

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Tuesday, March 29, 2016 11:33 AM
To: 'Lauren Brewer'; 'Nick Loizeaux'
Cc: Roe, Dilan, Env. Health
Subject: 9400 to 9500 International Blvd (RO3202) Draft RAP Comments

Lauren and Nick,
Thanks for bearing with our overloaded system, and thanks for the draft RAP. It was good.

The following comments can be incorporated into the draft RAP prior to finalization (as the public comment period proceeds). If appropriate, any public comments received can also be incorporated into the draft RAP prior to finalization. I've the following comments relative to the draft RAP (any additional thoughts or comments can likely be handled in the letter approving the RAP):

1. Key Transit System Yard; Groundwater – No groundwater risk was found at the site as a whole; however, only two groundwater samples collected. ACDEH recognizes and acknowledges the discussion in the text of the draft RAP, but based on experience requests the collection of site specific data. ACDEH is in general agreement with respect to the former dry cleaner facility where the groundwater samples were collected; however, potential contamination from the “Key Transit Yard” has not been evaluated, despite a portion of that yard being on the subject property. It appears appropriate to collect several grab groundwater samples along the southern and eastern site perimeter to access potential contamination from the old Key System Yard in an effort to be protective.
2. Key Transit System Yard; Vapor – No vapor risk was found relative to the Key System Yard; however, onsite vapor sampling was limited to accessible onsite areas that would appear to have been remote from the most active portions of that Key System Yard, and detected naphthalene. It appears appropriate to collect additional vapor samples along the southern property boundary to be protective of residents of the proposed building. ACDEH noted that while 1,1-DFA was identified as a tracer, analysis for a tracer was not included in the laboratory analytical reports. Without the inclusion of a tracer in the analytical suite, it cannot be determined if existing vapor samples were diluted by atmospheric air. If tracer concentrations were not collected for existing samples, it would be appropriate to recheck selected sampling locations (eastern boundary of site and former dry cleaner facility). The use of a shroud was also not discussed. In the event of the detection of a tracer in the vapor sample analytical suite, DTSC guidance indicates that analyzed tracer concentrations in the shroud should be can be used to determine if the sample is valid (< 5% leak). Please provide standard vapor sampling protocols with the next submittal.
3. COCs - The remedial actions are primarily focused on lead contamination; however, have identified additional contaminants as Chemicals of Concern (COC; including cobalt, mercury, TPHmo, and chlordane). It appears appropriate to additionally test all confirmation samples (based on proximity) for the identified COCs (i.e. TPHmo may only need testing in the general vicinity of documented TPHmo contamination). Arsenic was not identified as a COC; however, based on the ACDEH review there appear to be two arsenic populations at the site; natural and cultural. Existing publications (SFB RWQCB) have indicated that the upper end concentration for arsenic in the Bay Area is approximately 11 mg/kg, but must be based on the underlying geology / soils. Higher arsenic concentrations (several up to 14 mg/kg) were present in the fill soils and appear to be collocated with other COCs. It also appears appropriate to include arsenic as a COC, and to determine the UCL for the natural arsenic concentration based on a statistical approach.
4. Stormwater Treatment Areas – ACDEH has not been able to determine if the stormwater treatment areas will be unpaved infiltration areas or paved, and presumably used to treat and discharge stormwater to storm drains. Presuming them to be areas for unpaved infiltration, it is appropriate to collect additional confirmation samples from their final grades for the COCs, including soluble metals, esp. lead.

5. Landscaping Areas and Rubber Safety Surfacing Area – Limited additional samples are proposed for landscaping areas / planters / rubber safety surface. ACDEH has not been able to determine if surficial soils are proposed to remain in these, or in some of, the locations. While confirmation samples for lead and other COCs have been proposed to be collected at 2 feet bgs along excavation sidewalls and as excavation bottom confirmation samples at approximately 3 feet, ACDEH additionally presumes that very shallow (<2 ft) may also be affected by similar contamination. It appears appropriate to collect very shallow soil confirmation samples in landscaped areas (3 – 6 inches perhaps?) to be protective of children and other residents who may encounter / ingest / inhale / etc. surficial soils that are proposed to remain.
6. Potential for Lead Contamination Outside of Excavation Area – Similar to the comment above about very shallow soil, and dependent on any changes to the excavation boundaries, very shallow soil that will be excavated to allow the redevelopment (building pad, pavement sections) has the potential to additionally be contaminated by site COCs. It may be appropriate to collect very shallow soil samples from these areas to ensure excavated soil will be handled appropriately at the time of disposal. Alternatively the soil can be assumed to be contaminated (and will be tested for disposal purposes), and appropriate dust control measures be observed in the interim.
7. Excavation Backfill Material Quality – The chemical quality of the backfill to be used was not addressed as it was considered not to be a component of the remedial excavation, and the draft RAP stated the redevelopment contractor would backfill the excavation in accordance with the redevelopment design requirements. ACDEH considers backfill to be a component of remedial excavations in order to ensure that the chemical quality of the backfill is suitable for the intended site use. Please note that backfill operations can be conducted by the redevelopment contractor, but the fill standards are required to be appropriate for the site, and should be identified in the RAP. This is intended to eliminate the importation of inappropriate material. The primary goal at the site is to achieve a cleanup of the site that is protective of human health and the environment. Due to potential contamination issues with recycled concrete (e.g. absorbed hydrocarbons, PCBs, PNAs, solvents, and etc.), ACDEH requests the submittal of a document that certifies that the use of any recycled concrete is appropriate for this site, including laboratory analysis of the specific material to be imported. See the Department of Toxic Substances Control (DTSC) clean import guidance document (*Information Advisory Clean Imported Fill Material*), and the New Jersey Department of Environmental Protection (NJDEP) *Guidance for Characterization of Concrete and Clean Material Certification for Recycling*. Copies can be forwarded upon request.
8. Figure 9 – This point is mainly to clarify and prevent miscommunication of intentions. Figure 9 is identified as an example of possible excavation bottom and perimeter sampling, but appears to indicate that the southern and northern excavation boundaries will only undergo “field screening”, rather than “confirmation testing”. The text of the report appears to indicate otherwise. To clarify, ACDEH requests that the northern and southern excavation boundaries, should include “confirmation testing”, as do the eastern and western edges.

I think that was it.

Please let me know if you have questions or comments.

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