

From: [Detterman, Karel, Env. Health](#)
To: "Reza Sheikhai"
Cc: "Bob Clark-Riddell"; rick.pak@myopenbank.com; stephen.kang@myopenbank.com; [Roe, Dilan, Env. Health](#)
Subject: RO3163 Site Cleanup Program (SCP) RO0003163 and GeoTracker Global ID T10000006546, Elegant Cleaners, 1208 Lincoln Avenue, Alameda, CA
Date: Thursday, February 18, 2016 2:58:12 PM
Attachments: [DIR_L_2015-05-29.pdf](#)
[DIR_L_2015-11-04.pdf](#)
[Attachment_1_and_ftpUploadInstructions_2014-05-15.pdf](#)

Hello Mr. Sheikhai:

We understand that you have retained a new environmental consultant, Pangea Environmental Services, Inc. (Pangea) regarding the above referenced case. Mr. Bob Clark-Riddell, P.E. of Pangea contacted us regarding next steps at the site. With this e-mail, we are forwarding to Mr. Clark-Riddell our two Directive Letters dated May 29, 2015 and November 4, 2015 describing the requested Work Plan and Site Conceptual Model and a new submittal deadline. We look forward to making progress on this case.

TECHNICAL REPORT REQUEST

Please upload the final technical report to the ACEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with Attachment 1 and the following specified file naming convention and schedule:

- April 22, 2016 – Data Gap Investigation Work Plan and Site Conceptual Model
File to be named: RO3163_WP_SCM_R_yyyy-mm-dd

Online case files are available for review at the following website:

<http://www.acgov.org/aceh/lop/ust.htm>

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please send me an e-mail message at karel.detterman@acgov.org or call me at (510) 567-6708.

Karel Detterman, PG
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
Direct: 510.567.6708
Fax: 510.337.9335
Email: karel.detterman@acgov.org

PDF copies of case files can be downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>

From: [Roe, Dilan, Env. Health](#)
To: Cpareza@aol.com
Cc: stephen.kang@myopenbank.com; [Detterman, Karel, Env. Health](#); dave@ddfagala.com
Subject: Site Cleanup Program (SCP) R00003163 and GeoTracker Global ID T10000006546, Elegant Cleaners, 1208 Lincoln Avenue, Alameda, CA
Date: Wednesday, November 04, 2015 7:05:50 PM
Attachments: [Attachment A SCM Table and Pref Path Study.pdf](#)

Dear Mr. Sheikhai:

Alameda County Department of Environmental Health (ACEH) has reviewed the document entitled *Technical Report Workplan – Remedial Investigation for Soil, Groundwater (Work Plan)*, dated July 30, 2015 prepared by Dave Drilling Environmental Engineering, Inc. (DDEE) for the subject site in conjunction with the documents in the case file. As discussed with you on the phone, ACEH is unable to approve the Work Plan as presented due to a lack of requisite documentation to support the proposed field investigation activities.

Therefore, at this juncture ACEH requests that you prepare a revised Data Gap Investigation Work Plan that is supported by a Site Conceptual Model (SCM) to address the identified data gaps discussed during our May 21, 2015 meeting and documented in our May 29, 2015 Directive Letter. The SCM is a fundamental element of a comprehensive site investigation and establishes the source and attributes of the unauthorized release, describes all affected media (including soil, groundwater, and soil vapor as appropriate), describes local geology, hydrogeology and other physical site characteristics that affect contaminant environmental transport and fate, and identifies all confirmed and potential contaminant receptors (including water supply wells, surface water bodies, structures and their inhabitants). The SCM is relied upon by practitioners as a guide for investigative design and data collection. All relevant site characteristics identified by the SCM shall be assessed and supported by data so that the nature, extent and mobility of the release have been established to determine conformance with applicable criteria in the is policy. Please see Attachment A, *SCM Table* and *Preferential Pathway* for additional discussion on the requisite elements of an SCM.

To facilitate review, ACEH requests the SCM be presented in a tabular format that highlights the major SCM elements and associated data gaps, which need to be addressed to progress the site to case closure. Table 4-1 in Attachment A provides an example of a tabular SCM for your reference. The SCM must be supported with figures and tables consolidating and presenting all historical soil, soil gas, and groundwater data collected during all previous site investigations and proposed locations for collection of additional samples. The tables must include sample dates, depths, and the laboratory detection limits for “Non-Detect” (ND) results.

