BALCO
PROPERTIES

RECEIVED
By Alameda County Environmental Health 4:46 pm, Oct 12, 2017

September 29, 2017

Mr. Keith Nowell
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6577

RE: Post Construction Site Management Plan, Balco Properties LLC, 2855 Mandela Parkway, Oakland, California (Fuel Leak Case Number RO0000378)

Dear Mr. Nowell:

The property located 2855 Mandela Parkway in Oakland, California (the site) has been under the jurisdiction of Alameda County Department of Environmental Health's (ACDEH) Local Oversight Program (LOP) Fuel Leak Case Number RO0000378 since December 2001. Balco Properties LLC (Balco) has been working with ACDEH after acquiring the Site in 2006. A brief summary of recent correspondence between Balco and the ACDEH is summarized as follows:

Trihydro Corporation (Trihydro), on behalf of Balco, submitted an Additional Site Investigation Report to ACDEH, dated December 21, 2016. In a letter dated June 16, 2017, ACDEH requested a meeting with Balco and Trihydro to discuss site conditions and the path forward. A meeting between ACDEH, Balco, and Trihydro took place on July 12, 2017, at which the December 2016 report was discussed, along with the history of activities at the site. ACDEH, in a letter dated July 14, 2017, presented a number of technical comments regarding the site, and requested that a Site Management Plan (SMP) be prepared for the building on-site (Comment 11).

Please find an enclosed Post-Construction Site Management Plan for the building at 2855 Mandela Parkway. Balco appreciates ACDEH's continued assistance with this project. If you have any questions regarding this Additional Site Investigation Report, please free to call me at (510) 763-2911 or Matt Jones (Trihydro) at (360) 312-9109.

I have read and acknowledge the content, recommendations, and/or conclusions contained in the attached document *Post-Construction Site Management Plan, 2855 Mandela Parkway, Oakland, California*, submitted on my behalf to ACDEH's FTP server and the SWRCB's GeoTracker website.

Sincerely yours,

Mollie Westphal
Balco Properties, LLC

21B-001-002

POST CONSTRUCTION SITE MANAGEMENT PLAN

BALCO PROPERTIES, LLC

2855 MANDELA PARKWAY

OAKLAND, CALIFORNIA

September 15, 2017

Project #: 21B-001-002

SUBMITTED BY: Trihydro Corporation

1252 Commerce Drive, Laramie, WY 82070

PREPARED FOR: Balco Properties, LTD. LLC

1624 Franklin Street, Suite 1115, Oakland, CA 94612

CERTIFICATION STATEMENT
POST CONSTRUCTION SITE MANAGEMENT PLAN
BALCO PROPERTIES LLC
2855 MANDELA PARKWAY
OAKLAND, CALIFORNIA

I certify that this report was prepared under my supervision. To the best of my knowledge, the data contained herein are true and accurate, and the report has been prepared in accordance with professional standards.

September 15, 2017

Louis M. Arighi — Date

California Professional Geologist #8501

License expires: February 28, 2019

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1.0 INTRODUCTION AND OBJECTIVES

This Post-Construction Site Management Plan (SMP) was prepared by Trihydro Corporation (Trihydro) for Balco Properties, LTD, LLC (Balco) at their 2855 Mandela Parkway (Site) property. The purpose of this SMP is to establish general management practices for handling soil, groundwater and other materials during building modification or repair activities, active construction/development for the Site, or other activities that disturb the subsurface. The Site location is shown on Figure 1.

The Site is located at 2855 Mandela Parkway in Oakland, California (Figure 1) and consists of an approximate 4-acre parcel, occupied by a 143,000 square foot building. The Site is bordered by 32nd Street to the north, Mandela Parkway and Willow Street to the east and southeast, 26th Street to the southwest, and Wood Street to the northwest. Surrounding properties are predominantly light/heavy industrial and commercial (Treadwell and Rollo 2000).

