



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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July 27, 2016

Mr. Ernie Lee
Marina Faire, Shopping Center
3271 South Highland Drive, Suite 704
Las Vegas, NV 89109
(Sent via electronic mail to: ernestlee@gmail.com)

Subject: Tennant Notification, Risk Characterization and Uncertainty Analysis, IRAP; Site Cleanup Program Case No. RO0003155 and Geotracker Global ID T10000006425, Four Seasons Cleaners, 13778 Doolittle Drive, San Leandro, CA 94577

Dear Mr. Lee:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the *Indoor Air Sampling Report*, dated June 9, 2016 (received June 29, 2016). The report was prepared and submitted on your behalf by Well Test, Inc (WTI). Thank you for submitting the report.

The report documented the re-collection of four indoor air samples in four different commercial suites at the commercial strip mall due to elevated detection limits and sampling irregularities in previous indoor air samples. In order to lower detection limits at the site, the analytical testing used a more sensitive analytical test method (EPA 8270 SIM) and this resulted in analytical results below appropriate regulatory goals in three of the four indoor air samples. The fourth indoor air sample continued to yield elevated tetrachloroethene (PCE) concentrations, up to 260 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), substantially in excess of generic commercial Environmental Screening Levels (ESLs), in the dentist office. Conversely, this concentration appears to be significantly lower than the previous concentration and may be the result of the cessation of dry cleaning operations in late 2015 at the adjacent commercial suite.

Based on ACDEH staff review of the case file, we request that you address the following technical comments and send us the reports requested below.

TECHNICAL COMMENTS

- 1. Risk Characterization and Uncertainty Analysis** – Consistent with the October 2011 Department of Toxic Substances Control (DTSC) *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance)*, ACDEH requests that a Risk Characterization and an Uncertainty Analysis be conducted in order to preliminarily determine health risks at the subject site. If the estimated risk is greater than 10^{-4} or the Hazard Index is less than 1, response actions are needed (vapor intrusion mitigation and source remediation). Please submit the evaluation by the date identified below.
- 2. Post-Indoor Air Sampling Notification of Building Occupants** – Consistent with the March 2012 DTSC *Vapor Intrusion Public Participation Advisory*, public notification fact sheets must be generated to communicate the results of the indoor air sampling to building occupants. ACDEH requests that fact sheets conform to the requirements of the March 2012 DTSC advisory. Consistent with the referenced October 2011 DTSC *Vapor Intrusion Guidance* this should be done individually or in small groups. Please submit draft notification documents, in MS Word, by the date identified below.
- 3. Interim Mitigation Measures** – The referenced indoor air sampling report recommends interim remedial actions. This should include an evaluation of the need for interim mitigation measures, such as a modification of the Heating, Ventilation, and Air Conditioning (HVAC) system to provide positive pressure to reduce vapor intrusion exposures within at least the dentist's office, can include additional suites, and an evaluation of the need for the installation of fresh air and exhaust fans. Other options

may include carbon filtration of indoor air. These actions can be implemented quickly, and are in general conformance with the referenced October 2011 DTSC *Vapor Intrusion Guidance*. Consistent with this guidance, ACDEH does not consider mitigation to be a long-term solution. ACDEH considers remediation and mitigation as complimentary components of a response action for Volatile Organic Compounds (VOCs). Please submit this evaluation by the date identified below.

4. **Interim Remedial Actions** – As noted above, the referenced indoor air sampling report recommends interim remedial actions. This may include the installation of Soil Vapor (SVE) pilot test wells. If so, please be aware that ACDEH considers plot testing to be a form of interim remedial action. Please also be aware that a Remedial Action Plan will be required to evaluate feasible alternatives for the site, to incorporate the results of the proposed pilot test, and to recommend final alternatives in accordance with DTSC guidelines. ACDEH requests the identification of appropriate measures, and the submittal of an interim remedial action plan by the date identified below.
5. **Electronic Report and Data Upload Compliance** – A review of the case file and the State's Geotracker database indicates that the site is not in compliance upload requirements. Compliance is a State requirement. In accordance with California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs, including Site Cleanup Programs. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites was required in GeoTracker. At present missing data and documents include, but may not be limited to: recent subsurface investigation reports, recent analytical EDFs, and GEO MAPS. Please see Attachment 1 for limited additional details, and the state GeoTracker website for full details. ACDEH requests notification of, and a list of, the documents uploaded to Geotracker. Please uploaded to GeoTracker by the date specified below.

TECHNICAL REPORT REQUEST

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

- **August 17, 2016** – Geotracker Compliance
Please email to your case worker when documents have been uploaded
- **August 17, 2016** – Draft Post-Sampling Public Notification Fact Sheet
Please email to your case worker draft fact sheet
- **September 9, 2016** - Risk Characterization and Uncertainty Analysis
File to be named: RO3155_RISK_R_yyyy-mm-dd
- **September 23, 2016** – Interim Mitigation Measures
File to be named: RO3155_IRAP_R_yyyy-mm-dd
- **September 30, 2016** – Interim Remedial Action Plan
File to be named: RO3155_IRAP_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>.

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If you have any questions, please do not hesitate to call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations
Electronic Report Upload (ftp) Instructions

cc: Ms. Julie D'Hondt, Marina Faire, LP, 3271 S. Highland Drive, Suite 704, Las Vegas, NV 89109
(Sent via electronic mail to: highlandofficelv3@gmail.com)

Bill Dugan, Well Test, Inc; P.O. Box 8548, San Jose, CA 95115 (Sent via electronic mail to: dugan@welltest.biz)

Forrest Cook, Well Test, Inc; P.O. Box 8548, San Jose, CA 95115 (Sent via electronic mail to: Cook@welltest.biz)

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

Mark Detterman, ACDEH, (Sent via electronic mail to: mark.detterman@acgov.org)

Electronic File, GeoTracker

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

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) 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 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 Spills, Leaks, Investigations, and Cleanup (SLIC) 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 for more information on these requirements (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." 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 6735, 6835, and 7835.1) 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 registered 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 fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later 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 SLIC)	REVISION DATE: May 15, 2014
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010, July 25, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) 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 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) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) 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.