



October 9, 2018

Mike Bowes (Sent via E-mail to: mike.bowes@tripointehomes.com)
TRIPointe Homes
2010 Crow Canyon Place, Suite 380
San Ramon, CA 94583

Subject: Site Cleanup Program Case No. RO0003206; Global ID #T10000009064, Wood Street Redevelopment, 1708 Wood Street & 1711 18th Street, Oakland, CA 94607

Mr. Bowes:

Alameda County Department of Environmental Health (ACDEH) staff has reviewed the case file including the *Updated Soil Gas Sampling Report Addendum*, dated October 4, 2018 and prepared by West Environmental Services & Technology, Inc. (WEST) for the subject site. According to the analytical data, methane was detected above Department of Toxic Substances Control's methane action of 5,000 parts per million (ppm) in the north east portion of the site and in the south-central area of the site. As a result, those proposed structures (buildings) located in the vicinity of the elevated methane detections at the site will require sub-slab vapor mitigation systems beneath the structures to mitigate potential vapor intrusion to indoor air.

Based on a review of the case file and the above-referenced document, ACDEH has no objection to building permit issuance for building locations that will not require a vapor mitigation system, however, continue to withhold occupancy permits for the entire project, provided that all work observes the conditions specified in our September 17, 2018 correspondence, and as specified below. ACDEH will provide comment on the Vapor Mitigation System Plans & Specifications in a separate letter, however, concurs that vapor mitigation is required only under the following buildings planned for the site.

- Building 5
- Building 10
- Building 12
- Building 17
- Building 18

We request that you address the following technical comments, perform the proposed work, and send us the report described below. Please provide 72-hour advance written notification to this office (e-mail preferred to: keith.nowell@acgov.org and paresh.khatri@acgov.org) prior to the start of field activities.

TECHNICAL COMMENTS

1. Conditional Approval of Mass Grading and Foundation Soil Excavation - The above-reference report and the referenced reports in our September 17, 2018 correspondence propose a series of actions with which ACDEH is in agreement of undertaking. ACDEH requests the submittal of the following report by the date specified below.

- a. **Soil Import/Export Report** – ACDEH requests the submittal of a soil import/export report at the end of mass grading and foundation excavation for approval prior to the start of foundation pours. The report is to document the import of clean fill material and offsite disposal of contaminated soil, including volumes by source (mass grading or foundation excavation), manifests, and analytical reports required for disposal of the soil at appropriately permitted facilities.

- 2. Electronic Report and Data Upload Compliance** – A review of the case file and the State’s Geotracker database indicates that the site is not in compliance with previous directive letters. Compliance is also a State requirement. Pursuant to California Code of Regulations, Title 23, Division 3, Chapter 16, Article 12, Sections 2729 and 2729.1, beginning September 1, 2001, all analytical data, including monitoring well samples, submitted in a report to a regulatory agency as part of the UST or LUST program, must be transmitted electronically to the SWRCB GeoTracker system via the internet. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs, including SLIC programs. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites was required in GeoTracker.

ACDEH requests notification of, and a list of, the documents uploaded to Geotracker. Please upload all submittals to GeoTracker.

TECHNICAL REPORT REQUEST

Please submit the following technical reports and deliverables to the State Water Board’s Geotracker website and notify your case worker by electronic mail (keith.nowell@acgov.org), in accordance with the following specified file naming convention and schedule, as provided below, and in the Responsible Party(ies) Legal Requirements/Obligations which is included as Attachment 1. Please note ACDEH no longer accepts reports on the ftp site.

- **December 12, 2018** – GeoTracker Compliance Uploads
Please email your case worker upon completion
- **Prior to Concrete Pour or No Later Than December 12, 2018** – Soil Import/Export Report
File to be named: RO0003206_REM_R_YYYY-MM-DD

Thank you for your cooperation. If you have any questions, please call me at (510) 777-2478 or send me an electronic mail message at pareskhatri@acgov.org.

Sincerely,

Paresh C. Khatri
Supervising Hazardous Materials Specialist
Local Oversight & Site Cleanup Programs Manager

ENCLOSURES:

- Attachment 1 – Responsible Party (ies) Legal Requirements and Obligations
- Attachment 2 – ACDEH September 17, 2018 Correspondence
- Attachment 3 – Figure

DISTRIBUTION LIST:

