

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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April 10, 2008

Mr. Ken Phares
C/o Jay Phares Corporation
10700 MacArthur Boulevard, Suite #200
Oakland, CA 94605

Subject: SLIC Case No. RO0002580 and Geotracker Global ID SL18344764, Young's Cleaners,
10700 MacArthur Boulevard, Oakland, CA 94605

Dear Mr. Phares:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "Work Plan for Pilot Study," dated March 7, 2008 and prepared on your behalf by AEI Consultants. The Work Plan proposes the installation and short-term operation of a sub-slab and vapor extraction system. The sub-slab and vapor extraction system would consist of one extraction well and extraction lines consisting of 4-inch diameter pipes installed beneath the concrete floor of the building. Operation of the system is proposed as a pilot test for a period of one week. Following collection of data during the pilot test, operation of the system is proposed as an interim corrective measure until a long-term corrective action plan can be developed and approved.

Installation of a sub-slab and vapor extraction system for a pilot study and as an interim corrective measure may be acceptable provided that the operational and monitoring data collected during the pilot test indicate that the system can effectively remove VOCs in vapor beneath the building slab. However, we have several technical comments and questions regarding the design and monitoring of the system. In addition, elevated concentrations of VOCs have been detected beyond the building that formerly housed Young's Dry Cleaners. As discussed in technical comments 33 through d below, the potential for vapor intrusion beneath the adjacent buildings must also be addressed. Therefore, we request that you address the following technical comments and submit a Revised Pilot Test Work Plan.

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

TECHNICAL COMMENTS

1. **Concrete Slab Entry Points.** The Work Plan does not indicate whether the concrete slab has been inspected for potential vapor entry points. The existence of vapor entry points such as openings around pipes, separation joints, or other openings will potentially affect vapor intrusion and air flow during the pilot test. Therefore, we request that you modify the Work Plan to include inspection of the building foundation for potential VOC vapor entry points prior to conducting a pilot test. All possible entry points are to be monitored with a part per billion-

- range photoionization detector and then sealed. Inspection and sealing should be conducted within the area of the building that could potentially be affected by vapor intrusion and the operation of the vapor extraction system. Please include this modification in the Revised Pilot Test Work Plan requested below.
2. **Proposed Sub-Slab Vapor Extraction System Configuration.** The proposed sub-slab vapor extraction system consists of vapor extraction piping and one extraction well beneath the building space north of the former excavation area. Vapor extraction is not planned within the portion of the building above the former excavation area. We note that elevated concentrations of PCE were detected in vapor samples collected from probes VB-8 and VB-9, which are located in the southern portion of the excavation area. In the Revised Pilot Test Work Plan requested below, please describe the basis for the system design. Is it assumed that soil vapors in the former excavation area do not pose a risk for vapor intrusion or is it estimated that the vapor extraction system will have sufficient vacuum influence in the excavation area to remove vapor contamination in the former excavation area and the area east of the former excavation?
 3. **Extraction Well.** The proposed design of the extraction piping and trench shown in Appendix C of the Work Plan is acceptable. However, we were not able to locate proposed specifications for the extraction well in the Work Plan or Site Mitigation Plan. Please include these specifications in the Revised Pilot Test Work Plan requested below. In addition, please provide specifications regarding the design of the well boxes for the proposed sub-slab monitoring probes inside the building. Specifically, please indicate how the surface completions of the probes will be sealed to prevent air flow between the building space and sub-slab.
 4. **Sub-Slab Monitoring.** The proposed soil vapor monitoring points are expected to monitor the sub-slab soil at a depth of approximately 0.5 feet bgs and soil at a depth of 5 feet bgs. The proposed depths and construction of the proposed soil vapor monitoring points are acceptable. However, we note that three of the proposed monitoring probes are located outside the building. Since the sub-slab soil is not likely to extend beyond the perimeter of the building, it is not clear whether these monitoring points will effectively monitor vacuum influence within the building sub-slab. In the Revised Pilot Test Work Plan requested below, please modify the vapor monitoring locations or provide further rationale for locating the probes outside the building.
 5. **Building Space East of Former Young's Dry Cleaners.** VOCs were not detected in soil vapor samples collected from the building space east of Former Young's Dry Cleaners (VB-18 and VB-19). However, we note that no soil vapor samples were collected within the southern portion of the building adjacent to the former excavation. At a minimum, one or more vapor monitoring probes are required in this area. Due to the highly elevated concentrations of VOCs detected in VB-11, we also request that a soil vapor monitoring point be added in the area east of VB-11.
 6. **Extent of VOCs in Vapor to West.** Vinyl chloride was detected at a concentration of 2.0 micrograms per liter in the soil vapor sample collected at a depth of 4.5 feet bgs in soil vapor sample VB-3, which is located inside the building labeled "Former Grocery Store" on Figure 2 of the Work Plan. The presence of vinyl chloride at an elevated concentration in soil vapor

beneath the building requires further evaluation for potential vapor intrusion. In addition, elevated concentrations of PCE appear to be present in groundwater beneath the building. In the Revised Pilot Test Work Plan requested below, please indicate how the potential for vapor intrusion to the building "Former Grocery Store" will be evaluated.

7. **Extent of VOCs in Vapor to South.** Elevated concentrations of VOCs were detected in soil vapor samples collected from soil vapor probes VB-8 and VB-9, which are located south of the Former Young's Dry Cleaners. No soil vapor samples have been collected south of VB-8 and VB-9 or inside the building located south of the Former Young's Dry Cleaners. The limits of the elevated concentrations of VOCs in soil vapor to the south of the Former Young's Dry Cleaners have not been defined. In the Revised Pilot Test Work Plan requested below, please indicate how the potential for vapor intrusion to the building south of Former Young's Dry Cleaners will be evaluated.

TECHNICAL REPORT REQUEST

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

- **June 16, 2008** – Revised Pilot Test Work Plan
- **July 10, 2008** – Semiannual Groundwater Monitoring Report for 1st Semester 2008
- **February 10, 2009** – Semiannual Groundwater Monitoring Report for 2nd Semester 2008

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

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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." 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.

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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).

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

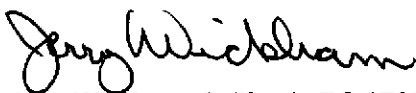
The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For 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.

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

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cc: Peter McIntyre
AEI Consultants
2500 Camino Diablo, Suite 100
Walnut Creek CA 94597

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	ISSUE DATE: July 5, 2005
	REVISION DATE: December 16, 2005
	PREVIOUS REVISIONS: October 31, 2005
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, 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 Alicia Lam-Finneke.
 - 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 at 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)