



January 26, 2018

Mr. Greg Lee
Marina Faire LP
3271 South Highland Drive, Suite 704
Las Vegas, NV 89109
(Sent via electronic mail to: glee@eurekamesquite.com)

Subject: Conditional Work Plan Approval; Site 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 have reviewed the *Indoor/Outdoor Air and Sub-Slab Soil Vapor Sampling Results*, dated January 3, 2018, and the *Vapor Assessment Work Plan*, dated January 15, 2018. The documents were submitted on your behalf by EKI Environment and Water, Inc. (EKI). Thank you for submitting them. They have significantly improved the technical understanding of the site.

The referenced work plan proposes the installation of additional sub-slab vapor points, and the collection of additional sub-slab and indoor air samples in the former dry cleaner suite, the dentist's suite, and in additional adjacent commercial suites. Due to the predominant clay lithology beneath the site, the work plan also proposed a passive soil vapor assessment along existing and former utility lines north of the building, and south of the building in the downgradient direction of groundwater, and a subsequent evaluation of the usefulness of the method at the site.

Based on ACDEH staff discussions with your team, and review of the documents, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are 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 at least a 48-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Work Plan Approval** – The referenced documents propose a series of actions with which ACDEH is in general agreement of undertaking; however, ACDEH requests several modifications to the approach. Please submit a report by the date specified below.
 - a. **Concurrent Sub-Slab & Indoor Air Sampling** – ACDEH notes that somewhat conflicting statements in regards to sub-slab and indoor air sampling are included in the report, indicating both concurrent sampling, and sampling within seven days of the collection of indoor air samples. To clarify, ACDEH requests adequate concurrent collection of these data in order to determine the site-specific attenuation factor the concrete slab provides at the site. Because different slab areas have been constructed at different times, and thus can provide different attenuation factors, ACDEH requests multiple concurrent sample locations be undertaken based on slab construction factors.
 - b. **Meeting Request and Submittal of Passive Sampling Results** – Conversations between ACDEH and EKI in regards to the work plan referenced above indicate that a meeting will be beneficial for communicating the results of the proposed Supplemental Indoor / Outdoor Air and Sub-Slab Soil Vapor Sampling, and the Sub-Slab Depressurization (SSD) System to be

proposed in a subsequent work plan. ACDEH requests that the meeting additionally include the preliminary results of the Passive Soil Vapor Assessment, also the subject of this letter. By the date below, please identify and forward potential meeting dates and times around day 75 (April 16, 2018), after the date of this letter.

2. **Proposed Schedule** – The referenced work plan proposed a revised submittal schedule. The schedule appears to be reasonable and expedited.
3. **Professional Certification and Stamps** – Please ensure all work is conducted under the oversight of a professional engineer or geologist, and that the reports are submitted under their signature and stamp. California Business and Professions Code require the reports containing geologic or engineering evaluations or judgements performed under the direction of an appropriately licensed or certified professional include a professional stamp, signature, and statement of professional certification as referenced in Attachment 1.

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:

- **February 16, 2018** – Potential Meeting Dates and Times
Please Communicate with Your Case Worker
- **March 16, 2018** – Indoor / Outdoor Air, Sub-Slab Vapor, and Passive Sampling Results
File to be named: RO3155_SWI_R_yyyy-mm-dd
- **March 30, 2018** – Work Plan for Sub-Slab Depressurization System
File to be named: RO3155_WP_R_yyyy-mm-dd
- **May 25, 2018** – Site Investigations and Data Gaps Work Plan
File to be named: RO3155_WP_R_yyyy-mm-dd

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

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: Ernest Lee, Maria Faire LP, 3271 S. Highland Drive, Suite 704, Los Vegas, NV 89109; (Sent via electronic mail to: ernestlee@gmail.com)

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

Vera Nelson, EKI Environment & Water, Inc, 577 Airport Blvd, Suite 500, Burlingame, CA 94010; (Sent via electronic mail to: vhnelson@ekiconsult.com)

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John DeWitt, EKI Environment & Water, Inc, 577 Airport Blvd, Suite 500, Burlingame, CA 94010;
(Sent via electronic mail to: jdewitt@ekiconsult.com)

Ed Firestone, (Sent via electronic mail to: efirestone@aol.com)

Sady Hayashida, Hayashida Architects, 832 Bancroft Way, Berkeley, CA 94710; (Sent via electronic mail to: sadyh@hayashida-architects.com)

Buzz Butler, Lake Street, 601 Van Ness Avenue, San Francisco, CA 94102; (Sent via electronic mail to: buzz@lakestreetventures.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)

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

Electronic File; GeoTracker

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are 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 (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

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 the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

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 and include the professional registration stamp, signature, and statement of professional certification. 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

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water 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.