- Chris Candell, City of Oakland, Planning, Building Preservation, 250 Frank H. Ogawa Plaza, Suite 2340, Oakland, CA 94612 (Sent via E-mail to: ccandell@oaklandnet.com)
- Alan Lu, City of Oakland, Process Coordinator III, Building Department, 250 Frank H. Ogawa Plaza, Suite 2340, Oakland, CA 94612 (Sent via E-mail to: alu@oaklandnet.com)
- Chong Hong, City of Oakland, Civil Engineer, Department of Transportation/Public Works, 250 Frank H. Ogawa Plaza, Suite 2340, Oakland, CA 94612 (Sent via E-mail to: chong@oaklandnet.com)
- William Quesada (Bill), City of Oakland, Project Manager II, Planning & Building Department, 250 Frank H. Ogawa Plaza, Suite 2340, Oakland, CA 94612 (Sent via E-mail to: bquesada@oaklandnet.com)
- Peter Morris, West Environmental Services & Technology, 711 Grand Avenue, Suite 220, San Rafael, CA 94901; (Sent via E-mail to: peterm@westenvironmental.com)

Wood Street Redevelopment
RO0003206
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Dilan Roe, ACDEH, (Sent via E-mail to: dilan.roe@acgov.org)
Paresh Khatri, ACDEH; (Sent via E-mail to: paresh.khatri@acgov.org)
Keith Nowell, ACDEH, (Sent via E-mail to: keith.nowell@acgov.org)
Electronic File; GeoTracker

Alameda County Environmental Cleanup Oversight Programs (LUST and SCP)	REVISION DATE: December 14, 2017
	ISSUE DATE: July 25, 2012
	PREVIOUS REVISIONS: September 17, 2013, May 15, 2014, December 12, 2016
SECTION: ACDEH Procedures	SUBJECT: Responsible Party(ies) Legal Requirements / Obligations

REPORT & DELIVERABLE REQUESTS

Alameda County Department of Environmental Health (ACDEH) Cleanup Oversight Programs, Local Oversight Program (LOP) and Site Cleanup Program (SCP) require submission of all reports in electronic form to the State Water Board's (SWB) GeoTracker website in accordance with California Code of Regulations, Chapter 30, Division 3, Title 23 and Division 3, Title 27.

Leaking Underground Fuel Tank (LUFT) Cases

Reports and deliverable requests are pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party (RP) in conjunction with an unauthorized release from a petroleum underground storage tank (UST) system.

Site Cleanup Program (SCP) Cases

For non-petroleum UST cases, reports and deliverables requests are pursuant to California Health and Safety Code Section 101480.

ELECTRONIC SUBMITTAL OF REPORTS

A complete report submittal includes the PDF report and all associated electronic data files, including but not limited to GEO_MAP, GEO_XY, GEO_Z, GEO_BORE, GEO_WELL, and laboratory analytical data in Electronic Deliverable Format™ (EDF). Additional information on these requirements is available on the State Water Board's website (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/)

- Do not upload draft reports to GeoTracker
- Rotate each page in the PDF document in the direction that will make it easiest to read on a computer monitor.

GEOTRACKER UPLOAD CERTIFICATION

Each report submittal is to include a GeoTracker Upload Summary Table with GeoTracker valid values¹ as illustrated in the example below to facilitate ACDEH review and verify compliance with GeoTracker requirements.

GeoTracker Upload Table Example

Report Title	Sample Period	PDF Report	GEO_MAPS	Sample ID	Matrix	GEO_Z	GEO_XY	GEO_BORE	GEO_WELL	EDF
2016 Subsurface Investigation Report	2016 S1	✓	✓	Effluent	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
2012 Site Assessment Work Plan	2012	✓	✓			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2010 GW Investigation Report	2008 Q4	✓	✓	SB-10	W	✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				SB-10-6	SO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	✓
				MW-1	WG	✓	✓	✓	✓	✓
				SW-1	W	✓	✓	✓	✓	✓

¹ GeoTracker Survey XYZ, Well Data, and Site Map Guidelines & Restrictions, CA State Water Resources Control Board, April 2005

Alameda County Environmental Cleanup Oversight Programs (LOP and SCP)	REVISION DATE: December 14, 2017
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ACKNOWLEDGEMENT STATEMENT

All work plans, technical reports, or technical documents submitted to ACDEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I have read and acknowledge the content, recommendations and/or conclusions contained in the attached document or report submitted on my behalf to the State Water Board's GeoTracker website." This letter must be signed by the Responsible Party, or legally authorized representative of the Responsible Party.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6731, 6735, and 7835) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately licensed or certified professional and include the professional registration stamp, signature, and statement of professional certification. Additional information is available on the Board of Professional Engineers, Land Surveyors, and Geologists website at: <http://www.bpelsg.ca.gov/laws/index.shtml>.

