

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Thursday, January 28, 2016 10:38 AM
To: 'Bob Clark-Riddell'; Danielle Reyes
Cc: Trevor Ashenbrenner; Jackson Buck
Subject: RE: 4901 Broadway - Agency response

Bob,

The ventilation system will provide a level of protection, but the level of dilution may be dependent on the level of contamination present, if any. Due to the limited time ACEH may need to hold the potential for vapor sampling as an appropriate data gathering method for the site, but let's gather some data first. I look forward to your final written response / clarification on the period between grading and foundation construction.

All,

Over the last month or so, and due to the pure number of redevelopment cases now active, ACEH has developed a series of redevelopment communication tools consisting of figures and tables that we are now requesting of redevelopment sites on a standard basis. A standard letter is anticipated to be put together in the near future; however, until that is done, I must communicate this with you and request these tools be included in the next report that will be generated for the subject site. As stated below, these tools are intended to quickly and effectively communicate between all parties, including the public. Please be aware, that our supervisor will not review a case without these included due to her and our limited time for review of each case. The following list is somewhat generalized for cases, but each element is necessary. They are as follows:

1. **Redevelopment Related Communication Tools** – In order to effectively communicate between project proponents, consultants, ACEH, and eventually the general public for the required 30 day public comment period for case closure, ACEH is requesting the use of several communication tools in future submittals.
 - a. **Previous Development Layout** – In order to help determine if previous uses at the site may have impacted the subject site, ACEH requests an overlay of earlier site layouts on one or more figures, as appropriate. This should include the location of previous buildings, use or storage areas, parking areas, storm drain catch basins, water wells, or other known historic features or structures. The effort is intended to help illustrate historic uses, and potentially identify any data gaps in site investigations to date, and to eventually support case closure.
 - b. **Development Cross Sections and Residual Contamination** – In order to clearly depict any, or no, residual contamination proposed to remain at the site, ACEH requests multiple cross sections through the entire site, depicting the specific proposed foundation elevations, stripped of geologic content, with soil, groundwater, vapor, or other sample analytical data, depth controlled and located appropriately. Contaminated material proposed to be excavated does not need to be depicted in the cross section data, but will be retained in tables (see below). The intent of this request is to allow quick review of site data in a graphic fashion, and to assemble support for the eventual case closure and required communications with the public during a public comment period. Should corrective actions be required, the data will again assist with general communications with all parties. This is requested to include multiple detailed cross sections through select areas of environmental interest, such as the elevator sumps, stair wells, data relative to subgrade structures or foundations, significant contamination requiring added detail, and etc.
 - c. **Tables** – To assist in communication between all interested parties, ACEH requests the following tables be assembled and submitted in the requested report:
 - **Associated Parcels** – Review of the assessor's website indicate that multiple parcels and addresses are associated with the referenced redevelopment. To clarify current and future parcel

use, please include a table that lists all current parcel numbers, associated addresses, intended changes to the number of parcels (merges / splits), lists historic infrastructure associated with the parcels, lists historic and current soil bores, or other environmental data collection locations on each parcel.

- **Analytical Data** – Analytical data tables must include all historic and current analytical data. Previously excavated soil, or proposed to be excavated (historic and future), is requested to be indicated by shading or strike out (but still legible). If it is important to distinguish between historic removed and future proposed excavation, different shadings are appropriate. Data can be tabulated by “soil to be removed / soil proposed to remain” sections within a data table (soil, groundwater, soil vapor, etc.) if useful, appropriate, or warranted.
- **Non-Detectable Data** - All non-detectable (ND) data is requested to be tabulated by individual chemical detection limit (<x), with highlighting or bolding of detects, or of concentrations or detection limits over ESLs (or other goals). This is intended to quickly determine if a specific sample meets or exceeds identified goals, and communicate with the general public prior to closure. This effort can partly be combined with a professional signed statement for each data set that the data has reviewed and it is below ESLs or other goals for the site; however, the predominance of the data is required to be listed as just described.
- **Added Table Column** – An additional “Relative to Proposed Building Foundation Elevation” column in soil, groundwater, and vapor, or other, analytical tables is requested. The intent of this column is to quickly indicate the depth of the sample relative to the proposed building foundation depth. As noted above, data proposed to be excavated or otherwise removed is requested to be retained in the tables, but lined or shaded out, but in either case kept legible.
- **Use of Environmental Screening Levels** – Please be aware of the appropriate use of ESLs relative to the future proposed foundation depth. For example, a groundwater or a vapor sample at a site may have been collected at 10 feet bgs, may in the future be 2 ft below the foundation, and would not meet the 10 foot separation distance groundwater ESLs assume or 5 ft separation that vapor ESLs assume.

