



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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March 14, 2016

Fremont State Street Center, LLC
Regis Homes Bay Area, LLC
c/o Mr. David Hopkins
901 Mariners Island Blvd, #700
San Mateo, CA 94404
(Sent via electronic mail to:
dhopkins@srgnc.com)

City of Fremont
c/ o Mr. Clifford Nguyen
Urban Initiatives Manager
330 Capitol Avenue, Building A
P.O. Box 5006
Fremont, CA 94537
(Sent via electronic mail to: cnguyen@fremont.gov)

Subject: Conditional Work Plan Approval; Site Cleanup Program Case No. RO0003176 and Geotracker Global ID T10000007102, Fremont Plaza Shopping Center, 39155 and 39183 State Street, Fremont, CA 94538

Dear Messrs. Hopkins and Nguyen:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the *Work Plan for Soil Excavation and Well Destruction*, dated January 29, 2016. The work plan was submitted on your behalf by PES Environmental, Inc. (PES). The work plan was submitted in response to a meeting held in our offices on November 19, 2015. Thank you for the work plan.

The document details actions associated with the excavation, removal, and disposal of concrete debris and potentially contaminated material in the vicinity of soil vapor sample B4, and the destruction of the agricultural water supply well (No. 4S/1W-33D002). The work plan additionally addressed concerns that ACDEH has previously expressed in regards to the appropriateness of detected vapor concentrations of Freon 11 and Freon 12. Based on that analysis, it does not appear that these vapor concentrations are of potential concern to future residents.

Based on ACDEH staff review of the work plan, the proposed scope of work is conditionally approved for implementation provided that the technical comments below are incorporated during the proposed work. Submittal of a revised work plan or a work plan addendum is not required unless an alternate scope of work outside that described in the work plan or these technical comments is proposed. We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: mark.detterman@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. **Work Plan Modifications** – The referenced work plan proposes a series of actions with which ACDEH is in general agreement of undertaking; however, ACDEH requests modifications to the approach as discussed below. Please submit a report by the date specified below.
 - a. **Stockpile Characterization Sampling** - The work plan stated that one discrete soil sample would be collected for each 100 cubic yards of excavated soil up to 1,000 cubic yards, and for greater volumes, an additional sample for each 500 cubic yards would be collected. This may be adequate for offsite landfill disposal; however, should portions of the material be identified as potentially reusable onsite, ACDEH observes the guidelines promulgated by the San Francisco Bay Regional Water Quality Control Board (RWQCB; *Characterization and Reuse of Petroleum Hydrocarbon Impacted Soil and Inert Waste*, dated October 20, 2006).
 - b. **Soil Sample Collection Containers** – The work plan stated glass jars or metal tubes would be used to collect soil samples. In the experience of ACDEH, the use of glass jars requires a significant level of soil disturbance and aeration, which can skew even non-volatile analytical

results. Consequently ACDEH requests that soil sample collection use metal tubes to collect relatively undisturbed samples that will minimize sample aeration of the samples to the extent possible.

- c. Confirmation Analytical Testing** – While likely an oversight, the analytical suite for excavation confirmation sampling was not described (stockpile sampling was). Consequently, ACDEH requests that analysis include contaminants of potential concern in the excavation area. This should include Total Petroleum Hydrocarbons as gasoline (TPHg), as diesel (TPHd), as motor oil (TPHmo), Petroleum Volatile Organic Compounds including benzene, ethylbenzene, toluene, total xylenes (BTEX), and methyl tert butyl ether (MTBE) by EPA 8260, Semi-Volatile Organic Compounds by EPA 8270, and metals, unless other corroborating data is available to document the excavation perimeter has been adequately characterized.
- 2. Quality of Imported Excavation Backfill** –The work plan stated that imported material would be used to backfill the excavation at the site without specifying the nature of the material. The primary goal at the site is to achieve the removal of any contamination from the site so that it is protective of human health and the environment. In the event recycled baserock is contemplated as a backfill material, ACDEH requests the submittal of documentation that certifies that the recycled concrete is appropriate for this site, including laboratory analysis of the specific material to be imported, by the date identified below. This is due to potential contamination issues that have been associated with recycled baserock concrete (e.g. absorbed hydrocarbons, PCBs, PNAs, solvents, and etc.). Use of non-recycled material does not require this step.

Please utilize the Department of Toxics Substances Control (DTSC) clean import guidance document (*Information Advisory Clean Imported Fill Material*), and the New Jersey Department of Environmental Protection (NJDEP) *Guidance for Characterization of Concrete and Clean Material Certification for Recycling* for guidance on appropriate sampling intervals.

- 3. Electronic Report and Data Upload Compliance** – Thank you for recently claiming the site in Geotracker and for uploading a number of documents to the website. Please note that in order for the site to obtain compliance with Geotracker requirements additional submittals are required. A recent review of the case file and the State's Geotracker database indicates that the site is not in compliance with previous directive letters. Compliance is a State requirement. Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the SCP program must be transmitted electronically to the SWRCB GeoTracker system via the internet. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites was required in GeoTracker. At present missing data and documents include, but may not be limited to, EDF submittals, GEO MAPS, and all bore logs. Please see Attachment 1 for limited additional details, and the state GeoTracker website for full details. ACEH requests email notification of, and a list of, the documents uploaded to Geotracker. Please upload all submittals to GeoTracker as well as to ACEH's ftp website by the date specified below.

TECHNICAL REPORT REQUEST

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

- **April 15, 2016** – Geotracker Required Submittals
Email notification to Case Worker
- **April 29, 2016** – Recycled Baserock Certification (If Necessary)
File to be named: RO3176_MISC_R_YYYY-mm-dd
- **June 24, 2016** – Excavation and Well Destruction Reports
File to be named: RO3176_EX_R_YYYY-mm-dd and WELL_DCM_R_YYYY_mm_dd

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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: Carl Michelsen, PES Environmental, Inc, 1682 Novato Blvd, Suite 100, Novato, CA 94947, (sent via electronic mail to CMichelsen@pesenv.com)

Tom Graf, GrafCon, P.O. Box 1105, Tiburon, CA 94920, (sent via electronic mail to Tom@grafcon.us)

Denise Cunningham, SummerHill Homes, (sent via electronic mail to DCunningham@shhomes.com)

Katia Kamangar, SummerHill Housing Group, (sent via electronic mail to KKamangar@shhousinggroup.com)

Selim Zeyek, Alameda County Water District, 43885 South Grimmer Blvd, Fremont, CA 94538, (sent via electronic mail to Selim.Zeyrek@acwd.com)

Thomas Berkins, Alameda County Water District, 43885 South Grimmer Blvd, Fremont, CA 94538, (sent via electronic mail to Thomas.Berkins@acwd.com)

Dilan Roe, ACDEH, (Sent via electronic mail to dilan.roe@acgov.org)

Mark Detterman, ACDEH, (sent via electronic mail to mark.detterman@acgov.org)
Electronic File, GeoTracker