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FAX Transmittal

Date: 6-12-03 *FAX Number:* 337-9335

To: EVA CHU

Organization: Dept of ENVIRONMENTAL HEALTH

Address: _____ *Dept./Floor:* _____

City: _____ *State/ZIP:* _____

Document Name: RESPONSE TO COMMENTS - TR-7305

From: ANDY YOUNG *Total Pages Including Cover:* 12

Message

EVA -

PLEASE REVIEW THESE RESPONSES TO THE COMMENTS. I STILL HAVE TO CHECK THEM MYSELF - BUT THEY LOOK PRETTY GOOD.

WE WOULD LIKE YOU TO GIVE US ~~A~~ A LETTER INDICATING THAT YOU CONSIDER THE FOLLOW-UP INVESTIGATION, AND THE RESPONSE TO THE COMMENTS, TO BE FULLY RESPONSIVE (IF SO) AND THAT ALL DEPT. OF ENV. HEALTH CONCERNS HAVE BEEN MET.

If you do not receive all pages or if they are not legible, please call us at the above number.

PLEASE CALL ME LATER TODAY at 56555

Andy

northgate
environmental
management, inc.

June 11, 2003

Mr. Andrew Young
Alameda County Community Development Agency
Development Planning Division
224 West Winton Avenue, Room 111
Hayward, California 94544

Re: Response to comments on the Phase I Environmental Site Assessment
& Surface and Subsurface Environmental Site Assessment Reports
Vesting Tentative Map, Tract 7305

Dear Mr. Young:

As requested in your letter dated June 9, 2003, Northgate Environmental Management, Incorporated (Northgate), has prepared responses to the comments on the above-referenced reports attached to the September 21, 2001 letter from Mr. Dave Sadoff and Ms. Cindy Barclay. The responses are based on our review of the reports prepared by Terrasearch, Inc., titled *Phase I Environmental Site Assessment on Proposed Residential Development, 4605, 4611, and 4643 Malabar Avenue, Castro Valley, California* dated September 27, 2000 and *Surface and Subsurface Environmental Assessment on 4605, 4611, and 4643 Malabar Avenue, Castro Valley, California* dated November 3, 2000; information collected by Northgate through interviews with the property owner and others; and the results of additional sampling and testing performed at the site by Northgate in response to a request for additonal information received from the Alameda County Health Services Agency. The results of Northgate's additional investigation are summarized in a report titled *Environmental Investigation Report, Malabar Avenue Property (Tract 7305), Castro Valley, California*, dated June 4, 2003.

Please don't hesitate to call if you have any questions or require additional information.

Sincerely,

Northgate Environmental Management, Inc.

Dennis Laduzinsky, C.E.G./R.E.A.
Associate

Attachments: Response to Comments

Responses to Comments on Phase I Environmental Site Assessment on Proposed Residential Development, 4605, 4611 and 4643 Malabar Avenue, Castro Valley, California, for Delco Building and Developers" by Terrasearch, Inc., September 27, 2000

Comment No. 1 - Section 2.3

The source of the information on the depth to groundwater presented in the Phase I report is not documented in the report. The current depth to groundwater at the site is not known.

Comment No. 2 - Section 2.4

According to Mrs. Marie Alcorn, owner of the site, the concrete slab situated south of the smaller shed was previously used as a carport.

Comment No. 3 – Section 3.1

The comment is noted.

Comment No. 4 – Section 3.1

The comment is noted.

Comment No. 5 – Section 3.1

According to Mrs. Marie Alcorn, owner of the site, scattered apricot trees were present on the site when her parents purchased the site in 1929. However, the site was never operated as an orchard during the time her family owned the site. If evidence of an orchard is present in photographs of the site from 1953 and 1959, it may pre-date ownership of the site by the Alcorns in 1929.

Comment No. 6 Section 3.1

According to Mrs. Marie Alcorn, owner of the site, the concrete slab situated south of the smaller shed was previously used as a carport. According to Mrs. Alcorn, there never were any pesticide storage areas on the site.

Comment No. 7 – Section 3.1

The possible presence of landslides or former stream channels should be addressed as part of the geotechnical evaluation of the site.

