

From: [Roe, Dilan, Env. Health](#)
To: Cpareza@aol.com
Cc: stephen.kang@myopenbank.com; [Detterman, Karel, Env. Health](#); dave@ddfagala.com
Subject: Site Cleanup Program (SCP) R00003163 and GeoTracker Global ID T10000006546, Elegant Cleaners, 1208 Lincoln Avenue, Alameda, CA
Date: Wednesday, November 04, 2015 7:05:50 PM
Attachments: [Attachment A SCM Table and Pref Path Study.pdf](#)

Dear Mr. Sheikhai:

Alameda County Department of Environmental Health (ACEH) has reviewed the document entitled *Technical Report Workplan – Remedial Investigation for Soil, Groundwater (Work Plan)*, dated July 30, 2015 prepared by Dave Drilling Environmental Engineering, Inc. (DDEE) for the subject site in conjunction with the documents in the case file. As discussed with you on the phone, ACEH is unable to approve the Work Plan as presented due to a lack of requisite documentation to support the proposed field investigation activities.

Therefore, at this juncture ACEH requests that you prepare a revised Data Gap Investigation Work Plan that is supported by a Site Conceptual Model (SCM) to address the identified data gaps discussed during our May 21, 2015 meeting and documented in our May 29, 2015 Directive Letter. The SCM is a fundamental element of a comprehensive site investigation and establishes the source and attributes of the unauthorized release, describes all affected media (including soil, groundwater, and soil vapor as appropriate), describes local geology, hydrogeology and other physical site characteristics that affect contaminant environmental transport and fate, and identifies all confirmed and potential contaminant receptors (including water supply wells, surface water bodies, structures and their inhabitants). The SCM is relied upon by practitioners as a guide for investigative design and data collection. All relevant site characteristics identified by the SCM shall be assessed and supported by data so that the nature, extent and mobility of the release have been established to determine conformance with applicable criteria in the is policy. Please see Attachment A, *SCM Table* and *Preferential Pathway* for additional discussion on the requisite elements of an SCM.

To facilitate review, ACEH requests the SCM be presented in a tabular format that highlights the major SCM elements and associated data gaps, which need to be addressed to progress the site to case closure. Table 4-1 in Attachment A provides an example of a tabular SCM for your reference. The SCM must be supported with figures and tables consolidating and presenting all historical soil, soil gas, and groundwater data collected during all previous site investigations and proposed locations for collection of additional samples. The tables must include sample dates, depths, and the laboratory detection limits for “Non-Detect” (ND) results.

Please also prepare a *Data Gaps Summary and Proposed Investigation Table* in the Data Gap Investigation Work Plan that correlates to the data gap numbering in the tabular SCM (please see Table 5-1 in Attachment A for an example). Please sequence activities in the proposed Data Gap Investigation scope of work to enable efficient data collection in the fewest mobilizations possible. Additionally, data quality objectives including use of laboratory method detection limits below the relevant environmental screening levels and standard operating procedures (SOPs) for all proposed sampling activities must be included in the work plan. SOPs for the collection and analysis of soil gas samples must be in accordance with the Department of Toxic Substances Control guidance.

Please submit the revised work plan to ACDEH by **December 11, 2015**. Please note that although I was filling in for Karel Detterman while she was out on medical leave, she has returned to the office and is the primary caseworker for this site. Please direct all communication to her, and copy me going forward.

Thank you,

Dilan Roe, P.E.

Program Manager - Land Use & Local Oversight Program

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PDF copies of case files can be reviewed/downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>

From: Detterman, Karel, Env. Health

Sent: Wednesday, November 04, 2015 4:25 PM

To: Roe, Dilan, Env. Health <Dilan.Roe@acgov.org>

Subject: Site Cleanup Program (SCP) RO3163 and GeoTracker Global ID T10000006546, Elegant Cleaners, 1208 Lincoln Avenue, Alameda, CA

Hi Dilan:

Karel Detterman, PG

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