013	5	**57,000**	<100	<100	<100	<100	<100	<100
VP-15	10-16-2013	5	**83,000**	<100	<100	<100	<100	<100	<100
VP-16	10-16-2013	5	**110,000**	<100	<100	<100	<100	<100	<100
VP-17	10-16-2013	5	**80,000**	<100	<100	<100	<100	<100	<100
VP-18	10-16-2013	5	**95,000**	<100	<100	<100	<100	<100	<100
VP-19	10-16-2013	5	**76,000**	<100	<100	<100	<100	<100	<100
VP-20	not completed								
VP-21	10-17-2013	5	**100,000**	<100	<100	<100	<100	<100	<100
VP-22	10-17-2013	5	**110,000**	<100	<100	<100	<100	<100	<100
VP-23	10-17-2013	5	**77,000**	<100	<100	<100	<100	<100	<100
VP-24	10-17-2013	3	**400,000**	<100	<100	<100	<100	<100	<100
VP-25	10-17-2013	5	**190,000**	<100	<100	<100	<100	<100	<100
VP-26	10-17-2013	5	**84,000**	<100	<100	<100	<100	<100	<100
VP-27	10-17-2013	5	**100,000**	<100	<100	<100	<100	<100	<100
VP-28	10-17-2013	5	**110,000**	<100	<100	<100	<100	<100	<100
VP-29	10-17-2013	5	**50,000**	<100	<100	<100	<100	<100	<100

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(micrograms per cubic meter)

Sample ID	Date	Depth (feet bsg)	EPA Method 8260B						
			PCE	TCE	1,1-DCE	Trans 1,2-DCE	Cis 1,2-DCE	VC	Chloroform
VP-30	10-17-2013	5	**1,200**	<100	<100	<100	<100	<100	<100
VP-31	10-18-2013	5	**100,000**	<100	<100	<100	<100	<100	<100
VP-32	10-18-2013	5	**2,500**	<100	<100	<100	<100	<100	<100
VP-32 (dup)	10-18-2013	5	**2,100**	<100	<100	<100	<100	<100	<100
VP-33	10-18-2013	5	**18,000**	<100	<100	<100	<100	<100	<100
VP-34	10-18-2013	5	**20,000**	<100	<100	<100	<100	<100	<100
VP-35	10-18-2013	5	**14,000**	<100	<100	<100	<100	<100	<100
VP-36	10-18-2013	5	**5,900**	<100	<100	<100	<100	<100	<100
VP-37	10-18-2013	5	**14,000**	<100	<100	<100	<100	<100	<100
VP-38	10-18-2013	5	**37,000**	<100	<100	<100	<100	<100	<100
VP-39	10-18-2013	5	**24,000**	<100	<100	<100	<100	<100	<100
VP-40	10-18-2013	5	**17,000**	**220**	<100	<100	<100	<100	<100
VP-41	05-05-2014	5	**7,300**	<100	<100	<100	<100	<100	<100
VP-42	05-05-2014	5	**14,000**	<100	<100	<100	<100	<100	<100
VP-43	05-05-2014	5	**32,000**	<100	<100	<100	<100	<100	<100
VP-43 (dup)	05-05-2014	5	**30,000**	<100	<100	<100	<100	<100	<100
VP-44	05-05-2014	5	**38,000**	<100	<100	<100	<100	<100	<100
VP-45	05-06-2014	5	**1,200**	<100	<100	<100	<100	<100	<100

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1395 MacArthur Boulevard, San Leandro, California
(micrograms per cubic meter)

