

Chan, Barney, Env. Health

From: Kyle Emerson [kemerson@secor.com] 202906 SL
Sent: Wednesday, March 01, 2006 1:51 PM
To: Chan, Barney, Env. Health; Molly Maybrun; Phil Kerr; Preston Brooks
Cc: Brian Viggiano
Subject: Meyers Plumbing Supply

Barney:

It was a pleasure talking to you yesterday about the environmental issues at the above referenced property. As I discussed with you understanding the Counties opinions concerning the required responses to the environmental issues at this property is essential to our plans and budgets for redevelopment. Based on our discussions yesterday I am sending to you a brief summary of what I understood the County is going to require and would expect to be completed as part of addressing the environmental issues as part of Site redevelopment.

In your letter dated February 16, 2006 you provided three technical comments concerning the identified environmental issues. In addition, you requested that a work plan be submitted to address these technical comments by March 20, 2006. The following response is how I understood you wished these technical comments to be addressed in the pending work plan.

Underground Storage Tank soil and groundwater contamination:

Need to show GW not dw / Cleanup goals soil + GW
 TPHd 500 ✓
 TPHg 100/400
 640
 500 } *ppb*

The plan of the Olson Company is to remove the abandoned in place UST as part of Site re-development. When that UST is removed, soil contamination located around the UST will be removed and disposed of from the project Site. SECOR would like to receive from the county in advance of that removal, Site specific clean up levels to determine the extent of excavation and removal required. Again the Site usage will be parking on the bottom floors of this development with no subsurface parking and living space in the upper floors of the structure.

If groundwater is encountered during removal of the UST and contamination is identified, removal of this water in the excavation will be undertaken. If the County has a specific recommendation for clean up criteria to be used for groundwater in this case, it would be helpful to understand that as part of preparing the pending work plan.

Groundwater contamination from source other than the UST:

*- depends on
 dg levels it could be
 higher than*

As I understood your concerns on this issue the county would like to have us collect additional information concerning potential off-Site source of groundwater contamination that maybe affecting the Site. We will provide supporting information we collected as part of the Phase I ESA discussing the large number of reported leaking USTs in close proximity to the Site that have reportedly affected groundwater. In addition, we will propose to drill borings around the Site to evaluate the local/regional groundwater contamination levels. It was my understanding from you that if a regional contamination issue exists, that the Site would not be responsible for any Site specific clean up or regional contribution. In the work plan we will be addressing what evaluation is possible with all the physical access constraints imposed by Site and adjacent properties.

HVOCs:

*GW sampling after site demo?
 as needed to define plumes.*

Based on your letter it is my understanding that you will not require further assessment of HVOCs on this site.

Lead in soil:

Lead has been found in soils on-Site in excess of U.S. EPA region 9 PRGs and in some cases above the California TTLC for definition as a hazardous waste. It is our opinion this lead is from regional sources (old fill). You indicated that the county has seen this before in other areas. What we are proposing is to not do any more site characterization of the lead in soil prior to demolition of the building. Our plan, as discussed with you, is to characterize all soil excavated at the site as part of construction and determine from that profiling where regulation requires the soil to be disposed of. Those soils would then be properly disposed of from the site. As part of that construction, additional soil samples will be collected to evaluate where any residual lead

contaminated soils exist that will remain on Site after construction. The Olson Company would then desire to leave those lead contaminated soil on-Site below the new building slab. A map will be made depicting the location, concentrations, and depth of the lead in soil. This will be attached to the deed of the property as a notification of the presence of lead. A plan will also be provide to establish procedure for any construction work that maybe required in the future that may uncover this lead contaminated soil.

It was my understanding that you have allowed this procedure to occur on other sites like Mandela Gateway Project located a few blocks away at 7th and Mandela. You also said you would forward to us the deed notification/restriction language the county would like to see on our deed if we were to follow this procedure. This is critical to this project to understand that the county will allow the residual lead to remain on-Site due to the expense of off-site disposal. Please reconfirm the counties wiiliness to allow this procedure to occur.

Other requests:

Sent copies of model & example Deed Restriction

SECOR will make sure we that all future work plans and reports are submitted to you in the requested electronic format, as well to geotracker. SECOR will also include in the future reports the perjury statement and the professional certification as requested.

If you could please respond to this e-mail indicating that my understanding of our recent phone call is accurate and the approach to manage the lead in soil will be acceptable to the county. Your response will be much appreciated. In addition, we will look for the deed information the County would require to be included on this site.

Thank you again for your help on this project.

Kyle Emerson