Should you have questions, please let me know.

Mark Detterman
Senior Hazardous Materials Specialist, PG, CEG
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
Direct: 510.567.6876
Fax: 510.337.9335
Email: mark.detterman@acgov.org

PDF copies of case files can be downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>

From: Bob Clark-Riddell [mailto:briddell@pangeaenv.com]
Sent: Thursday, January 28, 2016 10:02 AM
To: Danielle Reyes
Cc: Detterman, Mark, Env. Health; Trevor Ashenbrenner; Jackson Buck
Subject: Re: 4901 Broadway - Agency response

Mark,

The engineering controls described below would more than adequately mitigate any potential vapor intrusion into the building. Please call me to discuss at your convenience. Bob

Sent from my iPhone

On Jan 28, 2016, at 9:21 AM, Danielle Reyes <Danielle@srmdevelopment.com> wrote:

Bob,

We have two levels of parking at our site, P1 and P2, but the sidewalk grade changes drastically along Broadway Avenue. P2 is the lower level of parking at approximately 36,600 SQFT and completely below grade. P1 is approximately 42,000 SQFT, but the South section approximately 15,000 SQFT (towards 49th Street) is above grade. Our mechanical engineer has designed a CO detection system with a variable frequency drive at each exhaust fan and all associated controls. Between P2 and P1, we have (3) garage exhaust fans. Each level also includes all associated ducting to the exterior, supply fans and air terminals. I have attached our GEF schedule with project specific performance and the layout of these units on P1 and P2. If you would like specific cut sheets on each unit, I can supply those as well.

Danielle Reyes, Project Manager

SRM Construction, Inc.

O 425.629.4431 | C 831.277.8680

danielle@srmdevelopment.com

From: Bob Clark-Riddell [<mailto:briddell@pangeaenv.com>]

Sent: Wednesday, January 27, 2016 6:03 PM

To: Detterman, Mark, Env. Health; Trevor Ashenbrener

Cc: Trevor Ashenbrener; Jackson Buck; Danielle Reyes

Subject: RE: 4901 Broadway - Agency response

Mark – I intended to send this to the client for comment.

Trevor – Please provide information about the plans for the ventilation or containment of vapors collecting in the parking garage. I understand there is a lower level parking garage and another level of parking.

Bob Clark-Riddell, P.E.

Pangea Environmental Services, Inc.

510.435.8664 direct

From: Bob Clark-Riddell

Sent: Wednesday, January 27, 2016 3:46 PM

To: 'Detterman, Mark, Env. Health' <Mark.Detterman@acgov.org>

Cc: Trevor Ashenbrener <Trevor@srmdevelopment.com>; Jackson Buck

<Jackson@srmdevelopment.com>; 'Danielle Reyes' <Danielle@srmdevelopment.com>

Subject: RE: 4901 Broadway - Agency response

Trevor,

How does this draft email for Mark sound? Do you have specs or info on the building's parking garage ventilation plan?

This is written confirmation that we will work diligently to provide the requested soil gas data beneath the future parking basement elevation in order to investigate the existence of chlorinated solvents or

stoddard solvent beneath the former dry cleaner. (We are also collecting the requested soil and groundwater data).

Pangea informs us that the site soil beneath the planned slab at the former dry cleaner area is clayey soil, which would limit our ability to install and sample two vapor wells at the requested 5 ft depth. Pangea also found water in borings about 6 ft currently which is apparently rising and could flood any soil gas wells. We are dewatering the area but predicted rain will continue to collect in this area.

