## ALAMEDA COUNTY **HEALTH CARE SERVICES**

AGENCY





DAVID J. KEARS, Agency Director

April 26, 2001

**ENVIRONMENTAL HEALTH SERVICES** ENVIRONMENTAL PROTECTION 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

Mr. Mark Gomez City of Oakland Environmental Services Division 250 Frank H. Ogawa Plaza, Suite 5301 Oakland, California 94612

Subject:

**Proposed Preservation Park Development** 655 12th Street, Oakland, CA 94612

(STID # 6704) (RO#0000183)

Dear Mr. Gomez:

The Alameda County Department of Environmental Health Services (ACDEHS) has reviewed the following reports submitted for the subject site:

- Risk Management Plan for Preservation Park Residential Redevelopment dated April 2, 2001, prepared by SCI and received on April 12, 2001
- Soil / Groundwater Investigation and Tier 3 RBCA Evaluation dated April 2, 2001, prepared by SCI and received on April 12, 2001
- Fax copy of site map for Shorenstein Parcel T12 submitted by SCI on April 25, 2001

The referenced reports were submitted to address the issues listed in our letter dated February 6, 2001 regarding the proposed development of the subject site.

Results of the recent groundwater investigation which included the installation of three temporary monitoring wells (TW 1, TW2 and TW3) showed that groundwater contamination appeared to be limited on-site. Data collected from three monitoring wells on the Shorentein Parcel T12 (located approximately 50 feet east of the subject site) were used to establish groundwater flow direction in the area.

Based on the review of all the reports submitted to date for the subject site, the presence of residual contaminants in soil and groundwater at the site do not pose a risk to future on-site residents as proposed in the development plan. Therefore, the proposed development plan is acceptable, groundwater monitoring is not required and the site can be evaluated for closure. Please notify our office as to who will be responsible for implementing the risk management plan at the site. In addition, a report should be submitted following completion of the development of the site and should include at a minimum copies of any soil and/or groundwater disposed off site, results of any additional sampling, etc. Prior to issuance of a "no further action" letter, a long-term risk management plan for the site is required. The long-term risk management plan should include at a minimum the following:

- The human health risk assessment should be re-evaluated if land use change to a more conservative scenario (i.e. day care center, school, residential units with back yard scenario, etc.).
- Shallow groundwater should not be used at the site.
- 3. Health and safety plan for future construction workers such as utility workers who maybe exposed to residual contaminants left at the site.

Mr. Mark Gomez RE: Proposed Preservation Park Development April 26, 2001 Page 2 of 2

Please notify our office when construction activities will begin at the subject site.

Regional Water Quality Control Board (RWQCB) staff has reviewed this letter and concur with the contents of the letter.

If you have any questions about this letter or the subject site, please contact me at (510) 567-6780.

Sincerely,

Susan L. Hugo Acting Supervisor

Hazardous Materials Specialist

c: Jerry Brown, Mayor, City of Oakland
Mee Ling Tung, Director, Environmental Health Services
Ariu Levi, Chief, Environmental Health Services
Chuck Headlee, San Francisco Bay RWQCB

Hernan Gomez, Oakland Fire Services

Glenn Young, SCI, 3736 Mt. Diablo Blvd., Suite 200, Lafayette, CA 94549

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DAVID J. KEARS, Agency Director

February 6, 2001

Mr. Mark Gomez City of Oakland Environmental Services Division 250 Frank H. Ogawa Plaza, Suite 5301 Oakland, California 94612

ENVIRONMENTAL HEALTH SERVICES **ENVIRONMENTAL PROTECTION** 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502-6577 (510) 567-6700 FAX (510) 337-9335

Subject:

Proposed Preservation Park Development 655 12th Street, Oakland, CA 94612

(STID # 6704)

Dear Mr. Gomez:

The Alameda County Environmental Health Services (ACEHS) has reviewed the following reports submitted for the subject site:

- Draft Soil Investigation and Tier 3 RBCA Evaluation Report dated September 7, 2000 prepared by SCI
- Phase II Environmental Site Assessment Summary Report (1998) prepared by Tetra Tech
- Soil Contamination Assessment Report dated June 17, 1991 prepared by SCI

It is my understanding that the subject site will be developed into a two-to-four story, 92-unit residential structure with a first level parking garage below grade.

