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By Alameda County Environmental Health at 3:10 pm, Sep 25, 2013

September 24, 2013

Ms. Karel Detterman  
Alameda County Environmental Health  
1131 Harbor Bay Parkway, Suite 250  
Alameda, California 94502

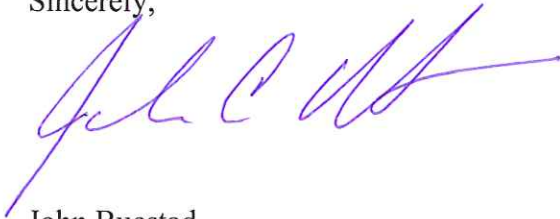
**Subject: Perjury Statement and Report Transmittal**  
1630 Park Street, Parcel B  
Alameda, California 94501  
AEI Project No. 298931  
ACEH RO#0000008

Dear Ms. Detterman:

I declare under penalty of perjury, that the information and/or recommendations contained in the attached report for the above-referenced site are true and correct to the best of my knowledge.

If you have any questions or need additional information, please do not hesitate to call me or Mr. Peter McIntyre at AEI Consultants, (925) 746-6004.

Sincerely,



John Buestad  
President

JB/pm

Attachment: AEI Consultants, *Interim Source Removal Work Plan*

cc: Mr. Peter McIntyre, AEI Consultants, 2500 Camino Diablo, Walnut Creek, CA 94597



September 24, 2013

Karel Detterman  
Hazardous Materials Specialist  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502

**Subject: Interim Source Removal Work Plan**  
Response to Comments  
1630 Park Street, Parcel B  
Alameda, California  
AEI Project No. 298931  
ACEHD Fuel Leak Case No. RO0000008

Dear Ms. Detterman:

AEI Consultants (AEI) has prepared this response to comments on behalf of Foley Street Investments (FSI) developer of the subject site. The comments relate to the September 4, 2013 Interim Source Removal Workplan (ISRWP) and were provided in an email from Alameda County Environmental Health Department (ACEH) on September 12, 2013.

Each of the ACEH comments are provided below (*in italics*) followed by the response.

1. *Soil Vapor Probe reinstallation: One soil vapor probe is proposed to be installed within the excavation backfill, however ACEH notes that soil vapor probes should be installed in native material around the excavation. Please provide the rationale for installing replacement vapor probe(s) just outside the excavation extent but in the building pad footprint.*

The purpose of the soil vapor probes following the source removal is to confirm a reduction in concentrations of contaminants of concern (COCs) after those actions. AEI concurs that the vapor probe may be moved outside of the completed excavation. Due to the requested decommissioning of soil vapor probe SB-5, two replacement probes (SV-13 and SV-14) are tentatively proposed. SV-13 is now proposed outside of the proposed building footprint. Given the fact that development will require abandonment of all probes (existing and proposed) beneath the footprint of the building, AEI recommends that the location and rationale for replacement vapor probes be verified with ACEH and FSI following the excavation and prior to their installation. Please see the attached Figure 1 for revised probe locations.

2. *Proposed cleanup targets for the excavation: Please revise the limits for TPH-g and TPH-d so they are consistent with the May 2013 RWQCB ESLs Summary Table A.*

The cleanup targets proposed in the IWRWP were based on Table C-2 (subsurface soil at commercial/industrial land with groundwater as a potential drinking water resource). The revised proposed targets for TPH-g and TPH-d are based on Table A-1 (surface soil at commercial/industrial land with groundwater as a potential drinking water resource); these revised values are 500 mg/kg for TPH-g and 500 mg/kg for TPH-d. Both values are based on a "ceiling level" driver. The ESL document defines "shallow" soil is that above 10 feet and "deep" soil that below 10 feet. Therefore, the "shallow" soil screening levels are proposed as targets, as requested. However, if after completion of the excavation and review of sample data, residual impact exists that is below 10 feet in depth, the use of "deep" soil ESLs for further decision-making may be more appropriate.

