

ALAMEDA COUNTY
**HEALTH CARE SERVICES
AGENCY**

REBECCA GEBHART, Interim Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP) FOR
HAZARDOUS MATERIALS RELEASES
1131 HARBOR BAY PARKWAY
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

June 30, 2017

College Claremont Venture LLC
1345 Grand Ave.
Piedmont, CA 94610
Attention: Mr. Ronald Elvidge
(Sent via electronic mail to: ronpatelvidge@gmail.com)

Ila Gordon
Trustee of SIRILA Living Trust
Ila Lynn Gordon Investment Trust of
Gordon Family Trust
PO Box 13214
Palm Desert, CA 92255

Brian J. Gordon
PO Box 13214
Palm Desert, CA 92255

David B. Gordon
9 Calle
San Clemente, CA 92673

Todd Borst, Trustee
Ila Lynn Gordon Investment Trust
2305 Little Ben
Lincoln, CA 95648

George Kong (Sent via electronic mail to: gkongwashworld@comcast.net)

Subject: Conditional Work Plan Approval, Site Cleanup Program Case No. RO0002981 and Geotracker Global ID T10000000416, Red Hanger Kleeners, 6235-6239 College Ave., Oakland, CA 94618

Dear Responsible Parties:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file and the recently submitted document entitled *Supplemental Remedial Investigation Workplan* (Work Plan) dated June 19, 2017 and prepared by LRM Consulting Inc. (LRM) for the subject case. The Work Plan was prepared in response to our letters dated April 18, 2017 and April 20, 2017. In the April 18, 2017 letter, ACDEH requested a work plan for additional contaminant delineation. In our April 20, 2017 letter, we requested remediation system modification work plan (RSM) and a utility survey/ repair report.

As presented in the Work Plan, LRM indicates the storm and sanitary utility survey is ongoing, and proposes the installation and sampling of six groundwater monitoring wells and installation of two shallow (7 feet below the ground surface-bgs) and two deep (17 feet bgs) vapor monitoring wells to further delineate contamination. LRM states proposed modification of the current onsite remediation system necessarily requires the completion of the subsurface investigation and that the potential need for repairing the damaged clay pipe will be further evaluated once the modified remediation system has been put into operation.

ACDEH generally concurs with the proposed scope of work with regard to the additional contaminant delineation. 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. **Soil Sampling** – LRM states soil samples will be collected at five-foot intervals down to the water table, estimated at 5, 10, and 15 feet bgs. A photoionization detector (PID) will be used to screen all soil being logged and additional soil samples may be collected in response to elevated PID, upwards of 50 parts per million by volume (ppmv), readings.

ACDEH recommends that soil samples be collected and analyzed at intervals of not more than five feet, areas of obvious contamination, the soil/groundwater interface, and at significant changes in lithology. If staining, odor, or elevated PID readings are observed over an interval of several feet, a sufficient number of soil samples from this interval should be submitted for laboratory analyses to characterize the concentrations of potential chemicals of concern (PCOCs) within this interval. ACDEH requests an appropriate PID threshold reading be used based on the sensitivity of the PID to the PCOCs screening levels.

The sample collection method described using an un-sleeved split-spoon sampler for collection of soil samples is inappropriate for the PCOCs at the site as volatilization of the samples may result in non-representative PCOC concentrations. ACDEH recommends the use of a dual-purpose direct push/auger drill rig to advance the bores. Using direct push techniques, soil can be collected in acetate (or similar) tubes for logging and selected sample screening and collection. Following advancing the bore to the target depth, the bore would be over-drilled with a hollow stem auger for well completion.

2. **Sanitary Sewer Repair** – A video inspection of the sanitary sewer pipe performed in March 2016 revealed several of the joints in the clay pipe appear to be offset. However, a proposed exploratory excavation of the sewer pipe lateral was not deemed warranted following the soil vapor extraction (SVE) system feasibility test. Repair of the sanitary sewer pipe should not be dependent on results of the SVE system or for the proposed remediation system modification work. ACDEH recommends the sewer line be repaired in a timely manner.
3. **Sanitary Sewer Soil Sampling** – As indicated above, the joints in the clay pipe portion of the sewer line appear to be offset. The offsets may provide potential leakage zones along the clay pipe portion of the sewer line. In a previous investigation, the depth of the bottom of the sanitary sewer at a cleanout was determined to be less than two feet. As the proposed locations of monitoring wells MW-4, MW-5, and MW-6 are described as near existing drains associated with sewer lines, ACDEH recommends additional soil samples be collected at the depth of the base of the adjacent sewer line at the locations of these monitoring wells.
4. **Vapor Monitoring Wells** – LRM proposes the installation of two shallow (7 feet bgs) and two deep (17 feet bgs) vapor monitoring wells (VMWs). The rationale for these depths is that they will be similar to the existing VMW network. As indicated above, ACDEH has requested a RSM as, at an appropriate vacuum (reported as 50- to 100-inches of water column), the existing SVE system is reported to encourage water into the extraction wells, resulting in periodic tripping of the system. Six of the eight soil vapor extraction wells are screened to 17 feet bgs. Additionally, two feet of water was reported for selected SVE wells.

