

**From:** [Eileen Chen](#)  
**To:** [Wickham, Jerry, Env. Health](#)  
**Cc:** [Tom Berkins](#); [Michelle Myers](#)  
**Subject:** Public Storage #CA13186, 6800 Overlake Place Newark (SCP Case #RO0003136)  
**Date:** Tuesday, January 13, 2015 4:28:10 PM

---

Jerry Wickham, Alameda County Environmental Health (ACEH):

Thank you for the opportunity to comment on Antea Group's "Site Management Plan" (Plan) dated December 8, 2014, for the Public Storage #CA13186, 6800 Overlake Place, Newark. Following are our comments:

1. ACWD does not object to the proposed capping of the shallow contaminated soil at this site to limit potential human exposure, if ACEH approves the proposed capping methods/materials. However, we recommend that the contaminated soil be capped in-place and not excavated, relocated, and, in some cases, buried at greater depths, especially considering the shallow depth to groundwater at this site.

For the area beneath the footprint of the proposed building, available data indicate that approximately the top 1 to 2 feet of soil are impacted with elevated metal concentrations. The Plan proposes to excavate and re-located the shallow impacted soil (approximately 2,700 cubic yards), so that deeper clean soil (to a total depth of 5 feet) can be excavated to create a pit large enough to bury slag impacted soil from other parts of the site. This re-locating of contaminated soil on-site does not result in any kind of contaminant cleanup, but it increases the risk of human exposure risk during implementation and creates a new contamination zone from depths of 2 to 5 feet. If cleanup is not being proposed, then the contaminated areas should be disturbed as little as possible.

In addition, it is unclear what are the seasonal or historical highs of groundwater elevations beneath this site. The Plan referenced a geotechnical investigation conducted in 2013, which reported first encountered of groundwater to be from 10 to 17 feet. In 2011, a monitoring well and borings drilled at 6500 Overlake Place (property adjacent to the subject site) reported first encountered of groundwater at approximately 8 feet. Potentially, during the raining season, contamination buried at 4 or 5 feet may be in direct contact with groundwater. Due to the shallow groundwater beneath this site, contaminated material should not be relocated from a shallower depth to a deeper depth.

2. As mentioned above, due to the shallow depths of groundwater, selected soil samples should be collected and tested for their metals leaching potential. In addition, because some soil samples documented total chromium concentrations that are a magnitude higher than the published regional background concentration (Lawrence Berkeley Nation Laboratory, 2009), and the source of the slag/chromium is unclear, selected soil samples should be considered for chromium (VI) analysis.
3. It is recommended that groundwater samples should be collected at B-18 and B-19, where elevated concentrations of lead were detected at depths greater than 3 feet. If lead is

detected in groundwater at concentration exceeding the Maximum Contaminant Level (MCL), then impacted soil at these locations should be excavated and transported to an appropriate landfill. Depending on the concentrations detected, a groundwater investigation may be warranted.

4. As part of the post-construction site management requirement, if any disturbance (e.g., trenching, excavation, grading, landscaping) of the capped areas is proposed, approval must first be obtained from ACEH.

If you have any questions, please give me a call.

Thank you,  
Eileen Chen

\*\*\*\*\*

Eileen Chen  
Groundwater Resources Scientist  
Alameda County Water District  
43885 South Grimmer Boulevard  
Fremont, CA 94538  
Phone: (510) 668-4473  
Fax: (510) 651-1760

\*\*\*\*\*