The building currently occupying the Site was constructed by International Harvester Company as the Branch House and Service Station in 1941. A construction drawing from 1941 showed a feature that included a possible fuel dispensing pump. Sometime after 1970 International Harvester vacated the premises. A property transfer document from 1982 indicated the property was still owned by International Harvester in 1982 when it was transferred to Cypress General Partnership (Cypress). In 1983 Cypress transferred the property to Wareham Property Group (Wareham), who in turn transferred the property in 1998 to 2855 Mandela Property, LLC. The property was transferred to the current owner, Balco, in late October 2006. Since the property transfer to Cypress in 1983, space at the property has been leased by the respective owners to third-party commercial tenants (Treadwell and Rollo 2000).

Numerous investigation, remediation, and/or reporting activities have occurred at the Site from 1990 through 2017. Current corrective action activities are conducted pursuant to Alameda County Department of Environmental Health's (ACDEH) Local Oversight Program (LOP) via Fuel Leak Case Number RO0000378. Balco has been working with ACDEH since 2006, after acquiring the property. The nature, degree, and extent of hydrocarbons in the subsurface have been generally defined by numerous investigations, remediation, and/or reporting activities completed at the Site from 1990 through the present. Known contaminants of concern (COC) at the Site include hydrocarbons and volatile organic compounds (VOCs) in soil, soil vapor, groundwater, and light non-aqueous phase liquids (LNAPL).

Ground disturbance construction activities are not currently planned for the Site; however, this SMP establishes general handling protocols for soil and groundwater during utility line removal/repair, soil excavation, and future potential remodeling efforts at the Site which cut or break through the existing concrete slab or asphalt parking areas. Such activities include, but are not limited to, minor excavation or trenching beneath the building slab, maintenance, repair

or installation of sewer systems, water supply systems, natural gas lines, underground electrical, or storm drain systems.

Trihydro has prepared this SMP for Balco to satisfy requests made by ACDEH to develop mitigation strategies for any future ground disturbance activities (e.g. utility repairs) which may result in exposure to impacted soil or groundwater present at the Site. A copy of this SMP will be provided to future contractors for their review and each subcontractor will be advised to provide appropriate information to their subcontractors. Specific objectives of this SMP include the following:

- Describe general worker training requirements, general health and safety measures, and general media handling procedures during future ground disturbance activities.
- Describe general site control procedures to control the flow of personnel, vehicles, and materials in and out of the Site during future ground disturbance activities.
- Establish decontamination procedures to reduce the potential for equipment and vehicles to release impacted soil onto public roadways or other off-site transfer during future ground disturbance activities.
- Establish protocols for buried structures, debris, or unidentified areas of impacted soil that may be encountered during future ground disturbance activities.
- Establish measures to minimize dust generation and tracking of soil off-site.
- Establish protocol for groundwater dewatering activities, in the event groundwater dewatering is required.
- Establish protocols to characterize/profile soil or groundwater so that appropriate mitigation, disposal, or reuse alternatives, if necessary, can be implemented.
- Describe stockpiling protocols for "clean" and "impacted" soil during future ground disturbance.

2.0 GENERAL PROTOCOLS FOR SITE ACTIVITIES

This section identifies appropriate general risk mitigation protocols (not necessarily media specific).

2.1 WORKER HEALTH AND SAFETY

Site-specific Health and Safety Plans (HASPs) are designed to assist in Site activities being performed in a manner protective of the health and safety of construction workers and interim users in the construction zone. Each subcontractor working onsite will be responsible for their own health and safety and providing their own HASPs.

Based on known environmental conditions at the Site, the use of personnel trained and certified in OSHA 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) training requirements (OSHA-certified) is advisable in certain areas during intrusive activities. Intrusive construction activities include, but are not limited to, excavation, trenching, grading, and drilling. OSHA-certified worker compliance may be necessary for certain activities. Each contractor and subcontractor will be responsible for determining and confirming when OSHA-certified worker compliance is necessary.

2.1.1 DECONTAMINATION PROCEDURES

Contact with impacted soil/groundwater should be minimized to the extent practicable while performing future ground disturbance and excavation activities at the Site. However, contact with impacted materials is possible and decontamination practices should be implemented, as needed. Proper use of personal protective equipment (PPE) should reduce the amount of contact with impacted soils/groundwater during excavation activities. The following decontamination activities should be implemented to minimize the movement of contaminants outside of work zones.

