

✓ R0437

January 31, 2003  
1731-2B

Mr. Amir K. Gholami  
**ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH**  
1131 Harbor Bay Parkway  
Alameda, California 94502

**RE: RESIDENTIAL REDEVELOPMENT  
303 AND 315 DERBY AVENUE,  
2901 AND 2909 GLASCOCK STREET  
OAKLAND, CALIFORNIA**

Dear Mr. Gholami

This letter summarizes the planned redevelopment of 2901 Glascock Street in Oakland, California. In addition, this letter provides additional information requested by you during our January 22, 2003 conversation.

Signature Properties is in the process of purchasing 2901 Glascock Street for residential redevelopment. The 2901 Glascock Street parcel (approximately 2 acres) will be combined with the adjacent 2909 Glascock Street parcel (approximately ¼ acre) and 303 and 315 Derby Avenue (approximately 2 ¾ acres) (Site). The combined Site will be redeveloped with townhomes, discussed in more detail below. The California Regional Water Quality Control Board (CRWQCB) is providing regulatory oversight for the remediation of the 303 and 315 Derby Avenue parcels. The Alameda County Department of Environmental Health (ACDEH) has been providing regulatory oversight of 2901 Glascock Street.

#### **Site Description**

The 2901 Glascock Street is occupied almost entirely by an approximately 72,000-square-foot warehouse. The warehouse is constructed of wood- and steel-frame with corrugated metal paneling. A private apartment is located inside the southwest corner of the warehouse. On the exterior of the northwest side of the warehouse, an approximately 30-foot wide fenced strip extending from Glascock Street to the estuary is present. Along the estuary on the west side of the warehouse, an abandoned wood-plank dock is present. Adjacent to the estuary, the warehouse is bordered by a concrete foundation/seawall. ICONCO, a demolition contractor, uses 2901 Glascock Street for storage of equipment, minor maintenance of heavy equipment (bulldozers, loaders, etc.) and for office space.

#### **Planned Redevelopment**

During April to June 2003, all on-site structures will be demolished. Ground water remedial actions on 303 and 315 Derby Avenue are planned from January 2003 to August 2003. Soil remedial actions are planned from July to August 2003. Signature Properties is planning to construct 100-town homes on-Site beginning September 2003. The current plans include a garage on the first level with a walk-up entrance to second and third floor living areas. A

public access promenade is planned along the waterfront that will include a pedestrian path and landscaping. The Site will be remediated to concentrations that will be protective of human health in a residential setting. The town homes will be built with vapor/gas barriers beneath building slabs to help reduce the potential for migration of soil vapors into living spaces.

### **Corrective Action Plan and Risk Management Plan**

Soil beneath 303 and 315 Derby Avenue has been impacted by petroleum hydrocarbons from a former bulk fuel distribution facility. A corrective action plan (CAP) (Lowney Associates, October 31, 2002) has been prepared to cleanup 303 and 315 Derby Avenue to residential and ecological cleanup goals. The CRWQCB staff conditionally approved the CAP on December 3, 2002. A risk management plan (RMP) (Lowney Associates, January 14, 2002) will be submitted to the CRWQCB staff that presents protocol for managing soil with low levels (below cleanup goals) of petroleum hydrocarbons and unknown contamination encountered during development, if any. The RMP includes the removal of two localized areas of impacted surface soil from 2901 Glascok Street. The impacted soil will be removed following demolition of the facility.

Cleanup goals presented in the CAP have been approved by the CRWQCB. Cleanup goals for contaminants of concern (COCs) detected in soil and ground water beneath the Site during previous investigations are listed in Table 1. Ecological cleanup goals will be applied to a 50-foot wide buffer (from top of estuary bank) along the estuary. The CRWQCB staff also approved residential occupancy objectives for the Site. The CRWQCB staff agreed that they will not object to residential occupancy of the Site when the residential occupancy objectives are met.

Table 1 includes arsenic, copper, and polychlorinated biphenyls (PCBs), which were not included in the CAP for 303 and 315 Derby Avenue but which were detected on 2901 Glascok Street. The cleanup goal for arsenic (8 ppm) is from the CRWQCB's RBSL document, which considers arsenic below 8 ppm to be background. The residential RBSLs for copper and PCBs also were used for the cleanup goals in Table 1.

**Table 1. Ground Water Residential Occupancy Objectives and Soil and Ground Water Cleanup Goals**

Compound	Site-Wide Ground Water Residential Occupancy Objectives (ppb)	Ecological Buffer Zone Ground Water Cleanup Goals (ppb)	Soil Cleanup Goals (ppm)
TPHg	97,500	3,700	0 to 3 feet 500 ppm total gasoline/diesel/residual fuels
TPHd	Removal of free product*	640	3 to 7 feet 1,000 ppm total gasoline/diesel/residual fuels, with 500 ppm maximum gasoline 7 feet to top of capillary fringe 5,000 ppm total gasoline/diesel/residual fuels (plus removal of gross free product)
Benzene	5,800	71	0 to 7 feet 2.4 ppm 7 feet to top of capillary fringe 4.7 ppm
Toluene	530,000	130	8.4
Ethyl-benzene	170,000	290	24
Xylenes	160,000	130	10
MTBE	2.7E+07	1,800	10
Lead	NE	NE	200
Arsenic	NE	NE	8.0
Copper	NE	NE	225
PCBs	NE	NE	0.22

\* If TPHd concentrations are above 5,000 ppb TPHd, ground water at the sampling point needs to be evaluated for presence of free product (greater than 1/10-inch thick floating on ground water).