3. *Imported Fill: Please submit a strategy to ensure that fill material is imported to the site in accordance with DTSC's October 2001 Clean Imported Fill Material Information Advisory. Please ensure that the permeability of the fill material is less than or equal to that of the native material to avoid potential groundwater ponding beneath the building in the vicinity of the excavated hydraulic lift.*

Import fill will be evaluated in accordance with the DTSC's October 2001 Clean Imported Fill Material Information Advisory. If fill material is imported from a quarry or similar vendor where fill material is distributed as "virgin" material for use as clean fill, documentation will be obtained from the source that the material is clean. If soil for use as fill material is sourced from another property or project site, such soil will be evaluated in accordance with the Advisory referenced above; this evaluation would include review of site documents (such as Phase I and Phase II report, etc.) and/or collection and analyses of soil samples as outlined in the Advisory.

The excavation will be at the edge of the proposed building and therefore the geotechnical specifications for backfilling are under review by the soils engineer for the development project. Based on the planned development characteristics, the area of this proposed excavation will be covered for the most part with either the building or hard-scape, thereby reducing the likelihood of significant surface water infiltration or "groundwater ponding" in the area of the excavation. The soils engineer will provide guidance on backfill material specifications and expected relative permeability of native and proposed fill soils to address this comment by ACEH. The ACEH will be provided this information in the coming days, prior to mobilization for excavation.

4. *Excavation and Off-Site Disposal Activities: Please describe excavation and off-site removal procedures including, but not limited to, dust control mitigation, truck loading, load tarping, truck routes, truck tire decontamination/cleaning, and traffic control. Additionally provide the details of the "hot-loaded" procedure.*

The "hot-load" procedure simply refers to the method of loading trucks directly during the excavation rather than stockpiling soil at the site. Prior to mobilizing for the excavation, AEI will profile the soil to be removed for acceptance to the landfill. This process is underway and

acceptance is expected by September 26 or 27, 2013. This avoids stockpiling of soils and the expense of stockpile management and double-handling the soil.

Thus, during the excavation, trucks will be loaded directly from the excavator or with the use of a loader. The trucks will leave the site once full and transport the soil for proper disposal at the pre-approved facility. The trucks will be scheduled such that a minimal number of trucks are staged onsite and no trucks will be staged on the street.

At this time, landfill review of soil profile data is underway. Detailed transportation routes can be provided once landfills are chosen based on waste acceptance. The trucks are expected to exit directly onto Park Street and travel northeast on Park Street to Ford Street where they will turn left towards 23<sup>rd</sup> Avenue. The trucks will continue northwest on 23<sup>rd</sup> Avenue until they reach highway 880 where they will continue on to the landfill of choice. The trucks will arrive and leave the site between 7:00 am and 4:00 pm during work days (Monday through Friday). Local traffic is not expected to be significantly impacted by the added truck traffic; on average, roughly only 10 trucks will enter and leave the site during a given day.

All waste transportation activities will be performed in compliance with applicable laws, regulations and ordinances. The hauling contractor(s) used to transport contaminated waste will be fully licensed and permitted by the US EPA and State of California. All Department of Transportation (DOT) and California Highway Patrol (CHP) safety regulations will be followed.

All permitted disposal facilities operate a certified weight station at their facility. As such, each truck will be weighed before offloading its payload. Weight tickets and copies of manifests will be provided for each load from the site.

Fugitive dust and site control measures will be implemented during the remedial excavation; these measures will include:

- Application of water (spraying and misting while excavating, and loading, as needed);
- Limiting vehicle speeds to 5-miles per hour on unpaved portions of the Property;
- Minimizing drop heights while loading/unloading soil;
- Trucks will be tarped or otherwise covered to prevent soil from spilling out of the truck or dust from being generated during off-site transport;
- Prior to exiting the site, the vehicle will be swept to remove any extra soil from non-covered portion of truck;
- Tires will be checked to ensure off-site tracking of soils is minimized; site egress will be swept periodically during and at the end of each days work;
- Wind conditions will be observed throughout soil handing; if excessive winds occur, additional measures may be implemented or the work ceased until winds decrease.