The redevelopment planning allows adequate time to attempt soil gas sampling and perform source removal or implement contingency plans. We will conduct dewatering as necessary to attempt to collect soil gas samples at the requested depth from the clayey soil. If impact is detected, we can remove additional source material and/or install a passive ventilation system (permeable material, piping, and wind-powered roof turbine fans) to ventilate any potential vapors collecting under the building.

Please note that the bottom floor in this area is a parking structure, so in the unlikely event of any VOC vapor intrusion, this intrusion would mingle and be vented by the building's ventilation system for motor vehicle exhaust. (Also note the clayey soil would help mitigate potential vapor intrusion from any deeper groundwater impact, although none has been detected to date). We respectfully request that if no VOC or TPH Stoddard solvent impact is found in soil or groundwater, and if soil gas sampling is unsuccessful due to clayey soil and/or shallow water, that your agency will deem our building's ventilation system as sufficient for vapor mitigation. Our building is designed to ventilate vehicle exhaust, which would be vastly more significant than any limited VOC mitigation.

Bob Clark-Riddell, P.E.
Pangea Environmental Services, Inc.
510.435.8664 direct

From: Detterman, Mark, Env. Health [<mailto:Mark.Detterman@acgov.org>]
Sent: Wednesday, January 27, 2016 2:04 PM
To: Bob Clark-Riddell <briddell@pangeaenv.com>
Cc: Trevor Ashenbrener <Trevor@srmdevelopment.com>; Jackson Buck <Jackson@srmdevelopment.com>; 'Danielle Reyes' <Danielle@srmdevelopment.com>
Subject: RE: 4901 Broadway - Final Report

All,

Thanks for your responses.

Given the recent infiltration of rain water into the excavation, the outline of planned actions presented below for the site appear reasonable; however, ACEH must request written confirmation (email is sufficient) from project proponents that redevelopment planning allows adequate time for the installation of two vapor wells to a depth of 5 feet below the future parking basement elevation in order to investigate the existence of chlorinated solvents or stoddard solvent beneath the former dry cleaner. There is a risk with this approach in that if sufficient contamination is documented, additional actions will be required that will delay the construction schedule. If required, this potentially may include source removal / excavation and potentially a modification to the building plans to incorporate a vapor mitigation system thereafter. Alternative actions at this time may preclude this delay. These could include construction dewatering the current excavation to a level a minimum of 6 feet below the future parking basement elevation to allow the installation of vapor wells and the collection of soil vapor prior to, or concurrent with, site grading. I remain hopeful that no (?) contamination will be encountered; however, this is a decision that can engender future problems. Please let me know how you will proceed.

Mark Detterman

Senior Hazardous Materials Specialist, PG, CEG
Alameda County Environmental Health
1131 Harbor Bay Parkway
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Direct: 510.567.6876
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From: Bob Clark-Riddell [<mailto:briddell@pangeaenv.com>]
Sent: Wednesday, January 27, 2016 12:14 PM
To: Detterman, Mark, Env. Health
Cc: Trevor Ashenbrener; Jackson Buck; 'Danielle Reyes'
Subject: RE: 4901 Broadway - Final Report

Mark,

Per our discussion just now, Pangea is currently at the site sampling soil and groundwater with hand tools capable of reaching 8 ft depth beneath the future slab. Water is entering our borings at about 3 ft depth, and could be from infiltration of ponded water in the excavation hole. Pangea will perform the following assessment today:

1. Advance four borings to 8 ft depth below the future foundation depth to provide good coverage of the former dry cleaner site.
2. Collect soil samples from 1, 3, 5 and 8 ft depth from each boring.
3. Collect a water sample from each boring.
4. Analyze each sample for TPHg/d/mo (will evaluate possible TPH Stoddard solvent use) and HVOCs by EPA Method 8010. (The Method 8010 reporting limit for PCE is 0.005 mg/kg and well below the residential ESL of 0.55 mg/kg).

Soil gas sampling will be attempted in the future if dry conditions can be obtained about 5 ft depth below the planned foundation. Pangea recommends proceeding with the mass grading and performing any such required soil gas sampling in the future, prior to site construction.

