

## Nowell, Keith, Env. Health

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**From:** PDKing0000@aol.com  
**Sent:** Thursday, August 20, 2015 1:22 PM  
**To:** Roe, Dilan, Env. Health; Nowell, Keith, Env. Health  
**Cc:** Gary\_Bates@efiglobal.com; patrick@ellwoodcommercial.com; ronpatelvidge@gmail.com; wkoehenderfer@cs.com; dave@bblandlaw.com  
**Subject:** Fwd: FW: College Ave - RO 2981 Red Hanger Cleaners at 6239 College Ave

Hi Dilan and Keith,

As Dilan and I discussed yesterday, below are my initial comments on the 7/27/15 subject site report.

It is my understanding that the report will be re-issued based on the revised lab report for indoor air samples IA4 and IA5.

Paul

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From: PDKing0000@aol.com  
To: patrick@ellwoodcommercial.com  
CC: elvidge@sbcglobal.net  
Sent: 8/2/2015 20:10:53 Pacific Daylight Time  
Subj: Re: FW: College Ave

Hi Patrick and Ron,

I have performed a preliminary review of the 7/27/15 Youngdahl report for the former Red Hangar Cleaners on College Avenue in Oakland, and I have the following preliminary comments. Please note that Appendix E is the indoor air evaluation report.

General comments include the following:

- o Performing the statistical analysis that they did on the soil gas samples that were collected at a depth of 5 feet may not be considered a valid method of evaluating risk at the site. Usually a default of the highest detected value should be used for risk assessment, and statistical analysis of data when evaluating risk should be performed following discussions with the regulatory oversight agency.
- o It is unclear why they analyzed the indoor air samples for soil gas petroleum issues (oxygen, carbon dioxide, methane).

The report does not appear to have been prepared using local (County, RWQCB, or DTSC) guidance as follows:

- o Sub-slab soil gas result interpretation. The PCE results were compared to the soil gas PCE commercial ESLs of 2,100 ug/m<sup>3</sup>, and what they should have compared the results to is 20 times Table E-3 indoor air PCE commercial value which is 42 ug/m<sup>3</sup>. So any PCE concentration greater than 42 ug/m<sup>3</sup> that is under the slab is likely to result in some form of vapor intrusion. The detected PCE sub-slab soil gas concentrations were 610, 5,200, and 1,100 ug/m<sup>3</sup>.
- o The sample duration for indoor air was for 8 hours instead of 24 hours.
- o The indoor air results were compared to the US EPA RSL for PCE commercial air value of 47 ug/m<sup>3</sup>. They should have used the DTSC HERO May 2015 Human Health Risk Assessment (HHRA) Note 3 which says not to use the US EPA RSL in California for PCE in indoor air and instead use their California-approved Table 3 value of 2.1 ug/m<sup>3</sup>.

- o There is reference to the SFRWQCB 7/9/14 memorandum regarding USEPA for vapor intrusion guidance, but there is no reference to the SFRWQCB October 2014 guidance document that was developed to provide guidance for implementation of the 7/9/14 memo. This guidance includes testing indoor air with the HVAC on and the HVAC off, and sets forth indoor air TCE concentrations for accelerated and urgent responses.

I sent the attached 10/16/14 SFRWQCB DRAFT Interim Framework for Assessment of Vapor Intrusion at TCE-Contaminated Sites in the San Francisco Bay Region back on 4/20/15 and cc'd Gary Bates when I sent it. Please see pages 17 and 18 of the Interim Framework text for Table 4 and the discussion regarding the TCE commercial

- o Accelerated Response Action Level (ARAL) air concentration of 8 ug/m<sup>3</sup> and the
- o Urgent Response Action Level (URAL) air concentration of 24 ug/m<sup>3</sup>.

Recommended response time for the ARAL is a few weeks and for the URAL is a few days.

The 7/27/15 report provided by Gary Bates (in Appendix E of the Youngdahl 7/27/15 report) shows 88 ug/m<sup>3</sup> TCE in air on the second floor in sample IA-4 and 66 ug/m<sup>3</sup> in sample IA-5 on the third floor. Both of these concentrations exceed the URAL TCE indoor air concentration of 24 ug/m<sup>3</sup>.

The samples were collected 5/29/15, and the lab report for the indoor air samples is dated 6/12/15. The SCS Engineers report (Appendix E) is dated 7/27/15. There is no reference to the SFRWQCB 10/16/14 Interim Framework document in their report, or in the Youngdahl report.

