Nowell, Keith, Env. Health

From: John Lucio < John.Lucio@erm.com> Sent: Wednesday, September 12, 2018 2:12 PM To:

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Cc: Conner, Anne P; Arun Chemburkar; Gina Sperinde; Xiaodong Huang

Subject: 205 Brush Street Excavation Extent and Pre-Excavation Sampling Results Review

ERM completed a review of the pre-confirmation sample results with regard to the proposed excavation extent for the OAKPORT (205 Brush Street) site as requested in the 31 August 2018 meeting and documented in the meeting notes sent to ACDEH on 5 September 2018. Since most of the excavations were completed to the property boundary, ERM reviewed the samples that defined the vertical limits of the excavation to confirm that the excavation was completed to a depth with concentrations of target compounds below the site cleanup goals. In addition, the southwestern and northern lateral excavation boundaries of the design excavation submitted in the CAIP, which did not extend to property boundaries, were reviewed to confirm that the excavations were completed laterally to locations containing concentrations of target compounds below the site cleanup goals.

Along the southwestern excavation boundary, samples A2-SO and B2-SO both contained lead at concentrations below the remedial goal. Along the northern excavation boundary, samples SB-29, SB-30, SB-32, which defined the lateral extent in this direction, also contained target compound concentrations below remedial goals. However, in accordance with ACDEH's request at the 8/31/18 meeting, surficial samples will be collected from the grid cells under Building 414 that were not previously sampled to document residual soil conditions at the site. The scope of this proposed sampling will be provided in a forthcoming email once the schedule for demolition of Building 414 has been formalized.

A review of the pre-construction sampling analytical results indicates that the proposed excavation lateral and vertical extent in the CAIP was designed to be completed to depths where the concentrations of target compounds are below the site cleanup goals with the following two exceptions:

- The deepest samples collected from location F1-SO (3 feet below the bottom of the paving) exceeded remedial goals for pesticides (dieldrin in F1-SO at a concentration of 0.0045 mg/kg versus its remedial goal of 0.0023 mg/kg). Due to the lack of deeper samples and project time constraints, it was decided to increase the excavation depth in this grid past the slight remedial goal exceedance detected in the deepest samples (3 feet below the bottom of paving). Therefore, the F1 grid cell was excavated to a depth of 4 feet below the bottom of the pavement.
- Samples were collected from location E1-SO to define the vertical extent of exceedances within grid cell E1 (dieldrin and endrin were detected in boring E1 at concentrations of 0.0047 and 0.0031 mg/kg for dieldrin and endrin, respectively, in the deepest sample collected at 3 feet below paving, which are slightly above the remedial goals of 0.0023 mg/kg for dieldrin and 0.00065 mg/kg for endrin, respectively). The sample collected at 4 feet below the bottom of the paving from E1-SO contained pesticide concentrations below the remedial goals, and the excavation for this grid cell was completed to 4 feet below the bottom of the paving. However, upon review, the sample collected from 5 feet below the bottom of the paving in this location contained a low concentration of dieldrin (0.0046 mg/kg) that slightly exceeded the remedial goal of 0.0023 mg/kg, and this soil was inadvertently left in place. However, the concentration was only slightly above the ESL and will be covered by approximately 4 feet of clean fill. In addition, this remaining exceedance of the dieldrin remedial goal will be acknowledged in the subsequent soil management plan.

Thanks,

John Lucio

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