Please also prepare a *Data Gaps Summary and Proposed Investigation Table* in the Data Gap Investigation Work Plan that correlates to the data gap numbering in the tabular SCM (please see Table 5-1 in Attachment A for an example). Please sequence activities in the proposed Data Gap Investigation scope of work to enable efficient data collection in the fewest mobilizations possible. Additionally, data quality objectives including use of laboratory method detection limits below the relevant environmental screening levels and standard operating procedures (SOPs) for all proposed sampling activities must be included in the work plan. SOPs for the collection and analysis of soil gas samples must be in accordance with the Department of Toxic Substances Control guidance.

Please submit the revised work plan to ACDEH by **December 11, 2015**. Please note that although I was filling in for Karel Detterman while she was out on medical leave, she has returned to the office and is the primary caseworker for this site. Please direct all communication to her, and copy me going forward.

Thank you,

Dilan Roe, P.E.

Program Manager - Land Use & Local Oversight Program

Alameda County Environmental Health

1131 Harbor Bay Parkway

Alameda, CA 94502

510.567.6767; Ext. 36767

QIC: 30440

dilan.roe@acgov.org

PDF copies of case files can be reviewed/downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>

From: Detterman, Karel, Env. Health

Sent: Wednesday, November 04, 2015 4:25 PM

To: Roe, Dilan, Env. Health <Dilan.Roe@acgov.org>

Subject: Site Cleanup Program (SCP) RO3163 and GeoTracker Global ID T10000006546, Elegant Cleaners, 1208 Lincoln Avenue, Alameda, CA

Hi Dilan:

Karel Detterman, PG

Hazardous Materials Specialist

Alameda County Environmental Health

1131 Harbor Bay Parkway

Alameda, CA 94502

Direct: 510.567.6708

Fax: 510.337.9335

Email: karel.detterman@acgov.org

PDF copies of case files can be downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>



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

May 29, 2015

Mr. Reza Sheikhai
Elegant Cleaners
1208 Lincoln Avenue
Alameda, CA 94501-2326
(Sent via e-mail to: cpareza@aol.com)

Subject: Technical Report Request for Site Cleanup Program Case Number RO0003163 and
GeoTracker Global ID T10000006546, Elegant Cleaners, 1208 Lincoln Avenue, Alameda, CA

Dear Mr. Sheikhai:

Thank you for attending the meeting at Alameda County Environmental Health (ACEH) offices on May 21, 2015 for a discussion of the *Phase III Environmental Site Assessment* (Phase III) dated January 14, 2015, prepared for Open Bank by ENCON Solutions, Inc. (ENCON). ACEH understands that the Phase III was prepared in conjunction with a property transaction. The report summarizes data and findings from previous site investigations which are documented in the 2006 *Phase II Subsurface Investigation* prepared by ERAS Environmental, Inc. (ERAS), a January 2013 *Phase I Environmental Site Assessment* prepared by ERAS, and an August 2014 *Phase II Limited Soil Gas Survey* prepared by ENCON. The building was built approximately 100 years ago, was occupied by various retail businesses until 1986 when it was used as a dry cleaner that utilized Tetrachloroethene (PCE). In approximately 2005 the dry cleaning operations began using a hydrocarbon-based system and discontinued use of PCE. Based on our meeting, to advance your case to site closure, ACEH requests that you prepare a Work Plan to address the identified technical comments discussed during our meeting and summarized in the following Technical Comments. Please address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

1. **Technical Comments and Meeting Discussion Topics:**
 - a. **Description of Immediate Land Use:** Please provide a description supported by a figure, of the immediately land use of the adjacent neighboring property land use including, but limited to, the usage of the second story of the dry cleaner building and adjacent buildings.
 - b. **Map and Bar Scale:** Please note that all report figures must be to scale and must have a scale bar. This is to enable figures to be copied, enlarged, or reduced without losing the scale.
 - c. **Soil Sample Collection:** For any proposed soil sample collection, ACEH requests soil sample collection and analysis from depths less than 5 feet and within the 5 to 10 foot interval, the capillary fringe, saturated zone, stained interval(s), areas with elevated Photoionization Detector (PID) readings, and the bottom of the soil boring. Please collect soil analytical data for soil samples collected in suspected PCE high-use areas and areas of documented elevated soil vapor concentrations. ACEH requests soil sample collection below or at first encountered groundwater based on indications of contamination (PID detections, odor, staining, or etc.). If visual indications are not encountered, please

collect soil samples at or just above the soil – water interface and the bottom of the boring. Please ensure that the analytical results determine the vertical and horizontal extent of VOC impacts at the site; please include PID readings at the corresponding depths on all future boring logs.

