

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
COLLEEN CHAWLA, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
1131 HARBOR BAY PARKWAY, SUITE 250
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

9 October 2018

Jacob Levy
Palm Peninsula, LLC and 7200 Bancroft, LLC
201 Wilshire Boulevard
Santa Monica, CA 90401
(Sent via e-mail to: jacob@levyaffiliated.com)

Subject: Site Cleanup Program Case No. RO0002942 and GeoTracker Global ID SLT19735483, Sparkle Cleaners, 7200 Bancroft Avenue, Oakland, CA 94605 - Conditional Approval of Site Management Plan, Vapor Intrusion Workplan, and Addendum

Dear Mr. Levy:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file for the above-referenced site, including the following documents prepared on your behalf by PES Environmental, Inc. (PES):

- *First 2018 Semi-Annual Monitoring Report, And Work Plan For Vapor Intrusion Investigation*, dated 16 April 2018 (Work Plan)
- *Addendum to Work Plan For Vapor Intrusion Investigation*, dated 14 May 2018 (Addendum)
- *Site Management Plan*, dated 4 May 2018 (SMP)

In addition, ACDEH staff conducted a conference call with you and PES on 19 April 2018.

The SMP identifies regulated activities at the site, specifies required activities – including notification to ACDEH– prior to conducting regulated activities at the site, and describes general environmental measures required in association with performance of any regulated activities at the site. The property owner and property manager representatives are identified in the SMP. The ACDEH requires the property owner ensure that the SMP is implemented at all times.

The Work Plan, as modified by the Addendum, proposes soil gas sampling from 11 permanent vapor pin locations. PES proposes to collect sub-slab soil gas samples from: (1) the Sparkle Cleaners tenant space, (2) an interior hallway, (3) a vacant tenant space, (4) the Money Mart tenant space, and (5) the Bank of America tenant space. If necessary based on the sub-slab soil gas results, PES proposes to collect indoor air samples as a next step in the vapor intrusion (VI) investigation. Prospective indoor air sampling locations are included in the Workplan.

Based on our review of the case file, ACDEH conditionally approves the Workplan as modified by the Addendum, provided that you address the technical comments listed below as part of the implementation. Submittal of a revised workplan or a workplan addendum is not required. Provide 72-hour written notification to robert.schultz@acgov.org prior to the start of field activities. Send us the reports described below according to the specified schedule.

TECHNICAL COMMENTS

ACDEH requests that you address the following technical comments as part of your implementation of the Workplan as modified by the Addendum, and perform the proposed work in conformance with the conditions listed below.

1. **Conformance with DTSC Advisory.** Sub-slab soil gas sample collection methodology must conform with the California Department of Toxic Substance Control (DTSC) and Los Angeles Regional Water Quality Control Board, 2015, *Advisory – Active Soil Gas Investigations*. A gaseous tracer compound, such as helium, should be used along with a shroud placed over the sampling equipment.
2. **Documentation of Site Management Plan Compliance.** Compliance with the SMP must be documented in the Semi-Annual Monitoring Reports required below. Please include a summary of regulated activities in each semi-annual report. ACDEH requires that you provide updated information identifying property owner and manager representatives, tenant representatives, and a site plan identifying tenant locations relative to the dry cleaner release investigation area in each semi-annual monitoring report.
3. **Conceptual Site Model.** The Vapor Intrusion Investigation Report, required below, needs to be supported by an updated CSM that synthesizes all the analytical data and evaluates all potential exposure pathways and potential receptors that may exist at the site. At a minimum, the SCM should include:
 - a. Local and regional plan view maps that illustrate the location of sources (former facilities, piping, tanks, etc.) extent of contamination, direction and rate of groundwater flow, potential preferential pathways, and locations of receptors;
 - b. Geologic cross section maps that illustrate subsurface features, man-made conduits, and lateral and vertical extent of contamination;
 - c. Plots of chemical concentrations versus time;
 - d. Plots of chemical concentrations versus distance from the source;
 - e. Summary tables of chemical concentrations in different media (i.e. soil, groundwater, and soil vapor); and
 - f. Well logs, boring logs, and well survey maps;

- g. Discussion of likely contaminant fate and transport.
 - h. We request that you prepare the SCM in a tabular format to facilitate review and updating as additional data is collected.
 - i. If data gaps are identified in the SCM, please include a proposed scope of work to address those data gaps in the work plan.
4. **Semi-Annual Groundwater Monitoring.** The ACDEH requires semi-annual groundwater monitoring at this site. Monitoring well MW-2B was installed on 15 February 2018 and according to 14 May 2018 report prepared by PES may be downgradient of Sparkle Cleaners.

SUBMITTAL ACKNOWLEDGEMENT STATEMENT

ACDEH requires a Submittal Acknowledgement Statement, signed by the Responsible Party (RP), as a cover letter to technical reports and submittals. The requirement is described in Attachment 1. The language for the Submittal Acknowledgement Statement is as follows:

"I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Resources Control Board's GeoTracker website."

TECHNICAL REPORT REQUEST

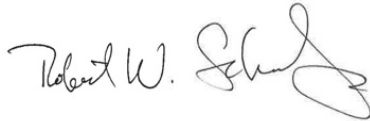
Please upload technical reports to the ACDEH ftp site (instructions to comply with this requirement are attached), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- 15 January 2019 – Vapor Intrusion Investigation Report;
File to be named: RO2942_SWI_R_YYYY-mm-dd
- 15 January 2019 – Groundwater Monitoring Report – 2nd Half 2018
File to be named: RO2942_GWM_R_YYYY-mm-dd
- 15 January and 15 July Each Year – Semi-Annual Monitoring Report
Files to be named: RO2942_GWM_R_YYYY-mm-dd

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If you have any questions, please call me at (510) 567-6721 or send me an electronic mail message at robert.schultz@acgov.org. Online case files are available for review at the following website: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=SLT19735483.

Sincerely,

A handwritten signature in blue ink that reads "Robert W. Schultz". The signature is fluid and cursive, with the first name "Robert" and last name "Schultz" clearly legible.

Robert W. Schultz, CHG
Senior Hazardous Materials Specialist

Attachment: Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations

cc: William Mast, PES Environmental, Inc., 1682 Novato Blvd., Suite 100, Novato, CA 94947
(Sent via e-mail to: wmast@pesenv.com)
Robert Schultz, ACDEH (Sent via e-mail to: robert.schultz@acgov.org)
Dilan Roe, ACDEH (Sent via e-mail to: dilan.roe@acgov.org)
GeoTracker, eFile

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6731, 6735, and 7835) 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 licensed or certified professional and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.