2.1.2 PERSONAL HYGIENE

Contractors and sub-contractors working at the Site should provide equipment and supplies (i.e. soap, water, towels, trash bags) to implement proper decontamination of personnel. Field personnel should conduct the following actions:

- Wash hands, face, neck and forearms at the end of each work day.
- Take a full body shower at the end of each work day. Particular attention should be paid to areas of the body that are commonly overlooked such as behind the ears and between the toes.
- No eating drinking or smoking will be permitted in the established work zones.

2.2 EQUIPMENT DECONTAMINATION

Field equipment that has come into contact with impacted soil and/or groundwater during future ground disturbance activities should be cleaned prior to removal from the established work zones. Manual equipment such as shovels and rakes should be decontaminated on a daily basis (if necessary) or prior to reuse. Decontamination may be with soapy water or high-pressure steam. Decontamination activities will be performed in established areas.

2.3 SITE ACCESS CONTROL

While future ground disturbance activities are in progress, work zones shall be established around the excavation and equipment staging area. Only authorized personnel will be permitted to enter work zones. Authorized personnel will include those who have duties requiring their presence in the work zones and have received appropriate health and safety training. For work occurring inside the existing building, the work zone should be delineated with hard barricades or delineators and caution tape, and employees of affected tenant businesses should be notified in advance.

2.4 UTILITY REPAIRS

During activities at the Site, if utility corridor trenches are uncovered or newly created, they will be backfilled with "clean-fill" or non-impacted soil from the Site. Soils used for backfill will be screened following the guidelines established in Section 2.6 below.

2.5 CONTINGENCY PROTOCOLS FOR THE DISCOVERY AND MANAGEMENT OF UNANTICIPATED SITE CONDITIONS

During future ground disturbance activities at the Site, it is possible that unknown contamination and/or structures may be encountered, especially during excavation. If such unknown contamination and/or structures are encountered, the risk mitigation measures described below may be implemented.

- Work will be stopped in the area where the suspect material is encountered and covered with plastic sheeting.
- Notify the General Contractor's site safety officer and site superintendent. The General Contractor will request that the Environmental Professional conduct a site inspection and will consult with the Environmental Professional regarding appropriate follow-up actions in the suspect area. The Environmental Professional will notify ACDEH of site conditions that indicate a material threat to human health or the environment.
- Review the existing health and safety plan for revisions, if necessary, and have appropriately trained personnel on-site to work with the affected materials, once directed by the General Contractor.

If necessary, notifications will be performed, and permits will be acquired prior to subsurface feature removals, following permit conditions.

If stained soil or odors are noted in association with an unknown subsurface feature, plastic sheeting will be placed over the affected area and the Environmental Professional will be contacted for inspection and appropriate action. If the stained or odor-containing soil is excavated, the soil will be stockpiled onto plastic sheeting and covered with plastic sheeting. The Environmental Professional will collect and analyze soil samples to determine disposal of the material and the extent of the unexpected area of apparent petroleum impacted soil.

2.6 OFF-SITE FILL

Any offsite fill will be new and certified clean and/or analyzed appropriately per analytical protocols, such as the Department of Toxic Substances Control (DTSC) "Information Advisory, Clean Imported Fill" (DTSC, 2001).

2.7 RECORDS

Contractors will be responsible for accurately completing hazardous waste manifests and nonhazardous bills of lading. The owner (Balco) will maintain records including copies of uniform-hazardous waste manifests signed by the designated waste disposal facility and records pertaining to the characterization of hazardous and non-hazardous wastes generated on Site.

3.0 SOIL MANAGEMENT PROCEDURES

Potential on-site excavation activities include, but may not be limited to, soil removal and trenching. Additionally, soil and soil vapors may be disturbed during any construction or maintenance activities which break or cut the existing slab. In general, it is anticipated that soil volumes generated during future ground disturbance activities such as tenant improvements or utility repairs will be small. In these cases, the small volumes of soil may be placed directly into roll-off bins or drums for profiling and disposal as described in Section 3.3 below. If excavated soil volumes are large, the procedures outlined in this section may become necessary.

