



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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May 29, 2015

Mr. Reza Sheikhai
Elegant Cleaners
1208 Lincoln Avenue
Alameda, CA 94501-2326
(Sent via e-mail to: cpareza@aol.com)

Subject: Technical Report Request for Site Cleanup Program Case Number RO0003163 and
GeoTracker Global ID T10000006546, Elegant Cleaners, 1208 Lincoln Avenue, Alameda, CA

Dear Mr. Sheikhai:

Thank you for attending the meeting at Alameda County Environmental Health (ACEH) offices on May 21, 2015 for a discussion of the *Phase III Environmental Site Assessment* (Phase III) dated January 14, 2015, prepared for Open Bank by ENCON Solutions, Inc. (ENCON). ACEH understands that the Phase III was prepared in conjunction with a property transaction. The report summarizes data and findings from previous site investigations which are documented in the 2006 *Phase II Subsurface Investigation* prepared by ERAS Environmental, Inc. (ERAS), a January 2013 *Phase I Environmental Site Assessment* prepared by ERAS, and an August 2014 *Phase II Limited Soil Gas Survey* prepared by ENCON. The building was built approximately 100 years ago, was occupied by various retail businesses until 1986 when it was used as a dry cleaner that utilized Tetrachloroethene (PCE). In approximately 2005 the dry cleaning operations began using a hydrocarbon-based system and discontinued use of PCE. Based on our meeting, to advance your case to site closure, ACEH requests that you prepare a Work Plan to address the identified technical comments discussed during our meeting and summarized in the following Technical Comments. Please address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

1. **Technical Comments and Meeting Discussion Topics:**
 - a. **Description of Immediate Land Use:** Please provide a description supported by a figure, of the immediately land use of the adjacent neighboring property land use including, but limited to, the usage of the second story of the dry cleaner building and adjacent buildings.
 - b. **Map and Bar Scale:** Please note that all report figures must be to scale and must have a scale bar. This is to enable figures to be copied, enlarged, or reduced without losing the scale.
 - c. **Soil Sample Collection:** For any proposed soil sample collection, ACEH requests soil sample collection and analysis from depths less than 5 feet and within the 5 to 10 foot interval, the capillary fringe, saturated zone, stained interval(s), areas with elevated Photoionization Detector (PID) readings, and the bottom of the soil boring. Please collect soil analytical data for soil samples collected in suspected PCE high-use areas and areas of documented elevated soil vapor concentrations. ACEH requests soil sample collection below or at first encountered groundwater based on indications of contamination (PID detections, odor, staining, or etc.). If visual indications are not encountered, please

collect soil samples at or just above the soil – water interface and the bottom of the boring. Please ensure that the analytical results determine the vertical and horizontal extent of VOC impacts at the site; please include PID readings at the corresponding depths on all future boring logs.

- d. **Eco-Friendly Dry Cleaning:** PCE was used for dry cleaning from 1986 to 2005 then the dry cleaning process was changed use “Eco-Friendly” chemicals, i.e., “hydrocarbon”. Please provide the chemical composition of the “Eco-Friendly” hydrocarbon chemicals and assess the need to analyze for the “Eco-Friendly” hydrocarbon chemicals in soil samples a minimum of one time.
 - e. **Heating, Ventilation, and Air Conditioning (HVAC):** It was unclear from ENCON’s August 2014 *Phase II Limited Soil Gas Survey* if the HVAC was turned off during Indoor Air (IA) sampling event, which would represent a worse-case scenario and is consistent with Department of Toxic Substances Control (DTSC’s) Guidance document, the October 2011 *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air*. Please determine the sampling procedure used during the August 2014 event.
 - f. **California Human Health Screening Levels (CHHSLs):** Please be aware that the *California Human Health Screening Levels* (CHHSLs) are out of date and no longer used. The San Francisco Bay Regional Water Quality Control Board (SFBRWQCB’s) Environmental Screening Levels (ESLs) are currently used, but also be aware that closure to ESLs may not be required. Alternative cleanup goals can be supported by the SFBRWQCB’s draft Final July 31, 2009 *Assessment Tool for Closure of Low-Threat Chlorinated Solvent Sites*.
 - g. **Former Dry Cleaner Machine Location:** Please map the locations of the old dry cleaner machine and associated dry cleaner components as described in the State Coalition for Remediation of Drycleaners *Conducting Contamination Assessment Work at Drycleaning Sites* Revised October 2010 at <http://www.drycleancoalition.org/>
 - h. **Onsite PCE Uses:** In an effort to locate PCE source areas, please identify likely PCE use areas such as delivery and/or storage areas where spills/leaks/discharges could have occurred. Please determine the former use(s) of the rear yard to clarify why SV-5 detected the maximum PCE (22,480 ug/m³) soil gas concentration at 5 feet below ground surface (bgs).
2. **General ACEH comments on the Phase III Report, Section 6.0 Conclusions: Objective 1, Indoor Air Quality:**
- a. ACEH does not agree that the crawl space provides an attenuation factor due to spaces between wood flooring.
 - b. Epoxy coating provides mitigation only, not remediation. ACEH requires that remediation must be accomplished.
 - c. Objective 2: SVE may be an acceptable method, after PCE source areas are better defined.
 - d. Objective 3: Additional shallow sample soils (0 to 5’ bgs) are needed for vertical PCE delineation.
 - e. Objective 4: Please conduct additional groundwater delineation including underground utility survey and depths of utilities.
3. **General ACEH comments on the Phase III Report, Section 7.0, Recommendations:**
- a. Installation of downgradient groundwater monitoring wells appear reasonable; alternatively, it may be possible to delineate the groundwater plume with a soil boring and/or grab groundwater transect placed on 15-20 foot centers, followed by select well

