

ALAMEDA COUNTY  
HEALTH CARE SERVICES



AGENCY  
DAVID J. KEARS, Agency Director

ENVIRONMENTAL HEALTH SERVICES

ENVIRONMENTAL PROTECTION  
1131 Harbor Bay Parkway, Suite 250  
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(510) 567-6700  
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May 12, 2008

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, "*Additional Site Characterization Results, 224 Rickenbacker Circle, Livermore, California*" dated April 8, 2008 and prepared on your behalf by Engeo, Incorporated. The report was prepared in response to ACEH correspondence dated August 17, 2007, which requested submittal of a site assessment Report by December 19, 2007.

The "*Additional Site Characterization Results*" report indicates that soil vapor sampling results from the December 2007 sampling event are significantly different than results from the January 2007 soil vapor sampling event. We request that you prepare a Work Plan to address this apparent discrepancy and to provide reliable data on the potential for soil vapor intrusion to indoor air.

As discussed in the technical comments below, the "*Additional Site Characterization Results*" report is also missing several elements normally included in a site assessment report. Therefore, we request that you address the items identified in the technical comments below and prepare a revised report with the missing elements and a work plan to evaluate vapor intrusion **no later than July 22, 2008**.

**TECHNICAL COMMENTS**

1. **Soil Vapor Sampling Data.** The description of soil vapor sampling in the Additional Site Characterization Report is incomplete. In the Revised Site Characterization Report requested below, please include the following items:

- Depth at which soil vapor samples were collected
- Whether a purge volume test was conducted
- Purge volume
- Volume of sampling system
- Sampling volume

- Purge and sample flow rates (use of flow regulator required)
  - Duration of purging and sampling
  - Whether leak check compound was placed around surface bentonite seal and top of soil gas probes
  - Whether any significant rainfall events occurred prior to sampling
  - Pressure in Summa canister prior to sampling, after sampling, and upon arrival at laboratory
  - Type of "qualitative permeability observations" discussed in section 2.2.
2. **Footnote on Laboratory Reports.** Many of the soil vapor analytical reports in Appendix B include a footnote stating, "Due to low initial pressure in a Summa canister, sample was diluted prior to analysis by addition of argon. Results are reported to the MDL." In the Revised Site Characterization Report requested below, please provide further explanation regarding why the Summa canisters had low initial pressure and required dilution prior to analysis.
3. **Analysis of Soil Vapor Sampling Results.** The Additional Site Characterization Report speculates that the syringes used in sample collection during the January 2007 sampling event, "may not have been properly purged prior to sampling and may exhibit cross-contamination from other off-site sources." The soil vapor sampling methods used during the January 2007 sampling event are widely applied on numerous sites. Please indicate why you believe sampling contamination may have occurred during the January 2007 sampling.
4. **Soil Vapor Analytical Methods.** The "Additional Site Characterization Report," states that, "EPA 8260 Method used for mobile analysis was not specifically developed for air analysis. Discrepancies between 8260 and TO015 analysis have been demonstrated in the past." The report concludes that the methods used for the January 2007 sampling event are, "subject to significant sample recovery and analytical error in comparison to Summa canister recovery and TO-15 analysis." Please describe your basis for these statements. Although EPA Method 8260 has higher reporting limits than TO-15, we are not aware of systematic analytical errors from using EPA Method 8260 for analyzing soil vapor samples. When conducted using proper analytical and QA/QC techniques by a California certified laboratory, EPA Method 8260 provides accurate and reliable results.
5. **Potential for Vapor Intrusion.** The "Additional Site Characterization Report," suggests that there is a discrepancy between the December 2007 soil vapor sampling results and the January 2007 soil vapor sampling results even though the samples were collected in different locations. Further evaluation of the potential for vapor intrusion on the site is required. Please prepare a Work Plan to address any apparent discrepancies and to accurately evaluate the potential for on-site vapor intrusion.
6. **Groundwater Sampling.** The description of groundwater sampling in the Additional Site Characterization Report is incomplete. In the Revised Site Characterization Report requested below, please include the following items:
- Depths to water
  - Surveyor's report with locations and top of casing elevations

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- Table of depths to water and groundwater elevations
- Potentiometric surface map
- Sampling field sheets showing measured parameters during purging and sampling, purge volumes, etc.

### **TECHNICAL REPORT REQUEST**

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

- **July 22, 2008** – Revised Site Characterization Report and Work Plan

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 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](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

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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 or send me an electronic mail message at [jerry.wickham@acgov.org](mailto:jerry.wickham@acgov.org).

Sincerely,



Jerry Wickham, California PG 3766, CEG 1177, and CHG 297  
Senior Hazardous Materials Specialist

Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Cheryl Dizon, 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

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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

**Alameda County Environmental Cleanup  
Oversight Programs  
(LOP and SLIC)**

ISSUE DATE: July 5, 2005

REVISION DATE: December 16, 2005

PREVIOUS REVISIONS: October 31, 2005

SECTION: Miscellaneous Administrative Topics & Procedures

SUBJECT: Electronic Report Upload (ftp) Instructions

Effective **January 31, 2006**, 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.

**REQUIREMENTS**

- Entire report including cover letter must be submitted to the ftp site as a **single portable document format (PDF) with no password protection**. (Please do not submit reports as attachments to electronic mail.)
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- Signature pages and perjury statements **must** be included and have either original or electronic signature.
- **Do not password protect the document**. Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:  
RO#\_Report Name\_Year-Month-Date (e.g., RO#5555\_WorkPlan\_2005-06-14)

**Additional Recommendations**

- A separate copy of the tables in the document should be submitted by e-mail to your Caseworker in **Excel** format. These are for use by assigned Caseworker only.

**Submission Instructions**

- 1) Obtain User Name and Password:
  - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
    - i) Send an e-mail to [dehloptoxic@acgov.org](mailto:dehloptoxic@acgov.org)
    - or
    - ii) Send a fax on company letterhead to (510) 337-9335, to the attention of Alicia Lam-Finneke.
  - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses, and the Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
  - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
    - (i) Note: Netscape and Firefox browsers will not open the FTP site.
  - b) Click on File, then on Login As.
  - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
  - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
  - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
  - a) Send email to [dehloptoxic@acgov.org](mailto:dehloptoxic@acgov.org) notify us that you have placed a report on our ftp site.
  - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name at acgov.org. (e.g., [firstname.lastname@acgov.org](mailto:firstname.lastname@acgov.org))
  - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload)