

Nowell, Keith, Env. Health

From: Nowell, Keith, Env. Health
Sent: Tuesday, September 11, 2018 2:34 PM
To: Conner, Anne P
Cc: 'John Lucio'; Roe, Dilan, Env. Health; Xiaodong Huang; Arun Chemburkar; Gina Sperinde; Sanders, Jonathan, Env. Health
Subject: RE: RO3196, CNG Station; S-081 Brush St Backfill - Hansen Clayton Quarry Sampling Summary

Anne,

A review of the data provided for the proposed import material indicates the material contains cobalt concentrations which exceed the site's background concentrations and the San Francisco Bay Region, Regional Water Quality Control Board (R2-RWQCB) Environmental Screening Levels (ESLs) for Construction Workers. As the site will have a deed restriction and a post-construction Site Management Plan (SMP), Alameda County Department of Environmental Health (ACDEH) conditionally approves the import of the Hansen Clayton Quarry aggregate profiled in the attachment to the following electronic mail.

The import approval conditionally requires the SMP have language to address the health risks associated with the presence of cobalt and the appropriate measures to mitigate construction worker exposure.

Regards,
Keith Nowell

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From: John Lucio [mailto:John.Lucio@erm.com]
Sent: Tuesday, September 11, 2018 10:57 AM
To: Roe, Dilan, Env. Health <Dilan.Roe@acgov.org>; Nowell, Keith, Env. Health <Keith.Nowell@acgov.org>
Cc: Conner, Anne P <APB1@pge.com>; Xiaodong Huang <Xiaodong.Huang@erm.com>; Arun Chemburkar <Arun.Chemburkar@erm.com>; Gina Sperinde <Gina.Sperinde@erm.com>
Subject: RE: S-081 Brush St Backfill - Hansen Clayton Quarry Sampling Summary

On September 7, 2018 PG&E collected samples from the Hansen Clayton quarry stockpile for the import backfill screening. Three Class II aggregate (Class II AB) and one 1.5-inch base rock samples were collected and analyzed in accordance with the Soil Import Management Plan (SIMP). Both materials are virgin materials mined at the quarry. Samples were taken from the fines of the materials to facilitate lab testing, which we believe would be biased high. Table 1 in the attached report summarizes the results against the SIMP screening levels.

One Class II AB had arsenic detected at 16 mg/kg. The screening level for arsenic is 14 mg/kg. Although the detection exceeded the screening level slightly, we believe it is within the background level in the area.

All four samples had cobalt detected above the SIMP screening level of 23 mg/kg, ranging from 29 to 41 mg/kg. For reference, the site cobalt cleanup goal in the FS/RAP is 28 mg/kg. However, since these potential import material are

virgin materials from the quarry, the cobalt concentrations are most likely natural occurring and background levels. Given that the site will have a deed restriction and a soil management plan that will identify any potential risks to reduce any potential exposure to future site workers, we believe that this material could be used as backfill as long as the cobalt concentrations were identified within the soil management plan.

Due to impending construction schedules, we would like to have a quick 5-minute discussion as soon as possible with you to get your thoughts on the use of this material. Do you think this would be possible?

Thank you for your consideration.

Thanks,

John Lucio
Program Director

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