



September 22, 2017

Mr. David Kasirer
WAC Enterprise FHS
c/o Western Avenue Capital Management, Inc.
Los Angeles, CA 90048
(Sent via E-Mail to: dkasirer@westernavecap.com)

Subject: Site Cleanup Program (SCP) Case RO0002850 and GeoTracker Global ID SL 18344764, Young's Cleaners, 10700 MacArthur Boulevard, Oakland, CA 94605 – Request for Technical Reports

Dear Mr. Kasirer:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the SCP case file for the above-referenced site, including the following recently submitted reports:

- Work Plan, Data Gap Investigation, Former Young's Cleaners, 10700 MacArthur Boulevard, Oakland, California, Toxics Case No. RO0002580. Prepared by AEI Consultants, Inc. (Work Plan)
- SVET System Evaluation, Former Young's Cleaners, 10700 Mac Arthur Boulevard, Oakland, California, Toxics Case No. RO0002580. Prepared by AEI Consultants, Inc. (SVET System Evaluation)
- Draft Site Management Plan, Revision 1, Property Identification: Former Young's Cleaners, 10700 Mac Arthur Boulevard, Oakland, California, Toxics Case No. RO0002580. Prepared by AEI Consultants, Inc. (Draft SMP)

The dry cleaning chemical tetrachloroethylene (PCE) and its degradation products are reported in groundwater beneath and downgradient of the site. Additional investigation of PCE in groundwater is needed prior to preparation of a remedial action plan (RAP). AEI proposes installation and sampling of four additional groundwater monitoring wells.

In addition, AEI recommends continued PCE removal from soil gas beneath the former dry cleaners using a soil vapor extraction and treatment (SVET) system. To optimize the SVET system, AEI recommends collection of additional vadose zone data. AEI proposes temporary shutdown of the sub-slab depressurization system (SSDS) followed by vacuum measurement from existing soil gas wells to evaluate the radius of influence of the SVET system.

Concurrent with the activities proposed above, AEI has revised the Draft SMP. The SMP describes environmental measures to be implemented at the site during investigation and cleanup. AEI prepared the revised SMP to respond to ACDEH's 8 May 2017 directive.

Based on our review of the case file, ACDEH conditionally approves the Work Plan and SVET System Evaluation provided that you address the technical comments listed below as part of the implementation. Submittal of a revised workplan or a workplan addendum is not required. We request that you address the following technical comments, perform the proposed work and send us the

report(s) described below. Provide 72-hour advance written notification to Robert.schultz@acgov.org prior to the start of field activities.

TECHNICAL COMMENTS

- 1. PCE Concentrations in Source Area Groundwater.** The closest downgradient monitoring well to the former dry cleaner space is well AMW-6R. The reported PCE concentration in well AMW-6R was 860 ug/L PCE on 13 April 2017. Additional source area groundwater data is needed to evaluate cleanup needs and alternatives.

As part of the proposed investigation a well pair with shallow and deeper well screens will be installed in the area of the Breezeway, southeast of well AMW-6R.

Proposed well MW-13 will be installed adjacent to the former excavation, in the approximate location of former well AMW-2.

- 2. PCE Concentrations in Downgradient Groundwater.** Proposed well MW-15 will be installed as a well-pair to monitor shallow and deeper groundwater, downgradient of the shopping mall.

All site wells will be gauged and sampled concurrently, including the wells installed pursuant to the subject workplan. All well screens, both shallow and deep, will be no greater than 10 feet in length.

- 3. Interpretation of Groundwater Flow Directions and Hydrostratigraphy.** For the April 2017 monitoring event, AEI reported a southward horizontal groundwater flow direction in deeper groundwater beneath the site, and based its interpretation on water level measurements from wells AMW-8, AMW-9, and FHS-MW-10. The shallow groundwater flow direction at the site has generally been reported to the west-northwest. The deeper contaminant plume appears to have migrated from beneath the former dry cleaner area to the west-southwest, consistent with the regionally anticipated groundwater flow direction.

AEI shows the depth to shallow groundwater to be approximately 8 feet less than the depth to deeper groundwater. This finding indicates that a downward vertical gradient at the site is possible. The proposed investigation report needs to include revised cross-sections showing groundwater elevations, the surveyed ground surface elevations at monitoring well locations, well screen intervals, PCE concentrations in groundwater, and interpreted hydrostratigraphy. The CPT logs collected during previous investigations at the site need to be incorporated into the hydrostratigraphic interpretations. At a minimum, one cross-section following the approximate plume axis (i.e., crossing through FHS-MW-10 and AMW-2), and a second cross-section perpendicular to the plume axis will be prepared and submitted in the report.

- 4. SVET System Evaluation.** As discussed at the 18 July 2017 meeting, ACDEH understands that the soil vapor extraction (SVE) system at the site will be repaired and restarted. AEI proposes to shutdown both the SVET and SSD systems to conduct a radius of influence test of the SVET system. Elevated concentrations of trichloroethene (TCE) have been detected in soil gas, in addition to PCE. AEI states that the building HVAC system will be run in positive

pressure mode throughout the test, and that a vapor barrier has been installed in one of the retail units, and that these measures will protect indoor air from vapor intrusion.