installation at the soil bore indicating the highest groundwater concentration along Lincoln Avenue.

- b. Please initiate quarterly groundwater monitoring and sampling of the existing three wells.
4. **Request for a Work Plan:** ACEH requests the submittal of a work plan by the date provided below. A partial list of data gaps that should be addressed in the work plan and were discussed during the meeting include, but are not limited to:
- a. **Groundwater plume definition:** Please propose a plan to define the groundwater gradient direction and the extent of offsite plume migration. The highest concentration of PCE in groundwater was detected in MW-1, the downgradient well that is co-located in one of the known the source areas. However, the groundwater gradient direction has not yet been determined and consequently, off site plume delineation of PCE in groundwater has not been defined. The existing three monitoring wells are spaced approximately 30 feet apart and may provide adequate on-site gradient direction; however, the lack of a limited areal extent of the existing three wells cannot provide an off-site gradient direction. The groundwater gradient direction may be variable as shown by historical groundwater gradient directions from adjacent closed Fuel Leak Case RO0000086 located at the former Texaco Service Station, 1127 Lincoln Avenue, Alameda.
 - b. **PCE Source Area(s) Identification:** Please propose a plan to determine the location of additional PCE source area(s) due to the possible existence of additional PCE source areas. To date, two areas have been identified as potential source areas: in the parking area near SV-5 and adjacent to the dry cleaner machine at SV-2, SV-3, and SV-4.
 - c. **PCE Vapor Cloud Definition:** Please propose a scope of work that will determine the lateral limits of the PCE vapor plume (i.e., the vapor cloud).
5. **GeoTracker Compliance** – A review of the State Water Resources Control Board's (SWRCB) GeoTracker website indicates the site has not yet been claimed. Because this is a state requirement, ACEH requests that the site be claimed in GeoTracker by the date identified below. As described in the attached Responsible Party(ies) Legal Requirements/Obligations, all technical reports must be submitted to both the ACEH ftp website and the State Water Resource Control Board (SWRCB) GeoTracker website.

To upload to the Geotracker website you will need to claim your site on GeoTracker and then upload the Work Plan and all future reports to the GeoTracker website. Pursuant to CCR Sections 2729 and 2729.1, all analytical data submitted in a report to a regulatory agency as part of the LUFT program, must be transmitted electronically to the SWRCB Geotracker website via the internet. Additionally, should groundwater wells be required, all permanent monitoring points utilized to collect groundwater samples (i.e. monitoring wells) and submitted in a report to a regulatory agency, must be surveyed (top of casing) to mean sea level and latitude and longitude accurate to within 1-meter accuracy, using NAD 83, and transmitted electronically to the SWRCB Geotracker website. Beginning July 1, 2005, electronic submittal of a complete copy of all reports (LUFT or SLIC) is required in GeoTracker (in PDF format). Please upload all reports prepared after July 1, 2005 to the SWRCB's Geotracker database website in accordance with the above-cited regulation. Please additionally upload the reports to the ACEH ftp website. Additional information regarding the SWRCB's GeoTracker website may be obtained online at http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/ and http://www.swrcb.ca.gov/ust/electronic_submittal/report_rqmts.shtml) or by contacting the GeoTracker Help Desk at geotracker@waterboards.ca.gov or (866) 480-1028.

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- 6. Request for documentation:** Please forward copies of any other reports or correspondence related to environmental investigations for this site including, but limited to, ERAS's 2006 and 2013 Reports and ENCON's August 2014 Reports as we discussed in the meeting, by the date listed below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's GeoTracker website according to the following schedule and file-naming convention:

- **June 30, 2015** – Claim site in Geotracker
- **June 30, 2015** – Upload Correspondence and/or Reports
Files to be named: RO3163_MISC_R_yyyy-mm-dd
- **July 31, 2015** – Soil and Groundwater Investigation Work Plan
File to be named: RO3163_WP_R_yyyy-mm-dd

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

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 567-6708 or send me an e-mail message at karel.detterman@acgov.org

Sincerely,

Karel Detterman, PG
Hazardous Materials Specialist

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

cc: Dave Fagorala, DDEE, (Sent via E-mail to: fagala@outlook.com)
Dilan Roe, ACEH (Sent via E-mail to: dilan.roe@acgov.org)
Karel Detterman, ACEH (Sent via E-mail to: karel.detterman@acgov.org)
GeoTracker, Electronic Case File

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.