Sample ID	Date	Depth (feet bsg)	EPA Method 8260B						
			PCE	TCE	1,1-DCE	Trans 1,2-DCE	Cis 1,2-DCE	VC	Chloroform
VP-46	05-06-2014	5	**24,000**	<100	<100	<100	<100	<100	<100
VP-46 (dup)	05-06-2014	5	**21,000**	<100	<100	<100	<100	<100	<100
VP-47	05-07-2014	5	**1,400**	<100	<100	<100	<100	<100	<100
VP-48	05-07-2014	5	**3,400**	<100	<100	<100	<100	<100	<100
VP-49	05-07-2014	5	**3,000**	<100	<100	<100	<100	<100	<100
VP-50	05-07-2014	5	**570**	<100	<100	<100	<100	<100	<100
VP-51	05-07-2014	5	**2,100**	<100	<100	<100	<100	<100	<100
VP-52	05-07-2014	5	**1,300**	<100	<100	<100	<100	<100	<100
VP-52 (dup)	05-07-2014	5	**1,500**	<100	<100	<100	<100	<100	<100
B46-Vapor	02-10-2015	3	**1,400**	<250	<250	<250	<250	<250	<250
B47-Vapor	02-10-2015	3	**800**	<250	<250	<250	<250	<250	<250
B48-Vapor	02-10-2015	3	**410**	<250	<250	<250	<250	<250	<250
B49-Vapor	02-10-2015	3	**440**	<250	<250	<250	<250	<250	<250
B50-Vapor	02-10-2015	3	**1,500**	<250	<250	<250	<250	<250	<250
B51-Vapor	02-26-2015	5	**170**	<100	<100	<100	<100	<100	<100
B52-Vapor	02-26-2015	5	**260**	<100	<100	<100	<100	<100	<100
B53-Vapor	02-26-2015	5	**350**	<100	<100	<100	<100	<100	<100
B54-Vapor	02-26-2015	5	**1,300**	<100	<100	<100	<100	<100	<100

TABLE 1

ANALYTICAL RESULTS OF SOIL-VAPOR SAMPLES
Swiss Valley Cleaners
1395 MacArthur Boulevard, San Leandro, California
(micrograms per cubic meter)

Sample ID	Date	Depth (feet bsg)	EPA Method 8260B						
			PCE	TCE	1,1-DCE	Trans 1,2-DCE	Cis 1,2-DCE	VC	Chloroform
B55-Vapor	02-26-2015	5	**1,700**	<100	<100	<100	<100	<100	<100
B55-Vapor (dup.)	02-26-2015	5	**1,700**	<100	<100	<100	<100	<100	<100
B56-Vapor	02-27-2015	5	**36,000**	<100	<100	<100	<100	<100	<100
B58-Vapor	02-27-2015	5	**68,000**	<100	<100	<100	<100	<100	<100
B58-Vapor (dup.)	02-27-2015	5	**70,000**	<100	<100	<100	<100	<100	<100
B59-Vapor	02-27-2015	5	**18,000**	<100	**140**	<100	<100	<100	<100
B60-Vapor	03-10-2015	5	<100	<100	<100	<100	<100	<100	<100
B61-Vapor	03-10-2015	5	**210**	<100	<100	<100	<100	<100	<100
B62-Vapor	03-10-2015	5	<100	<100	<100	<100	<100	<100	<100
B63-Vapor	03-10-2015	5	<100	<100	<100	<100	<100	<100	<100
B63-Vapor (dup.)	03-10-2015	5	<100	<100	<100	<100	<100	<100	<100
CHHSLs (Residential)			180	528	-	31,900	15,900	13.3	-
SFBRWCB ESL Shallow Soil Gas (Commercial)			2,100	3,000	100,000	260,000	-	16	230
SFBRWCB ESL Shallow Soil Gas (Residential)			210	300	880,000	31,000	-	160	2,300

Notes:
SFBRWCB ESL: San Francisco Bay Regional Water Quality Control Board Environmental Screening Level for shallow soil gas
<: Indicates constituents were not detected at a concentration greater than the reporting limit shown.
CHHSLs: California Human Health Screening Levels
PCE: Tetrachloroethene
TCE: Trichloroethene
1,1-DCE: 1,1-Dichloroethene
Trans 1,2-DCE: Trans 1,2-Dichloroethene
Cis 1,2-DCE: Cis 1,2-Dichloroethene
VC: Vinyl Chloride
bsg: below surface grade
* : notation for detection above the liner range of calibration

APPENDIX A

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
ALEX BRISCOE, Agency Director

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
1131 Harbor Bay Parkway, Suite 250
Alameda, CA 94502-6577
(510) 567-6700
FAX (510) 337-9335

August 11, 2015

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

Subject: Draft Corrective Action Plan 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 Environmental Health (ACEH) has reviewed the *Site Assessment Report,* dated May 19, 2015, prepared and submitted on your behalf by Advanced GeoEnvironmental, Inc, (AGE). The report also includes a *Remedial Action Work Plan* as an appendix to the report. Thank you for submitting the report.

