

Nowell, Keith, Env. Health

From: Nowell, Keith, Env. Health
Sent: Monday, August 18, 2014 12:24 PM
To: Walter Sprague (WSprague@pcandf.com)
Cc: 'Dennis Dettloff'; Roe, Dilan, Env. Health
Subject: Fuel Leak Case RO219 - Unocal #5043, 449 Hegenberger Rd., Oakland, CA - RDIP

Dear Mr. Sprague,

Alameda County Environmental Health (ACEH) has reviewed the recently submitted document entitled *Remedial Design and Implementation Plan (RDIP)* dated June 19, 2014 prepared by Antea Group (ANTEA) on your behalf. ACEH generally concurs with the proposed scope of work and requests that you address the following technical comments, update the RDIP, and send us the technical reports described below.

Technical Comments

- A discussion of, and the design of, the shoring has not been provided to ACEH. It is unclear to ACEH how many sides of the excavation will be shored and if the lateral and vertical extents can be enlarged based on direct field observations. Please describe the excavation shoring anticipated to be used at the site. Additionally, ACEH would like to review the shoring design prior to its implementation.
- The source and nature of excavation backfill material is not identified in the RDIP. Please describe the source and properties of the backfill material. ACEH requests the backfill material have similar properties as the material it is replacing. Note that all backfill must be demonstrated to be free of contamination. Please refer to Department of Toxic Substances Control (DTSC) Clean Imported Fill Material fact sheet dated October 2001 for information regarding analysis scope and sampling density for testing import material. If use of recycled concrete is anticipated, please refer to the New Jersey Department of Environmental Protection document entitled *Solid and Hazardous Waste Management Program Guidance for Characterization of Concrete and Clean Material Certification for Recycling* (Updated January 12, 2010) in order to demonstrate the recycled concrete material to be free of contamination.
- Please include a description in the revised RDIP of how the ORC-A will be introduced in to the back fill.
- Please prepare a site plan showing the staging area for the water storage tanks used to store groundwater prior to disposal and potential discharge locations should groundwater be discharge to the sewer or storm drain system. Note that prior to groundwater disposal, the water will need to be tested to determine the appropriate disposal method. A discharge permit may be required prior to discharge to local utilities.
- Please recover confirmation soil samples from the excavation base and submit to an analytical laboratory for analysis. Collect a minimum of two samples from each of the two excavated areas. Collect an additional sample on a one sample per 625 square feet basis should the floor of the excavation exceed 625 square feet.

Technical Report Request

Please upload technical reports to the ACEH ftp site (Attention: Keith Nowell), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **September 30, 2014**– Revised Remedial Design and Implementation Plan (file name: RO0000219_RDIP_R_yyyy-mm-dd)

ACEH looks forward to reviewing the shoring design for the proposed excavation, the Traffic Control and Waste Transportation Plan, and the Air Monitoring Plan for use during excavation activities in the near future.

Thank you for your cooperation. ACEH looks forward to working with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Respectfully,

Keith Nowell

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

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