

**From:** [Detterman, Karel, Env. Health](#)  
**To:** [Charles Gurney](#)  
**Cc:** "[gabe.stivala](#)"; [Roe, Dilan, Env. Health](#)  
**Subject:** RO3097 SCP Program 580 Market Place Shopping Center, East Castro Valley Boulevard, Castro Valley, CA  
**Date:** Friday, August 12, 2016 10:26:11 AM  
**Attachments:** [Attachment 1 and ftpUploadInstructions 2014-05-15.pdf](#)

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Hello Chuck:

Thank you for submitting the August 10, 2016 *Revised Remedial Excavation Work Plan* (Revised Work Plan) prepared and submitted on your behalf by ATC Group Services LLC (ATC). The Revised Work Plan was requested during a conference call with Alameda County Department of Environmental Health (ACDEH) on July 21, 2016. The purpose of the conference call was to discuss ATC's March 14, 2016 *Remedial Excavation Work Plan* (Work Plan) and ATC's April 14, 2016 *Sub-Slab Vapor and Indoor Air Assessment Report* (Report).

Based on ACDEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are addressed and incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org)) prior to the start of field activities.

As discussed during the conference call, the stakeholders recognize that, while the proposed approach is an interim remedial action, it may not be effective in removing the elevated concentrations of tetrachloroethene (PCE) in soil in the suspected source area at the site.

### **TECHNICAL COMMENTS**

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The following list provides a summary of the main topics discussed during the conference call.

- 1. Excavation Event and Interim Remediation Report:** The selected PCE remedial goal of 0.1 milligrams per kilogram (mg/kg) in soil is acceptable to ACDEH. Please provide the basis for selection this value in the Interim Remediation Report. The proposed excavation field screening value of 500 parts per billion (ppb) PCE using a photoionization detector (PID) is also acceptable to ACDEH.

Please notify the DryClean 580 business that the back door may need to be kept closed during the excavation activities and that it may be necessary to request that the DryClean 580 tenant commence using the heating, ventilation, and air conditioning (HVAC) system during the upcoming excavation event.

Soil Vapor Wells SV-23A and SV-23B are located within the area of the proposed excavation and will need to be destroyed prior to the start of excavation. ATC submitted a well destruction permit application yesterday August 11, 2016 to Alameda County Public Works Agency (ACPWA). Please include the well destruction documentation in the Interim Remediation Report requested below.

- 2. Trash Enclosure and Sewer Line:** The Work Plan indicates that the proposed excavation is limited in extent by the structure to the north and the utility corridor to the south; however, as discussed during the conference call, the trash enclosure could be temporarily moved allowing excavation beneath the trash enclosure. The Revised Work Plan indicates that the excavation may be extended to the northeast as necessary. Please describe potential excavation step-out

sampling protocol. Since the sewer line appears to be within the excavation limits, please determine the depth of the sewer line and describe how the sewer line will be secured if the excavation is deeper than the sewer line depth. Please provide a description of the contingencies if it becomes necessary to extend the excavation. Since the edge of the trash enclosure coincides with the southwest boundary of the proposed excavation please include description of contingencies if confirmation sampling indicates that the sewer line and/or the trash enclosure are contaminant source(s) including, but not limited to: sewer line and/or trash enclosure hot spot excavation, sewer line replacement, and temporary business disruption during sewer line replacement. If the sewer line requires temporary capping, please provide a description of the contingencies to accommodate affected tenants.

3. **Clean Backfill Guidance Document:** Thank you for including a reference to the California Department of Toxic Substance Control's (DTSC) October 2001 *Information Advisory Clean Imported Fill Material* for importing backfill material for the proposed excavation in the Revised Work Plan; since the excavation area will be graded and capped with asphalt concrete during site restoration, the grain size of the clean backfill material may not have much impact on future contaminant migration. Additionally, as discussed during the July 21, 2016 conference call, we understand that confirmation sample results will be provided to ACDEH and ACDEH will provide approval of the excavation backfilling prior to the placement of all backfill material.
4. **California Health Hazard Screening Limits (CHHSLs):** Appendix A, *Airborne Monitoring, Personal Protective Equipment & Exposure Control Protocol* of the Revised Work Plan refers to DTSC's outdated CHHSL screening levels instead of the screening levels provided in the DTSC Human Health Risk Note No. 3 (dated May 21, 2013 and subsequently revised on July 14, 2014). Please ensure that CHHSLs are not referenced in any future documents.
5. **San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) Environmental Screening Levels (ESLs):** When referencing ESLs, please use the most recent published version of February 2016 Version 3.
6. **Post Interim Remediation:** In the Interim Remediation Report requested below, please provide an estimate of the mass of PCE and other VOCs in the excavated soil, include a figure indicating the vapor plume contours, and include a proposal to conduct post interim remediation indoor air sampling event(s).

#### **TECHNICAL REPORT REQUEST**

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

- **October 21, 2016** – Interim Remediation Report  
File to be named: RO3097\_IR\_R\_yyyy-mm-dd

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please send me an e-mail message at [karel.detterman@acgov.org](mailto:karel.detterman@acgov.org) or call me at (510) 567-6708.

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PDF copies of case files can be downloaded at:

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