Comment No. 8 – Section 3.4

The comment is noted.

Comment No. 9 – Section 3.4

Mrs. Alcorn was interviewed by Northgate regarding the history of the site in May 2003. According to Mrs. Alcorn, a neighboring resident (Mr. Jesse Glenn) was allowed to use the southern portions of the site to grow crops for resale at a roadside stand for a brief period about 20 years ago. This report generally agrees with the short-term appearance of agriculture observed in the aerial photographs of the site as indicated in the Phase I report. According to Mrs. Alcorn, there was never any commercial agriculture at the site, aside from previous chicken ranching, and the limited use noted above.

Northgate also interviewed Mr. Glenn regarding agricultural practices at the site. Mr. Glenn stated that he grew corn and other crops on the site for approximately seven years in the 1980s. Mr. Glenn stated that he used horse manure for fertilizer, and did not use pesticides during his use of the site.

Comment No. 10 – Section 3.4

Northgate interviewed Mrs. Alcorn regarding the presence of leach fields on the property. According to Mrs. Alcorn, a septic tank and leach field are present on the site associated with the cabin located on the western portion of the property. No other leach fields are known to be present.

Comment No. 11 – Section 4.1

According to Mrs. Marie Alcorn, owner of the site, pesticides were not stored or used at the site during her family's ownership.

Comment No. 12 – Section 4.1

The Phase I report does not indicate that the northern portion of the site was used as an orchard. Therefore, the report does not identify the possible use of pesticides on an orchard in the northern portion of the site as a potential contamination source. However, at the request of the Alameda County Health Services Agency, Northgate analyzed eight shallow soil samples collected from the northern portion of the site for organochlorine and organophosphorous pesticides. None of the samples contained pesticide compounds above the laboratory method reporting limits.

Comment No. 13 – Section 4.1

According to Mrs. Marie Alcorn, owner of the site, the fuel tank and the dispenser were located together at the site. There are no known diagrams, plans, or other information available that might indicate otherwise.

Comment No. 14 – Section 4.1

Northgate contacted the Alameda County Fire Prevention Office (ACFPO) for information regarding USTs or other hazardous material storage at 4605, 4611, and 4643 Malabar Avenue in Castro Valley. According to Deputy Fire Marshall Ed Laudani, the ACFPO does not maintain any files for addresses at the subject site.

Comment No. 15 – Section 4.1

Terrasearch did not consider the possible presence of a leach field associated with a residence at the site to represent a significant environmental concern. In Northgate's opinion, it is not necessarily standard practice to identify leach fields associated with a residence as a primary contamination concern, as indicated in the comment.

Comment No. 16 – Section 4.1

As noted in the comment, no swimming pools are known to exist at the site. The reference to the presence of asbestos-containing materials "observed wrapped around the boilers beneath the larger swimming pool" appears to be incorrect.

Comment No. 17 – Section 4.2

The VISTA Site Assessment Report listed the property at 8410 Pepper Street as having an underground fuel storage tank. However, the property is not listed as the site of a known fuel release. As there is no contamination documented at the property, Terrasearch concluded that potential impact to the subject site from this property was highly unlikely, and no additional investigation was performed.

Comment No. 18 . Section 5

The information that the UST was removed in the 1960s comes from Mrs. Marie Alcorn, owner of the site. There is no other information for the site regarding the presence or removal of USTs available at the County Fire Protection Office, the County Health Services Agency, or the Alameda County Department of Public Works – Planning and Building Departments.

Comment No. 19 – Section 5

It appears that the reference to an orchard in this portion of the report actually refers to the row crops in the southern portion of the site, as the subsequent recommendations for sampling and analysis to evaluate potential impacts are limited to the southeast and southwest portions of the site. However, Northgate's subsequent investigation did include an evaluation of the possible presence of pesticides in shallow soil on the northern portion of the site that included collection of eight shallow soil samples, with analysis for organochlorine and organophosphorous pesticides. Pesticides were not reported present in any of the samples.