UNDERGROUND STORAGE TANK CLEANUP FUND

For LUFT cases, RP's non-compliance with these regulations may result in ineligibility to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse the cost of cleanup. Additional information is available on the internet at: https://www.waterboards.ca.gov/water_issues/programs/ustcf/

AGENCY OVERSIGHT

Significant delays in conducting site assessment/cleanup or report submittals may result in referral of the case to the Regional Water Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

ALAMEDA COUNTY
**HEALTH CARE SERVICES
AGENCY**

COLLEEN CHAWLA, Agency Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP) FOR
HAZARDOUS MATERIALS RELEASES
1131 HARBOR BAY PARKWAY
ALAMEDA, CA 94502
(510) 567-6700
FAX (510) 337-9335

September 17, 2018

Chris Candell

City of Oakland, Planning, Building Preservation
250 Frank H. Ogawa Plaza, Suite 2340
Oakland, CA 94612

(Sent via electronic mail to: CCandell@oaklandnet.com)

Alan Lu

City of Oakland, Process Coordinator III, Building Department
250 Frank H. Ogawa Plaza, Suite 2340
Oakland, CA 94612

(Sent via electronic mail to: ALu@oaklandca.gov)

Chong Hong

City of Oakland, Civil Engineer, Department of Transportation/Public Works
250 Frank H. Ogawa Plaza, Suite 2340
Oakland, CA 94612

(Sent via electronic mail to: CHong@oaklandca.gov)

William Quesada (Bill)

City of Oakland, Project Manager II, Planning & Building Department
250 Frank H. Ogawa Plaza, Suite 2340
Oakland, CA 94612

(Sent via electronic mail to: bquesada@oaklandnet.com)

Subject: Site Cleanup Case No. RO0003206 and GeoTracker Global ID T10000009064, 1708 Wood St & 1711 18th Street, Oakland, CA 94607

To Whom It May Concern:

Alameda County Department of Environmental Health (ACDEH) is providing regulatory oversight of the subject site to support redevelopment of the site and a change in site use from commercial/industrial to residential. The site is approximately 4.3 acres and is bounded by Wood Street, Campbell Street, 17th Street and 18th Street. The property consists of two adjoining parcels with Assessors' Parcel Numbers (APN) 7-562-1 and 7-563-1, referenced as Parcel B and Parcel A, respectively, in the development plans. The property owner, Tri Pointe Homes, Inc. (Tri Pointe) has entered into a Voluntary Remedial Action Agreement with ACDEH, and has prepared a remedial action plan to address residual contamination in soil, groundwater and soil vapor at the site from historic site uses to facilitate site development. The ACDEH approved remedial actions include:

- Excavation of soil containing petroleum hydrocarbons, polycyclic aromatic hydrocarbons and lead in shallow soil from landscape areas, foundation excavations and utility trenches for on-site reuse as engineered fill beneath buildings and hardscapes or offsite disposal at a permitted landfill;
- Installation of geotextile marker fabric at the base of the landscape area excavations to delineate the interface between clean imported landscaping soil and the underlying contaminated soil. Fill material imported to the site must be approved for use by ACDEH prior to being imported to the site.
- Installation of subslab vapor mitigation systems beneath select buildings to minimize vapor intrusion into buildings from residual subsurface contamination; and

- Installation of trench dams and plugs within utility corridors to minimize vapor migration along utility corridors.

Based on information presented in the case file, and with the provision that the information provided to this agency is accurate and representative of site conditions, ACDEH has no objections to Tri Pointe beginning earthwork and grading operations for the redevelopment project work on the above listed parcels provided the work is conducted in accordance with the following ACDEH approved documents prepared on behalf of Tri Pointe by West Environmental Services & Technology:

- Remedial Design and Implementation Plan, dated September 2018;
- Soil Import Management Plan, dated June 2018;
- Construction Soil and Groundwater Management Plan, dated June 2018; and
- Remedial Action Plan, dated February 2017

ACDEH requests that the City of Oakland **withhold authorization to construct building foundations and install utility plugs/dams** until receipt of written notification by ACDEH that (1) the remedial soil excavation and clean fill import has been completed in accordance with the above listed documents, and (2) ACDEH has approved the vapor mitigation engineering controls design. ACDEH also requests that the City of Oakland withhold issuance of final occupancy for the residential buildings until receipt of notification by ACDEH that Tri Pointe has submitted the requisite documentation on the installation and testing of the vapor mitigation engineering controls.

The above listed documents are available for review in the online case files at the following website: <http://www.acgov.org/aceh/index.htm>.

Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Sincerely,



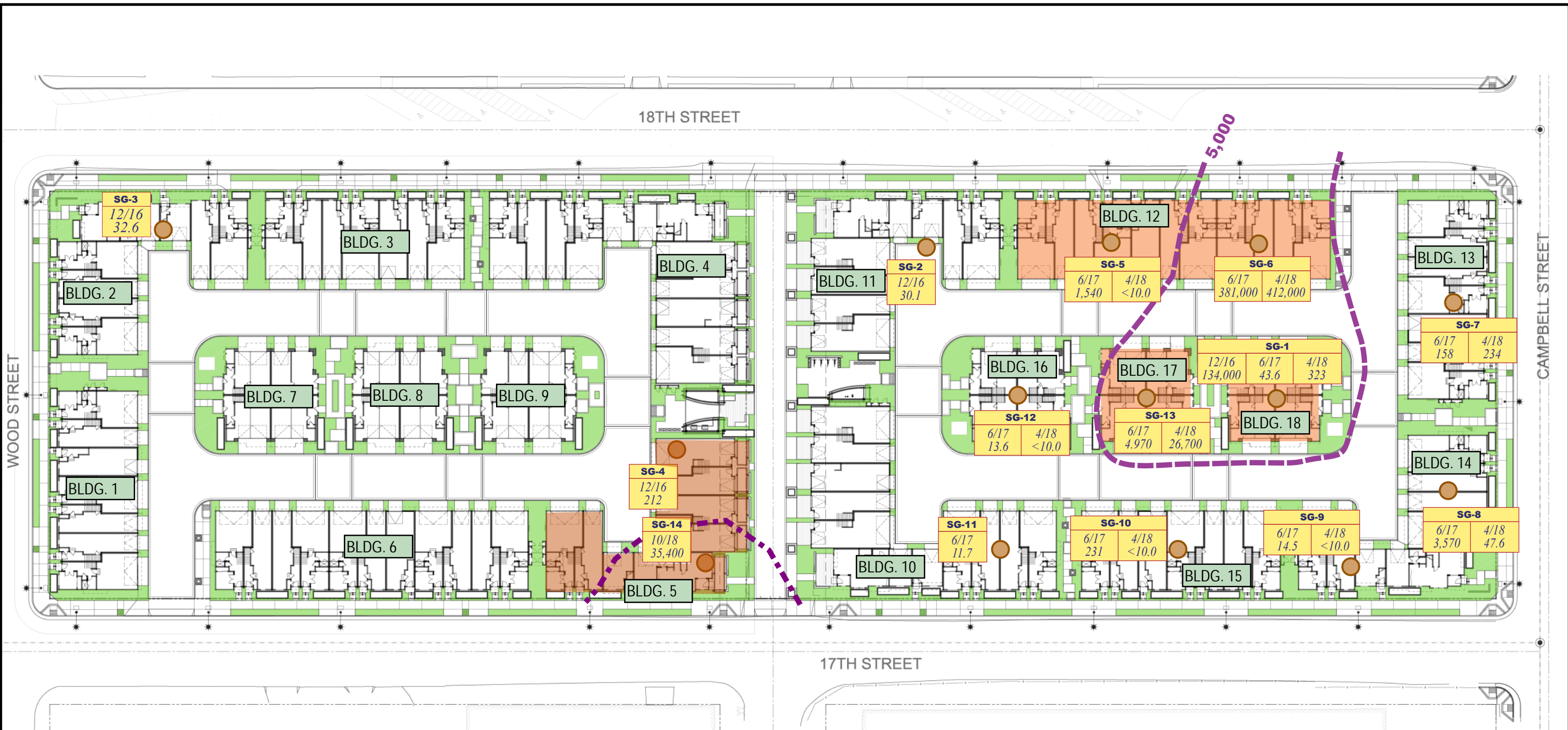
Digitally signed by Keith Nowell
DN: cn=Keith Nowell, o=Alameda County,
ou=Department of Environmental Health,
email=keith.nowell@acgov.org, c=US
Date: 2018.09.17 15:45:26 -07'00'

Keith Nowell, PG, CHG
Hazardous Materials Specialist

Cc: Mike Bowes, Tri Pointe, (*Sent via electronic mail to: Mike.Bowes@TRIPointeHomes.com*)
Peter Morris, West Environmental Services & Technology, (*Sent via electronic mail to: peterm@westenvironmental.com*)

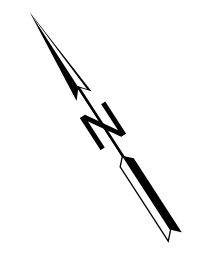
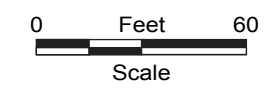
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Ronald Browder, ACDEH, (*Sent via electronic mail to: ronald.browder@acgov.org*)

GeoTracker, Electronic Case File



EXPLANATION

- Landscape/Proposed Excavation
(3-feet Below Ground Surface)
- Proposed Buildings for Methane Mitigation
- Methane Sampling Location
- | | |
|-------------|----------------------------|
| SG-6 | Sample ID |
| 6/17 | Date Sampled |
| 381,000 | Methane in Soil Gas (ppmv) |
- Methane Isocontour (5,000 ppmv)



SUMMARY OF SOIL VAPOR RESULTS AND PROPOSED METHANE MITIGATION AREAS

1708 Wood Street, Oakland, California

Environmental Services & Technology

Figure 2

September 2018