



January 30, 2018

Mr. Chris Brawer
Anchor Valley Partners
500 Grand LLC
2040 Bancroft Way, Suite 301
Berkeley, CA 94704
(Sent via email to: Chris@anchorvalley.com)

Subject: Construction Soil and Groundwater Management Plan and Project Schedule Request; Site Cleanup Program Case No. RO0003175 and Geotracker Global ID T1000007707, 500 Grand Redevelopment, 500 Grand Avenue, Oakland, CA 94611

Dear Mr. Brawer:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the *Remedial Action Completion Report*, dated December 5, 2017. The report was submitted on your behalf by Cardno. Thank you for submitting the report. It will help move the site through the redevelopment process.

The report documented the excavation of petroleum hydrocarbon contaminated soil at the site above commercial remedial goals beneath the proposed redevelopment. Excavation was conducted by large diameter auger and by slot trenching in two areas of the site. The maximum residual contaminant concentrations documented after the excavation were 880 mg/kg TPHd, 410 mg/kg TPHg, <0.250 benzene, 1.3 mg/kg ethylbenzene, and 4.7 mg/kg naphthalene. These concentrations are located on the south wall of the excavation adjacent to the offsite sidewalk, and are below commercial and construction worker Environmental Screening Levels (ESL) values based on particle or vapor inhalation promulgated by the San Francisco Bay Regional Water Quality Control Board (RWQCB).

Based on the review of the case file ACDEH requests that you address the following technical comments and send us the documents requested below.

TECHNICAL COMMENTS

- 1. Status Site Redevelopment** – At present the status of the site redevelopment, including entitlement, and permitting, is not clear to ACDEH. Consequently ACDEH requests an updated schedule to provide site redevelopment details. Additionally, at present ACDEH is in receipt of planning level development plans, dated May 18, 2016, and more recent plans have not been submitted yet. ACDEH is open to meeting or holding a conference call to facilitate this communication. Please submit the updated schedule, plan set, and potential meeting or conference call dates by the date identified below.
- 2. Site Data Support Figures** – ACDEH has not located a compilation figure or figures that provide historic soil and groundwater data (from site investigation and cleanup inception in 1988) relative to proposed foundation elements, first floor property use (commercial / residential), and the location of new utility lateral entry on to the site. ACDEH requests submittal of this data / figures to clarify areas of residual contamination (for example the rectangular area bounded by CEW WS2, CEW WS4, CEW WS5 and the Southern Excavation Area, as well as AW SB2) with respect to the proposed redevelopment, and the potential for new site utilities to provide migration pathways for volatile contaminants. ACDEH notes that older data was not included in the Human Health Risk Assessment (HHRA) and requests that the toxicologist be present at the meeting or conference call to help discuss the data. ACDEH requests that a copy be included in the Construction Site and Groundwater Management Plans (CSGMPs) discussed below.

- 3. Construction Soil and Groundwater Management Plan** – Due to contractor failure to adhere to CSGMPs at multiple other redevelopment sites, ACDEH has developed a standard CSGMP for site redevelopment projects. The use of a standardized CSGMP expedites ACDEHs review of the document and facilitates contractor implementation of the CSGMP. ACDEH requests the submittal of a standard CSGMP to manage the removal of documented, and incidentally encountered, residual soil and groundwater contamination discovered at the time of site redevelopment construction. An example copy will be forwarded under separate cover. Please submit the CSGMP by the date specified below.

TECHNICAL REPORT REQUEST

Please upload technical reports to the State Water Resources Control Board's Geotracker website, and notify your case worker (Mark Detterman), in accordance with the specified file naming convention below, and according to the following schedule:

- **February 9, 2018** – Potential Meeting or Conference Call Dates and Times Identification
File to be named: RO3175_SMP_R_yyyy-mm-dd
- **March 2, 2018** – Updated Project Schedule and Plan Set
File to be named: RO3175_SCH_yyyy-mm-dd and RO3175_DEV_PLAN_yyyy-mm-dd
- **March 30, 2018** – Construction Soil and Groundwater Management Plan
File to be named: RO3175_SMP_R_yyyy-mm-dd

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

If you have any questions, please do not hesitate to call me at (510) 567-6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,



Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

Enclosures: Attachment 1 – Responsible Party (ies) Legal Requirements / Obligations
Electronic Report Upload (ftp) Instructions

cc: Glen Smith, Cardno, 2300 Clayton Road, Suite 200, Concord, CA 94520; (Sent via E-mail to: glen.smith@cardno.com)

Janice Jacobson, 2300 Clayton Road, Suite 200, Concord, CA 94520; (Sent via E-mail to: janice.jacobson@cardno.com)

Heidi Dieffenbach-Carle, 2300 Clayton Road, Suite 200, Concord, CA 94520; (Sent via E-mail to: Heidi.dieffenbach-carle@ardno.com)

Dilan Roe, ACDEH, (Sent via electronic mail to: dilan.roe@acgov.org)
Paresh Khatri, ACDEH; (Sent via electronic mail to: paresh.khatri@acgov.org)
Mark Detterman, ACDEH, (Sent via electronic mail to: mark.detterman@acgov.org)
Electronic File; GeoTracker

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: NA
	ISSUE DATE: December 14, 2017
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6731, 6735, and 7835) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately licensed or certified professional and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.