



October 31, 2018

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

Subject: Work Plan Approval 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 a meeting at Alameda County Department of Environmental Health's (ACDEH's) office on October 3, 2018 attended by yourself, Bob Clark-Riddell and Morgan Gillies of Pangea, your consultant, and ACDEH staff. The purpose of the meeting was to discuss the October 9, 2017 *Data Gap Investigation Report* (Report), prepared and submitted on your behalf by Pangea and the next steps to progress the case to closure. ACDEH understands that the property is currently in use as a dry cleaner utilizing a hydrocarbon-based dry cleaning machine (DF 2000) since 2005 and redevelopment is not under consideration.

ACDEH's highest priority is to assess the potential for vapor intrusion (VI) to indoor air (IA) risk to nearby residential properties and secondly, to define the off-site PCE plume. Please prepare a brief work plan as described below and submit by the following date.

TECHNICAL COMMENTS

The Elegant Cleaners source area for groundwater and vapor appears to be located in the rear of the Elegant Cleaners building, the location of the dry cleaner machine, and behind the building in the unpaved parking lot. The Report's attached Figure 4, *PCE in Groundwater March 2017*, and Figure 5, *PCE in Subslab/Soil Gas, March 2017*, documented the existence of tetrachloroethene (PCE) in both groundwater and soil vapor on-and off-site. Three site groundwater monitoring wells located in the unpaved parking lot behind the Elegant Cleaners building detected a maximum of 43 ug/L PCE in April 2016. Grab groundwater samples B-4 through B-7 were collected in Lincoln Avenue; B-5 detected 360 micrograms per liter (ug/L) PCE. The extent of PCE in groundwater is undefined to the west and east of the source area, beneath the contiguous store front businesses on either side of the Elegant Cleaners building.

The extent of the PCE vapor cloud is undefined in all directions of Elegant Cleaners, as indicated by Vapor Well (VW)-1, sub-slab (SS)-2, and SS-3. A 30-day Soil Vapor Extraction Pilot Test was run August 21, 2017 to September 22, 2017 on Soil Vapor Extraction (SVE)-1 and SVE-2 located in the source area.

A. Immediate Actions: During the October 3, 2018 meeting, ACDEH verbally requested immediate implementation of the following actions without submittal of a Work Plan and prior to issuing the Directive Letter. Data is to be included with the report requested below.

1. Conduct a groundwater monitoring and sampling event as soon as possible to obtain dry season data.
2. Collect a soil gas sample from SG-2 located in the unpaved alley adjacent to the 1544 Bay Street residence as soon as possible to assess risk to crawl space;
3. Collect indoor air (IA) and sub-slab (SS) in 1208 Lincoln Avenue SS (site building) as soon as possible.

- B. Post Directive Letter Actions:** Please prepare a Work Plan comprised of figures, tables, a brief summary, and Standard Operation Procedures (SOPs) addressing the following meeting discussion topics:
- a. Compare and overlay the Report's Figure 4, *PCE in Groundwater March 2017*, and Figure 5, *PCE in Subslab/Soil Gas* and calculate estimated groundwater concentrations;
 - b. Conduct a Sensitive Receptor Survey including the following. Please plot the results of the well survey, sensitive receptor identification, and underground utility survey on an aerial photography-based figure and provide a table listing the numbered location.
 - i. A 1,500-foot radius well survey using both Alameda County Public Works Agency (ACPWA) and Department of Water Resources (DWR) well data base for a complete inventory of vicinity water supply wells. The ACPWA and DWR data bases provide dissimilar results which necessitate review of both data bases. ACDEH requests the identification and location on a site vicinity figure of all irrigation, water supply, domestic, industrial, and dewatering wells within a 1,500-foot radius of the site.
 - ii. Sensitive Receptor Identification: Please identify on one figure the beneficial resources and other sensitive receptors including, but not limited to, surface water bodies, natural resources, schools, hospitals, day care centers, elder care facilities, etc.
 - iii. Underground Utility Survey: Please include the results of an on-and off-site underground utility survey including depths to the underground utilities.
 - iv. Please confirm zoning with the City of Alameda;
 - c. Update the Site Conceptual Model using all historical and current soil, soil gas, and groundwater data, including groundwater monitoring data from the nearby closed fuel leak case RO000086, Former Texaco Station, 1127 Lincoln Avenue;
 - d. Perform quality assurance review on indoor air data from the 2014 Indoor Air sampling event included in the January 14, 2015 *Phase III Environmental Site Assessment* prepared by ENCON Solutions, Inc., including leak detection and the number of hours sampled;
 - e. Collect of soil vapor extraction pilot test rebound samples;
 - f. Summarize in a table the following information for each adjacent commercial and residential building:
 - i. The number of stories of each building;
 - ii. Heating Ventilation Air Conditioning (HVAC) configuration of each building;
 - iii. Building configurations;
 - iv. Foundation types and foundation depths of each building;
 - v. Surrounding building use and business hours;
 - g. Propose to install SV and/or SS probes behind the Elegant Cleaners building to assess soil vapor risk:
 - i. 1542 Bay Street
 - ii. 1544 Bay Street
 - iii. 1545 Sherman Street
 - iv. 1539 Sherman Street
 - h. Install of a monitoring well in Lincoln Avenue;

