

From: [Soo, Kit, Env. Health](#)
To: johnjay@jayphares.com
Cc: "[Jeremy Smith](#)"; [Peter McIntyre](#); [Roe, Dilan, Env. Health](#); [Khatri, Paresh, Env. Health](#)
Subject: RE: RO0002580 - 10700 MacArthur Boulevard, Oakland CA - Response to September 23, 2016 Indoor Air Sampling Report
Date: Friday, October 21, 2016 3:52:00 PM

Dear Mr. Jay,

Alameda County Department of Environmental Health (ACDEH) Staff has reviewed the Site Cleanup Program (SCP) case file for the above referenced site including the recently submitted *Indoor Air Sampling Report* (Indoor Air Sampling Report) dated September 23, 2016. The Indoor Air Sampling Report, which was prepared on your behalf by AEI Consultants, presents results from the indoor air sampling event performed in the former Anna's Linen's tenant space on August 23, 2016. The Indoor Air Sampling Report concludes that Tetrachloroethene (PCE) was detected slightly above the State Water Resources Control Board's Commercial Environmental Screening Levels (ESL) for indoor air of 2.1 ug/m³ ([micrograms per cubic meter](#)), and trichloroethene (TCE) was not detected above its respective ESL for indoor air of 3 ug/m³ and the short term exposure response level established by the Environmental Protection Agency (EPA) of 7 ug/m³. Based on these findings, AEI recommends the continued operation of the soil vapor extraction (SVE) system to reduce volatile organic compounds (VOCs) in the subsurface, and additional indoor air sampling to be collected to confirm the effectiveness of the SVE system.

ACDEH concurs with the conclusion that additional indoor air sampling should be collected in the former Anna's Linen tenant space to confirm the September 23, 2015 indoor air results for PCE and to collect additional data to assess vapor intrusion risk from subsurface soil gas. However, additional indoor air sampling activities are required to further evaluate indoor air quality at the site and are discussed in the Technical Comments below.

TECHNICAL COMMENTS

1. PCE in Indoor Air Samples
 - a. The PCE concentrations detected in indoor air samples collected on August 23, 2016 were above the Commercial ESL of 2.1 ug/m³ as well as the new recommended Department of Toxic Substances Control (DTSC) screening level for commercial/industrial air of 2 ug/m³ (Human and Ecological Risk Office [HERO] Human Health Risk Assessment [HHRA] Note Number 7, October 17, 2016). Resampling of the former Anna's Linen tenant space and additional indoor air sampling in other tenant spaces is required to assess indoor air quality and to determine whether the SVE and sub-slab depressurization (SSD) systems located at this site are providing adequate mitigation at the site. We request that you perform indoor air sampling at the former Anna's Linen, the former Dry Cleaner, and the Rainbow Apparel tenant spaces. Our understanding is that the former Anna's Linen tenant space remains unoccupied, and the former Dry Cleaner and Rainbow Apparel tenant spaces are occupied. At least three weeks prior to the sampling event, provide ACDEH with the proposed new sampling locations in the former Dry Cleaner and Rainbow Apparel tenant spaces to obtain approval. Ambient air samples must

be collected as well, and all sampling procedures conducted be in adherence to the August 17, 2016 *Indoor Air Sampling Work Plan* and the DTSC's *Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air* (DTSC Guidance), dated October 2011. As per the DTSC Guidance, Step 8 : Building Survey and Work Plan Development includes the following preparatory activities (building inventory, sampling methodology, data evaluation procedures, contingency planning, public notification, and building screening and indoor air sampling preparation) should be included in your indoor air sampling work plan. In particular, the public notification requirement must be performed prior to indoor air sampling at any occupied tenant space. Please present the following documents to ACDEH on the requested due dates: Revised Indoor Air Sampling Work Plan (due no later than November 22, 2016); Draft Fact Sheet and Notification Letters (to be provided to ACDEH for review prior to finalization and due no later than November 22, 2016); Final Fact Sheet and Notification Letters (due no later than November 29, 2016); and Results to the Additional Indoor Air Sampling Report (due no later than January 23, 2017).

2. Assess the Extent of the Soil Vapor Plume, and the Effectiveness of the SVE and SSD at the Site
 - a. As referenced in our email directive dated September 13, 2016, ACDEH requested that the SVE and SSD be evaluated to verify their effectiveness relative to the extent of the soil vapor plume. The effectiveness of these systems will be evaluated together with item 1. Please note that the SVE and SSD systems must operate on a continuous basis until the evaluation is received and approved by ACDEH. In addition, the monitoring of the systems must be performed on a regular basis to ensure continuous operation.

TECHNICAL REPORT REQUEST

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

- November 22, 2016 – Draft Fact Sheet and Notification Letters – via email only
- November 22, 2016 – Revised Indoor Air Sampling Workplan
File to be named: REV_WP_R_yyyy-mm-dd RO2580
- November 29, 2016 - Finalized Fact Sheet and Notification Letters
File to be named: FACT_SHEET_yyyy-mm-dd RO2580
- No later than December 16, 2016 – Perform Indoor Air Sampling
- January 23, 2017 – Additional Indoor Air Sampling Report
File to be named: SWI_R_yyyy-mm-dd RO2580

If you have any questions, please let us know.

Thanks,
Kit

Kit Soo, PG

Senior Hazardous Materials Specialist

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