3.1 DUST, VAPOR, AND ODOR CONTROL MEASURES

Future soil excavation activities are anticipated to disturb limited volumes of soil through trenching or small excavations, and may occur inside the building, therefore a dust control plan is not required. Should handling of large volumes of soil within outdoor areas become required, the following dust control strategies are recommended.

If necessary, recommended dust, vapor, and odor control best practices may include:

- Limiting area or number of open excavations at any given time.
- Covering open excavations and soil stockpiles.
- Providing supplemental ventilation, if indoors.
- Use of spray or misting systems around the work area.
- Haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- Public streets will be swept daily if soil is visible.
- Excavation and loading activities will be suspended if the hourly average wind speed exceeds 25 miles per hour.

3.2 VAPOR AND ODOR CONTROL

Petroleum vapor or odors may be encountered when performing earth work in the area of the existing LNAPL plume. The General Contractor is responsible for maintaining acceptable indoor air quality during earthwork activities. Vapor and odor control measures, if needed, may include:

- Limiting the area of open excavations
- Covering soil piles or open excavations with tarps or other covers

- If outdoors, limiting soil excavation or loading to times when meteorological conditions are conducive to conducting operations (e.g. the predominant wind direction does not direct vapors or odors toward a sensitive receptor)
- Spraying water or water containing a non-toxic biodegradable deodorizer, odor suppressing foam, or other odor mitigating agents onto exposed soil during excavation and loading (e.g. Simple Green, ODEX, or BioSolve)
- Use of spray or misting systems around the work area
- If indoors, providing supplemental ventilation

To minimize the risk of project delays, the General Contractor will be prepared to implement odor suppression measures during excavation in the areas above the LNAPL plume (Figure 3). The General Contractor will notify ACDEH of complaints, if any, and record them in a log book kept by the General Contractor.

3.3 STOCKPILE SOIL ON-SITE REUSE OR OFF-SITE DISPOSAL DETERMINATION

Excavated soil for disposal should be stockpiled on-site, and soil samples will be collected from soil stockpiles and submitted for analyses to a certified laboratory, for the established COCs on site.

- VOCs by EPA Method 8260 (or equivalent)
- Total Petroleum Hydrocarbons (TPH) quantified as gasoline and diesel by EPA Method 8015B

Potential additional laboratory analyses required by a receiving facility may include:

- Semi-Volatile Organic Compounds (SVOCs) using EPA Method 8270C
- Polychlorinated biphenyls (PCBs) and pesticides using EPA Method 8081A/8082
- CAM17 metals using EPA Method 6020 and 3050B
- pH by 0045D

Stockpiled soil will be managed in accordance with applicable regulations respective to the waste characterization demonstrated in the excavation sample(s) analytical results. The waste generator, Balco (or designee), will determine, based on soil sample analytical results, whether soil disposal is necessary. Soils designated for disposal will be transported offsite for disposal at a permitted federally- or state-licensed hazardous waste treatment or disposal facility, as appropriate. Any soils saturated with water, shall be assumed as impacted, and will be analyzed per the analytical list above before designated for re-use and/or disposal at a permitted facility.

3.4 STOCKPILE, DISPOSAL, LOADING AND TRANSPORTATION

Following receipt of analytical data, an evaluation of disposal options, and waste manifesting, stockpiled soils to be transferred offsite will be loaded into trucks or roll-off containers. Once loaded, the truck/roll-off will be inspected by a representative (or designee) before being covered to reduce the risk of releasing material during transportation. If the characterization and disposal of large volumes of excavated soils becomes necessary, it is recommended that pre-characterization of soils using historical soil data in the particular location is used to allow for direct loading soils onto trucks for transportation and disposal. All material leaving the Site will be properly manifested according to the waste characterization as designated by the analytical results. A summary of excavation activities, including: manifests, final soil disposition, and total amount of soil transported will be included in subsequent reports (as necessary).

3.5 OFF-SITE SOIL TRACKING

Once removed from the Site, soil will be tracked via waste manifests, signed by the waste generator, Balco (or designee), and a representative of the waste transportation company. The designated waste disposal facility and unique waste tracking number should be identified on the manifest as well as the U.S. EPA number for the waste transporter. Records of these waste manifests will be kept on file and included in subsequent reports, as necessary.

