ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

SENT 10-3-05

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

November 2, 2005

Mr. Stephen Wong
CW Investment Group
132 Ninth Street, Suite 200
Oakland, CA 94607

Subject: SLIC Case RO0002895, Wash Time Laundromat, 1815 Park Boulevard, Oakland, CA – Request for Work Plan

Dear Mr. Wong:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above-referenced site and the work plan entitled, "Subsurface Investigation and Assessment Workplan," dated October 31, 2005, prepared on your behalf by AllWest Environmental, Inc. ACEH concurs with the proposed scope of work provided that the technical comments below are addressed.

We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1. **Soil Borings.** The proposed boring locations and sampling methods are acceptable. Soil boring permits are to be obtained from the Alameda County Public Works Agency.

2. **Soil Vapor Sampling.** The proposed soil vapor sampling methods, analyses, and locations are acceptable. However, ACEH requests one additional soil vapor sampling location northwest of but in close proximity to existing boring SB-5. The purposes of this soil vapor sample are to evaluate whether a potential unidentified vadose zone source of volatile organic compounds (VOCs) may exist in the area of the former dry cleaning machine and to assess VOC concentrations downgradient of the previous VOC detections in soil and groundwater.

TECHNICAL REPORT REQUEST

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

- **March 2, 2006** – Subsurface Investigation Report

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).

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.

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) 567-6791.

Sincerely,

Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Michael Siembieda, AllWest Environmental, Inc. 530 Howard Street, Suite 300, San Francisco, CA 94105

Kenneth Phares, Jay-Phares Corporation, 10700 MacArthur Boulevard, Suite 200, Oakland, CA 94605-5260

William Phua, P.O. Box 10664, Oakland, CA 94610-0664

Peter McIntyre, AEI Consultants, 2500 Camino Diablo, Suite 200, Walnut Creek, CA 94597

Donna Drogos, ACEH
Jerry Wickham, ACEH
File

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

Sent 10-17-05

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

October 13, 2005

Mr. Stephen Wong
CW Investment Group
132 Ninth Street, Suite 200
Oakland, CA 94607

Subject: SLIC Case RO0002895, Wash Time Laundromat, 1815 Park Boulevard, Oakland, CA – Request for Work Plan

Dear Mr. Wong:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above-referenced site and the report entitled, "Subsurface Investigation Report," dated June 30, 2005, prepared on your behalf by AllWest Environmental, Inc. The "Subsurface Investigation Report" documents the results of sampling activities conducted at the site in May 2005. Volatile organic compounds (VOCs) were detected at concentrations exceeding Environmental Screening Levels (San Francisco Bay Regional Water Quality Control Board, February 2005) [ESLs] in soil and groundwater beneath a portion of the building. Based on these results, further investigation is required to define the extent of and evaluate potential risks from the site contamination. Existing data gaps and potential approaches for addressing the data gaps were discussed on October 12, 2005 during a conference call between Michael Siembieda of AllWest Environmental, Peter McIntyre of AEI Consultants, and Jerry Wickham of ACEH. The data gaps were also discussed during a telephone conference call on October 11, 2005 between Stephen Wong, Kenneth Phares, William Phua, and Jerry Wickham. **We request that you submit a work plan to address the items discussed in the technical comments below by December 16, 2005.**

We request that you address the following technical comments, perform the proposed work, and send us the technical reports requested below.

TECHNICAL COMMENTS

1. **Sanitary Sewer Line and Extent of VOCs to Southeast.** Elevated concentrations of tetrachloroethene (PCE) were detected in boring AWB-2, which is the boring furthest to the southeast at the site. The extent of VOCs in soil and groundwater in the southeastern portion of the building is not known. The sanitary sewer line, which is shown on Figure 2 within the central portion of the building, may be a potential source of VOCs in addition to the former dry cleaning machine. Please propose a scope of work to define the extent of VOCs in the southeastern portion of the building and to evaluate the sanitary sewer line as a potential source. Additional information on the depth and flow direction for the sanitary sewer line would be useful in helping to assess whether the line is a potential source of the contamination encountered. Please present your plans to address this data gap in the work plan requested below.

2. **Potential for Indoor Vapor Intrusion.** The concentrations of PCE in soil and groundwater beneath the facility exceed the ESLs for vapor intrusion under a commercial or residential use. In order to more directly evaluate the potential risks from vapor intrusion, please consider the use of subslab or soil vapor sampling. A soil vapor survey may also be useful in focusing subsequent soil and groundwater sampling on areas of likely or potential solvent discharges. Please present your plans to address the potential for indoor vapor intrusion in the work plan requested below.

