

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Friday, June 03, 2016 2:24 PM
To: 'Alexis Gevorgian'; Stuart Solomon
Cc: 'Chris Solomon'; Roe, Dilan, Env. Health
Subject: 10550 International Blvd (RO3195)

Alexis and Stuart,

Dilan and I have had a chance to review the draft SMP, and while we have a number of comments, and a request for a revision to the SMP, we wanted to get you going fairly quickly. Rather than an official directive letter response, I'm sending a less formal response so as to get it moving. For the most part the revisions should go pretty quick. The intent of the modifications is to define and agree on acceptable procedures now, to limit the need for our input at potentially critical points in the development. This generally (?) leads to delays in the redevelopment process and adds costs (our charges at an absolute minimum).

The following is pretty much a punch list of items that we noted should be incorporated into the SMP:

- Section 2.3 - COPCs only list TPHg, TPHd, TPHmo, but needs to include BTEX, full VOCs (where appropriate), SVOCs (same), naphthalene when not otherwise analyzed for by VOC or SVOC analysis, lead, and in association with TPHmo or waste oil analysis, PAHs (SVOCs).
- Section 3.2.1 – Please propose the number of samples for lead definition (rather than start a negotiation) and if above residential ESLs, then define with appropriate step out sampling (similar to Section 3.3.1).
- Section 3.3.1 – Please modify so that submittal of data is to ACDEH, and not only the developer (Alexis). This lets us know, while you continue to define to ESLs with step out samples.
- Section 3.3.2 – Include step out language again
- Section 4.1 – Key Contacts – With potential for old heating oil USTs, it appears wise to include a contact for reporting to CUPA. This allows the work to move rather than figure out who needs to be contacted.
- Figures – Elevator locations appear incorrect based on the plan set we have; please double check.
- Tables – There may be better tables in color used previously; check appropriateness.
- Plan set – Please reference the most up-to-date plan set (see below) in the SMP.

A couple of other items of importance –

- Has the latest plan set been submitted to ACDEH? The latest we have is dated March 24, 2015. Our approval will be tied to the latest plan set, so it is important to get that established.
- We understand that we need to send a letter to the City of Oakland regarding our approval status. Who and where should it go? We intend to do this concurrent with the modifications to the SMP requested above.
- Please update us as to where you are exactly in the development plan generation, and the approval process so we can include the correct details or language in our letter to the City.
- Please be aware that in accordance with the Porter-Cologne Act, if residual contamination is to remain at the site such that the property is not suitable for unrestricted use, a land use restriction may be needed for the protection of public health, safety, and the environment. If this is a problem, then the modifications to the SMP should be incorporated into the punch list above so that all such contamination is removed (step out samples) to residential ESLs.
- Please also be aware that ACDEH cannot close the case until the foundation is in (essentially that the project is up out of the ground).

I think that is it.

Please let us know if you have questions.

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PDF copies of case files can be downloaded at:

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