

Detterman, Mark, Env. Health

From: Roe, Dilan, Env. Health
Sent: Tuesday, September 24, 2013 3:25 PM
To: Bob Clark-Riddell; Tony Kershaw
Cc: Detterman, Mark, Env. Health
Subject: Site Cleanup Program Case No. RO0002857, Albany A1 Cleaners

Hi Tony and Bob:

Mark and I have reviewed the draft updated schedule for corrective action for the subject site. We know you are anxious to perform the work to facilitate occupancy of the former dry cleaner space. Although we appreciate your diligent efforts to remediate the site in a timely manner and collect data to ensure the safety of occupants of the adjacent tenant spaces, we need you to recognize that you continue to push the boundaries of what we feel comfortable with in regards to the appropriate level of regulatory oversight. As indicated in your schedule, you will be asking ACEH to provide a comfort letter in early November to help you with refinancing, approve proposed corrective actions, and ultimately grant closure of the site. This becomes increasingly difficult for us when we are notified after the fact of actions that you have taken without documentation or approval from our agency prior to implementation. Although we have brought this to your attention multiple times, it continues to happen as evidenced in your last email to us where you told us that you had installed a groundwater extraction well and were installing a passive subslab ventilation system.

Mark and I have worked diligently with you to move your case forward and provide expedited review and face to face meeting time to help you refinance, reoccupy your tenant space and ultimately gain case closure. Our review of the schedule indicates that the project is approaching a key milestone where ACEH is requested to issue a comfort letter to your financial institution stating that our agency thinks the interim remediation work done to date and the mitigation measures installed are appropriate and protective of site occupants for risk to risk of vapor inhalation of chlorinated solvents.. ACEH notes that this request comes prior to submittal of requisite information that we will need to help us make this decision As previously discussed, ACEH will not be able to issue such a comfort letter until adequate documentation has been provided for all work conducted at the site to date, including as-built drawings of the vapor mitigation system, construction quality assurance documentation that provides a level of comfort that the systems have been installed, start up testing that documents system function, operation and maintenance procedures, results of indoor air sampling and subslab sampling, and interim remedial excavation activities and confirmation sampling, etc.

We would like to schedule a conference call prior to our next meeting to discuss these issues. We remain committed to your project and we need your commitment to us that you will follow appropriate protocol going forward. Please identify a time and date in the next week to hold the call.

Thanks,

Dilan Roe, P.E.

Program Manager - Land Use & Local Oversight Program

Alameda County Environmental Health

1131 Harbor Bay Parkway

Alameda, CA 94502

510.567.6767; Ext. 36767

QIC: 30440

dilan.roe@acgov.org

PDF copies of case files can be reviewed/downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>

From: Bob Clark-Riddell [mailto:briddell@pangeaenv.com]
Sent: Wednesday, September 11, 2013 11:09 PM
To: Detterman, Mark, Env. Health; Tony Kershaw
Cc: Roe, Dilan, Env. Health
Subject: RE: RO2857 A1 Cleaners

Hello Mark,

Attached is our **updated schedule** for corrective action for the subject site. As you probably noticed, a workplan for **indoor air sampling** was submitted to ACEH earlier this week. Your quick review would allow sampling to proceed on or near 9/26/13 as currently scheduled.

The additional soil excavation has been completed, with approximately 125 tons of soil disposed offsite. Three subslab vents were installed under 1183 Solano for use with a future active ventilation system, if merited. The planned second subslab vent under 1191 Solano has been delayed pending the indoor air testing.

You will be happy to hear that we are installing a **passive ventilation system beneath 1185 and 1187 Solano** within the excavation area. It will be completed Thursday and Friday this week (and possibly Monday next week) in case you'd like to observe its installation. The passive system is based on available guidance documents. It will include 4" diameter slotted piping surrounded by a gravel layer covering the entire excavation area. The riser pipe will exit the roof at least 10' from the nearest air unit and 3 ft above the roof. A wind-powered turbine fan is planned to enhance the passive ventilation. Overlying the gravel will be a geotextile membrane and 10 mil plastic sheeting and then about 12" cement slurry up to the future slab elevation. **A GeoSeal vapor barrier can be installed** on top of the cement slurry or slab in the future, if merited based on indoor air test results or other reasons.

Four new soil gas probes will also be installed within 1185 and 1187 Solano units to facilitate monitoring within the passive venting system. Existing subslab probes will allow monitoring of subslab gas in 1183 and 1187 Solano.

You'll also appreciate that we permitted and installed a **source area groundwater monitoring well**.

Bob Clark-Riddell, P.E.
Pangea Environmental Services, Inc.
510.435.8664

From: Detterman, Mark, Env. Health [mailto:Mark.Detterman@acgov.org]
Sent: Wednesday, August 07, 2013 1:44 PM
To: Bob Clark-Riddell; Tony Kershaw
Cc: Roe, Dilan, Env. Health
Subject: RO2857 A1 Cleaners - Request for VI Imminent Hazard Determination

Tony and Bob,

The October 2011 DTSC *Final Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air* contains a step-wise approach to evaluate and mitigate Vapor Intrusion (VI) which is outlined in the executive summary, and detailed further on in the document. For existing buildings one of the early steps is to determine if an imminent hazard for VI exists for indoor air. For this site this should especially include a determination for occupied portions of the building, rather than just a focus on the unoccupied units. As a consequence, and in order to get the site caught up with standard DTSC protocols, ACEH requests that the previously approved work (directive letter dated August 5, 2013), which included indoor air monitoring during interim remediation, also conduct indoor air monitoring of occupied units to determine if existing VI health hazards exist. If VI health hazards exist in the occupied portions of the building, immediate mitigation is required. If excavation has not begun, baseline indoor VI sampling would be very useful, if excavation has begun, then the indoor VI sampling would be oriented to determining if immediate mitigation is required until VI risks are demonstrated to have abated.

Due to the proposed pace of work at the site, please respond to this email directive letter by Friday August 7th, to document your indoor VI imminent health risk sampling plan.

Should you have any questions, please contact me.
Thank you.

Mark Detterman
Senior Hazardous Materials Specialist, PG, CEG
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
Direct: 510.567.6876
Fax: 510.337.9335
Email: mark.detterman@acgov.org

PDF copies of case files can be downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>