3. **Well Survey.** We request that you locate all wells (monitoring and production wells: active, inactive, standby, decommissioned, abandoned and dewatering, drainage and cathodic protection wells) within ½ mile of the subject site. We recommend that you obtain well information from both Alameda County Public Works Agency and the State of California Department of Water Resources, at a minimum. Submittal of maps showing the location of all wells identified in your study, and the use of tables to report the data collected as part of your survey are required. Please present your results in the Work Plan requested below.

4. **Sensitive Receptors.** Please identify any sensitive receptors such as schools, day care centers, or medical care facilities within 500 feet of the site.

5. **Site Conceptual Model.** The development of a Site Conceptual Model (SCM) for this site is encouraged in order to provide a framework for understanding the site conditions affecting the fate and transport of contaminants in the subsurface. A SCM is a set of working hypotheses pertaining to all aspects of the contaminant release, including site geology, hydrogeology, release history, residual and dissolved contamination, attenuation mechanisms, pathways to nearby receptors, and likely magnitude of potential impacts to receptors. The SCM is used to identify data gaps that are subsequently filled as the investigation proceeds. As the data gaps are filled, the working hypotheses are modified, and the overall SCM is refined and strengthened. Subsurface investigations continue until the SCM no longer changes as new data are collected. At this point, the SCM is said to be "validated." The validated SCM then forms the foundation for developing the most cost-effective corrective action plan to protect existing and potential receptors.

   When performed properly, the process of developing, refining and ultimately validating the SCM effectively guides the scope of the entire site investigation. We have identified, based on our review of existing data, some key data gaps in this letter and have described several tasks that we believe will provide important new data to refine the SCM. We request that your consultant develop a SCM for this site, identify data gaps, and propose specific supplemental tasks for future investigations. There may need to be additional phases of investigations, each building on the results of the prior work, to validate the SCM. Characterizing the site in this way will improve the efficiency of the work and limit its overall cost.

   The SCM approach is endorsed by both industry and the regulatory community. Technical guidance for developing SCMs is presented in API's Publication No. 4699 and EPA's Publication No. EPA 510-B-97-001; and "Guidelines for Investigation and Cleanup of MTBE and Other Ether-Based Oxygenates, Appendix C," prepared by the State Water Resources Control Board, dated March 27, 2000.

The SCM for this project shall incorporate, but not be limited to, the following:

a) A concise narrative discussion of the regional geologic and hydrogeologic setting obtained from your background study. Include a list of technical references you reviewed, and copies (photocopies are sufficient) of regional geologic maps, groundwater contours, cross-sections, etc.

b) A concise discussion of the on-site and off-site geology, hydrogeology, release history, source zone, plume development and migration, attenuation mechanisms, preferential pathways, and potential threat to downgradient and above-ground receptors. Be sure to include the vapor pathway in your analysis. Maximize the use of large-scale graphics (e.g., maps, cross-sections, contour maps, etc.) and conceptual diagrams to illustrate key points. Include structural contour maps (top of unit) and isopach maps to describe the geology at your site.

c) Identification and listing of specific data gaps that require further investigation during subsequent phases of work.

d) Proposed activities to investigate and fill data gaps identified above.

e) When data are available, the SCM shall include an analysis of the hydraulic flow system at and downgradient from the site. Include rose diagrams for groundwater gradients. The rose diagram shall be plotted on groundwater contour maps and updated in all future reports submitted for your site. Include an analysis of vertical hydraulic gradients. Note that these likely change due to seasonal precipitation and pumping.

f) Temporal changes in the plume location and concentrations are also a key element of the SCM. In addition to providing a measure of the magnitude of the problem, these data are often useful to confirm details of the flow system inferred from the hydraulic head measurements. When data are available, include plots of the contaminant plumes on your maps, cross-sections, and diagrams.

g) Other contaminant release sites exist in the vicinity of your site. Hydrogeologic and contaminant data from those sites may prove helpful in testing certain hypotheses for your SCM. Include a summary of work and technical findings from nearby release sites and incorporate the findings from nearby site investigations into your SCM.

You are encouraged to report the applicable information discussed above in your initial SCM and include it in the Work Plan requested below. Include updates to your SCM in the Subsurface Investigation Report requested below.

TECHNICAL REPORT REQUEST

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

- **December 16, 2005** - Work Plan for Subsurface Investigation
- **120 days after ACEH approval of Work Plan** – Subsurface Investigation Report

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).

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.

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) 567-6791.

Sincerely,

Jerry Wickham
Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Michael Siembieda, AllWest Environmental, Inc. 530 Howard Street, Suite 300, San Francisco, CA 94105

Kenneth Phares, Jay-Phares Corporation, 10700 MacArthur Boulevard, Suite 200, Oakland, CA 94605-5260

William Phua, P.O. Box 10664, Oakland, CA 94610-0664

Peter McIntyre, AEI Consultants, 2500 Camino Diablo, Suite 200, Walnut Creek, CA 94597

Donna Drogos, ACEH
Jerry Wickham, ACEH
File