Results of soil samples collected at the site identified the presence of the following maximum concentrations of chemicals of concern (COC): 598 parts per million (ppm) total lead; 4,000 ppm total petroleum hydrocarbon (TPH) as gasoline; 1,800 ppm TPH as diesel, 82 ppm total oil and grease (TOG); 280 parts per billion (ppb) chlorobenzene; 330 ppb 1,2 dichloroethane, 3.2 ppm benzene, 26 ppm toluene, 19 ppm ethyl benzene and 156 ppm xylene. Heavy metals (barium, cadmium, chromium, cobalt, copper, mercury, nickel, vanadium, and zinc) were detected at low levels and similar to background concentrations found in the area. Groundwater samples collected at the site showed the following maximum concentrations of COCs: 430 ppb lead; 33,000 ppb TPH as gasoline; 17,000 ppb TPH as diesel; 350 ppb benzene; 1,800 toluene; 640 ppb ethylbenzene and 4,700 ppb xylene. Low levels of dichloroethane and trimethylbenzene were also detected in groundwater.

Based on the review of the referenced reports, the subject site is a strong candidate for regulatory closure and can be developed. However, the following issues must be addressed prior to development of the site and subsequent issuance of a "no further action" letter:

- 1. A short term "construction" risk management plan should be submitted for the site and should include, at a minimum, the following elements - acceptable health and safety plan for construction workers, soil management plan, groundwater management plan (if applicable), dust control and stormwater run-off control, and the person(s) responsible for implementation of the plan.
- 2. A contingency plan should be prepared for the site. The plan should include steps to be taken in the event that an unexpected or unusual condition is encountered during construction activities at the site. This should include additional soil and/or groundwater sampling if abandoned tanks and associated pipings, hot spots and unknown contamination are encountered unexpectedly. A flowchart of steps to be taken should be included, along with the person(s) responsible for implementation of the contingency plan.
- 3. A development plan for the site should be submitted. The plan should include, at a minimum, the following items: description of the project, site map with location of proposed buildings, landscaping, basements, underground garages, utility lines, and extent of excavation associated with construction activities at the site.

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- 4. A site map should be submitted showing all the samples (soil and groundwater) collected at the site, including depths at which samples were collected.
- 5. The Tier 3 human health risk assessment should be revised to include data collected by SCI in 1991 and to reflect the change in excavation depth from 6 feet to 8 feet.
- 6. Underground storage tanks (USTs) were reportedly removed at the site. Laboratory reports should be submitted confirming the assertion that no methyl tertiary butyl ether (MTBE) has been detected on site. If lab reports are not available, confirmation samples should be collected.
- 7. If residual levels of contaminants to be left at the site pose a risk to future maintenance workers such as utility workers who may be exposed to them, institutional control should be in-place by entering and flagging the site in the City of Oakland Permit Tracking System.
- 8. Additional soil and or groundwater samples may be required if hot spots or unknown contamination is discovered during construction activities at the site. Results of confirmation samples should be evaluated and should meet the cleanup goals developed for the site.
- 9. The extent of groundwater plume must be adequately defined prior to evaluating the site for closure as a low risk soil and /or groundwater case.
- 10. A report should be submitted after completion of the subsurface construction and should include, at a minimum, copies of any manifests for soil and/or groundwater disposed off site and results of any additional soil and/or groundwater sampling conducted during construction.

A work plan addressing the above listed issues should be submitted to and approved by this agency prior to development of the subject site.

If you have any questions about this letter or the subject site, please contact me at (510) 567-6780.

Sincerely,

Susan L. Hugo Acting Supervisor

Hazardous Materials Specialist

Hugo

c: Ariu Levi, Chief, Environmental Health Services
 Chuck Headlee, San Francisco Bay RWQCB
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