Comment No. 20 – Section 5

In general, shallow groundwater in unconfined aquifers can be assumed to flow in the general direction of surface topography; in this case, toward the south or southwest. However, local variations in flow direction can be present due to a variety of factors. Applying this commonly accepted hydrogeologic assumption to the approximate location of 8410 Pepper Street shown on the VISTA Site Assessment Report suggests that it would generally be located upgradient of the subject site. As Pepper Street is relatively limited in extent, this is a reasonably conservative assumption for almost any address located along Pepper Street.

Comment No. 21 – Section 5

The report does not indicate that the northern portion of the site was ever used as an orchard, and therefore does not recommend collecting soil samples in this area. However, Northgate's subsequent investigation did include an evaluation of the possible presence of pesticides in shallow soil on the northern portion of the site. Northgate's investigation included the collection of eight shallow soil samples from the northern portion of the site, with analysis for organochlorine and organophosphorous pesticides. Pesticides were not reported present in any of the samples.

Comment 22 – Section 5

According to Mrs. Marie Alcorn, owner of the site, the fuel dispenser was located immediately adjacent to the UST. The soil and groundwater sample location recommended by Terrasearch is adequate for investigation of the former UST and associated fuel lines and dispenser.

Comment 23 – Section 5

Collection of soil samples in the vicinity of leach fields on the property is not discussed or recommended in the report because Terrasearch did not identify the presence of a leach field as a significant environmental concern. In our opinion, the presence of a septic tank and leach field associated with a residential structure at the site is not a significant environmental concern, and sampling does not appear warranted.

Comment 24 – Section 5

According to Mrs. Marie Alcorn, owner of the site, pesticides were never used or stored at the site. Therefore, the report does not include recommendations for soil sampling at former pesticide storage areas.

Comment 25 – General Comments

The location of the site is misidentified on Figure 1, Site Vicinity Map. However, the site is correctly located on the Vista Site Assessment Report attached to the report. The correct location of the site will be indicated on all subsequent Site Vicinity Maps.

Comment 26 – General Comments

The caption for Site Photographs, Figure 3B, is incorrect. The caption should read "Small shed and cabin, view to west".

Response to Comments Regarding "Surface and Subsurface Environmental Site Assessment, 4605, 4611 and 4643 Malabar Avenue, Castro Valley California" by Terrasearch, Inc., November 3, 2000

Comment No. 27 – Section 1.1

Additional soil samples have been collected and analyzed for organophosphorous pesticides subsequent to the report. As described in Northgate's June 4, 2003 *Environmental Investigation Report*, 16 soil samples collected within one foot of the ground surface across the northern and southern portions of the site did not contain organophosphorous pesticides above the laboratory method reporting limits.

Comment No. 28 – Section 1.1

According to Mrs. Marie Alcorn, owner of the site, there were no pesticide storage areas on the site.

Comment No. 29 – Section 1.1

According to Mrs. Marie Alcorn, owner of the site, a septic tank and leach field are located on the northwestern portion of the property, associated with a residential cabin at the site. Whereas the identification of septic tanks and leach fields may be standard practice for environmental assessments, collection and analysis of samples from leach field areas is not. In our opinion, septic tanks and leach fields associated with residential structures do not represent a significant environmental concern, and sampling in the leach field area is not recommended.

Comment No. 30 – Section 1.1

According to Mrs. Marie Alcorn, owner of the site, the fuel dispenser was located immediately adjacent to the former UST. There is no information available to indicate otherwise. In our opinion, the sampling and analysis performed to date by Terrasearch and Northgate is adequate to evaluate potential releases from the piping and fuel dispenser associated with the former UST at the site.

Comment No. 31 – Section 1.2

The location of the former UST was identified in the field by Mrs. Marie Alcorn, owner of the site. As stated in the Terrasearch report, soil boring B-2 "..was drilled in the immediate vicinity of the former gasoline UST.." In addition, Northgate collected soil samples from two borings drilled in the same general area. One boring was drilled at the exact location identified by Mrs. Alcorn as the location of the former UST, and the second boring was drilled approximately 25 feet southwest of the identified former UST location. At the area identified by Mrs. Alcorn as the location of the former UST, a shallow depression was present that could represent settlement in a loosely filled excavation such as might occur at the location of removed UST. The boring at this location encountered what appeared to be old fill material, including fragments of red clay pipe, to a depth of about four feet, where hard bedrock was encountered. The presence of the fill could be related to backfilling the excavation following removal of the UST.