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PROPOSED SCHEDULE

The following is an estimated schedule of proposed actions as discussed in during the meeting:

1. Now (ASAP): Conduct immediate action items and summarize;
2. November 2018 Meeting: Submit Work Plan and discuss results of immediate action items;
3. December 2018 Meeting: Discuss offsite data and proposed Corrective Action Plan (CAP)
4. January 2019: Submit Corrective Action Plan
5. April 2019: Implementation of CAP
6. Fall 2020: Rebound Testing

TECHNICAL REPORT REQUEST

Please upload technical reports to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule and send an e-mail with the report attached to: karel.detterman@acgov.org:

- **November 13, 2018:** Vapor Intrusion and PCE Plume Definition and Updated SCM Work Plan
File to be named: RO3163_WP_SCM_R_yyyy-mm-dd

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.

Sincerely,

Karel Detterman, PG
Senior Hazardous Materials Specialist

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

Attachment A: Figure 4, *PCE in Groundwater March 2017*, and Figure 5, *PCE in Subslab/Soil Gas, Data Gap Investigation Report, Pangea*, October 9, 2017

cc: Bob Clark-Riddell; Pangea, 1710 Franklin Street, Suite 200, Oakland, CA 94612 (Sent via E-mail to: briddell@pangeaenv.com)

Morgan Gillies; Pangea, 1710 Franklin Street, Suite 200, Oakland, CA 94612 (Sent via E-mail to: mjillies@pangeaenv.com)

Dilan Roe, ACDEH, (Sent via E-mail to: dilan.roe@acgov.org)
Karel Detterman, ACDEH, (Sent via E-mail to: karel.detterman@acgov.org)
Paresh Khatri, ACDEH, (Sent via E-mail to: paresh.khatri@acgov.org)
GeoTracker, eFile

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

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 the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

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 and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