NE No ground water cleanup goal established.

The ACDEH previously approved ecological-based ground water cleanup goals for 2901 Glascock Street. The ecological cleanup goals in the CAP are consistent with or lower than the ecological goals approved by the ACDEH for 2901 Glascock Street.

### Sensitive Receptors

Ground water flow beneath 2901 Glascock Street has consistently been toward the southwest, toward the Oakland Estuary. Therefore, the Oakland Estuary is a sensitive receptor for the Site. Concentrations of petroleum hydrocarbons in monitoring well MW-6, located within approximately 10 feet of the estuary, were significantly below the ecological cleanup goals during November 2002. In addition, no petroleum fuel hydrocarbons have been detected in monitoring well MW-8, located within approximately 15 feet of the estuary, since March 2001. Based on the ground water flow direction and analytical data, the estuary does not appear to be significantly impacted by the petroleum hydrocarbons detected beneath 2901 Glascock Street.

There are no active on-Site water supply wells. In addition, based on historical information reviewed for 2901 Glascock Street, there do not appear to have been water supply wells on-Site. In addition, no records were reviewed indicating that water supply wells are or have been located on adjacent sites. Because ground water flows from the Site into the estuary, there are no down-gradient properties that could potentially have water supply wells.

### **Extent of Contaminants**

Ground water beneath 2901 Glascock Street has been impacted by petroleum fuel hydrocarbons. The extent of the petroleum-impacted ground water has been defined to the northeast (upgradient) and northwest. As noted above, the estuary is located to the southwest. To the southeast, the petroleum hydrocarbons may be commingling with the petroleum impacted ground water beneath 303 and 315 Derby Avenue.

Corrective actions have included the injection of oxygen releasing compound (ORC) to stimulate biodegradation of hydrocarbons in ground water. Petroleum hydrocarbon concentrations in ground water have been decreasing. During November 2002, no petroleum fuel hydrocarbons were detected above the ecological cleanup goals approved by the CRWQCB, with the exception of 830 parts per billion (ppb) total petroleum hydrocarbons as diesel (TPHd) detected in monitoring well MW-2. The ecological cleanup goal for diesel is 670 ppb. Monitoring well MW-2 is located approximately 240 feet from the estuary. The petroleum fuel concentrations detected in ground water beneath 2901 Glascock Street, including MW-2, were below the residential cleanup goals for the Site. A Site plan summarizing ground water concentrations, from the most recent monitoring report by others (Shaw Environmental, Inc., January 15, 2003), is presented in Attachment A.

Previous investigations identified several locations with elevated (above 500 parts per million (ppm)) concentrations of petroleum hydrocarbons in soil. Corrective actions include the over-excavation of petroleum-impacted soil and ORC injection to stimulate biodegradation of hydrocarbons in ground water. No petroleum fuel hydrocarbon concentrations were detected above the soil cleanup goals for the Site.

During recent investigations on 2901 Glascock Street, two limited areas were identified that will require corrective actions prior to residential redevelopment. The areas include the northwest corner of the warehouse where metal filings were encountered. Elevated concentrations of lead and copper were detected in soil at this location. In addition, an apparently limited area of polychlorinated biphenyls (PCBs) and arsenic was encountered in the exterior unpaved area on the north side of the warehouse. Removal of the impacted soil will be discussed in the RMP.

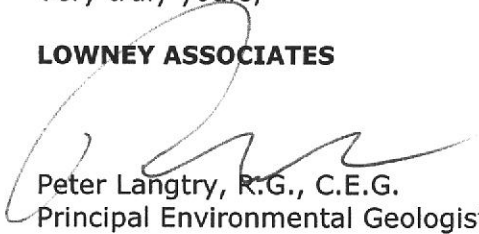
### **Requested Meeting with ACDEH Staff**

We request a meeting with ACDEH staff to discuss the planned redevelopment and obtaining case closure for the Site. We will contact you soon to discuss scheduling a meeting in the next one to two weeks.

If you have any questions, please call and we will be glad to discuss them with you.