Comment No. 32 – Section 1.2

We agree that collecting groundwater samples in the vicinity of a former UST is consistent with current standard environmental assessment practices. However, as indicated in Terrasearch's November 3, 2000 report, drilling became very hard at five feet below the ground surface due to the presence of bedrock, and drilling activities ceased. Similar conditions were encountered in the subsequent borings advanced by Northgate, and Northgate's borings could not be advanced beyond depths of about 9 to14 feet. As groundwater was not encountered within 14 feet of the ground surface, samples could not be collected. In our opinion, appropriate efforts, consistent with generally accepted environmental assessment procedures, have been made to collect groundwater samples in the vicinity of the former UST.

Comment No. 33 – Section 1.2

According to Mrs. Marie Alcorn, owner of the site, the UST was removed from the ground sometime in the 1960s. Whereas geophysical instrument search methods are an available, but not required, method of providing additional information on the possible presence of abandoned in-place USTs, available information indicates that the UST at the site was not abandoned in-place.

Comment No. 34 – Section 3.1

Additional soil sampling was subsequently performed on the northern portion of the site to evaluate potential pesticide impacts related to the possible presence of orchards. As presented in Northgate's June 4, 2003 report, eight soil samples collected within one foot of the ground surface on the northern portion of the site did not contain organochlorine pesticides or organophosphorous pesticides above the laboratory method reporting limit.

Comment No. 35 – Section 3.1

The report indicates that the sample collection depths are approximate. Information in the report indicates that the soil samples were generally collected within the upper foot of soil at the site, which is consistent with standard practice for evaluating the possible presence of pesticides in shallow soil related to previous agricultural land uses.

Comment No. 36 – Section 3.1

In our experience, the highest concentrations of residual pesticide compounds at former agricultural sites are found within the upper foot of soil, unless buried by subsequent grading or filling. Whereas tilling and percolating rainwater may allow migration of pesticides to greater depths, they do not completely remove the pesticides from the surface soils. In accordance with generally accepted practice, the absence of pesticide compounds in samples collected from the upper foot of soil is sufficient to demonstrate the likely absence of pesticides in deeper soil; especially at a site such as this that has not been subjected to a long history of intense agricultural use.

Comment No. 37 – Section 3.1

Given the presence of hard bedrock at a depth of about four to five feet at the Malabar Avenue site, five feet may in fact be a likely depth for the bottom of a small-diameter UST. If soil borings cannot be readily drilled due to hard bedrock, excavation for a UST may have been equally difficult, and it is entirely reasonable that the UST may have been buried at a relatively shallow depth.

Comment No. 38 – Section 3.1

The soil sample collected by Terrasearch was analyzed for the possible presence of petroleum hydrocarbons at a laboratory certified by the California EPA to perform such analyses. The sample did not contain petroleum hydrocarbons above the laboratory method-reporting limit. Whereas a field instrument such as an organic vapor detector can be a helpful tool in qualitative screening of soil samples in the field, particularly in helping decide which soil samples to submit to the laboratory for analysis, its use at the Malabar Avenue site would be of limited benefit given that the borings could not be advanced beyond a depth of about five feet. The absence of a field-screening instrument does not constitute a significant concern.

Comment No. 39 – Section 3.1

According to Mr. James Yoo of the Alameda County Public Works Agency, no drilling permit applications are on file for the Malabar Avenue addresses comprising Tract 7305 related to any drilling performed by Terrasearch.

Comment No. 40 – Section 4.1

The comment is noted.

Comment No. 41 – Section 4.2

None of the surficial soil samples that have been collected at the site have been found to contain organochlorine or organophosphorous pesticides above the laboratory method reporting limits. In our opinion, additional sampling is not required at this site, based on these results. Interviews with the property owner indicate that pesticides were never stored at the site. Therefore, no pesticide storage area samples are required. Deeper soil samples are not required because pesticides were not detected in the surficial samples. Finally, soil sampling is not recommended in the area of the leach field associated with the residential cabin on the site as there is no indication that the site was used in a manner that would be likely to result in the discharge of chemicals to the septic system at the cabin.