An Addendum to the SMP will be prepared to specify when the environmental consultant WILL be onsite to observe excavation of known or suspect impact. Specifically, the environmental consultant will be onsite during the excavation of the known shallow TPHmo at location SB-10, the suspect gray material at 1 ft depth in boring B-4, and the suspect black substance at 6 ft depth in boring B-15. Confirmation soil samples will be collected beneath these locations, and within any lateral sidewalls near the location or in the closest final excavation sidewall.

Bob Clark-Riddell, P.E.
Pangea Environmental Services, Inc.
510.435.8664 direct

From: Detterman, Mark, Env. Health [<mailto:Mark.Detterman@acgov.org>]
Sent: Wednesday, January 27, 2016 10:48 AM
To: Bob Clark-Riddell <briddell@pangeaenv.com>
Cc: Trevor Ashenbrener <Trevor@srmdevelopment.com>; Jackson Buck

<Jackson@srmdevelopment.com>; 'Danielle Reyes' <Danielle@srmdevelopment.com>

Subject: RE: 4901 Broadway - Final Report

Hi all,

I got wrapped up in another site needing a quick response.

The intent of the agreed upon soil bores and soil and groundwater sampling was to determine the potential for chlorinated solvents to have been released at a former dry cleaning operation. Unfortunately they were not collected as agreed upon. I do believe that soil vapor is an important component of such an investigation; however, the requested initial investigation data is not available on which to make next-step judgments. Additionally, now time is more limited. Given the time constraint, probably the only way to obtain my supervisor's (Dilan's) buy in (and thus her final signature at closure) that the investigation was robust enough is two pronged and would involve the installation of multiple soil bores, probably a minimum of four, in estimated probable former use areas, and to collect and analyze soil for chlorinated solvents (full scan) at 1, 3, 5, and 10 feet below the FUTURE proposed building foundation elevation, and to collect groundwater in each soil bore. As before, groundwater is an important component of the sampling program. For the second prong, and while I understand that rain is a factor, I also believe that the installation of a minimum of two vapor probes, in estimated former use areas, should also be undertaken (installed to 5 feet below the FUTURE proposed concrete slab) and a determination made based on the pending rain to either wait or collect vapor samples understanding they do not meet DTSC guidelines. Unfortunately, low detectable concentrations of chlorinated solvents in soil beneath a dry cleaner can produce vapor concentrations of concern.

We should also discuss an addendum, or modification of the SMP (your choice provided it is additionally distributed to the grading contractor), in order to document areas where the environmental consultant WILL be onsite during excavation in order to oversee excavation of known contaminated soil, and to collect lateral and sidewall samples of the contaminant removal excavations. As currently worded, the Pangea is to be contacted if evidence is encountered. This is perfect for potential unknowns, but not for the documented known areas of contamination.

Should you have questions, please let me know.

Mark Detterman
Senior Hazardous Materials Specialist, PG, CEG
Alameda County Environmental Health
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Direct: 510.567.6876
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From: Bob Clark-Riddell [<mailto:briddell@pangeaenv.com>]

Sent: Tuesday, January 26, 2016 4:27 PM

To: Detterman, Mark, Env. Health

Cc: Trevor Ashenbrener; Jackson Buck; 'Danielle Reyes'

Subject: RE: 4901 Broadway - Final Report

Mark,

Here is our proposed sampling plan based on our discussion today. Pangea is planning to sample soil at two locations beneath the former dry cleaners. The soil samples will be collected approximately 2 ft below the anticipated slab. We plan to analyze soil samples for VOCs by EPA Method 8260 and for TPHg/d/mo by EPA Method 8015 with silica gel. However, if you are only concerned about CVOCs we could limit analyses to CVOCs by EPA Method 8010.

We will also try to collect groundwater samples at each locations. The area is partially filled with water and contractor removes water to extent allowable but some water remains. This means we will use hand augering techniques, and means soil gas sampling is not likely feasible. Rain is also expected several days in the next 10 days, also making any soil gas sampling very challenging.

Does this sampling plan sound acceptable to satisfy your concerns about potential vapor intrusion issues beneath the former dry cleaner?