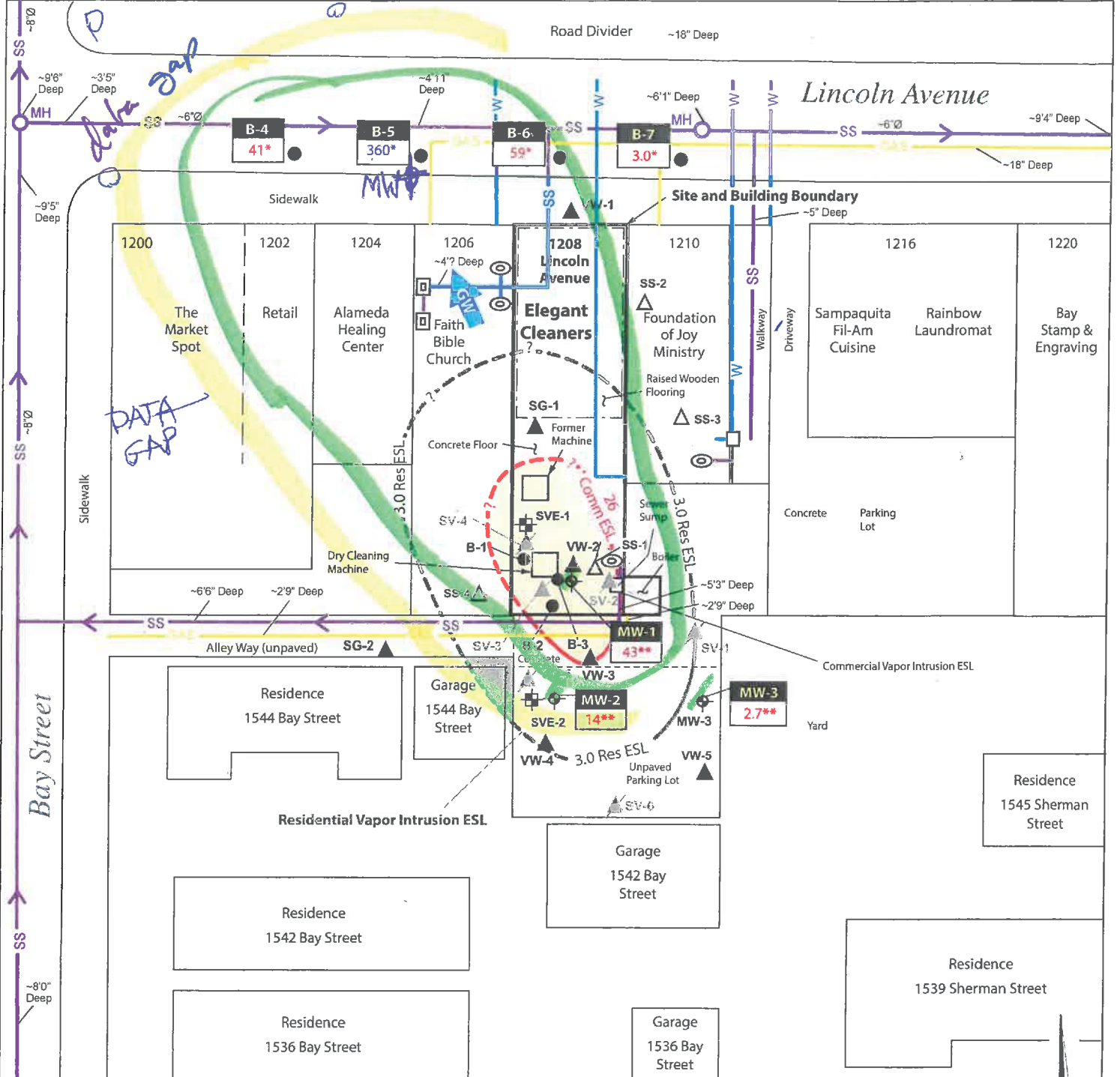
UNDERGROUND STORAGE TANK CLEANUP FUND

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.

IF NEEDED



LEGEND

MW-1	Groundwater Monitoring Well Location		Shaded area is raised wooden flooring
SVE-1	Soil Vapor Extraction Well		Estimated Groundwater Flow Direction
B-1	Soil Boring Location		Man Hole
SS-1	Subslab Gas Sample Location		Water Line
VW-5	Soil Vapor Well Location		Gas Line
SV-6	Soil Gas Sample Location (former)		Sanitary Sewer
			Sink
			Toilet
			Water Meter

