

## Wickham, Jerry, Env. Health

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**From:** Wickham, Jerry, Env. Health  
**Sent:** Monday, March 03, 2014 11:55 AM  
**To:** Peter Sims  
**Subject:** Re: Ashland Housing Project

Our 12/11/2013 approval of the IRAP requested that analytical results for reuse of stockpiles be submitted to ACEH for approval prior to reuse on site. There are other factors in addition to cleanup goals that could enter into decisions on reuse.

Jerry Wickham  
Alameda County Environmental Health  
Sent from my iPad

> On Mar 3, 2014, at 11:22 AM, "Peter Sims" <[psims@ninyoandmoore.com](mailto:psims@ninyoandmoore.com)> wrote:

>  
> Will do, samples from the stockpile of unknown origin (hereafter known  
> as SP-7), will be analyzed for the full suite of analyses as detailed  
> in the IRAP.

>  
> I had previously thought that we would be using the May 2013 Tier 1  
> ESLs as our screening levels for on-site reuse of stockpiled soil as  
> well as cleanup goals. Should we be using different numbers for  
> on-site reuse screening and cleanup goals?

> Thanks,

>  
> Peter D. Sims, LEED AP  
> Project Environmental Geologist  
> Ninyo & Moore  
> Geotechnical & Environmental Sciences Consultants  
> 1956 Webster Street, Suite 400  
> Oakland, California 94612  
> (510) 343-3000 x15216 (Office)  
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> New San Jose office  
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> San Jose, CA 95131  
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> Experience \* Quality \* Commitment

> -----Original Message-----

> From: Wickham, Jerry, Env. Health [<mailto:jerry.wickham@acgov.org>]  
> Sent: Monday, March 03, 2014 10:02 AM  
> To: Peter Sims  
> Subject: Re: Ashland Housing Project

> Peter,

>  
> Given the conditions and time that has passed for the stockpile of  
> unknown origin, it should not be treated the same as any other  
> stockpile generated during the project. In addition to the analyses  
> proposed below, please include PAHs by Method 8270 and PCBs by Method 8082.  
>  
> I do not see a need to revise the cleanup goal of 500 mg/kg for TPHmo  
> at this time. However, the ceiling value may be considered along with  
> other factors in making decisions on reuse of soil.  
>  
> Regards,  
> Jerry Wickham  
> Alameda County Environmental Health  
>  
>  
> Sent from my iPad  
>  
> On Feb 28, 2014, at 11:45 AM, "Peter Sims"  
> <[psims@ninyoandmoore.com](mailto:psims@ninyoandmoore.com)<mailto:psims@ninyoandmoore.com>> wrote:  
>  
> Hi Jerry,  
>  
> The stockpile of unknown origin at the site has been identified.  
> According to the remediation contractor and site owner, it was  
> generated during utility trenching in East 14th Street. As such, I'd  
> like to treat it the same as any other soil stockpiled on site from  
> trenching in adjacent streets. The stockpile would be sampled for  
> on-site reuse at a rate of one 4-point composite per 50 cubic yards.  
> The composite sample would be analyzed for TPHg, TPHd, TPHmo, Title 22  
> Metals, and BTEX. Is this acceptable?  
>  
> The new Tier 1 ESL (December, 2013) for TPHo is 100 mg/kg (based on  
> Ceiling Value) which is lower than the previous ESL (May, 2013) for  
> TPHo of 500mg/kg which is our proposed cleanup goal for TPHo. Since  
> the residential direct exposure ESL for TPHo is 1,000 mg/kg and  
> impacts to groundwater have shown to not be a concern, I believe the  
> 500mg/kg cleanup goal will be sufficient for the planned site use.  
> What's your take?  
>  
> Thanks,  
>  
>  
> Peter D. Sims, LEED AP  
> Project Environmental Geologist  
> Ninyo & Moore  
> Geotechnical & Environmental Sciences Consultants  
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