

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

January 10, 2008

MacArthur Boulevard Associates  
c/o Mr. J. Alec Merriam  
1884 Mountain View Blvd., Suite 200  
Tiburon, CA 94920

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

Dear Mr. Merriam:

Subject: Toxics Case No. RO0002580, Global ID SL18344764, Young's Cleaner, 10700  
MacArthur Blvd., Oakland, CA 94605

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the referenced site including the November 20, 2007 Site Mitigation Plan by AEI Consultants. The report presents conceptual plans for remediation including soil sampling beneath the west half of the proposed day care center, potential soil excavation within this area and installation of a vapor extraction and vapor monitoring system. Such action is required prior to approval of the proposed development of this site. It is noted that the northern half of the former Young's Cleaner site bisects the proposed Head Start day care center. Residual perchloroethylene (perc) and its breakdown products pose a potential health risk to this sensitive site use. We request that you address the following technical comments when performing the proposed work and submit the technical reports requested below.

**TECHNICAL COMMENTS**

1. **Site Characterization-** Due the presence of existing buildings, analytical data from soil, groundwater and soil vapor has been limited in the area of the proposed daycare center. The absence of this data will need to be addressed prior to granting approval to develop this area for the proposed use. Nine soil samples are proposed within the proposed vapor barrier area, however, this represents only half the area for the proposed day care center. Please provide a map indicating the locations of the proposed borings plus propose additional sample locations to cover the other half of the proposed day care center. Specify and explain the media to be sampled, the proposed analyses and the rationale for sample locations. Prior results should be used when considering sampling locations. The data from the site characterization should be evaluated and used in the design of your remediation system including the post-remediation vapor monitoring locations.
2. **Soil Sampling and Contingency Source Excavation-** We concur that should chlorinated solvents be encountered when exposing soil beneath building foundations, it would be appropriate to excavate the soil as a method of source removal. Please provide justification for your proposed cleanup levels. It is noted that recent ESL updates have removed ESLs for the exposure pathway soil to indoor air.

3. **Iso-concentration Maps-** Please submit figures indicating iso-concentration contours for the residual contaminants in soil, water and soil vapor to visually depict areas of residual contamination and to aid in identifying areas of potential data gaps.
4. **Pilot Test-** You may consider doing a pilot test for the selection (and possible confirmation) of your remedial alternative. What assumptions have been made in the design of the proposed vapor extraction vapor monitoring system i.e., radius of influence, extent of contamination et al? We recommend performing a pilot test to evaluate the effectiveness of the proposed remediation system and determine if modifications are necessary. Please provide a detailed description on how your pilot test will be performed.
5. **Proposed Corrective Action Plan (CAP)-** After your pilot test submittal of a CAP is required. We have the following technical comments regarding the selected CAP.
  - a. **Detailed Feasibility Study-** Please provide a detailed evaluation of the remedial options considered. Please compare applicability, cost, effectiveness i.e., ability to meet cleanup goals and expected time required to reach both active remediation cleanup levels and site cleanup goals. At least three remediation alternatives, besides no action and natural attenuation, are to be presented in the CAP.
  - b. **Public Participation-** We request that you provide our office with the names, addresses and parcel numbers for those neighboring sites which might have direct or indirect impacts from the proposed corrective actions. These individuals will be notified that the CAP will be available for public review and comment.
  - c. **Contingency Plan-** For the proposed remediation alternative, please provide a contingency plan in the event that the proposed remediation is not effective or unforeseen results occur. In the event that elevated soil vapor samples are detected, indoor air sampling must be considered.
6. **Day Care Center Development-** Our office would consider the results of the additional sampling data and the results from the remediation activities and vapor monitoring to make an evaluation of site use. We do not yet approve the development of the proposed daycare center. Please elaborate what data you will present to justify approval for day care development at this site.
7. **Closure Requirements-** Your Site Mitigation Plan suggests that ultimate site closure will be justified through a combination of groundwater and soil vapor sampling data. We will also require a post-remediation risk assessment and the filing of an approved deed restriction prior to closure consideration.

### **TECHNICAL REPORT REQUEST**

Please submit the following reports as requested below according to the following schedule:

- **February 21, 2008** - Work Plan for additional site characterization, iso-concentration maps, pilot test details and contingency plan and rationale for daycare development approval.
- **60 days after work plan approval** - Soil and Groundwater Investigation Report
- **120 days after completion of soil and groundwater investigations** - Corrective Action Plan

### **ELECTRONIC SUBMITTAL OF REPORTS**

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. Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was 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](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.

Mr. Merriam  
RO 2580, 10700 MacArthur Blvd., Oakland  
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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 case meet this requirement.

If you have any questions, please call me at (510) 567-6765 or Donna Drogos at 510-567-6721.

Sincerely,



Barney M. Chan  
Sr. Hazardous Materials Specialist

cc: files, D. Drogos, A. Levi  
Messrs. K. Phares & J. Jay, Jay-Phares Corp., 10700 MacArthur Blvd., Suite 200,  
Oakland, CA 94605  
Mr. P. McIntyre, AEI Consultants, 2500 Camino Diablo, Suite 200, Walnut Creek,  
CA 94597

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