

## Roe, Dilan, Env. Health

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**From:** Roe, Dilan, Env. Health  
**Sent:** Monday, February 27, 2017 6:45 PM  
**To:** 'Peter Solar'  
**Cc:** Mack, Elizabeth E.; 'Andrew Stuart'; gabe stivala; Jurek, Anne, Env. Health  
**Subject:** Site Cleanup Case No. RO0003198  
**Attachments:** LUC Deed Restriction Procedure.pdf; Alameda County's Model Deed Restriction (Final) updated 2015-09-09.doc

Hi Peter:

The items listed below summarize Alameda County Department of Environmental Health's (ACDEH) comments on the on the Revised Soil and Groundwater Management Plan dated December 7, 2016 and the steps required to obtain ACDEH's approval on the project.

**Revised Soil and Groundwater Management Plan.** Please address the comments listed below and submit a track changed version of the revised report text to me via email to help facilitate a review and upload the report to the State Water Resources Control Board's Geotracker database and Alameda County's ftp site.

- 1) **City of Oakland Planning and Building Department Submittals.** Provide clarification in the report text on the entitlement process with the Planning Department and the conceptual plans provided in appendix A. Include separate appendices for the Building Department permit submittals for 2820 & 2855 Broadway. Include select plan sheets to provide sufficient detail on the project including cover sheet, site plan, subterranean construction elements, first floor layout, elevators, vapor mitigation barriers, utilities, landscaping, etc.).
- 2) **2820 Broadway Remedial Excavation of Impacted Soil in the Trench Basin Area.** Revise the report text to include additional discussion and details on the remediation of impacted soil in the vicinity of the Trench Basin including removal source material that is contributing to the TPH and benzene groundwater plume, lateral and vertical delineation of impacted soil, lateral and vertical excavation extents and cleanup criteria of soil impacted with Total Petroleum Hydrocarbons as gasoline and diesel (TPH-g and TPH-d), benzene, toluene, ethylbenzene and xylenes (BTES) and naphthalene. Revise the soil analytical data tables to include Environmental Screening Levels for Soil - Leaching to Groundwater Levels and highlight samples with concentration above the ESLs. Include discussion about soil profiling for direct loading during construction and to define the extent of the soil impact in the Trench Basin area.
- 3) **2855 Broadway.** Revise report text to provide clarification that carbon tetrachloride concentrations in groundwater is suspected to be from an upgradient source and that excavation for the subterranean garage will remediate any potential onsite sources in soil.
- 4) **Groundwater Monitoring Event.** Monitor the groundwater levels in the wells to determine fluctuations due to the recent wet weather. Assess whether collection of groundwater samples for laboratory analysis is prudent to evaluate volatile organic compound concentration changes with high groundwater levels. Revise the report text to incorporate groundwater monitoring results and changes to construction dewatering and vapor barrier extent beneath the building at 2820 Broadway, if warranted.
- 5) **Points of Contact Table.** Revise Points of Contact table to clarify ACDEHS role as Leas Site Cleanup Oversight Agency.

- 6) **Reuse of Petroleum Impacted Soil.** Revise report text to state that proposals to reuse petroleum impacted soil at the site must be submitted to ACDEH for review and approval prior to soil relocation.
- 7) **Verification Sampling.** Revise report text to include verification sample collection at signs of discoloration, odor, PID readings etc.

**Land Use Covenant.** Please read the accompanying guidance document and prepare a draft of the attached Alameda County's Land Use Covenant Deed Restriction template for review by ACDEH.

Also as discussed, I will work on drafting ACDEH's approval letter and send to you for review next week concurrent with your preparation of the LUC and the final Soil and Groundwater Management Plan.

**Dilan Roe, P.E.**

*Chief – Land Water Division*

Alameda County Department of Environmental Health

1131 Harbor Bay Parkway

Alameda, CA

510.567.6767; Ext. 36767

QIC: 30440

[dilan.roe@acgov.org](mailto:dilan.roe@acgov.org)