

## Wickham, Jerry, Env. Health

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**From:** Wickham, Jerry, Env. Health  
**Sent:** Thursday, December 04, 2014 8:05 AM  
**To:** Nicole Persaud  
**Cc:** Andy Lojo; Jim Fitzpatrick (jfitzpatrick@publicstorage.com)  
**Subject:** RO3136 Preliminary Review of Draft Site Management Plan

Alameda County Environmental Health (ACEH) received a draft version of the Site Management Plan (SMP) dated November 25, 2014 for the Public Storage #CA13186 site in Newark, CA. ACEH conducted a preliminary review of the draft SMP prior to formal submittal of the document in order to expedite the approval of the SMP. Based on our preliminary review, we have the following comments. Please incorporate these revisions prior to formal submittal of the SMP.

### Technical Comments

1. Section 7.2 – Excavation Activities. Please include some discussion of the expected depths of excavation in various areas.
2. Section 7.2.5 – Soil Confirmation Sampling Plan. Please provide further description of the criteria and locations of confirmation soil samples within the northern portion of the site in the bio retention pond area. Please also add additional text to this section to indicate what actions such as additional excavation and confirmation sampling will take place if confirmation samples exceed the commercial land use ESL for lead.
3. Construction of Cap. We request that you include additional information on construction of the cap including minimum thicknesses of the cap for various areas in the SMP. We suggest that at a minimum, information from Section 3.1 of the Post-construction Cap Monitoring Plan be included in the SMP also.
4. Reporting. Please include a section on Reporting in the SMP that describes the preparation of a Post-construction Report. Please also include reference to completion of a Covenant and Environmental Restriction on Property following completion and reporting of cap construction.
5. Dust Mitigation and Air Monitoring Plan (AMP) Draft. The action levels proposed in section 6.6 of the AMP are not acceptable. The California Ambient Air Quality Standard for respirable particulate matter (PM10) is 50 µg/m<sup>3</sup> (24 hour averaging time). The proposed Perimeter (24 hour average) action level of 50 mg/m<sup>3</sup> above upwind average may be an error. The use of OSHA occupational health criteria as a basis for perimeter action levels is not acceptable. We request that the perimeter action level be based on the California Ambient Air Quality Standard for respirable particulate matter (PM10) of 50 µg/m<sup>3</sup> (24 hour averaging time). An instantaneous or short-term action level (equivalent to 5 minutes or less TWA) to account for short duration variations in dust emissions should also be proposed. The working zone action level should be consistent with achieving the perimeter action level.
6. Dust Mitigation and Air Monitoring Plan Draft. The action levels and monitoring must be consistent with all guidance, regulations, permits, or other requirements of the San Francisco Bay Area Air Quality Management District.

Regards,  
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