

From: [Kalve, Erica](#)
To: [Wickham, Jerry, Env. Health](#)
Cc: [Tan, Angeline](#); [Tim Simon \(Tim.Simon@aspirepublicschools.org\)](mailto:Tim.Simon@aspirepublicschools.org); [Santos, Carmen](#)
Subject: RE: Building 300 Construction - Submittal of Air Monitoring Plans and Request for Well Abandonment (Case Number RO411)
Date: Wednesday, March 04, 2015 11:39:13 AM
Attachments: [BMP for Dust Control.pdf](#)
[Draft BAAQMD CEQA Guidelines May 2010 Final.pdf](#)

Hi Jerry,

Thank you for looking at the plan so quickly! Please see below for answers to your questions in black font. As discussed below, we will update the Plan to incorporate these revised action levels and response actions. We will hopefully get that out to you this afternoon. Please let us know if you have any additional questions or comments you would like to discuss after you review these responses.

Thank you again for your prompt review of the Plan.

Sincerely,
Erica

Please note my new contact information is provided below.

Erica Kalve, PG | Senior Geologist | erica.kalve@arcadis-us.com

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From: Wickham, Jerry, Env. Health [mailto:jerry.wickham@acgov.org]
Sent: Tuesday, March 03, 2015 7:10 PM
To: Kalve, Erica
Cc: Tan, Angeline; Tim Simon (Tim.Simon@aspirepublicschools.org); Santos, Carmen
Subject: RE: Building 300 Construction - Submittal of Air Monitoring Plans and Request for Well Abandonment (Case Number RO411)

Hello Erica,

The proposed schedule of submitting the Building 300 Vapor and Indoor Air Monitoring Plan by March 20, 2015 is acceptable.

Proper destruction of the five soil vapor monitoring points that are located within the footprint of proposed building 300 is acceptable.

I have started review of the Building 300 Construction Air Monitoring Plan but have some larger questions regarding the air monitoring and dust suppression:

- 1) The Plan seems to propose one action level based on PCBs. This is a derived chemical-specific level but is not necessarily a good action level. Are there other conditions for air

monitoring or dust control placed on the site by the permits for construction or other government agencies? Are there other standards that would be applied?

The Plan presents the calculation of action levels for several constituents. The final action level was chosen as the lowest of all the calculated action levels and that was based on the concentration of PCBs in soil.

This project was subject to CEQA and they obtained a conditional use permit for the development of the site. As such, we have imposed on the contractors the requirement to follow the Bay Area Air Quality Management District (BAAQMD) Basic Construction Mitigation Measures, which are recommended for all proposed projects regardless of whether or not the project emissions would exceed applicable thresholds of significance. There are two copies of the control measures, one published in the 1999 document (this is still the most applicable reference document for CEQA purposes) and the more recent Air Quality Guidelines (BAAQMD 2010) which contains additional measures that will be implemented (see attached). In addition to these control measures, as stated in the Cap Modification Addendum dated December 4, 2014 (ARCADIS 2014), we will be placing excavated material into plastic-lined roll-off bins equipped with lids to prevent dust emissions, or loading the material onto trucks for immediate hauling. Also, as discussed, we will have a privacy barrier installed on the fence to add an additional physical barrier for dust control.

Based on our conversation this morning, we will update the plan to incorporate the California Ambient Air Quality Standards which are protective of health. We will update the Plan to incorporate the PM₁₀ criteria for the daily dust action level of 0.050 mg/m³. To ensure that we are below this level on a daily basis, we will plan to maintain levels below 0.250 mg/m³ over any 10-minute average.

- 2) Is there only one action level proposed for the site? Dust suppression is often implemented in stages such that work is slowed down or specific dust suppression activities are implemented prior to reaching an action level. The Plan seems to propose only one action level for halting work and consulting USEPA.

We plan to use the lowest action level for the site and there will only be one final action level proposed that must be maintained. We will be implementing dust suppression measures in accordance with the attached BAAQMD guidelines. As described above, we will update the dust action levels based on the California Ambient Air Quality Standards which are well below the calculated levels for constituents of potential concern at the site. Therefore, these levels will be protective of the sensitive receptors at the Site. In response to these action levels, ARCADIS will recommend increased dust suppression activities and ARCADIS will notify ACEH and USEPA of any exceedance of these action levels.

- 3) The action level seems to be 6.5 mg/m³ for dust, which is increased by a factor of five based on a reference to ASTDR. Would this mean an active level of 32.5 mg/m³ for PM₁₀ to halt work? This would clearly be an unacceptable level as the California OSHA PEL for dust (not chemical-specific) is 10 mg/m³ on a time-weighted average and would be applied in the work area.

The extrapolation you presented is correct and is based on an instantaneous reading at any given time. However, we agree that this 5x's the action level is too high. We will respond if dust levels are above the revised action levels proposed under the answer to question 1.

- 4) Would the proposed action level be applied at the fenceline for the building or in the work area?

The proposed action level will be applied at the fenceline of the work area.

Regards,

Jerry Wickham

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From: Kalve, Erica [<mailto:Erica.Kalve@arcadis-us.com>]

Sent: Tuesday, March 03, 2015 5:31 PM

To: Wickham, Jerry, Env. Health

Cc: Tan, Angeline; Tim Simon (Tim.Simon@aspirepublicschools.org)

Subject: Building 300 Construction - Submittal of Air Monitoring Plans and Request for Well Abandonment (Case Number RO411)

Dear Jerry,

The Building 300 Construction Air Monitoring Plan (Plan) for the Former Pacific Electric Motors Site 1009 66th Avenue, Oakland, California; Alameda County Environmental Health (ACEH) Fuel Leak Case Number RO0000411 ("the Site") was uploaded to the ACEH ftp site and Geotracker today. This submittal presents the Building 300 pre-construction soil sampling results and air monitoring locations to be used during construction and is intended to meet the requirements of the first technical report described in the conditional approval for the Vapor Mitigation System Design dated January 8, 2015. Please let us know if you have any questions or would like to discuss the proposed dust and air monitoring locations and action levels.

Note that Aspire would like to begin construction as early as this Saturday, March 7th. ARCADIS is prepared to set up the air monitoring stations on Friday, March 6th, and initiate air monitoring activities on March 7th, in accordance with the attached air monitoring plan. The building construction completion date is currently estimated for October 5, 2015.

Additionally, as we discussed last week, we are working on the Building 300 Vapor and Indoor Air Monitoring Plan and will submit it as soon as possible for ACEH review and approval. If possible, we would like to request an extension for submittal by March 20, 2015. As required, the plan will describe the indoor air monitoring that will be completed and reported to ACEH prior to occupancy

of the building.

Finally, we request your permission to properly abandon the five soil vapor monitoring points (SVP-1 through SVP-5) that are currently located within the footprint of proposed building 300 (shown on the attached Figure 2). Once building 300 is constructed (including installation of the vapor mitigation system), soil vapor monitoring will no longer be needed in this portion of the site. Long-term monitoring of the building 300 vapor mitigation system will be presented in the Building 300 Vapor and Indoor Air Monitoring Plan to be submitted as soon as possible.

Thank you very much for your time and assistance with this project.

Sincerely,
Erica

Please note my new contact information is provided below.

Erica Kalve, PG | Senior Geologist | erica.kalve@arcadis-us.com

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