The referenced report documents the installation of shallow soil bores B46 to B63 at the subject site and at the downgradient adjacent property in order to delineate the lateral extent of tetrachlorethene (PCE) concentrations. The work was predominately successful in defining the extent of soil vapor to commercial Environmental Screening Levels (ESLs), promulgated by the San Francisco Bay Regional Water Quality Control Board (RWQCB) but was not fully successful in defining the ESLs to residential concentrations in a limited area along the downgradient property line.

The *Remedial Action Work Plan* portion of the report proposed the installation of 17 vapor wells to augment the existing four vapor extraction wells installed for the pilot study. With relatively minor modifications, the work appears appropriate.

Therefore, 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. **Remedial Action Work Plan Modifications –** The referenced Remedial Action Work Plan (RA WP) proposes a series of actions with which ACEH is in general agreement of undertaking; however, ACEH requests modifications to the approach as discussed below. Please submit a report by the date specified below.

    a. **Contingent Work Plan Approval –** In order to move the project forward, this letter provides contingent approval of the installation of infrastructure required to operate the Soil Vapor Extraction (SVE) system; however, approval of system activation 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. Towards that goal, ACEH requests the concurrent generation of a Draft Corrective Action Plan (Draft CAP) as communicated in previous directive letters, and below. Please be aware that some risk is involved in the installation of system infrastructure prior to completion of the required public comment period; however, this may be an acceptable situation to you.

2. **Draft Corrective Action Implementation Plan –** A Draft CAP is required to evaluate feasible alternatives for the site and to recommend final alternatives in accordance with DTSC guidelines. As indicated above, an important additional aspect of the Draft CAP is to provide a single principal document for members of the public to review and comment on during the public comment period.

   Therefore, ACEH requests that you prepare a Draft CAP, concurrent with the installation of SVE infrastructure 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.
   - Implementation of the selected corrective action.
   - System piping and plumbing figures.
   - Detailed description of proposed remediation including confirmation sampling and monitoring during implementation.
   - Post-remediation monitoring.
   - Schedule for CAP implementation of cleanup including adequate ACEH review periods.

   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. **Fact Sheet for Public Notification of Corrective Actions –** Public participation is a requirement for the Corrective Action Plan process to notify potentially affected stakeholders who live or own property in the surrounding area of the proposed remediation. We request that you submit a Draft Fact Sheet for ACEH review. Upon ACEH approval of a Draft Fact Sheet, we will request that you send the Fact Sheet to an address list provided by ACEH. Public comments on the proposed remediation will be accepted for a 30-day period. Following the end of the public comment period, any comments received including ACEH's comments described below, must be addressed and incorporated into a Final CAP.

4. **Work Plan Request for Downgradient Delineation of Vapor Plume –** Delineation of the lateral extent of the PCE vapor plume does not appear to have been achieved adjacent to the residential properties north of 993 Estudillo Avenue. Concentrations of PCE up to 3,400 µg/m^3 are present along this property line. It appears appropriate to define the lateral extent of the plume in this area concurrent with generation of the CAP or the presumed vapor extraction well installations. The lateral extent of delineation may affect the number and location of vapor extraction wells in this area of the site. Existing protocols, in conjunction with figures depicting proposed bore locations, can be used to minimize work plan response times.

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:

- **October 16, 2015 –** Draft Corrective Action Plan
  File to be named: RO3120_CAP_R_yyyy-mm-dd

- **October 16, 2015 –** Work Plan
  File to be named: RO3120_WP_R_yyyy-mm-dd

- **October 16, 2015 –** Draft Fact Sheet
  Delivered by electronic email to Case Worker

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.