Very truly yours,

**LOWNEY ASSOCIATES**



Peter Langtry, R.G., C.E.G.  
Principal Environmental Geologist

PML:

Copies: Addressee (1)  
Signature Properties (1)  
Mr. Patrick VanNess  
California Regional Water Quality Control Board (1)  
Ms. Betty Graham

OK, 1731-2B ACHDEH Summary 012303

**ATTACHMENT A**  
**SITE PLAN SHOWING FOURTH QUARTER 2002 GROUND WATER MONITORING RESULTS**

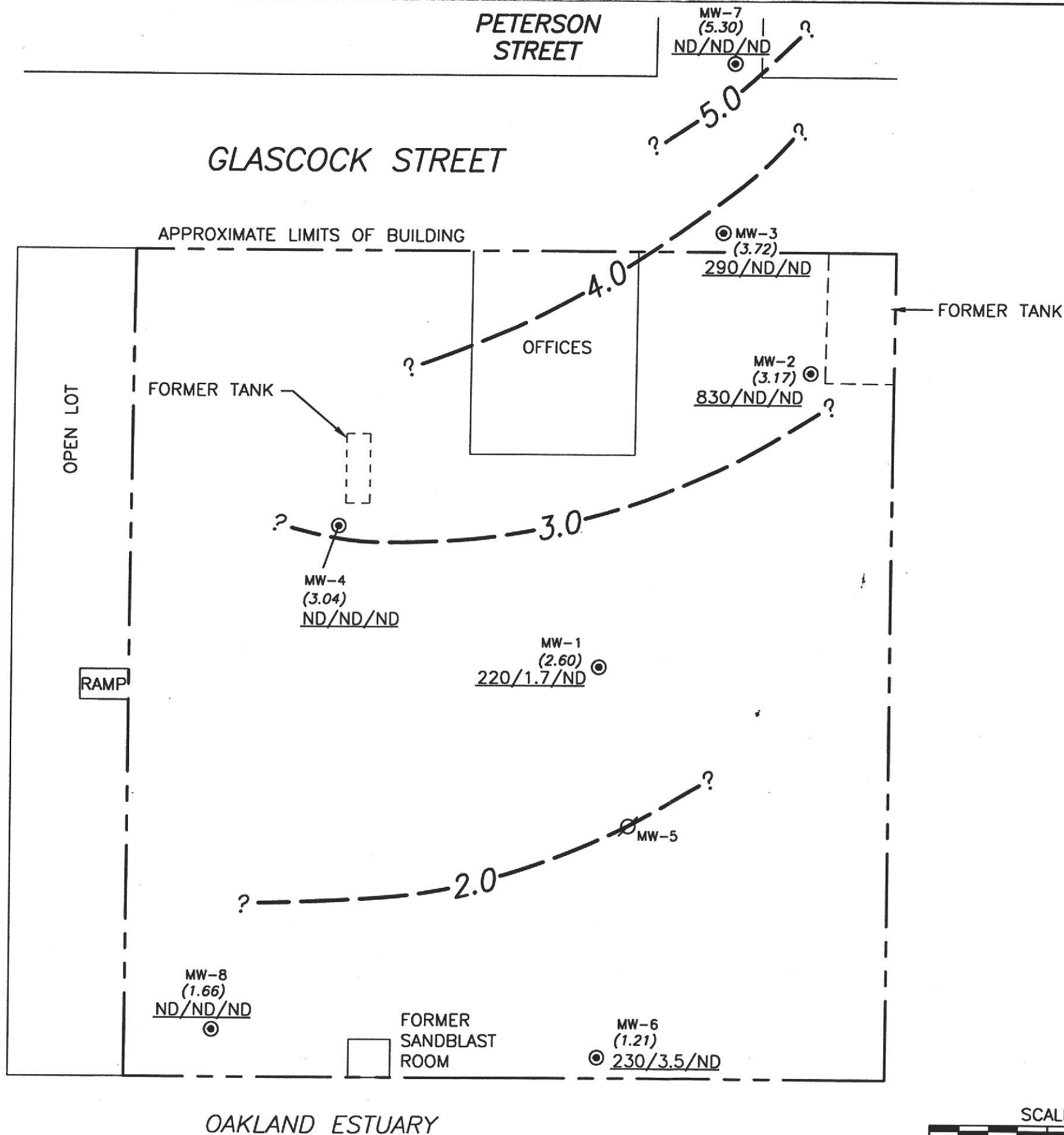
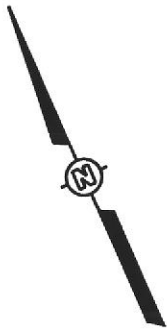
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APPROVED BY

CHECKED BY

DRAWN BY K. Block 1-8-03

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**LEGEND**

- ⊙ GROUNDWATER MONITORING WELL
- ∅ DESTROYED GROUNDWATER MONITORING WELL
- 830/ND/ND TEPH-d/BENZENE/TEPH-mo CONCENTRATIONS IN GROUNDWATER (PARTS PER BILLION); 11-25-02
- ND NOT DETECTED
- (3.17) GROUNDWATER ELEVATION (FT.-MSL); MEASURED 11-25-02
- ?- - - GROUNDWATER ELEVATION CONTOUR (FT.-MSL)



APPROXIMATE DIRECTION OF GROUNDWATER FLOW  
APPROXIMATE GRADIENT = 0.011



Shaw E & I, Inc.

ICONCO

**FIGURE 1**  
**GROUNDWATER MONITORING RESULTS**  
**FOURTH QUARTER 2002**  
 2901 GLASCOCK STREET  
 OAKLAND, CALIFORNIA