

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

June 27, 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 and Submittal Extension Approval; Site Program Case No. RO0003155 and Geotracker Global ID T1000006425, 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 Site Investigations and Data Gap Work Plan*, dated May 25, 2018. The report was submitted on your behalf by EKI Environment and Water, Inc. (EKI). Thank you for submitting it.

ACDEH has also reviewed the *Request to Change Due Date for Implementation Report for the Sub-Slab Depressurization System and for Interim Site Management Plan*, and the *Plans for Retro-Coat Vapor Intrusion Mitigation Coating*, both submitted by EKI on your behalf, and both dated June 26, 2018.

The work plan presented the results of the first two rounds of passive soil vapor sampling at the site, and as discussed in the meeting of May 1, 2018, proposed the installation seven passive soil vapor sampling points downgradient and southwest of previously installed passive vapor locations in an effort to delineate the extent of soil vapor contamination at the site. The work plan also proposed the installation of three soil vapor probes and the collection of active soil vapor at unspecified locations near the downgradient edge of the site where concentrations in the passive samples are highest. These samples are planned to verify the results of the passive samplers, especially for vinyl chloride. Grab groundwater samples would also be collected in the event the active soil vapor samples exceed Environmental Screening Levels (ESLs) to determine the potential for offsite vapor migration.

The *Request to Change Due Date...* requested an extension to the submittal date for the implementation of the Sub-Slab Depressurization System (SSD) and the Interim Site Management Plan (ISMP) based on requested design changes, construction scheduling, startup and initial confirmation monitoring. It is understood that the former dry cleaner suite will not be occupied until indoor air sampling results confirm acceptable indoor air levels at or below ESLs.

The *Plans for Retro-Coat Vapor Intrusion Mitigation Coating* briefly describes the installation area and application method for Retro-Coat within the former dry cleaner suite as an additional protective measure for future tenants in the suite.

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 agreement of undertaking. ACDEH additionally requests several modifications to the approach. Otherwise, please submit a final report by the date specified below.
  - a. **Soil Vapor Sample Locations** – The work plan did not specify the location for the location of the active soil vapor probes but they were reported to be planned near the downgradient edge of the site where concentrations in the passive samples are highest. This appears to be an effort to provide flexibility in the placement locations; however, ACDEH requests one at a minimum near PS-15. This request may require the addition of a probe should an alternative placement also be considered appropriate.
  - b. **Permanent Soil Vapor Probe Locations** – ACDEH requests that the proposed active soil vapor locations be installed as semi-permanent locations that can be resampled as needed in the future.
  - c. **Data Gap Work Plan and the Extent of Groundwater Plume** – The extent of the groundwater plume, in one or more water-bearing units, associated with the subject site has not been defined pending an initial focus of investigations into the extent of soil and sub-slab vapor and the risks of vapor intrusion to adjacent suites and downgradient suites, as well as a focus on the design, construction, and startup of the subslab depressurization system. In order to concurrently move the project forward, ACDEH requests the submittal of a Data Gap Work Plan concurrent with the submittal of the investigation report requested below.
2. **Extension Request Approval** – Please utilize this letter to document the approval of an extension request for the submittal of the SSD and Startup Report and the ISMP, to January 31, 2019 based on the estimated schedule contaminated in the *Request to Change Due Date for Implementation Report for the Sub-Slab Depressurization System and for Interim Site Management Plan*.
3. **Retro-Coat Installation** – ACDEH understands that the Retro-Coat will be applied using an installer trained and certified for Retro-Coat installation by Land Science Technologies, Inc at a 20-mil thickness and as described in the *Retro-Coat Vapor Intrusion Coating System for Existing Structures*, as attached to the referenced Retro-Coat letter. Thank you for its submittal. In general ACDEH is in agreement with the application of Retro-Coat; however, must separate this response in to a separate letter that will be provided shortly.

### **TECHNICAL REPORT REQUEST**

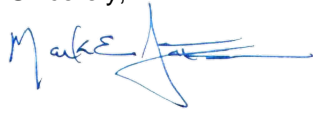
Please submit the following technical reports and deliverables to the State Water Board's Geotracker website and notify your case worker by electronic mail ([mark.detterman@acgov.org](mailto:mark.detterman@acgov.org)), in accordance with the following specified file naming convention and schedule, as 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.

- **August 20, 2018** – Soil Vapor Investigation and Data Gap Work Plan  
File to be named: RO3155\_SWI\_WP\_R\_yyyy-mm-dd

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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 4799, CEG 1788  
Senior Geologist  
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.