- d. **Eco-Friendly Dry Cleaning:** PCE was used for dry cleaning from 1986 to 2005 then the dry cleaning process was changed use “Eco-Friendly” chemicals, i.e., “hydrocarbon”. Please provide the chemical composition of the “Eco-Friendly” hydrocarbon chemicals and assess the need to analyze for the “Eco-Friendly” hydrocarbon chemicals in soil samples a minimum of one time.
 - e. **Heating, Ventilation, and Air Conditioning (HVAC):** It was unclear from ENCON’s August 2014 *Phase II Limited Soil Gas Survey* if the HVAC was turned off during Indoor Air (IA) sampling event, which would represent a worse-case scenario and is consistent with Department of Toxic Substances Control (DTSC’s) Guidance document, the October 2011 *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air*. Please determine the sampling procedure used during the August 2014 event.
 - f. **California Human Health Screening Levels (CHHSLs):** Please be aware that the *California Human Health Screening Levels* (CHHSLs) are out of date and no longer used. The San Francisco Bay Regional Water Quality Control Board (SFBRWQCB’s) Environmental Screening Levels (ESLs) are currently used, but also be aware that closure to ESLs may not be required. Alternative cleanup goals can be supported by the SFBRWQCB’s draft Final July 31, 2009 *Assessment Tool for Closure of Low-Threat Chlorinated Solvent Sites*.
 - g. **Former Dry Cleaner Machine Location:** Please map the locations of the old dry cleaner machine and associated dry cleaner components as described in the State Coalition for Remediation of Drycleaners *Conducting Contamination Assessment Work at Drycleaning Sites* Revised October 2010 at <http://www.drycleancoalition.org/>
 - h. **Onsite PCE Uses:** In an effort to locate PCE source areas, please identify likely PCE use areas such as delivery and/or storage areas where spills/leaks/discharges could have occurred. Please determine the former use(s) of the rear yard to clarify why SV-5 detected the maximum PCE (22,480 ug/m³) soil gas concentration at 5 feet below ground surface (bgs).
2. **General ACEH comments on the Phase III Report, Section 6.0 Conclusions: Objective 1, Indoor Air Quality:**
- a. ACEH does not agree that the crawl space provides an attenuation factor due to spaces between wood flooring.
 - b. Epoxy coating provides mitigation only, not remediation. ACEH requires that remediation must be accomplished.
 - c. Objective 2: SVE may be an acceptable method, after PCE source areas are better defined.
 - d. Objective 3: Additional shallow sample soils (0 to 5’ bgs) are needed for vertical PCE delineation.
 - e. Objective 4: Please conduct additional groundwater delineation including underground utility survey and depths of utilities.
3. **General ACEH comments on the Phase III Report, Section 7.0, Recommendations:**
- a. Installation of downgradient groundwater monitoring wells appear reasonable; alternatively, it may be possible to delineate the groundwater plume with a soil boring and/or grab groundwater transect placed on 15-20 foot centers, followed by select well

Mr. Reza Sheikhai
RO0003163
May 29, 2015, Page 4

- 6. Request for documentation:** Please forward copies of any other reports or correspondence related to environmental investigations for this site including, but limited to, ERAS's 2006 and 2013 Reports and ENCON's August 2014 Reports as we discussed in the meeting, by the date listed below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **June 30, 2015** – Claim site in Geotracker
- **June 30, 2015** – Upload Correspondence and/or Reports
Files to be named: RO3163_MISC_R_yyyy-mm-dd
- **July 31, 2015** – Soil and Groundwater Investigation Work Plan
File to be named: RO3163_WP_R_yyyy-mm-dd

Online case files are available for review at the following website: <http://www.acgov.org/aceh/lop/ust.htm>

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 567-6708 or send me an e-mail message at karel.detterman@acgov.org

Sincerely,

Karel Detterman, PG
Hazardous Materials Specialist

Enclosures: Attachment 1 Responsible Party(ies) Legal Requirements/Obligations
ACEH Electronic Report Upload (ftp) Instructions

cc: Dave Fagorala, DDEE, (Sent via E-mail to: fagala@outlook.com)
Dilan Roe, ACEH (Sent via E-mail to: dilan.roe@acgov.org)
Karel Detterman, ACEH (Sent via E-mail to: karel.detterman@acgov.org)
GeoTracker, Electronic Case 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.