

ALAMEDA COUNTY
**HEALTH CARE SERVICES
AGENCY**

REBECCA GEBHART, Interim Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP)
For Hazardous Materials Releases
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October 24, 2017

Mr. Tyler Wood
Lennar Multifamily Communities
492 9th Street Suite 300
Oakland, California 94607

Subject: Site Cleanup Program Case RO0003229 and GeoTracker Global ID T0000010099, Lennar Multifamily Communities, 1750 Webster Street, Oakland, CA 94612

Dear Mr. Wood:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file in conjunction with the *Construction Soil and Groundwater Management Plan, Proposed Multifamily Development, 1750 Webster Street, 1810 Webster Street and 301 19th Street, Oakland, California* (SGMP), prepared by GrafCon on your behalf, and dated October 24, 2017. The SGMP includes a summary of soil and groundwater conditions at the subject site and soil and groundwater management protocols that will be implemented during site redevelopment to mitigate conditions potentially hazardous to human health or the environment during and after construction.

The SGMP was prepared to support construction-related activities related to redevelopment of the site and a change in site use from commercial/industrial to commercial/multi-family residential, as detailed in the following redevelopment plans submitted to the City of Oakland Planning Department and Building and Public Works Departments:

- *Planning Permit Number PLN16-071, 301 19th Street Development Submittal:* This submittal includes schematic and entitlement set development plans for 301 19th street, 1750-1810 Webster (APN: 008-0625-002-01; -016-00; -017-00; & -018-00), submitted to the City of Oakland Planning Department on March 17th, 2016, as later revised on May 25th, 2017, and approved by the City of Oakland on August 26, 2016.
- *PZ Permit Number PZ1700062, 301 19th Street Site Improvements and Building Permit Set.* This submittal includes plans dated and submitted to the City of Oakland on August 29th, 2016, as revised on April 10th, 2017, and subsequently revised on June 26th, 2017, and July 25th, 2017, and approved and permitted by the City of Oakland on August 14th, 2017.
- *Grading Permit Number GR1700069, 301 19th Street Grading Permit Plan Set.* This submittal includes plans dated and submitted to the City of Oakland on March 3rd, 2017 as later revised on May 5th, 2017, and approved, bonded, and permitted by the City of Oakland on July 17th, 2017.

Based on the information in the case file, and with the provision that the information provided to this agency is accurate and representative of site conditions, ACDEH conditionally approves of the corrective actions and soil and groundwater management activities presented in the SGMP and concurs that implementation of the proposed measures will prevent exposure to construction workers and site occupants of the proposed development project from residual contamination at the site.

Therefore, at this juncture, you may proceed with site redevelopment activities provided the soil and groundwater management activities presented in the SGMP are implemented, the required mitigation measures including vapor barriers beneath the elevator pits and utility trench dams are installed, and the documents and field work listed in the Technical Report section below are submitted in accordance with the associated compliance dates. Case closure will be granted following completion and approval of the technical reports and completion of corrective actions.

TECHNICAL REPORT AND FIELD WORK REQUEST

1. Prior to the start of building construction the following work must be completed and documents submitted to ACDEH:
 - a. **Project Schedule.** A project schedule providing details of the sequencing of corrective actions and site redevelopment activities and submittal of requisite reports and documentation listed below. The schedule must include at a minimum the following activities: site grading and excavation of lead-impacted soil, soil import characterization and ACDEH approval, vapor barrier installation and testing, utility trench dam installation, and foundation construction.
 - b. **Groundwater Sampling and Monitoring Well Destruction.** Sampling of groundwater for volatile organic compounds in the area of the former gasoline station and from the three existing on-site wells. Following groundwater sampling permits for well destruction shall be obtained from Alameda County and well destruction activities shall be performed according to agency requirements. Results of groundwater sampling and documentation of the well destruction activities must be included in the Updated Site Summary Report required below.
2. Prior to the import of soil to the site the following documents must be submitted to ACDEH for review and approval:
 - a. **Soil Import Documentation.** Requisite documentation for imported fill material including information on proposed sources, sampling and profiling protocols, analytical laboratory reports, and tables with analytical results and applicable environmental screening levels.
3. Prior to pouring of elevator pits the following reports must be submitted to ACDEH for review and approval:
 - a. **Vapor Barrier and Trench Dam Design Report and Approved Building Permit Plans.** A basis of design report incorporating a copy of plans approved by the City of Oakland Building Department showing the vapor barrier and utility trench dam locations and specifications for the two on-site elevator areas and a Construction Quality Assurance Plan (CQA Plan). The report and plans must be stamped by a registered engineer. ACDEH must be notified if LMC or the City proposes changes to the site development and first floor building plans presented in the documents in the case files including but not limited to the location, depth and/or design of the elevator shafts, vapor barriers and utility trench dams. Any substantial changes made to the plans without review by ACDEH may invalidate the conclusions of the protectiveness of the redevelopment of the site with respect to residual contamination.
4. Prior to building occupancy the following documents must be submitted to ACDEH for review and approval:
 - a. **Construction SGMP Compliance Report.** A report documenting compliance with the Construction SGMP.
 - b. **Vapor Barrier and Utility Trench Dam Record Report of Construction.** A vapor barrier and utility trench dam record report of construction with as-built drawings and other information relevant to the installation of the vapor barriers and utility trench dams and certifying that the vapor barriers and utility trench dams were installed in accordance with the basis of design report and design plans.

