

Nowell, Keith, Env. Health

From: Nowell, Keith, Env. Health
Sent: Tuesday, November 10, 2015 3:08 PM
To: 'ronpatelvidge@gmail.com'
Cc: 'Gary Bates'; 'Patrick Ellwood'; 'dcs@youngdahl.net'; 'Paul King'; Roe, Dilan, Env. Health
Subject: Work Plan Review, ACEH case file RO2981 and GeoTracker Global ID T10000000416, Red Hanger Kleaners, 6235-6239 College Ave., Oakland

Dear Mr. Elvidge,

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site and the recently submitted document entitled *Sub-Slab Depressurization Feasibility Study Work Plan* (Work Plan) prepared by P&D Environmental, Inc. and dated November 9, 2015. The Work Plan recommends the installation of three five-inch-diameter sub-slab extraction wells constructed using PVC and seven sub-slab vapor pins. Vacuum will be applied sequentially to each of the extraction wells with vacuum observations made in the other two extraction wells, the seven sub-slab vapor pins, and at a sub-slab vapor pin previously approved by ACEH in a letter dated November 6, 2015. The field work will be followed by a report documenting the pilot test procedures, test result evaluation, and provide recommendations. Thank you for the Work Plan and the continuing work at the site.

ACEH generally concurs with the proposed scope of work and requests that you address the following technical comments, perform the proposed work, and send us the technical reports described below.

TECHNICAL COMMENTS

1. **Well Construction** – ACEH is in general concurrence with the well construction details presented, but has several concerns as listed below:
 - A. **Compatibility of Polyvinyl Chloride (PVC) Piping with Tetrachloroethene (PCE)**- Due to the tight timeframe for Work Plan review, ACEH was unable to locate data regarding the compatibility of polyvinyl chloride (PVC) piping with tetrachloroethene (PCE) and biasing volatile organic compound (VOC) concentrations. As the Work Plan is designed to evaluate the efficacy of sub-slab depressurization, ACEH is of the opinion the Work Plan adequately addresses this issue. However, ACEH requests the VOC-PVC compatibility issue be addressed in the report documenting the findings of the depressurization study.
 - B. **Use of Calk as a Well Seal**- The PVC pipe seal is described as being caulked in place. As some caulks contain VOCs, ACEH requests the caulk be a non-VOC containing material.
 - C. **Well Construction Details**- The Work Plan identifies three details of the extraction well construction: use of PVC pipe, the pipe being 4-inches in diameter, and that the pipe will be caulked in place. No other construction details, e.g. well depth, screened interval, annular seal, etc., have been disclosed. Please provide ACEH the well construction details for review and approval - by the date specified below.
2. **Sample Collection** – One air sample will be collected in a one-liter SUMA canister from the inlet to the blower for each of the three extraction locations. As the vacuum pressure of the SUMA canister exceeds the vacuum created by the blower, ACEH is concerned that air from the blower may be incorporated into the collected sample, possibly contaminating the sub-slab soil gas sample. Please address the potential for air passing through the blower being incorporated into soil gas sample by the date specified below.

Based on the tight timeline prior to the execution of work, ACEH requests Technical Comments 1C and 2 be addressed in an email correspondence- Attention Keith Nowell- for our prompt review.

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:

- **November 12, 2015- Response to Technical Comments** (file name: RO0002981_CORRES_L_yyyy-mm-dd)
- **January 9, 2016- Sub-Slab Depressurization Feasibility Study** (file name: RO0002981_FEASSTUD_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.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

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.

Regards,
Keith Nowell

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

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