The cleanup/decontamination area will be set up as close to the loading area as possible so as to minimize spreading the impacted soil. Prior to trucks leaving the site, the site manager will be responsible for inspecting each truck to ensure that the payloads are adequately covered, the trucks are cleaned of excess soil and properly placarded, and that the truck's manifest has been appropriately completed and signed.

AEI will update the existing site specific Health and Safety Plan conforming to Part 1910.120 (i) (2) of 29 CFR. Prior to commencement of field activities, a site safety meeting will be held at a designated command post near the working area each day of fieldwork. The Health and Safety Plan will be reviewed and emergency procedures will be outlined at this meeting, including an explanation of the hazards of the known or suspected chemicals of interest. All site personnel will be in Level D personal protection equipment, which is the anticipated maximum amount of protection needed. A working area will be established with barricades and warning tape to delineate the zone where hard hats, steel-toed shoes and safety glasses must be worn, and where unauthorized personnel will not be allowed. The site is currently fenced and access to the public and those not working under the Health and Safety Plan will be limited during this work. The site Health and Safety Plan will be on site at all times during the project.

5. *Groundwater Handling and Disposal: Please provide an estimate of the amount of groundwater to be removed and the number, type, and size of tanks required for disposal.*

Saturated soil is expected to be encountered at 10 to 11 ft bgs, based on previous excavations at the site; groundwater recharge rates have been relatively slow. The excavation will be managed to minimize the amount of groundwater accumulating. During the first phase of excavating, soils will be removed from approximately the top 8 feet of target soil. Then soil will be removed from 8 feet to the target depth, thus exposing saturated soils. Upon completion of the soil removal to the initial target extent, completion of field screening, and collection of confirmation samples, it is planned that drain rock will be placed across the bottom of the excavation while awaiting confirmation soil sample data. This will limit the amount of groundwater that accumulates. The remainder of the excavation will remain open until review of sample data, such that additional excavation can be conducted, if appropriate based on sample data and agree to by FSI and ACEH. Groundwater accumulation will be monitored regularly. A vacuum truck with 4,000-gallon capacity operated by Excel Environmental will be on standby. This represents sufficient capacity for water than may have accumulated in the drain-rock backfill of the smaller prior excavation plus accumulation that may occur prior to drain-rock emplacement. Although not anticipated, if groundwater accumulates faster, a larger temporary water storage tank (such as those provided by Rain-for-Rent) may be mobilized. Any water pumped from the excavation will be transported from the site for proper disposal or recycling. In the event a large amount of water is generated, permits to treat and discharge water locally may be sought. The disposition of any water pumped from the excavation will be appropriately documented.

6. *Confirmation soil sampling and Contingency Plan: The work plan states that the final excavation extents will be based upon the confirmation soil sample analytical results, and if the goals are not met, the excavation will be enlarged as feasible based on proximity to the property line, underground utilities, or other structures. In order to minimize costs due to unnecessary excavation activities and associated backfill, please provide details for conducting additional incremental excavation and/or hot spot removal and step-out sampling. Additionally, please provide SOPs for the collection of confirmation soil samples.*

A determination of additional incremental excavation, or hot spot removal, will be made based on the goal of removing any potentially mobile free product with volatiles. Field decisions will be

made to continue excavation based on PID readings above 100 ppm above background. This is based on indirect evidence for LNAPL as outlined in the "Technical Justification for Low-Threat Closure Scenarios for Petroleum Vapor Intrusion Pathway" document (included for ACEH review as an Appendix to the ISRWP).

The extents of the excavation will be screened by the methods described in the ISRWP. If free product is observed or screening identifies potentially mobile free product, the area may be extended in approximately 3 feet lateral increments. Prior to such expansion of the excavation, screening will be conducted at multiple points in the area of concern to confirm that sufficient impacted soil is present to warrant further removal; field observations and screening data will be documented. Based on extensive site assessment and prior excavation work, vertical expansion is not expected. If possible, the excavator may be used to excavate a small area from the side potentially requiring expansion, such that additional screening and visual inspection of soil can be performed prior to expanding the excavation unnecessarily. If AEI is directed by FSI to expand the excavation, ACEH will be notified by telephone of such a decision and documentation of conditions provided to ACEH as soon as practical.

