

Nowell, Keith, Env. Health

From: Nowell, Keith, Env. Health
Sent: Tuesday, January 27, 2015 12:44 PM
To: 'elvidge@sbcglobal.net'
Cc: Gary Bates (gary_bates@efiglobal.com); Patrick Ellwood (patrick@ellwoodcommercial.com); Roe, Dilan, Env. Health
Subject: SCP case RO2981 - Red Hanger Kleaners, 6335-6339 College Ave, Oakland

Dear Mr. Elvidge,

Thank you for the recently submitted documents regarding the subject Site Cleanup Program (SCP) case. Alameda County Environmental Health (ACEH) staff has reviewed the case file including the recently submitted documents, Phase II Environmental Site Assessment Work Plan (Work Plan) dated October 21, 2014, an email dated December 12, 2014 which was prepared in response to ACEHs technical comments of December 5, 2014 addressing the Work Plan, and a revised figure showing the proposed sampling locations provided as an attachment in an email provided to ACEH dated December 22, 2014. These documents were prepared by Youngdahl Consulting Group, Inc. (Youngdahl) for the subject site.

ACEHs technical comments of December 5, 2014 requested the addition of one sub slab sampling point in the boiler room of the dry cleaner suite. The December 22, 2014 response was to eliminate one of the proposed soil vapor sampling locations, keeping the total number of sample locations at thirteen. The rationale for the maintaining the number of sample points was twofold- first was a constraint imposed by the Alameda County Public Works Agency (ACWPA) to meet the grout inspectors schedule and second was the limitation imposed by the mobile laboratory by the number of samples that the mobile laboratory could process between instrument recalibrations.

ACEH is in general agreement with the work proposed in the Work Plan. The proposed scope of work may be implemented provided that the modifications requested in the technical comments below are addressed and incorporated during the field implementation. 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.

Technical Comments

1. Based on its review, ACEH requests the original thirteen sampling points be advanced as outlined in the Work Plan with the additional sub slab sample location requested by ACEH for the boiler room. As has been established, the additional sub slab sample point does not require grout inspection; thus the addition of this point will not impact the ACWPA inspectors schedule.
2. As has been discussed, in order to eliminate the impact to the mobile laboratory, ACEH requests that the three sub slab soil gas samples be submitted to a fixed site (brick and mortar) analytical laboratory for analysis.
3. ACEH notes that the analytical test method should meet the Data Quality Objectives (DQOs), and method reporting limits should be low enough for risk determination. Though trichloroethene (TCE) has not been reported at the site, its appearance is probable as TCE is a degradation product of tetrachloroethene (PCE). Therefore, ACEH is evaluating the laboratory reporting limits (LRLs) to the more conservative TCE screening level for this preliminary screening evaluation. Table 2 of the guidance document *Final- Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance)* prepared by Cal/EPA, dated October 2011, identifies an attenuation factor (AF) of 0.05 for existing commercial development for subslab soil gas samples. The *EPA Region 9 Interim Action Levels and Response Recommendations to Address Potential Developmental Hazards Arising from Inhalation Exposures to TCE in Indoor Air from Subsurface Vapor Intrusion*, dated June 30, 2014, identifies 3-8 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) for commercial/industrial TCE

exposures. Back calculating the laboratory reporting limit (LRL) (screening level divided by the AF) using the Region 9 exposure concentration yields 60 µg/m³, a value below the LRL for the 8260B test method.

Therefore, ACEH requests the sub slab vapor samples be analyzed using EPA test method TO-15, which has a LRL more appropriate than 8260B for determining risk.

4. Laboratory analysis of the shroud tracer gas is proposed for the first sample only with subsequent shroud tracer gas concentrations monitored using a photoionization detector (PID). The PID measurements will be used to estimate a scaled concentration of the tracer gas. This is a concern to ACEH as it increases the uncertainty, hence data validity, should leakage occur, reducing the usefulness of the data. ACEH requests a minimum of three shroud trace gas sample be collected and analyzed by the mobile laboratory. The multiple shroud gas analyses, coupled with the PID measurements, will provide a degree of confidence in the analytical to PID correlations.

Please provide 72-hour advance written notification to this office (e-mail preferred to: keith.nowell@acgov.org) prior to the start of field activities.

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:

- **April 17, 2015 – Soil Gas Investigation** (file name: RO0002981_SWI_R_yyyy-mm-dd)

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.

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.

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>