4.0 GROUNDWATER MANAGEMENT PROTOCOLS

Utility removal and/or installation could potentially result in short-term management of groundwater and/or free-phase hydrocarbons. This section describes management protocols for groundwater and free-phase hydrocarbons during future ground disturbance activities.

4.1 GROUNDWATER MANAGEMENT

Groundwater at the Site is encountered at approximately 4 to 12 ft-bgs and, in select areas, contains free product known as light non-aqueous phase liquids (LNAPL) (primarily total petroleum hydrocarbons quantified as gasoline and diesel). Groundwater management may be necessary during site activities, specifically for activities which require subsurface soil disturbance and/or penetrating the concrete foundation or asphalt parking lot areas such as maintenance or installation of subsurface utilities. Efforts will be made to minimize groundwater exposure and potential for groundwater management. Limited volumes of water may be stored in drums and disposed off-Site in accordance with local, state, and federal laws. The following measures will be implemented if groundwater is encountered during future ground disturbance activities.

4.1.1 EXCAVATION/CONSTRUCTION-PHASE DEWATERING

In the event that groundwater must be collected or otherwise removed to prevent infiltration or intrusion to open trenches or pits during activities, the groundwater will be removed by mechanical devices such as pumps, and placed in containers (such as drums, vacuum trucks, or fracture tanks) for temporary staging onsite as necessary. Small volumes of groundwater may be stored in drums and disposed of off-site in accordance with local, state, and federal laws.

Prior to any dewatering activities, groundwater will be evaluated for the presence of LNAPL. If LNAPL is present the atmosphere in the area of dewatering should be monitored for VOCs and combustible gases by appropriate monitoring technology (e.g. 4-gas meter with lower explosive limit [LEL] sensor). If combustible gasses are present, appropriate removal technologies, such as intrinsically safe pumps, or vacuum trucks with proper bonding and grounding, will be utilized.

Based upon known groundwater impacts, appropriate samples will be collected and analyzed by an approved California state laboratory for TPH-g and TPH-d by EPA Method 8015B and VOCs by EPA Method 8260 (or equivalent; at a minimum). Groundwater will be disposed in accordance with all applicable local, state and federal regulations via two anticipated options.

- Discharge of extracted groundwater via storm drain and City sewer assuming prior approval of the City of Oakland with applicable discharge permits obtained.
- Transported offsite and managed through appropriate waste handling companies.

If groundwater is discharged to the City, analytical requirements, including the number of samples, will be specified in the permits issued from the City and/or ACDEH (or other applicable permitting agencies).

4.1.2 OFF-SITE TRACKING

Off-site tracking, if necessary, will be tracked via waste manifests, signed by the waste generator, Balco (or designee), and a representative of the waste transportation company.

