

**From:** [Soo, Kit, Env. Health](#)  
**To:** ["Danny Haber"](#)  
**Cc:** [Bob Clark-Riddell](#); [Ron Scheele](#); ["tweise@aeiconsultants.com"](#); [Veronica Statham](#); [Jeremy Harris](#); [Roe, Dilan, Env. Health](#); [Khatri, Paresh, Env. Health](#)  
**Subject:** RO0003205 - 1919 Market Street, Oakland, CA - Review Comments  
**Date:** Monday, October 24, 2016 4:40:00 PM

---

Dear Mr. Haber,

Alameda County Department of Environmental Health (ACDEH) Staff has reviewed the Site Cleanup Program (SCP) case file for the above referenced site including the *Vapor Intrusion Mitigation System Basis of Design and Operation & Maintenance Plan* (VMIS Report), dated October 17, 2016, which was prepared on your behalf by AEI Consultants, and submitted to ACDEH at our meeting on October 17, 2016 with 1919 Crew and your consultants.

Based on our meeting, ACDEH understands that 1919 Crew would like to start performing foundation related work in the near future and requested review and comment on the VMIS Report to provide input to revisions to the Building Permit Plan Set. In the meeting, 1919 Crew stated that they would upload additional documents for our review by Friday, October 21, 2016. A review of the Geotracker and ACDEH's ftp databases today indicates only the following documents have been uploaded: 1) Phase I Environmental Site Assessment, November 19, 2014, AEI consultants; 2) Phase I Environmental Site Assessment, February 25, 2016, Partner Engineering and Science, Inc.; 3) Additional Subsurface Investigation Report, May 2, 2016, Partner Engineering and Science, Inc.; and 4) Development Plans, December 11, 2015, Jeremy Harris Designs.

As discussed during the meeting, there are multiple activities and reports including site assessment, remediation and mitigation activities that must be approved by ACDEH prior to start of construction activities. A summary of these required activities and associated deliverables are provided below. Please incorporate each of these elements in the construction sequencing plan and schedule:

#### Prior to Start of Foundation Work

The following activities and documents are required to be completed and deliverables uploaded and approved by ACDEH prior to the start of any foundation related work:

1. Fact Sheet, dated October 2016, and Certification of Mailings
2. Vapor Intrusion Mitigation System (VMIS) Design Basis Report
3. Revised Building Permit Plans incorporating VMIS, Soil Vapor Extraction System (SVE) components as appropriate (including and not limited to panels access, location of wells, vent pipes etc.), and trench plug-ins for utilities
4. Site Assessment Report documenting site investigation activities to date. All reports, electronic data in edf/edd format, and all other associated geo\_files (i.e. geo\_bore, geo\_map, geo\_well, etc.) must be uploaded to Geotracker and the ACDEH ftp site.
5. Construction Site Management Plan (SMP) for management of soil and groundwater during

utility trenching, subgrade foundation work and associated activities; profiling of offsite disposal of impacted soil and fill material, characterization of onsite fill ; contingency plans in the event impacted soil is encountered, etc.

6. Work Plan for Additional Site Assessment and SVE Pilot Study

Prior to Building Occupancy

The following activities and documents are required to be uploaded and approved by ACDEH prior to building occupancy:

1. Implementation of Additional Assessment and Pilot Study
2. Corrective Action Plan (CAP) Report documenting the evaluation of the nature and extent of release (s), and the development and implementation of an appropriate corrective measure to protect human health and the environment. The site assessment and pilot study results and findings (as well as the SVE design) must be included in the report.
3. CAP Implementation and effectiveness monitoring (indoor air and soil gas at a minimum)
4. Post Construction SMP. Appendices must include the following, at a minimum:
  - a) Record Report of Construction and As-Builts for VMIS, CAP, trench plugs
  - b) Final O&M Plans (including As-Builts)
  - c) Deed Restrictions
  - d) Tenant Notification & Proposition 65

VMIS Report Comments

The following are some of our general comments on the VMIS Report. We would like to schedule a teleconference call to go over all of our comments in detail:

1. The VMIS report lacks sufficient detail to provide full comment. As mentioned during previous meetings, please refer to the *Vapor Mitigation and Permeable Reactive Barrier Basis of Design Report*, RO0003014 (Former Crown Chevrolet North Parcel, 7544 Dublin Boulevard, Dublin CA) as an example and to get an idea on the level of detail required for the Basis of Design Report. [https://geotracker.waterboards.ca.gov/esi/uploads/geo\\_report/5448496222/T10000001616.PDF](https://geotracker.waterboards.ca.gov/esi/uploads/geo_report/5448496222/T10000001616.PDF)
2. Please revise the report to incorporate the requisite level of detail to support the design and address the following comments:
  - a. Provide a more detailed description of the project background, including site conditions and proposed development, and reference the *Workplan for Site Assessment, Pilot Study and Vapor Mitigation* (please confirm the name and title of this report). Expand on the purpose and scope of the Proposed Additional Site Assessment and Pilot Study.
  - b. Discuss and provide details about the demolition status of the existing building (i.e. extent of slabs and walls that are remaining, and proposed plans for the rest of the

remaining slab and walls).

- c. Discuss and provide details regarding the construction sequencing and phases of the redevelopment project (including but not limited to additional site assessment, SVE pilot study, utility/grade beam trenching, foundation construction [grade beams and slabs], CAP implementation and effectiveness monitoring, VMIS construction, trench plug installation, vertical riser installation, and etc.). Please include report submittals and adequate review time for ACDEH approval.
- d. Discuss that the mitigation system is being installed on the entire footprint of the building as a precautionary measure due to the expedited time line for this project, and that the delineation of the soil gas plume is still in progress and has not been delineated completely. Include a discussion of the phased installation of the VMIS system due to the phased approach of the building construction.
- e. Add a Contingency Section in the O&M Plan for conversion of the system from a passive system to an active system (i.e. use triggers, flow charts, etc.)
- f. Include the following appendices to support the design and to be used as stand-alone documents:
  - i. Construction Quality Assurance (CQA) Plan
  - ii. Draft Operations and Maintenance Plan (O&M, to be finalized later in the Post-Construction SMP, mentioned later)
  - iii. Construction Sequencing Plan
  - iv. Drawings and Technical Specifications
  - v. Design Calculations

**We have limited availability and can only meet from 9 to 10 am tomorrow (Tuesday, 10/25/2016).**

Please let us know as soon as possible whether this works. Otherwise we will have to reschedule for next week.

Thanks, Kit

**Kit Soo, PG**

***Senior Hazardous Materials Specialist***

Alameda County Department of Environmental Health (ACDEH)

1131 Harbor Bay Pkwy

Alameda, CA 94502

Direct - 510-567-6791

[kit.soo@acgov.org](mailto:kit.soo@acgov.org)