AGENCY



DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES

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

August 17, 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 revised July 9, 2007. The Work Plan was received by ACEH on July 27, 2007 and prepared on your behalf by Engeo, Incorporated in response to ACEH correspondence dated June 26, 2007.

The Work Plan proposes a scope of work that includes additional on-site soil vapor sampling, a utility corridor assessment, installation of three monitoring wells, 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. The proposed scope of work may be implemented provided that the technical comments below are addressed during the proposed field investigation. Submittal of a revised Work Plan is not required unless an alternate scope of work outside that described in the Work Plan and technical comments below is proposed.

We request that you address the following technical comments, 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 jerry.wickham@acgov.org) prior to the start of field activities

TECHNICAL COMMENTS

1. Additional Soil Vapor Sampling. The proposal to collect five additional soil vapor samples using protocols and procedures that are consistent with, "Advisory – Active Soil Gas Investigations," dated January 13, 2003 (Los Angeles Regional Water Quality Control Board and DTSC) is generally acceptable. However, we request the two additional soil vapor samples be collected at the sampling locations shown on the attached Revised Figure 4. Please present the results of the soil vapor sampling in the Site Assessment Report

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requested below. The Work Plan indicates that off-site soil vapor sampling will be addressed in a subsequent work plan after access agreements have been obtained.

- Utility Corridor Assessment. The proposal to conduct a utility corridor assessment in accordance with the December 15, 2004 DTSC Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air, is acceptable.
- 3. 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. We recommend that you advance the proposed deep soil boring prior to well installation in order to identify all water-bearing layers. The screen and filter packs for the monitoring wells must not provide potential pathways for cross-contamination by connecting separate water-bearing layers. Please present the results of the well installation and sampling in the Site Assessment Report requested below.
- 4. Deep Soil Boring. The proposed location for the deep soil boring is acceptable. We request that grab groundwater samples be collected from all significant water-bearing layers below 35 feet bgs. Please present the results from the deep soil boring in the Site Assessment Report requested below.

TECHNICAL REPORT REQUEST

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

• December 19, 2007 - Site Assessment 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

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

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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.

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.

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If you have any questions, please call me at (510) 567-6791.

Sincerely,

Jerry Wickham, P.G.

Hazardous Materials Specialist

Attachment: Revised Figure 4

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, Pleasanton, CA 94566

Kelly Krohn, Engeo, Incorporated, 2010 Crow Canyon Place, Suite 250, San Ramon, CA 94583-4634

Shawn Munger, Engeo, Incorporated, 2010 Crow Canyon Place, Suite 250, San Ramon, CA 94583-4634

Donna Drogos, ACEH Jerry Wickham, ACEH File

Revesed Figure 4