Bob Clark-Riddell, P.E.
Pangea Environmental Services, Inc.
510.435.8664 direct

From: Bob Clark-Riddell
Sent: Tuesday, January 26, 2016 2:17 PM
To: 'Detterman, Mark, Env. Health' <Mark.Detterman@acgov.org>
Cc: 'Trevor Ashenbrener' <Trevor@srmdevelopment.com>; 'Jackson Buck' <Jackson@srmdevelopment.com>; 'Danielle Reyes' <Danielle@srmdevelopment.com>
Subject: RE: 4901 Broadway - Final Report

Mark – Here is the tabulated groundwater. Awaiting graphics revision to Figure before providing revised report.

Bob Clark-Riddell, P.E.
Pangea Environmental Services, Inc.
510.435.8664 direct

From: Bob Clark-Riddell
Sent: Tuesday, January 26, 2016 1:24 PM
To: 'Detterman, Mark, Env. Health' <Mark.Detterman@acgov.org>
Cc: 'Trevor Ashenbrener' <Trevor@srmdevelopment.com>; 'Jackson Buck' <Jackson@srmdevelopment.com>; 'Danielle Reyes' <Danielle@srmdevelopment.com>
Subject: RE: 4901 Broadway - Final Report
Importance: High

Mark,

As requested, here is the figure showing the SS-1 thru SS-12 locations. We will update the report with a digitized figure and tabulated groundwater. Meanwhile, **here is our summary of site conditions per your concern in your email.** Your email expresses concern about data for understanding the potential for the former dry cleaner to represent an environmental concern for site redevelopment.

Per our report, seven borings (B-9 thru B-12 and B-16 thru B-18) were located near the former dry cleaner.

Soil Assessment: no VOCs were detected in analyzed soil from these borings...or in ANY other analyzed soil samples at the site. Per our revised SMP plan, Pangea performed sampling at 4 ft depth along the southern side of the property in native soil from borings B-17 and B-18 (adjacent former locations B-13 and B-14 referenced in your email) since this was presentative of shallow soil along this boundary and did not require permitting to access the sidewalk or street. No odors or other suggestion of potential VOCs from the former dry cleaner were observed.

Groundwater Assessment: The groundwater sample from B-12 (the only boring with water) was non-detect for VOCs (and also non-detect for TPHg/d/mo, VOCs, SVOCs, PCBs and pesticides). Note that during the January 2013 Phase II assessment, no VOCs were detected in any of the four groundwater samples (S-7 thru S-10) from 2013. Also note that boring (B-7) was present where prior boring S-7 had limited TPHmo (330 ug/L) detected in groundwater in January 2013, but no TPHmo impact was detected during our soil and water sampling.

This new information and prior data indicates that the former dry cleaner does not represent an environmental concern for site redevelopment. Also, consistent with our plan, we plan to collect floor and sidewall samples from the area to further confirm the lack of VOC impact in soil after excavation/grading and prior to building construction. **Based on this information, Pangea does not see justification for not allowing mass grading to commence.**

P.S. Regarding prior TPHmo impact reported for the site in boring S-10 in January 2013, Pangea performed soil sampling for borings B-9 thru B-11. No TPHmo was detected in soil at these locations (or in groundwater in boring B-12 adjacent former boring S-7 with limited TPHmo in groundwater). The only TPHmo detected was in shallow soil from B-17 at 4 ft depth at 49 mg/kg, and this is below final ESL of 100 mg/kg, and could represent naturally occurring materials since no silica gel cleanup filtration was performed. **Therefore, the former TPHmo impact does not represent a significant concern and future sampling of post-grading soil will help confirm this conclusion.**

I hope this information helps with your review and approval for mass grading to proceed. Contact me with any questions at 510.435.8664.

Bob Clark-Riddell, P.E.
Pangea Environmental Services, Inc.
510.435.8664 direct

From: Bob Clark-Riddell
Sent: Tuesday, January 26, 2016 12:11 PM
To: 'Detterman, Mark, Env. Health' <Mark.Detterman@acgov.org>; 'Danielle Reyes' <Danielle@srmdevelopment.com>
Cc: Trevor Ashenbrener <Trevor@srmdevelopment.com>; Jackson Buck <Jackson@srmdevelopment.com>
Subject: RE: 4901 Broadway - Final Report

Mark,

Per your request Pangea is revising the figure to identify S-1 thru SS-12 sample locations to the corresponding boring locations. We are also preparing a table summarizing groundwater data from the only boring that had water. I will call you to discuss shortly when this information is complete. Bob

