



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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September 24, 2009

Mr. Harold Turner
Snow Cleaners, Inc.
38 Sonora Street W
Stockton, CA 95203

Subject: Fuel Leak Case No. RO0000357 and Geotracker Global ID T0600101294, Snow Cleaners, 2678 Coolidge Avenue, Oakland 94601 – Subsurface Investigation Report

Dear Mr. Turner:

Alameda County Environmental Health (ACEH) staff has reviewed the fuel leak case file for the above-referenced site including the report entitled, "*Subsurface Investigation Report (SG1-SG18, B12, B15-B19, B21-B32, C1-C5, MW3 and MW4)*," dated August 19, 2009 and prepared by P&D Environmental, Inc. The Subsurface Investigation Report presents the results from a site investigation completed between June 30 and September 18, 2008. We note there was a significant delay in submitting these results following completion of field activities. The Subsurface Investigation Report was submitted well beyond the original due date of August 8, 2008 and the requested schedule extension to October 31, 2008. Future work must be completed within the requested time frame or approved schedule extensions.

The Subsurface Investigation Report included both on-site and off-site investigation. Tetrachloroethene (PCE) was detected at concentrations that exceeded screening levels in soil vapor samples collected adjacent to off-site buildings. Further investigation and evaluation of the potential for vapor intrusion in these off-site structures is required. As discussed in the technical comments below, we concur with the recommendations in the Subsurface Investigation Report regarding the need for additional soil, soil vapor, and groundwater sampling. We request that you submit a **Work Plan by November 8, 2009** to implement the recommendations in the Subsurface Investigation Report. You may request a meeting with ACEH to schedule implementation of these activities.

We request that you address the following technical comments, perform the proposed work, and send us the reports described below.

TECHNICAL COMMENTS

- 1. Further Evaluation of Potential Vapor Intrusion.** Based on the estimated cumulative risks associated with the detections of VOCs in soil vapor samples collected from off-site locations, the Subsurface Investigation Report recommends an indoor air study at three buildings on nearby properties. We concur that further evaluation of potential vapor intrusion is required and request that you prepare a Work Plan for sub slab sampling or an indoor air study inside the residential buildings at 3320 Davis Street and 2682 Coolidge Avenue. The Subsurface Investigation Report also recommends an indoor air study for the building at 2621 34th Avenue. However, the estimated risk is based on soil vapor samples collected at 3320 Davis Street. In the Work Plan requested below, please discuss the rationale for proceeding with soil vapor sampling at 2621 34th Avenue prior to the

collection of the soil vapor samples. We request that you present your plans to conduct subslab or indoor air sampling in the Work Plan requested below no later than November 8, 2009.

2. **Proposed Additional Soil Vapor Sampling.** We concur with the recommendation to collect additional soil vapor samples at the locations shown on Figure 3 of the Subsurface Investigation Report to define the extent of VOCs in soil vapor. In the Work Plan requested below, please present a schedule for implementation of the soil vapor sampling and clarify the sampling and analytical methods by referring to the previously submitted September 28, 2008 Work Plan and March 21, 2008 Work Plan Addendum or proposing modified sample collection and analysis methods.
3. **Proposed Soil and Groundwater Sampling.** The proposal to collect soil and groundwater samples at proposed locations B-33 through B38 is acceptable to further define the extent of TPH and VOCs in soil and groundwater in the vicinity of the site is acceptable. In the Work Plan requested below, please present a schedule for implementation of the soil and groundwater sampling and clarify the sampling and analytical methods by referring to the previously submitted September 28, 2008 Work Plan and March 21, 2008 Work Plan Addendum or proposing modified sample collection and analysis methods.
4. **Review of Drawings and Plans Regarding Source of Water Entering Peralta Hacienda Historic Park.** We concur with the recommendation to review the described sources of information regarding the source of water entering the creek going into Peralta Hacienda Historic Park. We note that further information regarding these plans and drawings was provided to ACEH in an email message from Mr. Paul King of P&D Environmental. Please include this information and any additional information obtained in the Work Plan requested below.
5. **Review of Historic Topographic Maps.** We also concur with the recommendation to review historic topographic maps to determine whether a historic drainage channel existed in the current locations of Davis Street. Please include the results of this review in the Work Plan requested below.
6. **Sampling in Peralta Creek.** We concur that no further sampling is required in Peralta Creek at this time.
7. **Groundwater Monitoring.** The proposal to measure water levels on a monthly basis in the existing monitoring wells for a period of one year and to sample existing wells on a semi-annual basis is acceptable. Please present the results in the semi-annual groundwater monitoring reports requested below.
8. **Fact Sheet.** Due to the off-site extent of contamination from your site, public notification of the current status of site investigation activities is necessary. ACEH will prepare a Fact Sheet for distribution to the surrounding residents and land owners.

TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **November 24, 2009** – Work Plan
- **February 8, 2010** – Fourth Quarter 2009 Semi-annual Groundwater Monitoring Report
- **July 8, 2010** – Second Quarter 2010 Semi-annual Groundwater Monitoring Report

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. ACEH notes the discussion of UST Cleanup Fund cost pre-approval in your December 23, 2005 correspondence.

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.swrcb.ca.gov/ust/cleanup/electronic_reporting).

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.

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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.

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org.

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Paul King, P & D Environmental, 55 Santa Clara Avenue, Suite 240, Oakland, CA 94610

Leroy Griffin, Oakland Fire Department, 250 Frank H. Ogawa Plaza, Ste. 3341, Oakland, CA 94612-2032

Donna Drogos, ACEH
Jerry Wickham, ACEH
Geotracker, File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: March 27, 2009
	PREVIOUS REVISIONS: December 16, 2005, October 31, 2005
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

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- 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)

Additional Recommendations

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

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 dehloptoxic@acgov.org
 - Or
 - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of My Le Huynh.
 - 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 and Firefox browsers will not open the FTP site.
 - b) Click on File, then on Login As.
 - 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 dehloptoxic@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.