ID
360
 PCE - Tetrachloroethene
 µg/L - Micrograms per Liter

* Grab data not used for contouring
 ** Prior data from April 20, 2016

26
 ESL Environmental Screening Level established by SFRWQCB, February 2016

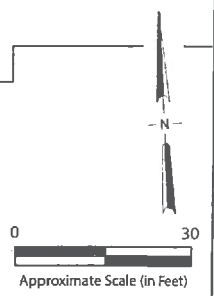
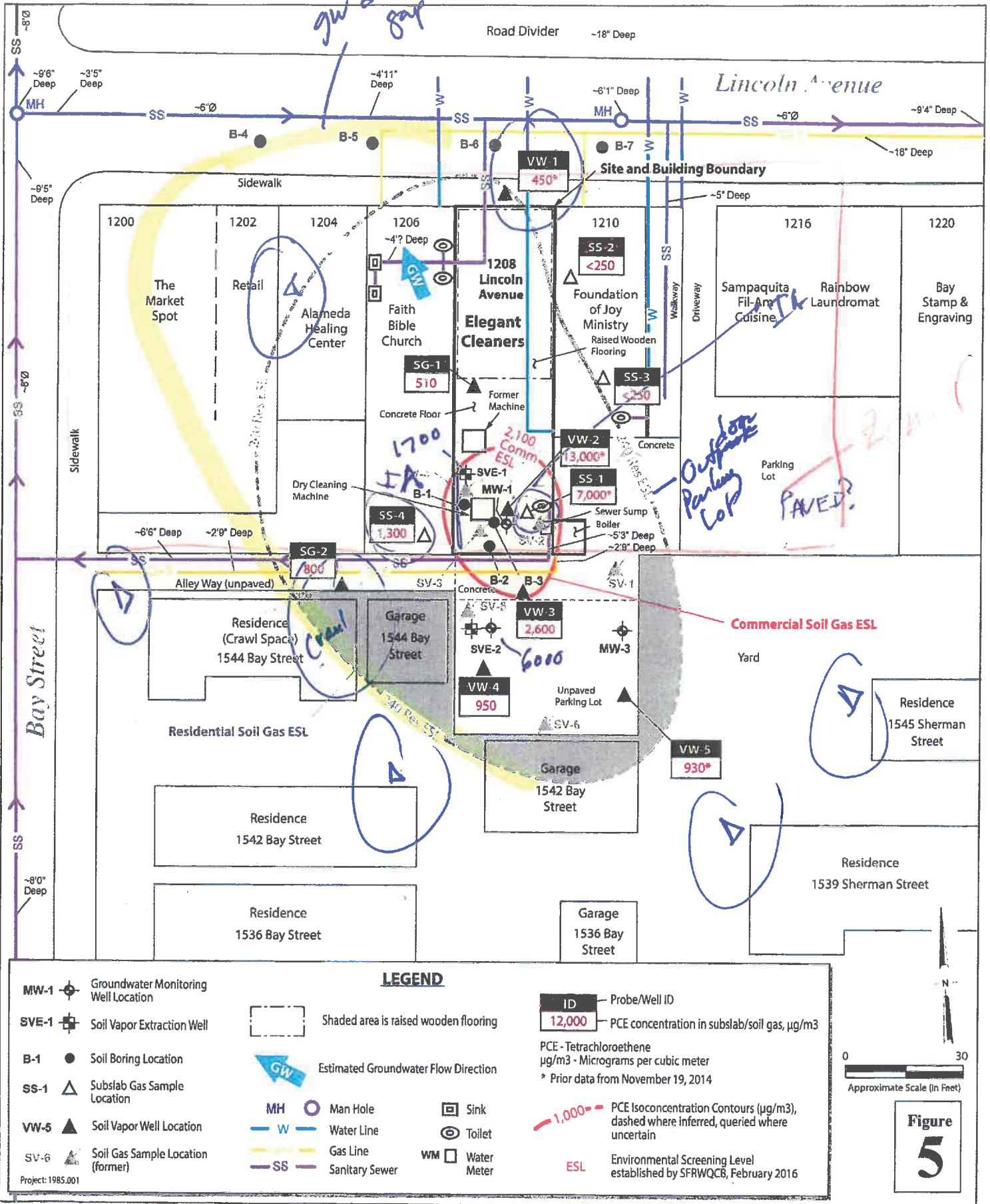


Figure 4

1208 Lincoln Avenue
Alameda, California



PCE in Groundwater,
March 2017



1208 Lincoln Avenue
Alameda, California



PANGEA

PCE in Subslab/Soil Gas,
March 2017

Figure
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