

ALAMEDA COUNTY  
HEALTH CARE SERVICES

AGENCY  
DAVID J. KEARS, Agency Director



EW  
9-8-04

September 7, 2004

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

Todd Adams  
Holliday Development  
1500 Park Avenue, Suite 200  
Emeryville, CA 94608

Subject: Toxics Case No. RO0002619, Southern Pacific Transportation Company Site,  
4226 Halleck St., Emeryville, California

Dear Mr. Adams:

Alameda County Environmental Health (ACEH) has reviewed the following reports documenting the detection and subsequent remediation of hazardous materials detected at the above-referenced site.

- December 19, 1990 *Subsurface Environmental Investigation, Phases II and III, Southern Pacific Property* prepared by PES Environmental Inc.
- July 6, 2001 *Summary of Completed Soil Removal, Former Emeryville Warehouse and Adjacent Parcel* prepared by Geomatrix Consultants, Inc.

PES (1990) identified: 1) hydrocarbon contamination in shallow groundwater on the northeastern corner of the site; and 2) sandy fill containing high metals concentrations in the northern portion of the site. Up to 6,800 mg/kg arsenic, 640 mg/kg lead, 0.96 mg/kg phenanthrene, 1.0 mg/kg flouranthene 1.1 mg/kg pyrene, 1.5 mg/kg bis(2-ethylhexyl)phthalate, and 0.95 mg/kg benzo(b,k)fluoranthene in site soil have been reported. The detected arsenic, barium, cadmium, cobalt, copper, lead, and zinc concentrations in site soil exceeded anticipated naturally occurring background levels. To clean up the site to residential levels so that a deed restriction would not be necessary to protect human health, Geomatrix prepared a January 18, 1999 *Soil Removal Work Plan* and a February 25, 1999 *Addendum to Soil Removal Work Plan*, then excavated and removed approximately 2,400 tons of metals-contaminated fill and approximately 770 cubic yards of overburden from the site. To progress your case toward regulatory closure, we request that you submit a summary report and address the following technical comments.

#### TECHNICAL COMMENTS

##### 1. Documentation

The *Summary of Completed Soil Removal* did not include waste manifests documenting proper disposition of the excavated soil. The December 9, 1997 *Additional Environmental Assessment* is a draft and does not include boring logs or analytical laboratory reports. Weiss Associates appears to have analyzed samples for all CAM-17 metals and detected high metals concentrations in two locations; however, the table submitted to ACEH is partially illegible due to repeated reproduction and no analytical laboratory report was included. We would like to see complete copies of the final reports. Your written technical response needs to present and address all available data for the site. Summary figures and tables are required. Your technical

response must include professional conclusions and recommendations based on all available site data.

## 2. Source and Lateral Definition

We request evaluation of the probable source and lateral definition of the metals-impacted fill soil. Include description of the spatial distribution of chemicals of concern both within the black sand layer and across the site. No excavation perimeter samples appear to have been collected. A field map dated July 22, 1999 indicates that areas in the southeast corner and along the western margin of the site were not excavated. Also, we would like to know if the metals-impacted fill extends offsite. We request that you evaluate these data gaps and present additional information detailing field activities or, if necessary, propose additional sampling. Compilation of a summary figure and submittal of boring logs for the 1997 *Additional Environmental Assessment* would be helpful.

## 3. Confirmation Sample Analytes

Geomatrix analyzed excavation confirmation samples for five metals only. We request that you provide additional evaluation of all pre-excavation soil data to support this decision. Please evaluate the potential for PNAs to have leached from the fill soil and impacted the underlying Bay Mud. If necessary, please propose additional sampling for PNAs.

## 4. Representative Concentrations

Due to the size of the sampling grids (approximately 1,600 sq. ft), each confirmation result should be compared to the appropriate risk-based screening level. On residential property, comparison of the 95% upper confidence level on mean of the confirmation results would be acceptable within cells of 1,000 sq. ft or less, or where the sampled soil is to be well-mixed prior to site reuse. Because confirmation samples were composited, we request that you evaluate the variability of your soil data and the potential for any of the chemicals of concern to exceed the cleanup levels within a sampling grid. Include confirmation sample results and pre-excavation assessment results for deeper soil not excavated from the site in your analysis.

## 5. Excavation Backfill Removal

The excavation overburden was initially used as backfill; however, it was later removed from the site. No confirmation sampling appears to have been performed after removing the excavation backfill. We request that you present additional information detailing field activities and justifying this approach or, if necessary, propose additional sampling.

## 6. Aresnic and Lead Concentrations in East Site

Samples S-1, S-2 and S-3 contained elevated arsenic concentrations. Based on the result for composite sample S-1 through S-4, the lead concentration in these grids may also exceed the appropriate risk-based cleanup level. Samples S-4A, S-2A and S-3A were reportedly collected as "resamples;" however, no locations were provided for samples S-2A and S-3A. Unless additional soil removal was performed following the initial detection or during removal of the backfill (Comment 5, above), the initial results should be considered in your evaluation of final site conditions. In addition, Geomatrix does not appear to have sampled grid A4 following excavation. The July 22, 1999 field map indicates that excavation was performed in this area., and samples from trench T-1 contained up to 340 mg/kg arsenic. The eastern portion of the site appears to be outside of a property boundary. We request that you further evaluate the data, present additional information detailing field activities and justify your approach or, if necessary, propose additional sampling.

#### 7. Cleanup Goals

The July 6, 2001 *Summary of Completed Soil Removal* compares concentrations to the 1998 USEPA Region 9 PRGs. Region 9 revised the PRGs in 2002, and the RWQCB-SFBR has proposed generally more conservative (except for lead) Environmental Screening Levels (ESLs). We recommend that you select the applicable current PRGs or the ESLs and justify your selection. Use of an arsenic cleanup level other than the cancer endpoint level of 0.39 mg/kg must be justified on a site-specific basis. Each data point for soil remaining at the site needs to be tabulated and compared to your cleanup levels.

#### 8. Hydrocarbons and Metals in Groundwater

We request that you describe and evaluate the hydrocarbon and metals concentrations detected in groundwater. Your report needs to address the sources, distribution, migration, and potential environmental and health risks of the groundwater impacts.

#### REPORT REQUEST

Please submit a summary report of site assessment and cleanup results, including address of the comments above. California Health and Safety Code Sections 25264 and 101480 authorize ACEH to provide regulatory oversight of all aspects of a site investigation and remedial action at a hazardous materials release site, and to certify remedial action completion.

Please call me at (510) 567-6719 with any questions regarding this case.

Sincerely,



Robert W. Schultz, R.G.  
Hazardous Materials Specialist

cc: Tom Graf, 980 Rosewood Dr., San Mateo, CA 94401  
Ignacio Dayrit, City of Emeryville, 1333 Park Ave., Emeryville, CA 94608  
Betty Graham, RWQCB-SFBR, 1515 Clay St., Ste. 1400, Oakland, CA 94612  
Donna Drogos, ACEH  
Robert W. Schultz, ACEH