



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

January 23, 2009

Mr. Bruce Burrows  
The Burrows Company  
6 South Point Road  
Orinda, CA 94563

Mr. Gabriel Chui  
Gabriel H. Chui & Lai H. Trust  
10898 Inspiration Circle  
Dublin, CA 94568

Nam Sun and Seung Hee Park  
Crow Canyon Cleaners  
7242 San Ramon Road  
Dublin, CA 94568

Mr. Dwight and Mr. Carleton Perry  
PO Box 20610  
Castro Valley, CA 94546

Lee Family  
20117 Forest Avenue #3  
Castro Valley, CA 94546

Messrs. William Karkozian, Robert  
Wiebe and Robert Jeha  
Dublin Town & Country Assoc.  
318 Diablo Road, Suite 255  
Danville CA, 94526

Subject: Spills, Leaks, Investigations and Cleanup (SLIC) case file #RO0002863 (Global ID #T06019764784), Crow Canyon Cleaners, 7272 San Ramon Road, Dublin, CA 94568

Ladies and Gentlemen:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site and the documents entitled, "Soil Vapor Sampling and Soil Sampling Report", received July 17, 2008 and "Soil Vapor Extraction Pilot Test Work Plan", received July 17, 2008 and prepared on your behalf by Ceres Associates and Terra Vac, respectively. Results from the soil vapor sampling indicate that the contamination beneath your site (in the vadose zone) is consistent with the operation of a dry cleaning facility. Tetrachloroethylene (TCE) was detected in soil vapor samples (SB-21 and SB-23) collected from behind the dry cleaners at concentrations of up to 17,000  $\mu\text{g}/\text{m}^3$ , while soil vapor samples collected beneath the building foundation slab (SB-19) detected TCE at concentration of up to 2,300  $\mu\text{g}/\text{m}^3$ .

Interim remediation by soil vapor extraction has been proposed to mitigate residual TCE contamination in the vadose zone. Terra Vac has proposed a soil vapor extraction pilot test to evaluate the efficacy of the soil vapor extraction (SVE) remediation method. ACEH generally concurs with the proposed soil vapor extraction pilot test. We request that you perform the proposed work, and send us the reports described below. Please provide 72-hour advance written notification to this office (e-mail preferred to [steven.plunkett@acgov.org](mailto:steven.plunkett@acgov.org)) prior to the start of field activities.

#### **TECHNICAL COMMENTS**

1. **Soil Vapor Extraction Pilot Test.** Terra Vac has proposed a soil vapor extraction pilot test to evaluate the feasibility of SVE. ACEH requires that the SVE Pilot Test be conducted following the DTSC/RWQCB 2003 Active Soil Gas Investigations Advisory Guidelines. In addition, leak detection tests for SVE extraction and monitoring wells should be performed during the pilot test according the DTSC/RWQCB 2003 Active Soil Gas Investigations Advisory Guidelines. Terra Vac has also proposed soil vapor sampling using tedlar bags; DTSC guidance does not recommend the use of tedlar bags for the collection of soil vapor samples. Also, please discuss what standard will be used to calibrate the PID and explain your conclusion that the long term test will be performed until diminishing returns of extracted PCE are observed.

In its current design, it is unclear how the proposed soil vapor extraction wells and vapor monitoring well configuration will adequately evaluate the radius of influence in the vadose zone. In order to evaluate the radius of influence for the soil vapor extraction wells, multiple monitoring wells are necessary. Also, please discuss detail the SVE system operations including proposed flow rates during the pilot test and soil vapor sampling and purge volumes for vapor monitoring; discuss how the long term extraction testing will be conducted and how soil vapor data will be analyzed, and what is the rationale that will be used to conclude when the pilot test is complete. Please address our comments and propose additional vapor monitoring well locations in the work plan addendum requested below.

2. **Soil Vapor Extraction Wells and Monitoring Well Installation.** It appears the proposed screen interval in the monitoring wells will monitor various lithologic zones, making it difficult to determine the extraction rate and vapor concentrations from discrete lithologic units. DTSC and ACEH recommend multiple monitoring depths to target the distinct lithologic units beneath the site. Please suggest additional depth discrete monitoring for the different lithologic units and present your findings in the work plan addendum requested below.
3. **Public Participation.** You are required to implement a program of public participation for your site. Once the SVE pilot test has been completed, please update the fact sheet with the results from the pilot test and the most recent DTSC comments and submit the fact sheet to ACEH for final review. Once ACEH final review of the fact sheet is completed, you will be required to distribute the fact sheet to the distribution list. Please compile your distribution list to include the properties indicated on the attached map. Please note that the distribution list must include parents of students from the Montessori School. Please send us the distribution list by the date specified below.

### **TECHNICAL REPORT REQUEST**

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

- **February 2, 2009** – Work Plan Addendum
- **February 6, 2009** – Public Participation Distribution List
- **Two Weeks After Work Plan Approval** – Begin Field Work
- **One Week After Pilot Test Completion** – Preliminary Pilot Test Results (draft results only) and Revised Fact Sheet

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**

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) now request submission of reports in electronic form. The electronic copy is intended to replace the need for a paper copy 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 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 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, electronic submittal of a complete copy of all reports is required in Geotracker (in PDF format). Please visit the State Water Resources Control Board 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.

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.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later 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.

If you have any questions, please call me at (510) 383-1767

Sincerely,



Steven Plunkett  
Hazardous Materials Specialist



Donna L. Drogos P.E.  
Supervising Hazardous Materials Specialist

Attachment: Map of public participation

cc: (via email only) Law Offices of Karl R. Morthole, [karl@mortholelaw.com](mailto:karl@mortholelaw.com)  
Bud Duke, DTSC, [BDuke@dtsc.ca.gov](mailto:BDuke@dtsc.ca.gov)  
Harold Wong, [Wong59@lInl.gov](mailto:Wong59@lInl.gov)  
Jan Greben, Greben & Associates, [jan@grebenlaw.com](mailto:jan@grebenlaw.com)  
Tom Downey, Burnham Brown, [tdowney@burnhambrown.com](mailto:tdowney@burnhambrown.com)  
Edward Polson, Esq., [epolson@sbcglobal.net](mailto:epolson@sbcglobal.net)  
Tiana Jenkins, Lamps Plus Plaza, [tianajenkins@aol.com](mailto:tianajenkins@aol.com)  
Jim Roessler, Roessler Investment Group, [Jim@roesslerinvestmentgroup.com](mailto:Jim@roesslerinvestmentgroup.com)  
Nick Patz, Ceres Associates, [nickpatz@ceresassociates.com](mailto:nickpatz@ceresassociates.com)  
Donna Drogos, Steven Plunkett, File



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941-2773-160 941-2773-47  
941-2773-17 941-2773-29  
941-2773-150 941-2773-54  
773-143 941-2773-21 941-2773-7  
941-2773-68 941-2773-30  
941-2773-136 941-2773-88  
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