

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Wednesday, September 30, 2015 2:38 PM
To: 'Leonard Niles'
Cc: Marc Cunningham; Patrick Ellwood; Roe, Dilan, Env. Health
Subject: RE: 900 Grand Avenue, Oakland Meeting Memo (RO3175)
Attachments: Attachment A Site Conceptual Model.pdf

Hi Len,

I've been delayed in my response due to a number of events that have been outside my control. Regardless, I did want to get back to you in regards to the referenced case; RO0003175 to separate it from RO000391. As discussed in the meeting, RO391 is a closed case, will not be reopened, and was closed to a commercial land use scenario in the current land use (as a parking lot).

In general ACEH is in agreement with the summary you have provided below; however, while the submittal should include the six items listed, the site should be evaluated as a whole (comprehensively). I've appended my thoughts to your email below **in red**, but also provide additional input here.

The closure for RO391 states (Section V) that concentrations up to 3,800 mg/kg TPHg, 580 mg/kg TPHd, and 22 mg/kg benzene remain in soil onsite (southern and eastern boundaries, and may extend past the known area of contamination on the east to the property line or further.). ACEH recognizes the data is older and that concentrations have likely attenuated in the intervening years, but is there sufficient recent data from the site and near site vicinity to determine that there is no risk to the proposed commercial and residential redevelopment? The referenced contaminant concentrations were collected at a depth of 4 – 5 feet bgs; thus potential concerns would likely include direct contact and outdoor air as well as vapor intrusion to both the proposed residential and commercial space. The analysis can be to a LTCP analysis; however, non LTCP contaminants would need to be to another standard.

Presuming a SMP for soil and groundwater excavation / management will be used at the site, the backfilling of any excavation will be required at some point. ACEH considers backfilling to be a part of a process to return a remedial excavation to its original "condition" (level). As discussed in the meeting, the importation of recycled base rock can be problematic due to its untested, undocumented nature (compared to fill soil which is typically tested prior to import). DTSC has a Clean Imported Fill Material advisory, and the New Jersey DEP has guidance for the characterization of recycled concrete. ACEH has used both previously. I can forward these documents if needed.

In order to move the site forward, it appears reasonable to request a Focused Site Conceptual Model (SCM) for the proposed redevelopment. This is intended to enable an analysis of the affect of the proposed site redevelopment changes on the site, and of the residual contamination on the redevelopment. In order to expedite review, ACEH requests the focused SCM be presented in a tabular format that highlights the major SCM elements and any associated data gaps which need to be addressed to progress the site to case closure. If it is your opinion that the focused SCM does not allow a sufficient ability to discuss the details of the site, please be aware that the request is not intended to exclude a text discussion of the pertinent details. Please see Attachment A "Site Conceptual Model Requisite Elements".

Should we set a submittal timeline? I recognize the intent is to expedite this analysis and thus a shorter period would be appropriate, could be submitted prior to the date, and of course, could be extended if needed. Should we use say, October 30th?

Hope this helps. Let me know if you have questions.

Mark Detterman
Senior Hazardous Materials Specialist, PG, CEG

Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
Direct: 510.567.6876
Fax: 510.337.9335
Email: mark.detterman@acgov.org

PDF copies of case files can be downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>

From: Leonard Niles [mailto:leonard@allwest1.com]
Sent: Friday, September 25, 2015 3:45 PM
To: Detterman, Mark, Env. Health
Cc: Marc Cunningham; Patrick Ellwood
Subject: 900 Grand Avenue, Oakland Meeting Memo

Mark,

Thank you for your time in meeting with us and our client Patrick Elwood today (Friday, 9/25/15) discussing the proposed redevelopment at 500 Grand Avenue, Oakland, ACEH Case # RO0000391.

The following topics of concern were discussed:

1. Potential soil vapor intrusion concerns in commercial spaces of the proposed building based on residual benzene and total petroleum hydrocarbons as gasoline (TPH-g) concentrations historically detected in soil samples on the southern margin of the subject site along the Grant Avenue sidewalk, and in groundwater samples on the eastern margin of the subject site.; **inclusive of ethylbenzene or other volatile contaminants of concern.**
2. Potential residual volatile organic compound (VOC) concentrations in soil, groundwater or soil vapor from the former waste oil underground storage tank (UST).
3. Potential direct contact or soil vapor human health impact under the adjacent Grand Avenue sidewalk.; **presuming the site can be managed with an SMP for soil and groundwater excavation and disposal management, does contamination reasonably presumed to be present in this area just off the site have the potential to laterally impact the proposed building.**
4. Potential explosion hazards from methane gas intrusion into the proposed building.; **intrusion into the building, or build up beneath the slab to explosive levels due to retardation induced by the slab.**
5. Proposed elevator shaft as a potential vapor intrusion pathway into the upper residential floors of the proposed building.; **I would rephrase the evaluation as a potential vapor intrusion pathway to the building, both commercial and residential, not just the upper floors.**
6. Proposed sub-slab vapor barrier effectiveness in mitigating potential vapor intrusion into the proposed building.; **mainly to clarify and eliminate confusion, consistent with DTSC, ACEH does not recognize a Visqueen plastic moisture barrier to be a vapor barrier.**

AllWest proposes to evaluate each of these concerns within the context and perspective of the State Water Resources Control Board (SWRCB) Low-Threat Underground Storage Tank Closure Policy to determine suitability of site for case closure as a mixed commercial/residential land use site. We will provide our evaluation in a letter style format.

We also propose to prepare and submit a Site Management Plan (SMP) to ACEH which will include site monitoring and site mitigation measures during site redevelopment activities.

Mark, please confirm the above scope of work with edits as need be. We would like to begin immediately.

Thank You,

Len

Leonard Niles, P.G., C.H.G.
Senior Project Manager
AllWest Environmental, Inc.

2141 Mission Street, Suite 100
San Francisco, CA 94110
office (415) 391-2510 x204
fax (415) 391-2008
Leonard@AllWest1.com

