

ALAMEDA COUNTY  
**HEALTH CARE SERVICES  
AGENCY**

COLLEEN CHAWLA, Director



DEPARTMENT OF ENVIRONMENTAL HEALTH  
LOCAL OVERSIGHT PROGRAM (LOP)  
For Hazardous Materials Releases  
1131 HARBOR BAY PARKWAY, SUITE 250  
ALAMEDA, CA 94502  
(510) 567-6700  
FAX (510) 337-9335

May 18, 2018

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](mailto:ernestlee@gmail.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 *Results of Indoor/Outdoor Air, Sub-Slab Soil Vapor, and Phase 1 Passive Soil Vapor Sampling Conducted On and In the Vicinity of 13778 Doolittle Drive, San Leandro, California*, dated March 16, 2018, and the *Work Plan for Sub-Slab Depressurization (SSD) System Construction, Startup, and Monitoring*, dated March 30, 2018. The documents were submitted on your behalf by EKI Environment and Water, Inc. (EKI). Thank you for submitting them.

The site investigation report documented the collection of twelve subslab vapor samples, the collection of eight indoor air samples, and the collection of one rooftop outdoor air sample in multiple suites surrounding the former dry cleaner suite. Concentrations of tetrachloroethene (PCE) in subslab vapor were detected up to 486,000 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) and of Trichloroethene (TCE) up to 6,420  $\mu\text{g}/\text{m}^3$ . Concentrations of PCE were detected in Indoor Air up to 6.89  $\mu\text{g}/\text{m}^3$  and TCE up to 0.142  $\mu\text{g}/\text{m}^3$ . Two Indoor Air concentrations exceeded the Environmental Screening Levels (ESLs), and these concentrations are intended to be addressed by the installation of a Subslab Depressurization (SSD) system, which is the subject of the referenced Work Plan.

The referenced site investigation report also documented the installation of passive vapor samples and concluded the method was effective at identifying locations of potential releases and the identification of vapor migrations pathways are.

The referenced Work Plan proposed, based in part on the results of the site investigation report, the completion of the SSD utilizing components of the SSD system and the Soil Vapor Extraction System installed after interim remedial excavation. The Work Plan also proposed the installation of a additional trench in an emergency exit hallway due to the presence of a grade beam that limited subslab vapor transmission to previously installed components.

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](mailto:mark.detterman@acgov.org)) prior to the start of field activities.

### **TECHNICAL COMMENTS**

- 1. Work Plan Modifications** – As noted above, the referenced work plan proposes a series of actions with which ACDEH is in partial agreement of undertaking and partially believe are premature to

implement. ACDEH additionally requests several modifications to the approach. Otherwise, please submit a work plan addendum and final report by the dates specified below.

- a. **Securing Riser Piping** – SSD conveyance piping is proposed to be installed on the roof of the building. ACDEH requests the vertical riser be secured to the existing building structure to prevent potential movement and breakage in daily area use, and during rarer seismic events.
  - b. **Riser Piping Labeling** – To prevent unintentional removal or damage to the riser piping, ACDEH requests the piping be labeled at minimum five foot intervals as conveyance piping for the SSD and the location be labeled and discussed in the future Site Management Plans (SMP).
  - c. **Sampling of Trench Soil** – As discussed in the meeting of May 1, 2018, ACDEH requests that the soil exposed in the proposed trench in the emergency exit hallway be sampled at a minimum of 20 foot intervals, and be biased towards positive responses by field instruments, such as a Photoionization Detector.
  - d. **Quarterly Inspections** – Quarterly inspections are proposed for the first year at a minimum; however, the SSD vacuum is proposed to be monitored annually. At a minimum ACDEH requests that the monitoring of the SSD vacuum be included in the quarterly inspections.
2. **Interim Site Management Plan** – As discussed in the May 1, 2018 meeting, ACDEH requests an Interim SMP be submitted with the SSD Implementation and Startup Report, by the date identified below.

### **SUBMITTAL ACKNOWLEDGEMENT STATEMENT**

Please note that ACDEH has updated Attachment 1 with regard to report submittals to ACDEH. ACDEH will now be requiring a Submittal Acknowledgement Statement, replacing the Perjury Statement, as a cover letter signed by the Responsible Party (RP). The language for the Submittal Acknowledgement Statement is as follows:

*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.*

Please make this change to your submittals to ACDEH.

### **TECHNICAL REPORT REQUEST**

Please submit the following technical reports and deliverables to the State Water Board's Geotracker website and notify your case worker by electronic mail ([mark.detterman@acgov.org](mailto:mark.detterman@acgov.org)), in accordance with the following specified file naming convention and schedule, as provided below, and in the Responsible Party(ies) Legal Requirements/Obligations which is included as Attachment 1. Please note ACDEH no longer accepts reports on the ftp site.

- **July 20, 2018** – SSD Implementation and Startup Report and Interim SMP  
File to be named: RO3155\_REM\_R\_YYYY-mm-dd

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](mailto: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: Greg Lee, 3271 S. Highland Drive, Suite 704, Los Vegas, NV 89109; (Sent via electronic mail to: [glee@eurekamesquite.com](mailto:glee@eurekamesquite.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](mailto: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](mailto:vhnelson@ekiconsult.com))

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

Joy Su, EKI Environment & Water, Inc, 577 Airport Blvd, Suite 500, Burlingame, CA 94010; (Sent via electronic mail to: [jsu@ekiconsult.com](mailto:jsu@ekiconsult.com))

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

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

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

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

Paresh Khatri, ACDEH; (Sent via electronic mail to: [paresh.khatri@acgov.org](mailto:paresh.khatri@acgov.org))

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

Electronic File; GeoTracker

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> December 14, 2017
	<b>ISSUE DATE:</b> July 25, 2012
	<b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016
<b>SECTION:</b> ACDEH Procedures	<b>SUBJECT:</b> 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/](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 values<sup>1</sup> 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
<b>2016 Subsurface Investigation Report</b>	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
<b>2012 Site Assessment Work Plan</b>	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>2010 GW Investigation Report</b>	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	✓	✓	✓	✓	✓

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

<b>Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)</b>	<b>REVISION DATE:</b> NA
	<b>ISSUE DATE:</b> December 14, 2017
	<b>PREVIOUS REVISIONS:</b> September 17, 2013, May 15, 2014, December 12, 2016
<b>SECTION:</b> ACDEH Procedures	<b>SUBJECT:</b> 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/](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.