



October 17, 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 *Phase II Site Investigation Report and Data Gap Work Plan*, dated August 31, 2018. The report was submitted on your behalf by EKI Environment and Water, Inc. (EKI). Thank you for submitting it.

The site investigation portion of the report documented the results of the installation and sampling of seven passive soil vapor probes, four active soil vapor probes, and the collection of soil and grab groundwater samples at selected locations as generally proposed in the May 2018 work plan. Passive soil vapor locations generally yielded lower concentrations of the chemicals of concern (COC) for the site and the data, as summarized in the report, suggests this may be the result of clay rich soils and shallower passive vapor point installation relative to the deeper installation of the active vapor sampling points (2 feet below grade surface [bgs] rather than 4 to 5 feet bgs, respectively).

The Data Gap Work Plan proposed the installation of three sub-slab vapor points in three suites of the retail shopping center, the collection of grab groundwater samples at three locations further downgradient for delineation purposes, and the installation of two active vapor probes across Doolittle Drive and construction of vapor wells at two depths at the vapor sampling locations.

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 site investigation and data gap work plan proposes a series of actions with which ACDEH is in agreement of undertaking; however, ACDEH requests several modifications to the approach. Otherwise, please submit a final report by the date specified below.
  - a. **Permanent Soil Vapor and Sub-Slab Probe Locations** – Similar to previous requests, ACDEH requests that all active soil vapor sampling locations be installed as semi-permanent locations that can be resampled as needed in the future.
  - b. **Indoor Air Vapor Sampling** – In accordance with the *Interim Framework for Assessment of Vapor Intrusion at TCE – Contaminated Sites in the San Francisco Bay Region*, dated October 16, 2014, and generated by the San Francisco Bay Regional Water Quality Control Board (RWQCB), ACDEH requests the collection of indoor air samples in shopping center suites

13972, 13988, and 13996. This request is based on the concentration of Trichloroethene (TCE) in active vapor well SVP02 exceeding the RWQCB Commercial Trigger Level for TCE soil gas and the presumed south to southwesterly flow of groundwater based on analytical data generated during site investigations. The RWQCB TCE Trigger Level is 8,000 ug/m<sup>3</sup> and the concentration of TCE in SVP02 was 15,200 ug/m<sup>3</sup>.

ACDEH requests the indoor air samples be collected in accordance with previously accepted sampling protocols submitted by EKI, and include an outdoor ambient sample at an upwind location to be documented, and a building survey with a chemical inventory of the separate suites, to be included in the report requested below. ACDEH requests the indoor air samples be collected concurrent with sub-slab vapor sampling in the three suites proposed for sampling in order to determine the site specific attenuation factor for the concrete slabs in each of the suites.

Advance notification of the occupants of the suites is required and is also requested to be documented in the report requested below.

ACDEH notes that further investigation of subsurface utilities was also proposed. Please ensure that laterals to each of the three suites are located at a minimum, as the utility locations may be relevant to vapor intrusion concerns in these, as well as other suites.

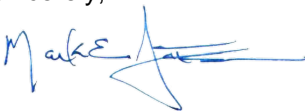
#### **TECHNICAL REPORT REQUEST**

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.

- **December 21, 2018** – Soil Vapor Investigation, and Data Gap Work Plan (as needed)  
File to be named: RO3155\_SWI\_WP\_R\_yyyy-mm-dd

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))

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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](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.