

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Friday, July 29, 2016 10:01 AM
To: 'Stuart Solomon'
Cc: 'Alexis Gevorgian'
Subject: RE: RO3195

Stuart and Alexis,

If closure is needed BEFORE ground breaking as you have indicated, ACDEH can provide, upon approval of the SMP, closure to EXISTING land use of each parcel (parcel by parcel). This obviously won't be the final land use for a number of the parcels, as they are currently commercial parcels and will be converted to residential upon development. Upon submittal of a final post-grading report (after case closure) that documents that there are were no contaminants that remain above residential, ACDEH can re-categorize (still after closure) the closure to residential. ACDEH cannot yet approve residential land use for all parcels as the earlier case (RO3151) was closed to existing land use (both commercial and residential; read the "Land Use Restrictions" on the cover letter from Dilan, which is repeated in the "Site Management Requirements" section on the 4th page, for clarity).

If closure can wait until AFTER grading, then ACDEH can provide, upon approval of the SMP and subsequent submittal of a final post-grading report that documents that there are no residual contaminants above residential ESLs, closure to RESIDENTIAL land use for all parcels. The front portion of 10550 International will remain commercial, but would either receive a residential closure, or perhaps a commercial closure if an APN is split off of the larger portion that will convert to residential upon development.

A key issue for ACDEH is the receipt, and then the timing of the receipt, of the final post-grading report that documents no residual contamination above residential ESLs for all parcels and no surprises were discovered. Known areas of TPH contamination above residential ESLs, but below direct contact ESLs, can also be addressed during grading.

I have reviewed the SMP, and it appears to be sufficient to manage site grading development. I just need to know how to proceed right now.

Let me know.

Thanks,

Mark Detterman
Senior Hazardous Materials Specialist, PG, CEG
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PDF copies of case files can be downloaded at:

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

From: Stuart Solomon [mailto:stuart@phase-1environmental.com]
Sent: Thursday, July 28, 2016 11:22 AM
To: Detterman, Mark, Env. Health
Cc: 'Alexis Gevorgian'
Subject: FW: RO3195

Hi Mark.

Alexis forwarded your email to him (attached below). I believe that my email to you on July 19th (copy attached below yours to Alexis) accurately addresses the situation. We cleaned all DTSC-identified areas on the site under RO3151 to all current ESL residential occupancy standards. The site was officially Closed by the County, with the caveat that an SMP be put in place during redevelopment to assure that; if anything new was discovered, it would be appropriately dealt with. I believe that the City is in agreement with this, and all the County needs to do is write a letter to them with this explanation. Could you please look this over and give us your opinion? Thank you, Mark! Stu

On Jul 25, 2016 12:24 PM, "Detterman, Mark, Env. Health" <Mark.Detterman@acgov.org> wrote:

Alexis,

Forgive me, but I've too many SMPs that are active and I am not finding my notes regarding our conversation last week. My recollection is that you prefer closure prior to development (as commercial) with a subsequent change to residential after site grading and the submittal of a report documenting that it is appropriate to reclassify the closure as residential. Please confirm or enlighten me! My letter to the city will need this detail.

Sorry for the extra work, but thanks,

Mark Detterman

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Email: mark.detterman@acgov.org

From: Stuart Solomon [<mailto:stuart@phase-1environmental.com>]

Sent: Tuesday, July 19, 2016 9:41 AM

To: 'Detterman, Mark, Env. Health'

Cc: 'Amanda Locke'; 'Alexis Gevorgian'

Subject: RO3195

Hi Mark,

I have been told by the developer that no work can be commenced on the project until the County gives the City their go-ahead. As I understand it; we have established with the City that the

residential development properties are not, and have never been on any of the Cortese lists. This was the first hurdle. Because of the property's automotive history, the County required a SMP during construction activities, which we have submitted. If the SMP is acceptable, the County would write a letter of approval for the project to the City, with the SMP incorporated.

I think the only problem we have here is one of semantics. "The case" (RO3195) is being construed as an "Open" (voluntary) clean-up case that needs to be "Closed", which, technically, is not correct. The site was "Closed" under RO3151. The "Open" case now (RO3195) is (more accurately) a preventative-measure oversight by the County to assure that; **if** unknown contamination is encountered during redevelopment activities, it will be appropriately addressed and properly handled.

I am not sure exactly how this should be worded to the City, but this is the concept that I believe needs to be put forth in a letter to them.

Respectfully, Stuart

Phase-1 Environmental Services

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