Excavation soil sample data will be summarized for ACEH and FSI as soon as it is available. It is expected that ACEH staff and FSI will be available on a regular basis during the field work for discussion of the field screening and observations to expedite decision-making in a cost effective manner regarding possible excavation expansion.

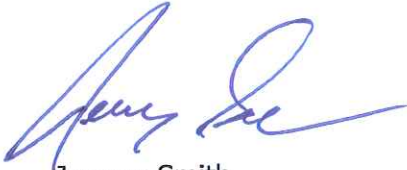
Confirmation soil samples will be collected from undisturbed volume of soil into 3-inch or 6-inch long 2-inch diameter brass or stainless steel sample tubes that will be driven into the soil until completely full. The tubes will be driven utilizing a spoon sample collection device into the soil using a manual sampler (slide hammer or equivalent) or directly with a wooden mallet. The samples will be immediately removed from the split spoon sampler, sealed with Teflon® tape and plastic end caps, labeled with unique identifiers, entered on a chain of custody record, and placed in a pre-chilled cooler on wet ice pending transportation to the laboratory.

The updated schedule is provided below:

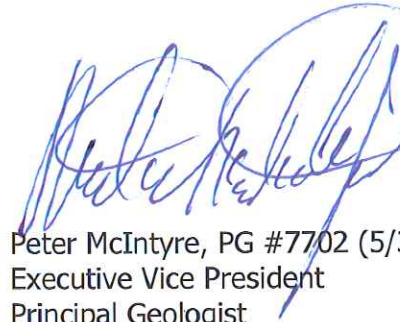
<u>Activity</u>	<u>Anticipated Start Date</u>
<i>Well Abandonment (DPE-5, SV-5, -10, -11)</i>	<i>Completed 9/18</i>
<i>Profiling and coordination</i>	<i>Week of 9/23 (underway)</i>
<i>Mobilization of equipment</i>	<i>9/30</i>
<i>Excavation, Sampling and Backfilling</i>	<i>10/1 to 10/4</i>
<i>Soil Vapor Probe Installation</i>	<i>Week of 10/7</i>
<i>Soil Vapor Sampling</i>	<i>Approximately 2-weeks after installation</i>
<i>Report</i>	<i>Within 30-days of Soil Vapor Sampling</i>

We welcome comments and questions from ACEH staff. Please contact us (925) 746-6000.

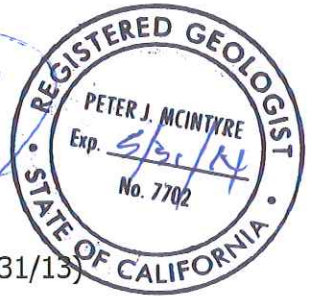
Sincerely,  
**AEI Consultants**



Jeremy Smith  
Senior Project Manager



Peter McIntyre, PG #7702 (5/31/13)  
Executive Vice President  
Principal Geologist



**Attachment:**

Figure 1 – Proposed Soil Vapor Monitoring Point Location

**Distribution:**

John Buestad, Foley Street Investments  
Karel Detterman, Alameda County Environmental Health Department (FTP Upload)  
GeoTracker (Upload)



**LEGEND**

- Vapor Probe
- Proposed Vapor Probe
- 2012 Excavation
- Proposed Excavation
- Parcel Split
- Proposed Building Extents
- H Former Hydraulic Lift
- L Former Hydraulic Lift

DRAFTED BY JAS 3-2-12  
REVISED BY JAS 8-12-13

<b>AEI CONSULTANTS</b> 2500 CAMINO DIABLO, WALNUT CREEK	
<b>PROPOSED SOIL VAPOR MONITORING POINT LOCATION</b>	
1630 PARK STREET ALAMEDA, CALIFORNIA	<b>FIGURE 1</b> PROJECT NO. 298931

0 15 30

Scale: 1" = 30'