Bob Clark-Riddell, P.E.
Pangea Environmental Services, Inc.
510.435.8664 direct

From: Detterman, Mark, Env. Hea]
Sent: Tuesday, January 26, 2016 10:16 AM
To: 'Danielle Reyes' <Danielle@srmdevelopment.com>; Bob Clark-Riddell <briddell@pangeaenv.com>
Cc: Trevor Ashenbrener <Trevor@srmdevelopment.com>; Jackson Buck <Jackson@srmdevelopment.com>
Subject: RE: 4901 Broadway - Final Report
Importance: High

Hi Danielle,

I have taken a quick review of the report from Pangea, and at present the data does not currently appear to support the mobilization for mass grading. The ACEH directive letter of October 8, 2015, required the collection of groundwater samples from proposed soil bores B-11 to B-13, and that does not appear to have occurred, at least the data is not present in the report. The data is considered to be important in understanding the potential for the former dry cleaner to represent an environmental concern for site redevelopment. Soil data from those bores is considered important for this purpose also. Figure 2 also does not indicate that soil bores B-13 and B-14 were installed. Additionally, export profile sample locations are not identified or located on Figure 2.

I have placed a call to Bob Clark-Riddell to obtain further information; however, have not heard back yet.

Once that information is available, we should have a conference call.

Mark Detterman
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Alameda County Environmental Health
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Alameda, CA 94502
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Fax: 510.337.9335
Email: mark.detterman@acgov.org

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From: Danielle Reyes [<mailto:Danielle@srmdevelopment.com>]
Sent: Monday, January 25, 2016 1:40 PM
To: Detterman, Mark, Env. Health; 'Bob Clark-Riddell'
Cc: Trevor Ashenbrener; Jackson Buck
Subject: RE: 4901 Broadway - Final Report

Mark,

We have completed demo and we will be mobilizing for mass excavation in the next few weeks. I will send you an update when we have the report uploaded to both site.

Thank you,

Danielle Reyes, Project Manager
SRM Construction, Inc.
O 425.629.4431 | C 831.277.8680
danielle@srmdevelopment.com

From: Detterman, Mark, Env. Health [<mailto:Mark.Detterman@acgov.org>]
Sent: Monday, January 25, 2016 9:34 AM
To: Danielle Reyes; 'Bob Clark-Riddell'
Cc: Trevor Ashenbrener; Jackson Buck
Subject: RE: 4901 Broadway - Final Report

Hi Danielle,
Please do upload the report, with the usual signed perjury statement, to the ACEH ftp site and to Geotracker. I won't have an opportunity to review the document for a bit; at what state is the site redevelopment? I recall demo has occurred, but that soil excavation has not started?? Is that correct?

Mark Detterman
Senior Hazardous Materials Specialist, PG, CEG
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From: Danielle Reyes [<mailto:Danielle@srmdevelopment.com>]
Sent: Monday, January 25, 2016 8:02 AM
To: 'Bob Clark-Riddell'; Detterman, Mark, Env. Health
Cc: Trevor Ashenbrener; Jackson Buck
Subject: RE: 4901 Broadway - Final Report

Good morning Mark,
I wanted to check in on if you would like us to upload the report or if we are not required to perform any further actions for ACEH moving forward.
Feel free to contact me anytime. My cell number is 831-277-8680. Thank you,

Danielle Reyes, Project Manager
SRM Construction, Inc.
O 425.629.4431 | C 831.277.8680
danielle@srmdevelopment.com

From: Bob Clark-Riddell [<mailto:briddell@pangeaenv.com>]
Sent: Saturday, December 26, 2015 3:01 PM
To: Detterman, Mark, Env. Health
Cc: Trevor Ashenbrener; Danielle Reyes
Subject: FW: 4901 Broadway - Final Report

Mark,

Here is our SMP implementation report for 4901 Broadway. Please let us know if we need to upload this report to Geotracker and ACEH FTP site.

Bob Clark-Riddell, P.E.
Pangea Environmental Services, Inc.

510.435.8664 direct

<Temescal Garage Exhaust Fan Schedule and Locations.pdf>