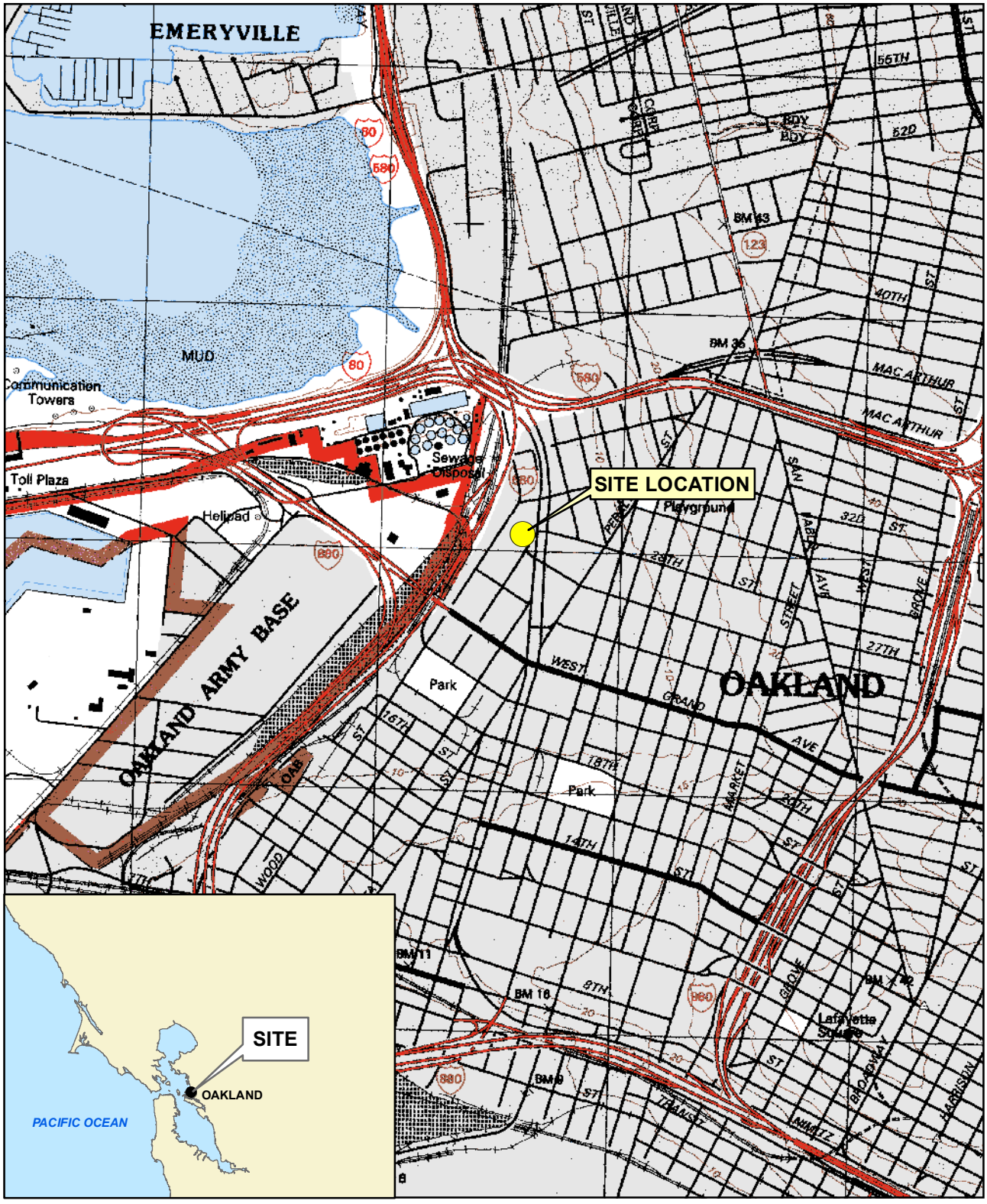
5.0 REFERENCES

Department of Toxic Substances Control. 2001. Information Advisory, Clean Imported Fill Material. October.

Treadwell and Rollo Inc. 2000. 1999 Site Investigation and Remediation Activities, 2855 Mandela Parkway Property, Oakland, California.

Trihydro Corporation. 2014. *Revised Work Plan for Additional Investigation, Balco Properties LLC, 2855 Mandela Parkway, Oakland, California*. September 30.

FIGURES



N

0 2,000 '

SOURCE: USGS 7.5' QUAD SHEET
OAKLAND WEST, CA, 1993

Trihydro CORPORATION

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Laramie, WY 82070
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(P) 307/745.7474 (F) 307/745.7729

FIGURE 1

SITE LOCATION

2855 MANDELA PARKWAY
OAKLAND, CALIFORNIA

Drawn By: DH	Checked By: JC	Scale: 1" = 2,000'	Date: 12/21/16	File: Balco_DataGapInvest_Fig1.mxd