- c. **Long-Term Site Management Plan (SMP).** An SMP for long-term site management providing details regarding the location and construction of the vapor barriers and utility trench dams, precautions should subsurface work be required in the area of installed mitigation measures, protocols for handling potentially impacted soil and groundwater exceeding direct exposure screening criteria that may remain beneath the ground floor slab and foundations, and notification and documentation procedures should the vapor barriers and/or trench dams be damaged. The SMP must include-as built drawings and specifications of the vapor barriers and utility trench dams and must be maintained at the site address by the property manager or designated representative and must be recorded at the Alameda County Clerk Recorder's Office.
- d. **Updated Site Summary Report.** An Updated Site Summary Report containing figures and tables showing locations and results of all sampling that has occurred at the site. The report will include descriptions of the year, reason for sampling, and what was analyzed for, and conclusions on status and source of residual chemicals.
- e. **Land Use Covenant.** A land use covenant (LUC) documenting long-term site use will be prepared and recorded, and will include the following restrictions: (1) implementation of the long-term SMP for the site, which shall be incorporated therein by reference, including preservation of the site cap, vapor barriers under the elevators and utility trench dams; and (2) prohibition on the extraction of groundwater for any use, including but not limited to domestic, potable, or industrial uses.
- f. **Continued Geotracker and Alameda County ftp Database Upload Compliance.** Electronic submittal of all reports and analytical data to both the County and State databases. A new "non-case" number will be opened to act as a repository for long-term monitoring documents including annual reports and five-year reviews.

TECHNICAL REPORTS/WORK SCHEDULE

Please perform the requested work and submit technical reports to ACDEH (Attention: Karel Detterman) in accordance with Attachment 1 and the schedule below. The technical reports may be combined as appropriate. The submittal compliance date for reports with a "Date to be Determined" notation will be finalized in a subsequent directive letter and will be based on the date(s) proposed in the Project Schedule.

- **Project Schedule** - November 3, 2017
- **Soil Import Documentation** – Date to be Determined
- **Vapor Barrier and Trench Dam Design Report and Approved Building Permit Plans** – Date to be Determined
- **Construction SGMP Compliance Report** – Date to be Determined
- **Vapor Barrier and Utility Trench Dam Record Report of Construction** – Date to be Determined
- **Long-Term Site Management Plan (SMP)** – Date to be Determined
- **Updated Site Summary Report** – Date to be Determined
- **Land Use Covenant** – Date to be Determined

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please call me at (510) 567-6767 or send me an electronic mail message at dilan.roe@acgov.org.

Sincerely,

Dilan Roe

Dilan Roe

Chief – Land Water Division

cc:

Tom Graf, Grafcon, (*Sent via E-mail to: tom@grafcon.us*)

Rob Campbell, Geosolve, (*Sent via E-mail to: rcampbell@geosolve-inc.com*)

Karel Detterman, ACDEH (*Sent via E-mail to: karel.detterman@acgov.org*)

Paresh Khatri, ACDEH (*Sent via E-mail to: paresh.khatri@acgov.org*)

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