

Nowell, Keith, Env. Health

From: Nowell, Keith, Env. Health
Sent: Wednesday, December 23, 2015 10:21 AM
To: 'ronpatelvidge@gmail.com'
Cc: Gary Bates (gary_bates@efiglobal.com); Patrick Ellwood (patrick@ellwoodcommercial.com); 'dcs@youngdahl.net'; Paul King (PDKing0000@aol.com); Roe, Dilan, Env. Health
Subject: Sub-slab Depressurization Feasibility Study Review and Request for a Work Plan, 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 including the recently submitted document entitled *Sub-slab Depressurization Feasibility Test Report* prepared by P & D Environmental, Inc. (P&D), dated December 14, 2015. The referenced report documents the sequenced application of vacuum at four extraction locations while measuring the vacuum at extraction locations where extraction was not being performed, at eight soil vapor pins, and at two soil gas wells. The study documents a radius of influence of approximately 60 feet as measured by the distance between vacuum point SSE1 and measuring port VP2. Additionally, at the conclusion of the vacuum application for each extraction location, a soil gas sample was recovered for laboratory analysis.

ACEH generally concurs with the findings of the depressurization feasibility study. We request that you address the following technical comments, submit the requested document below, and upon ACEH approval, perform the proposed work. 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 COMMENTS

1. It does not appear that a leak detection compound was applied at the vacuum and the measuring ports. A leak test should be conducted at every vacuum port to evaluate the integrity of the annular seal to prevent "short circuiting" of air introduced from the above the measured interval and at a sample point each time a soil gas sample is collected to evaluate the integrity of the sample. Without application of a leak test compound, it is unclear to ACEH if a good annular seal is present. The vacuum measured may have been communicated through the soil, through the sub-slab coarse-grained fill, or some combination of the two. Therefore, please incorporate the use of a leak detection compound to evaluate the condition of annular seals in the report requested below.

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 22, 2016** – Sub-slab Depressurization System Installation Work Plan (document to be named RO0002981_WP_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

Keith Nowell PG, CHG
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda , CA 94502-6540
phone: 510 / 567 - 6764
fax: 510 / 337 - 9335
email: keith.nowell@acgov.org

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

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