Trihydro CORPORATION
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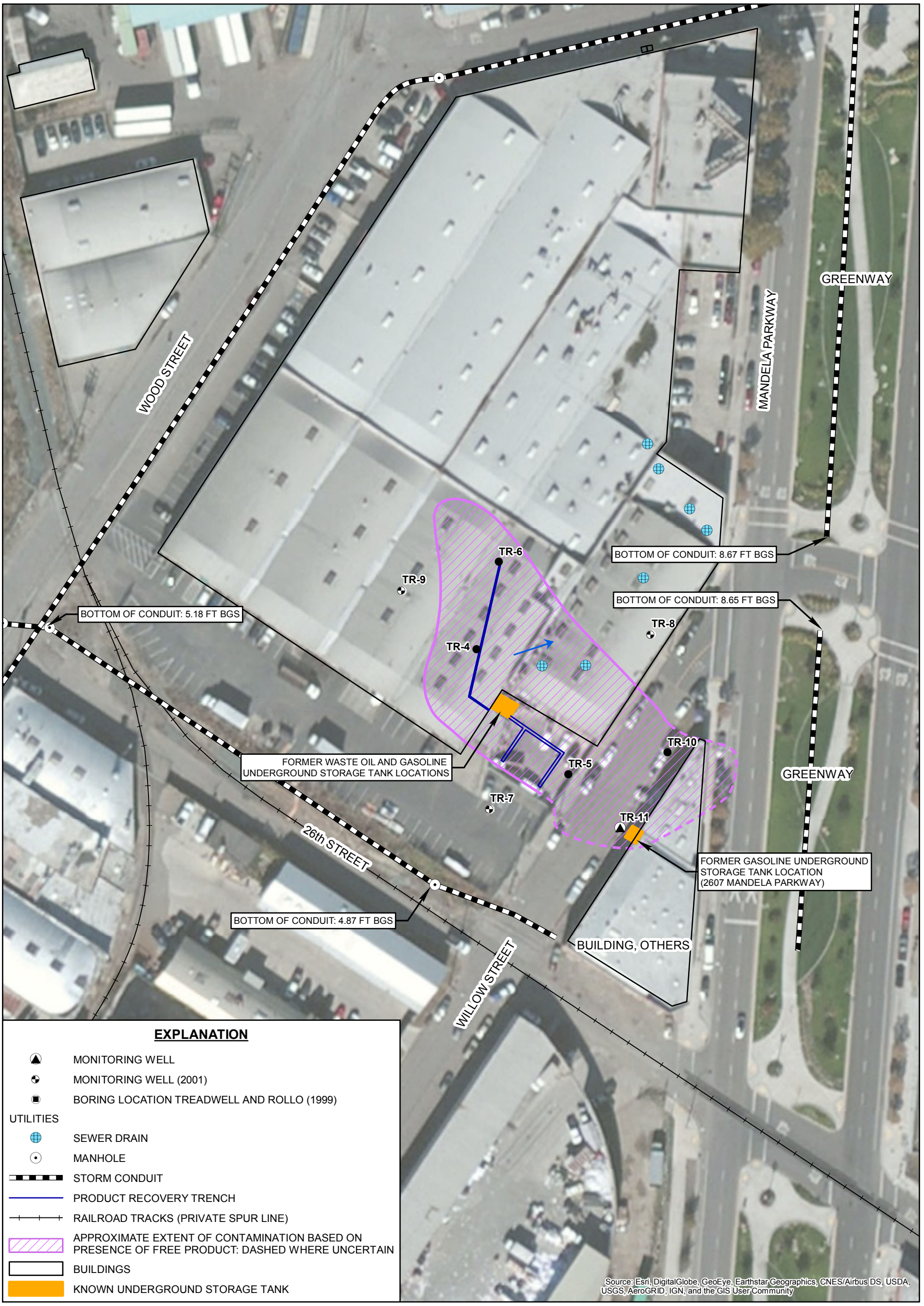
FIGURE 2

SITE MAP

2855 MANDELA PARKWAY
OAKLAND, CALIFORNIA

Drawn By: DH	Checked By: LA	Scale: 1 " = 70 '	Date: 12/21/16	File: 201608_Balco_ExistingWells_Fig2.mxd



NOTE:
FT BGS = FEET BELOW GROUND SURFACE

N

0 70'

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FIGURE 3

UTILITY LOCATION AND DEPTH

2855 MANDELA PARKWAY
OAKLAND, CALIFORNIA

Drawn By: DH	Checked By: LA	Scale: 1 " = 70 '	Date: 9/14/17	File: Balco_Utilities_Fig3.mxd