## Nowell, Keith, Env. Health

From: Nowell, Keith, Env. Health

**Sent:** Friday, August 24, 2018 12:24 PM

**To:** Mike Bowes (mike.bowes@tripointehomes.com)

Cc: Peter Morris (peterm@westenvironmental.com); Khatri, Paresh, Env. Health; Roe, Dilan,

Env. Health (Dilan.Roe@acgov.org); Detterman, Mark, Env. Health

**Subject:** Wood Street Redevelopment Project, RO3206 and GeoTracker Global ID

T10000009064; 1708 Wood St. & 1711 18th Ave., Oakland

Mike,

In our July 18, 2017 letter, Alameda County Department of Environmental Health (ACDEH) indicated that, prior to the start of building construction, the following documents must be submitted to ACDEH for review and approval:

Baseline Project Schedule and a Soil Excavation Report.

ACDEH also stated that prior to the import of soil to the site soil import documentation must be submitted to ACDEH for review and approval.

Our agency has received a Baseline Project Schedule (BPS), Construction Soil and Groundwater Management Plan (CSGMP), and the Soil Import Management Plan (SIMP). These document are currently under review by our agency.

Factors affecting our review include:

- 1. Unidentified UST- We have been informed of the identification and removal of an underground storage tank (UST) along 17<sup>th</sup> Street in the vicinity of Willow Street. According to Ms. Barb Jakub of the ACDEH Certified Unified Program Agency (CUPA), the UST experienced a release and will be transferred to the ACDEH Local Oversight Program (LOP). However, it is conceivable the UST investigation may be performed under the existing Voluntary Remedial Action Program (VRAP) case. Though a potentially slower route, work performed under the LOP case may be reimbursable by the state Clean Up Fund (CUF). Regardless of which route (VRAP or LOP) is pursued, we will prepare a letter requiring an investigation for delineation of the soil and potential groundwater impacts due the release.
- 2. Additionally, based on subsurface methanogenesis, ACDEH is of the opinion collection of soil vapor sample(s) is/are warranted to evaluate the potential risk for methane vapor intrusion to indoor air in the vicinity of the UST.
- 3. It is conceivable that project remedial grading can occur concurrent with the UST investigation. The UST location will need to be identifiable without on-site landmarks. The investigation findings may result in excavation subsequent to grading. The UST investigation will need to be incorporated to the BPS.
- 4. Items 53 through 61 of the BPS indicated the eastern portion of the site, consisting of buildings 10 through 18, will be developed first. ACDEH notes Building 10 is in the vicinity of the UST. Until the UST investigation is completed, it is unclear if Building 10 is affected by the UST. This will need to be addressed in a revised BPS.
- 5. Item 15 of the BPS identifies the relative scheduling for the remedial grading for the project. The entire 4.3-acre site will be graded during the 14-day period allotted. Building 5 is adjacent to the UST. Grading in this area will affect the UST investigation and will need to be addressed in a revised BPS. Additionally, it is unknown if a vapor mitigation system (VMS) will be required for buildings in the vicinity of the UST and how this may affect existing building plans and grading.
- 6. Based on the documents provided it is unclear if BPS Items 6 through 9 for off-tract utilities and Item 10 and Item 11 for re off-site concrete involve the area of the UST.
- 7. A review of the time line for demo, remedial grading and import soil for landscape area (BPS Items 14, 15 & 16), our review and approval for the revised BPS, CSGMP and the SIMP will required prior to the start of site demolition activities.

ACDEH would like to discuss the points expressed above in order to expedite the project. Please contact me to arrange for a conference call with me and my superior(s).

Thank you,

## Keith Nowell PG, CHG

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