Review of the SCS Engineers figure (in Appendix E of the Youngdahl 7/27/15 report) showing the sample collection locations for the indoor air samples shows that IA-4 and IA-5 are located near the elevator and bathrooms. It is unclear to me if the bathrooms are similarly located on the second and third floor. It is possible that TCE vapors are moving in the sewer pipes or in the elevator shaft to the second and third floor. Also, review of the Youngdahl report soil gas sample results shows that the highest PCE soil gas concentrations were detected in the vicinity of the bathroom and the elevator. No TCE was detected in the soil gas or sub-slab soil gas samples. For this reason I am suspicious of the sewer pipes as conduits for the TCE vapors.

I recommend the following:

- o Performing chemical inventories of the various tenant spaces on the second and third floor as soon as possible in an effort to identify potential TCE sources, and removing any suspected TCE-containing products,
- o Re-sampling air during a 24 hour period on all three floors and in a building sewer pipe cleanout as soon as possible, with expedited sample analysis,
- o Determining any tenant notification requirements.

To get the case closed I recommend meeting with the county to identify steps needed to move the case to closure. I anticipate that the following actions will need to be done.

- o Collect indoor air samples during a 24 hour period, and collect indoor air samples during multiple sampling events.
- o Perform an evaluation of building conditions for evidence of PCE and TCE sources on the upper floors associated with consumer products.
- o Provide tenant notifications of the results, and verify that Proposition 65 Safe Harbor concentrations are not exceeded.
- o Define the extent of PCE in soil gas at a depth of 5 feet horizontally to a concentration of 2,100 ug/m<sup>3</sup> or less.
- o Possibly define the extent of sub-slab soil gas at concentrations exceeding 42 ug/m<sup>3</sup>, or perform simultaneous indoor air and sub-slab soil gas sampling to demonstrate that the floor slab for the first floor is effective in creating more than 95% attenuation of sub-slab soil gas concentrations.

- o Verify that the County agrees that the extent of PCE in groundwater has been adequately defined.
- o Determine the full extent of impact of PCE to the soil and soil gas surrounding the sanitary sewer pipe.
- o Possibly evaluate indoor air quality for other ground floor tenant spaces adjacent to the former Red Hangar Cleaners based on future soil gas investigation results.
- o If more data provides a high level of confidence that there is a vapor intrusion issue at the site, the elevated sub-slab soil gas concentrations will need to be mitigated (stopped from being able to get into people's breathing space) and the source remediated.

Please let me know if you have any questions.

Thank you!

Paul

Paul H. King  
Professional Geologist

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In a message dated 7/29/2015 09:51:41 Pacific Daylight Time, patrick@ellwoodcommercial.com writes:

Paul: Gary Bates has finally produced the attached report for Ron's College Avenue building. Ron has asked that you review it such that we can anticipate what the County will think of this report and ultimately what is really necessary to get to a NFA status.

Thanks!

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**From:** Ron Elvidge [mailto:[ronpatelvidge@gmail.com](mailto:ronpatelvidge@gmail.com)]  
**Sent:** Tuesday, July 28, 2015 12:14 PM  
**To:** Ellwood, Patrick  
**Subject:** Fwd: College Ave

----- Forwarded message -----

**From:** **Bates, Gary** <[Gary\\_Bates@efiglobal.com](mailto:Gary_Bates@efiglobal.com)>  
**Date:** Tue, Jul 28, 2015 at 8:18 AM  
**Subject:** RE: College Ave  
**To:** "[wkochenderfer@cs.com](mailto:wkochenderfer@cs.com)" <[wkochenderfer@cs.com](mailto:wkochenderfer@cs.com)>  
**Cc:** "Ron Elvidge ([elvidge@sbcglobal.net](mailto:elvidge@sbcglobal.net))" <[elvidge@sbcglobal.net](mailto:elvidge@sbcglobal.net)>

Gentlemen, attached is EFI Global Soil Gas and Indoor Air Quality report. We have submitted this report to Alameda County and have notified Mr. Keith Nowell with Alameda County that the report has been upload to their system for his review.

Gary L. Bates P. G.  
Director, Environmental Remediation Services  
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-----Original Message-----

**From:** Wm. Kochenderfer [mailto:[wkochenderfer@cs.com](mailto:wkochenderfer@cs.com)]  
**Sent:** Wednesday, July 22, 2015 4:16 PM  
**To:** Bates, Gary  
**Subject:** College Ave

Hello Gary -

Thank you for speaking with me yesterday. Sounds like the current report needs some photos added and will be ready to submit, and I note you hope to do that this week.

Please loop me in on that when submitted, I appreciate it.

If you need anything further on an immediate basis on-site, please let me know, thanks.

Regards,  
Bill

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