

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director



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ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION
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June 26, 2007

Mr. Lawrence Hancock
Country Club Cleaners
500 Bollinger Canyon Way #A4
San Ramon, CA 94582

Mr. Mark Ratto
Peter J. Ratto Trust
670 W. Fruit Cive Forest Road
Jacksonville, FL 32259

Mr. Robert Strong
Country Club Cleaners
500 Bollinger Canyon Way #A4
San Ramon, CA 94582

Subject: SLIC Case RO0002913 and Geotracker Global ID T06019748481, Perciva/Metro Valley Cleaners, 224 Rickenbacker Circle, Livermore, CA 94550

Dear Mr. Hancock, Mr. Strong, and Mr. Ratto:

Alameda County Environmental Health (ACEH) staff has reviewed the Spills, Leaks, Investigations, and Cleanups (SLIC) case file for the above referenced site including the recently submitted document entitled, "Work Plan for Additional Site Characterization," dated June 1, 2007 and received by ACEH on June 12, 2007. The Work Plan was prepared on your behalf by Engeo, Incorporated in response to ACEH correspondence dated April 19, 2007, which is included as an attachment.

The Work Plan proposes a scope of work that includes indoor air sampling, monitoring well installation, and one deep soil boring. Off-site characterization to delineate the extent of soil vapor and groundwater contamination is required for the site but the Work Plan indicates that off-site sampling will be addressed in a subsequent Work Plan pending completion of off-site access agreements. We have several technical comments regarding the proposed indoor air sampling that require revisions to the Work Plan including more detailed descriptions of indoor air sampling methods. In general, we find that the proposed indoor air sampling is not discussed in sufficient detail and does not adequately follow December 15, 2004 DTSC *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air*. Therefore, we request that you **submit a revised Work Plan by July 26, 2007** that addresses the following technical comments.

TECHNICAL COMMENTS

1. **Overall Sampling Rationale and Proposed Methods.** We previously requested that you critically review all data and propose further investigation to evaluate potential indoor air vapor intrusion. We referenced the December 15, 2004 DTSC *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air* to help evaluate the results of the soil vapor sampling and present recommendations regarding additional sampling requirements. Please expand the description of sampling rationale and proposed indoor air sampling methods to be more consistent with requirements in the DTSC guidance document. The description of indoor air sampling in the Work Plan is currently one paragraph in length. In addition, please discuss the rationale for not conducting additional soil vapor or subslab

soil vapor sampling to further define the extent and sources of elevated concentrations of volatile organic compounds (VOCs) in soil vapor prior to indoor air sampling. As noted in our previous correspondence, step out sampling was not conducted during the January 2007 soil vapor sampling even though elevated concentrations of VOCs were detected in all of the soil vapor samples. Indoor air sampling is typically the last step in a vapor intrusion evaluation because of the complexity in evaluating the indoor air data. As noted in the December 15, 2004 DTSC *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air*, evaluation of indoor air sampling results will, "only be open to proper interpretation if the subsurface plumes are fully delineated, the conceptual site model is accurate, and buildings are adequately scrutinized prior to indoor air sampling."

2. **Multiple Sampling Events.** Since one indoor air sampling event may not be representative of long-term exposure, the December 15, 2004 DTSC *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air*, recommends a minimum of two indoor air sampling events before making a final risk determination for a site. At a minimum, one sampling event should be conducted during the late summer/early autumn and one event conducted during the late winter/early spring. In the Revised Work Plan requested below, please discuss the number of proposed indoor air sampling events.
3. **Proposed Indoor Air Sampling Locations.** Indoor air samples are typically collected near points of vapor entry and within discrete areas of potential exposure such as individual offices within an office building. Collection of indoor air samples from the Reception Area, Office, and one location adjacent to the dry cleaning machine appears to be acceptable since two of the locations are within discrete offices and the third is located adjacent to a likely point of release. Please describe the rationale for proposed indoor air sampling from the Boiler Room and the area in the northeastern portion of the building. The proposed indoor air sample in the northeastern portion of the building is north of previous soil vapor sampling locations. In the Revised Work Plan requested below, please include a discussion of potential points of vapor entry such as sumps, drains, cracks, joints, or enclosed spaces within the building foundation. Revise the proposed sampling locations as necessary to address significant locations of potential vapor entry.
4. **Utility Corridor Assessment.** In the Revised Work Plan below, please indicate whether a utility corridor assessment as described in the December 15, 2004 DTSC *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air*, has been conducted.
5. **Operation of HVAC System.** Indoor air sampling should be conducted in an environment that is representative of normal building use. Therefore, the heating and air conditioning system is to be operated for a period of 24 hours prior to and during indoor air sampling. Please include these plans in the Revised Work Plan requested below.
6. **Ambient (Outdoor) Air Sample.** Ambient air sampling is required to help assess the effects of outside sources on indoor air sampling results. In the revised Work Plan requested below, please include a plan to collect a minimum of one ambient (outdoor) air sample.