Comment No. 42 – Section 4.3

In our experience, naturally occurring background concentrations of metals do not vary significantly between Santa Clara County and Alameda County, unless the site is underlain by unique bedrock units (such as the Franciscan Complex), which is not the case at the Malabar Avenue site. However, background concentrations of metals in soils at a site in Alameda County presented by Lawrence Berkeley National Laboratory (Protocol for Determining Background Concentrations of Metals in Soil at Lawrence Berkeley National Laboratory (LBNL), 1995) indicated an average background concentration of about 9 to 31 parts per million (ppm) for arsenic, 9 to 21 ppm for lead, and 0.3 to 0.6 ppm for mercury. The concentrations of metals reported by Terrasearch are less than or equal to these background concentration ranges.

Comment No. 43 – Section 4.4

The location of the former UST was identified in the field by the owner of the site, Mrs. Marie Alcorn. According to Mrs. Alcorn, the fuel dispenser was located immediately adjacent to the former tank. No other information is available regarding the location of the former UST. In our opinion, the sampling and analysis performed to date by Terrasearch and Northgate is adequate to evaluate potential releases from the piping and fuel dispenser associated with the former UST at the site.

Comment No. 44 – General Comments

As the Terrasearch report was prepared for a private owner as part of a due diligence evaluation to investigate potential contamination issues for a real estate transaction, and not under an order from a government regulatory agency, there is no specific requirement to include borehole lithologic logs in their report. A detailed description of the materials encountered in the borehole is presented in Section 3.1 of the report.

Comment No. 45 – General Comments

As indicated in Terrasearch's November 3, 2000 report, drilling became very hard at five feet below the ground surface due to the presence of bedrock, and drilling activities ceased. Similar conditions were encountered in the subsequent borings advanced by Northgate, and Northgate's borings could not be advanced beyond a depth of about 14 feet. As groundwater was not encountered within 14 feet of the ground surface, samples could not be collected. In our opinion, appropriate efforts, consistent with generally accepted environmental assessment procedures, have been made to collect groundwater samples in the vicinity of the former UST at the site.

Comment No. 46 – General Comments

The reference to 24462 and 24506 Fairview Avenue, Hayward, California on Table 1 appears to be in error. However, review of the laboratory analytical reports included as Appendix A indicates that the chemical test results presented on Table 1 are for soil samples collected on Malabar Avenue in Castro Valley.

Comment No. 47 – General Comments

It is sometimes the case that scaled site plans are not available during investigations of this type. The sampling locations are adequately defined based on the information presented on the figures and in the text of the report.

Comment No. 48 – General Comments

It is not uncommon to encounter interferences that cause laboratory reporting limits to be raised on soil samples analyzed for organochlorine pesticide compounds. The raised reporting limits for the Sample 3 pesticide analysis is typical of the types of interferences encountered. In our opinion, the reporting limits for Sample 3 are not raised "substantially" as indicated in the comment. As the test results for 11 other samples collected at the site by Terrasearch and Northgate did not indicate the presence of organochlorine pesticide compounds at lower reporting limits, it is unlikely that Sample 3 contains pesticide compounds at levels of concern.

Comment No. 49 – General Comments

The chain of custody record attached in Appendix A indicates that ice was not present in the ice chest that contained sample B2-4 when the sample was submitted to the laboratory. However, the report text indicates that the sample was placed in a "pre-chilled ice chest for temporary storage". The reason for this discrepancy is not known. However, it should be noted that the chain of custody record indicates that the sample was collected at 9:00 AM, delivered to the laboratory at 10:45 AM, and analyzed that same day. Thus, if even if the sample was not immediately stored on ice, the short time period between collection and delivery to the laboratory would tend to minimize potential

impacts to the sample. In addition, the subsequent sampling performed by Northgate did not indicate the presence of significant environmental concerns in the vicinity of the former UST.