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October 8, 2013

Mr. Brian Waite
Chevron Environmental Management Co.
6101 Bollinger Canyon Road
San Ramon, CA 94583
(Sent via electronic mail to:
BWaite@chevron.com)

Mr. Geoffrey Sears
Emery Station Office II, LLC
c/o Wareham Development Corporation
1120 Nye Street, Suite 400
San Rafael, CA 94901
(Sent via electronic mail to:
gsears@warehamproperties.com)

Subject: Case Transfer; SCP Case File # RO0002535 and Geotracker Global ID SLT2O07076; Chevron #20-6265, Former Asphalt Batch Plant and Bulk Terminal, 1520 Powell Street, Emeryville, CA 94608

Dear Messrs. Waite and Sears:

Alameda County Environmental Health (ACEH) staff received a *Conceptual Site Model and Closure Request;* (CSM & RFC), dated December 14, 2012 for the above referenced site. The report was submitted on Chevron's behalf by Arcadis, Inc. (Arcadis). The report was submitted to support the position that the site meets the criteria presented in the San Francisco Regional Water Quality Control Board's *Assessment Tool for Closure of Low-Threat Chlorinated Solvent Sites,* dated July 31, 2009.

In ACEH's review of the document and of case files, it is apparent that the site vicinity also contains multiple Department of Toxic Substances Control (DTSC) oversight cases. A brief review of reports submitted to the DTSC and available on the Envirostor web database indicates that the subject site has been identified as a potential upgradient source for some of the chlorinated solvent contamination that is currently undergoing remediation at two downgradient DTSC oversight cases (Powell Street Release Area and Site B). In order to manage the case and vicinity cases more efficiently and comprehensively, it would appear to be appropriate to transfer the referenced (Chevron) site to DTSC oversight. On October 7, 2013, ACEH held two separate telephone conversations with the DTSC and Chevron; both were receptive to the transfer of the case to DTSC.

The Emerystation No. 3 Redevelopment appears to have been substantially completed in 2000. At present the southern portion of the site consist of four stories of parking, one below grade, and three above grade, with a residential condominium development above the parking. The northern portion of the site was also redeveloped in 1999 and 2000 into an Amtrak passenger terminal.

In order to help facilitate transfer of the case, we have summarized our initial thoughts relative to the site (see the technical comments below). ACEH has not completed a full review of all site documents, including the referenced report. This is in part due to an incomplete set of report documents; including older reports that are cited in the CSM & RFC, and in part due to the understanding that the integration of project oversight by one agency at multiple sites in the vicinity would be beneficial to the long-term success of the individual sites. Please contact DTSC and ACEH to facilitate the transfer of the case to DTSC.

TECHNICAL COMMENTS

1. **Incomplete Set of Referenced Documents –** A complete set of site documents has not been submitted to ACEH's ftp site or to the state Geotracker database and pertinent information appears to be present in these documents. These include, but may not to be limited to, the following reports:

a. *Site Information for Case Closure*, Former Asphalt Plant and Terminal No, 1001067, October 27, 1997, Cambria, Inc.

b. *Memorandum*, February 27, 1989, Western Geologic Resources, Inc.

c. *Additional Soils Excavation Memorandum*, April 24, 1990, Western Geologic Resources, Inc.

d. *Groundwater Monitoring Report 2009 – 2011,* October 8, 2012, Arcadis, Inc.

e. *The EDR Aerial Photo Decade Package,* Environmental Data Resources, Inc, August 8, 2012

2. **Incomplete List of Requested Documents –** A February 18, 2000 directive letter from ACEH requested the submittal of a Risk Management Plan prior to site development, and a post-construction report. An itemized list of applicable content for both reports was provided. Neither report appears to have been submitted. Disposal documentation for exported soil and groundwater extraction (construction dewatering) was to have been included in the later report. Only a copy of an EBMUD discharge permit has been provided.

3. **As-Built Diagrams –** ACEH has received a copy of the *Final Permit Set* for the Emerystation No. 3 redevelopment at the subject site. As-built diagrams do not appear to have been received. The recent CSM & RFC postulates that the excavation depth for Emerystation No. 3 was to a depth of 15 feet below grade surface (bgs). ACEH's calculations, inclusive of an approximate 30% fluff factor, suggest an approximate 10 foot deep excavation, which is reasonably consistent with the *Final Permit Set*. The submittal of as-built diagrams would resolve this issue.

4. **Placement of Historic Wells and Bores** – Figure 7 of the referenced CSM & RFC contain a number of bores and wells locations that do not appear to be supported by available historic documents. These include the depicted locations of wells MW-1, MW-2, MW-12, and perhaps MW-13. Additionally, the location of soil bores placed along the northern and western property line does not appear to be supported by historic documentation. Along the northern property line soil bores SB-2 to SB-25, installed by Western Geologic Resources, in March 1990, appear to have been installed along the northern excavation limits in order to characterize the excavation perimeter. Additional excavation, as depicted on Figure 7, to the north of these bores does not appear to have occurred. Along the western property line, this may include soil bores SB-33 to SB-43 also installed by Western Geologic Resources, in March 1990. In particular this may be important at soil bore SB-42 which had a detectable concentration of 15 milligrams per kilogram (mg/kg) of trichloroethene (TCE) between 4 and 5 feet bgs. Soil proximal to this location does not appear to have been removed or otherwise mitigated; however, this may be related to the location of the soil bore.

5. **Location of Elevator Shaft(s) –** The *Final Permit Set* indicates that at least one elevator accesses each level of the parking structure, including the underground basement parking portion. To accommodate the elevator, an elevator pit extends approximately four to five feet below basement grade, and contains a sump pit for water that extends further into the subsurface. The location of the elevator(s) relative to any potential residual contamination is not known. The sump pit may provide an opportunity to collect a groundwater sample beneath the existing structure.

6. **Risk of Vapor Intrusion –** Because the location of elevator shaft(s) and the location of potential residual contamination (e.g. SB-42) are not presently identified, the risk of vapor intrusion to the residential portion of the structure is not known. Additional residual contamination may also be present beneath other known TCE source removal areas within the former "Office and Lab Area" of the site. The extent the elevator shaft(s) function as preferential pathways for vapor intrusion has not been addressed. While high capacity fans are reported to be linked to a carbon monoxide detector in the basement, the linkage of the carbon monoxide detector with respect to the mitigation of potential chlorinated solvent vapor intrusion has not been established.

7. **Source of PCE Contamination –** The subject site principally appears to be a TCE release site based on historic analytical data, whereas the Powell Street Release Area and Site B appear to include tetrachlorethene (PCE). Historic waste manifests or inventory data for the office and laboratory where the onsite solvent release appears to have been sourced may more firmly establish this.

Online case files are available for review at the following website: http://www.acgov.org/aceh/index.htm.

Should you have any questions, please contact me at (510) 567--6876 or send me an electronic mail message at mark.detterman@acgov.org.

Sincerely,

Digitally signed by Mark Detterman
DN: cn=Mark Detterman, o, ou,
email=mark.detterman@acgov.org, c=US
Date: 2013.10.08 15:10:36 -07'00'

Mark E. Detterman, PG, CEG
Senior Hazardous Materials Specialist

cc: Ms. Juanita Bacey, California Environmental Protection Agency, Department of Toxic Substances Control, 700 Heinz Avenue, Suite 200, Berkeley, CA 94710, (Sent via electronic mail to: JBacey@dtsc.ca.gov)

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