5. **HVAC System Operation.** Prior to and throughout the test, proper function of the HVAC system will be inspected and verified, and any night-time mode changes will be overridden.
6. **Building pressure differential measurements** Prior to and during shutdown of the SSD system, building pressure differential measurements will be collected with equipment sensitive to 0.001 inches of water column to verify positive pressure in the building. Pressure differentials across the floor slab must be measured in each retail unit and must be verified to be greater than 0.01 inches of water column, including locations SS/VM-1, SS/VM-10, SS/VM-7, SS/VM-5 and SS/VM-8. If the pressure differential at any monitoring point, drops below 0.01 inches of water column, then the SSD system must be immediately restarted.

Pressure differentials between indoor and outdoor air will be measured and recorded in each retail unit (Shoe Palace, Rainbow Apparel, and Vacant units). If weather patterns indicated the potential for rapid changes in barometric pressure, the test will be rescheduled.

7. **IA and SG Sample Collection and Analysis.** After 24 hours following shutdown of the SSD system, A sub-slab soil gas sample will be collected and analyzed from each of SS/VM-1, SS/VM-10, SS/VM-7, SS/VM-5 and SS/VM-8.

Indoor air samples will be collected and analyzed from Rainbow Apparel, Shoe Palace, and the Vacant units upon completion of testing.

8. **Written Advance Notice of Test.** One week advance, written notice prior to testing will be provided to the Rainbow Apparel and Shoe Palace tenants and to the ACDEH.
9. **Draft Site Management Plan.** A second revised draft SMP will be submitted. WAC Enterprises is responsible for implementation all SMP requirements. Tenants, property manager(s), facility engineer(s), and any other key personnel will be identified in the SMP, including name, affiliation, and telephone number.

Notice of site activities will be provided by WAC Enterprises to the ACDEH. ACDEH will be provided advance notice of any intrusive (subsurface) work in the area of the property affected by the dry cleaner release.

The potentially affected area of the property (i.e., the area subject to the SMP) will be identified in the SMP.

U.S. EPA, DTSC and other applicable guidance for SSDS and HVAC systems performance will be followed. According to the U.S. EPA, most SSD systems are designed to achieve a pressure differential of at least 0.02 inches of water, during the worst-case season, to provide an adequate safety factor for long-term variations. HVAC systems used to control vapor intrusion must typically generate a positive pressure across the floor slab of between 0.005 and 0.01 inches of water column.

BAAQMD permits and requirements relevant to the SSD system or the SVET system will be identified in the SMP.

AEI's proposed VIMS Inspection Checklist is acceptable and copies will be submitted in the proposed quarterly reports. A schedule identifying each inspection and its frequency will be included in the revised SMP.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

ACDEH requires a Submittal Acknowledgement Statement, signed by the Responsible Party (RP), as a cover letter to technical reports and submittals. The language for the Submittal Acknowledgement Statement is as follows:

"I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the State Water Resources Control Board's GeoTracker website."

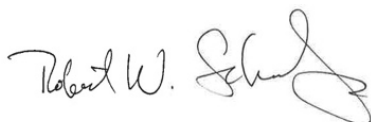
TECHNICAL REPORT REQUEST

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

- 15 December 2017 – Revised Site Management Plan;
File to be named: RO2580_SMP_yyyy-mm-dd
- 15 December 2017 – Interim Remedial Action Plan;
File to be named: RO2580_IRAP_yyyy-mm-dd
- 15 December 2017 – Groundwater Investigation and Monitoring Well Installation Report
File to be named: RO2580_SWI_yyyy-mm-dd
- 15 August and 15 February Each Year – Semi-Annual Groundwater Monitoring Report, ongoing semi-annual groundwater monitoring is requested for this site.
- 31 January, 30 April, 31 July, 31 October Each Year – Quarterly Vapor Mitigation and Site Remediation Status Report, ongoing quarterly status reporting for mitigation and remediation systems at this site is requested.

If you have any questions, please contact me at robert.schultz@acgov.org. Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

Sincerely,



Robert W. Schultz, CHG
Senior Hazardous Materials Specialist

Mr. Kasirer
RO0002580
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cc: Jeremy Smith, AEI Consultants (*Sent via E-mail to: jasmith@aeiconsultants.com*)
Dilan Roe, ACDEH (*Sent via E-mail to: dilan.roe@acgov.org*)
Robert Schultz, ACDEH (*Sent via E-mail to: robert.schultz@acgov.org*)
GeoTracker, eFile

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

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

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) 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 File Transfer Protocol (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 SCP 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 (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/) for more information on these requirements.

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 ACDEH's FTP server and the SWRCB's GeoTracker website." 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 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. 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. 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

Please note that delays in investigation, late 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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 1, 2016
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions


The Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) 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

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

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 deh.loptoxic@acgov.org.
 - 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) Open File Explorer using the Windows  key + E keyboard shortcut.
 - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) On the address bar, type in ftp://alcoftp1.acgov.org.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
 - d) Click Log On.
 - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - f) 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 deh.loptoxic@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.