Therefore, ACDEH recommends a phased approach to the proposed work. The first phase would be the installation of the groundwater monitoring wells. If stabilized groundwater measurements of the wells is less than 17.5 feet bgs, an evaluation should be made to determine the appropriateness of installation of the 17-foot deep VMWs.

Additionally, ACDEH request the investigation and well construction be conducted in accordance with the July 2015 *Advisory- Active Soil Gas Investigations* (Advisory) prepared by California Environmental Protection Agency/ Department of Toxic Substances Control (Cal EPA / DTSC), and the Regional Water Quality Control Boards of the Los Angeles (LARWQCB) and San Francisco (SFRWQCB) regions. The wells should be continuously cored in accordance with the Advisory. ACDEH recommends the use of a direct push rig as a means of obtaining a continuous lithologic log.

5. **Investigation Derived Wastes** – The standard operating procedures (SOPs) provided as an attachment to the Work Plan do not include the language that all investigation derived wastes (IDW) will be appropriately containerized, profiled, and disposed. Specifically, *SOP-1 Groundwater Monitoring Well Installation*, states that water from high-pressure steam cleaning will be allowed to fall on the ground. As the SOP goes on to

state the steam cleaning will not take place over the well and no water will be allowed to enter the borehole, it does not appear to ACDEH that the water generated from the steam cleaning process will be appropriately contained for disposal. ACDEH requests that all IDW be appropriately containerized, profiled, and disposed and that documentation of the disposal be provided as an attachment to the investigation report requested below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACDEH 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:

- **September 4, 2017** – Soil, Groundwater, and Soil Vapor Investigation Report
(File to be named: SWI_R_yyyy-mm-dd)
- **60 days following submittal of Soil, Groundwater, and Soil Vapor Investigation Report** - Remediation System Modification Work Plan RSM – (File to be named: WP_R_yyyy-mm-dd)

If your electronic mail address does not appear on the cover page of this notification ACDEH is requesting you provide your 'email' address so that we can correspond with you quickly and efficiently regarding your case.

Sincerely,

Keith Nowell PG, CHG
Hazardous Materials Specialist

Enclosures: Attachment 1 - Responsible Party(ies) Legal Requirements/Obligations & ACDEH Electronic Report Upload (FTP) Instructions

cc: Jonathan W. Redding, Wendel, Rosen, Black & Dean LLP, 1111 Broadway, 24th Floor, Oakland, CA 94607 (*Sent via electronic mail to jredding@wendel.com*)

Peter Ton, Wactor & Wick LLP, 180 Grand Avenue, Suite 950, Oakland, CA 94612 (*Sent via electronic mail to: pton@ww-envlaw.com*)

Natalie Mehta, 6036 Rockwell Street, Oakland, CA 94618, (*Sent via electronic mail to natalie.metha@yahoo.com*)

Mehrdad Javaherian, LRM Consulting Inc., 1534 Plaza Lane, #145, Burlingame, CA 94010 (*Sent via electronic mail to: mehrdad@lrm-consulting.com*)

Dilan Roe, ACDEH (*Sent via electronic mail to: dilan.roe@acgov.org*)

Paresh Khatri, ACDEH (*Sent via electronic mail to: paresh.khatri@acgov.org*)

Keith Nowell, ACDEH (*Sent via electronic mail to: keith.nowell@acgov.org*)

GeoTracker / File

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

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.

ELECTRONIC SUBMITTAL OF REPORTS

Alameda County Department of Environmental Health's (ACDEH) Environmental Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program File Transfer Protocol (FTP) site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) GeoTracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and other data to the GeoTracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to SCP sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/) for more information on these requirements.

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 ACDEH's FTP server and the SWRCB's GeoTracker website." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

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. For your submittal to be considered a valid technical report, you are to present site-specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this case meet this requirement. 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

Please note that delays in investigation, late reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional 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.

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 1, 2016
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010; May 15, 2014, November 29, 2016
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions


The Alameda County Environmental Cleanup Oversight Programs (LOP and SCP) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- **Signature pages and acknowledgement and perjury statements must be included and have either original or electronic signature.**
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Submission Instructions

- 1) Obtain User Name and Password
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to deh.loptoxic@acgov.org.
 - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses**, and the **Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
 - a) Open File Explorer using the Windows  key + E keyboard shortcut.
 - i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) On the address bar, type in ftp://alcoftp1.acgov.org.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive)
 - d) Click Log On.
 - e) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - f) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to deh.loptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload**. (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.