

## Nowell, Keith, Env. Health

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**From:** Nowell, Keith, Env. Health  
**Sent:** Friday, December 05, 2014 2:51 PM  
**To:** 'elvidge@sbcglobal.net'  
**Cc:** Patrick Ellwood (patrick@ellwoodcommercial.com); Gary Bates (gary\_bates@efiglobal.com); Roe, Dilan, Env. Health  
**Subject:** Site Cleanup Program case RO2981 - Red Hanger Kleeners, 6335-6339 College Ave., Oakland

Dear Mr. Elvidge,

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the *Soil Gas Investigation Work Plan* (Work Plan) dated October 21, 2014, which was prepared by Youngdahl Consulting Group, Inc. (Youngdahl) for the subject site. As stated in the Work Plan, the objective of the investigation is to further evaluate the extent of any dry cleaning solvent/solvent degradation product contamination in the soil gas. ACEH is of the opinion that, in addition to the proposed scope of work, the use of an on-site mobile laboratory will provide real time guidance in the field investigation, allowing for additional delineation of contaminants beyond the proposed work scope. ACEH need not approve additional soil boring locations resulting from the real-time investigation. ACEH is in general agreement with the scope of work presented in the Work Plan. Please incorporate the technical comments below into the executed Work Plan. Additionally, ACEH requests the technical comments be addressed in the report requested below.

### Technical Comments:

The Work Plan states:

1. *Several* soil gas samples will be collected. Figure 6 of the Work Plan shows 11 locations. ACEH requests that at least these 11 soil gas locations be sampled. ACEH should be provided with a revised figure for review should alternate locations be used which are not shown on Figure 6. It should be noted that these temporary sampling locations do not preclude the need for permanent sampling points based on review of the data.
1. One or two locations for subslab soil gas samples, as depicted on Figure 6, and that they will be either temporary or permanent sampling points. ACEH requests that at least three subslab soil gas locations be sampled and that the sampling points be permanent to allow for temporal sampling. Because the boiler room has a high probability of impact, ACEH requests locating a subslab sampling point in this room. ACEH should be provided with a revised figure for review should alternate locations be used which are not shown on Figure 6. Note that the subslab sample points will be set in the fill blanket just beneath the foundation slab, which may not correspond to a five-foot depth. Analyses will include acetone, chloroform PCE and toluene by EPA method 8260B. ACEH is of the opinion that the full volatile organic compound (VOC) analytical suite should be included for the EPA method 8260B analyses and should be performed for all soil gas samples associated with this investigation.
2. The sample train shroud will be monitored for the tracer gas isopropanol (IPA). The Work Plan does not identify how the monitoring will be performed. For each soil gas sample collected, please ensure IPA is tested for IPA in the soil gas analytical suite. In addition, the atmosphere within the shroud should be tested for IPA to ensure an adequate tracer gas concentration and to be able to calculate the percent leakage, should leakage occur.
3. Oxygen and carbon dioxide concentrations will be measured in at least one sample. As sample analysis will be performed using an on-site mobile laboratory, ACEH requests that, at a minimum, two sample locations be analyzed for concentrations of oxygen and carbon dioxide - at least one sample from a location shown to exhibit elevated VOC concentrations and at least one sample from a location shown to exhibit low-to-no VOC concentrations in order to evaluate the relationship of these gases to the VOC concentrations.

4. The data obtained from the proposed investigation will be evaluated against the San Francisco Bay Region, Regional Water Quality Control Board (SFBR-RWQCB) Environmental Screening Levels (ESLs) and/or evaluated according to the Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance), Department of Toxic Substances Control, California Environmental Protection Agency. ACEH requests that the data discussion and comparison should be made with the ESLs. Additionally, please address the EPA Region 9 Response Action Levels and Recommendations to Address Near-Term Inhalation Exposures to TCE in Air from Subsurface Vapor Intrusion, memorandum dated July 9, 2014.

### Technical Report Request

Please upload technical reports to the ACEH ftp site (Attention: Keith Nowell), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **February 6, 2015 – Soil Gas Investigation** (file name: RO0002981\_SWI\_R\_yyyy-mm-dd)

Thank you for your cooperation. ACEH looks forward to working with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org).

Respectfully,  
Keith Nowell

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PDF copies of case files can be reviewed/downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>