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7. **Comparison of Results to Occupational Safety and Health Administration (OSHA) or National Institute for Occupational Safety and Health (NIOSH) Exposure Criteria.** OSHA Permissible Exposure Limits (PELs) or NIOSH exposure criteria are not appropriate standards for evaluating risks associated with vapor intrusion to indoor air in California. Potential adverse effects at vapor intrusion sites should be evaluated in terms of acceptable exposure based upon risk rather than comparison to OSHA PELs or NIOSH exposure criteria regardless of site use. Please review Appendix F of the December 15, 2004 DTSC *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air* for a more detailed discussion of this subject.
8. **Groundwater Monitoring Wells.** The proposed groundwater monitoring well locations are acceptable. The Work Plan proposes a depth of approximately 40 feet bgs for the monitoring wells. We request that the monitoring wells be installed no more than 10 feet below the equilibrated static water level in the well borings. We note that static water levels in previous soil borings ranged from approximately 22 to 26 feet bgs. If similar static water levels are encountered during the monitoring well installation, the total depth of the wells should not exceed 36 feet bgs.
9. **Deep Soil Boring.** The purpose of the deep soil boring is to evaluate the site hydrogeology and identify deeper water-bearing layers for grab groundwater sampling to assess the vertical extent of contamination. We request that soil samples be collected continuously rather than at 5- or 10-foot intervals in the boring. Grab groundwater samples are to be collected from all significant water-bearing layers below 35 feet bgs. Please include this revision to the Revised Work Plan requested below and describe the rationale for extending the boring to 100 feet bgs.
10. **Off-site Soil Vapor and Groundwater Sampling.** Off-site soil vapor and groundwater sampling is required for the site. Please **submit a Work Plan for Off-site Investigation by August 27, 2007.**

TECHNICAL REPORT REQUEST

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

- **July 27, 2007** – Revised Work Plan
- **August 27, 2007** –Work Plan for Off-site Investigation

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.

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ELECTRONIC SUBMITTAL OF REPORTS

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) 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. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program ftp site are provided on the attached "Electronic Report Upload (ftp) Instructions." Please do not submit reports as attachments to electronic mail.

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. Submission of reports to the Geotracker website does not fulfill the requirement to submit documents to the Alameda County ftp site. 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 monitor wells, and other data to the Geotracker database over the Internet. Beginning July 1, 2005, electronic submittal of a complete copy of all necessary reports was required in Geotracker (in PDF format). Please visit the SWRCB website 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.

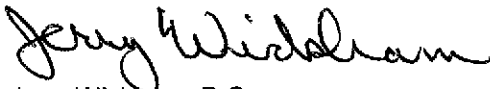
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AGENCY OVERSIGHT

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, P.G.
Hazardous Materials Specialist

Attachment: ACEH Correspondence dated April 19, 2007

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Colleen Winey, QIC 80201, Zone 7 Water Agency, 100 North Canyons Parkway,
Livermore, CA 94551

Danielle Stefani, Livermore-Pleasanton Fire Department, 3560 Nevada Street,
Pleasanton, CA 94566

Paul Smith, Livermore-Pleasanton Fire Department, 3560 Nevada Street,
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Kelly Krohn, Engeo, Incorporated, 2010 Crow Canyon Place, Suite 250, San Ramon, CA
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Donna Drogos, ACEH
Jerry Wickham, ACEH
File