

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Friday, February 07, 2014 3:13 PM
To: 'Jessica Sheldon'; Nick Patz (nick.patz@adanta-inc.com)
Cc: Roe, Dilan, Env. Health; BOD/Jodi Smith
Subject: RE: Ambassador Laundry Site (RO2973; 3623 Adeline Street, Emeryville)

Jessica and Nick,

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above referenced site including the draft version of the Site Conceptual Model (SCM), dated November 19, 2013, to determine if the site is eligible for closure as a low risk site under the State Water Resource Control Board's (SWRCB's) Low-Threat Closure Policy (LTCP). ACEH understands that Resources for Community Development (RCD) has finished construction of the building as and of January 8, 2014, the building is approximately 50% occupied. ACEH additionally understands that RCD's lender is requiring resolution of ACEH's concerns by the end of February 2014. Based on our review it appears to ACEH that the site is eligible for closure as a low-risk site under the LTCP. However, prior to formalizing closure at the site, ACEH requests additional documentation to support offsite delineation of shallow groundwater which has been identified as the remaining data gap at the site and submittal of missing documents as noted below in the Technical Comments to support site closure. Additionally, due to residual contamination remaining beneath the newly constructed building, ACEH requires submittal of a Site Management Plan (SMP) to manage risks associated with future subsurface entry or excavation.

As previously communicated, ACEH requests the following items from you to help facilitate case closure within your requested time frame. These should be discussed further in the meeting on Monday February 10, 2014, at 1:00 PM.

TECHNICAL COMMENTS

ACEH met with you and your consultant multiple times during 2013 in order to discuss site data to include in the SCM to support closure of your site. The following comments address the data required to delineate the shallow groundwater plume and elements of the SMP. In order to complete the case file please submit this data as an addendum to the SCM by the date referenced below.

1. **Missing Reports** - Please upload the following reports referenced in case documents in order to complete the case file.
 - a. *Preliminary Environmental Site Assessment for 1168 36th Street*, Converse Environmental West, July 29, 1994
 - b. *Phase I Environmental Site Assessment and Phase II Subsurface Investigation, 1168 & 1160 36th Street and 3601 & 3623 Adeline Street, Emeryville, CA*, PES Engineering & Environmental Services, September 21, 1999
2. **Missing Data or Evaluation** – Please include the following data or evaluations in an addendum to the SCM in order to support the closure evaluation of the site and the SMP.
 - a. **Analytical Data For Well EW-2** - Groundwater monitoring analytical results appear on Figure 8, but do not appear to have been tabulated. Page 18 of the SCM text states that EW-2 has been sampled three times, but no data appears to have been submitted. Please tabulate and submit the data. Alternatively, it is possible that a separate report (or reports) were generated that have not been provided and that document collection of this data. If the later, please submit the reports.
 - b. **Removal of Riveted UST** - In one of the meetings we have held, Adanta stated that they were confident that the riveted UST that was discovered on the western edge of the excavation for Sump 2 had been removed. The only data that may support removal of the UST is the removal of a diesel UST reported by Kleinfelder in their March 11, 2008 report (*Former Ambassador Laundry Subsurface Investigation, Underground Storage Tank Removal and Remediation Report*); however, the UST is reported near (east

of), but not in, the same location. This data is not discussed further and ACEH must determine the source of the data or documentation to support this statement.

- c. **Potential Remaining Onsite Sources** –Figure 2 of the May 28, 2003 *Soil and Groundwater Sampling Investigation* report by Clayton Group Services, documents the presence of five sumps, two are currently known as Sump 1 and Sump 2; however, the other 3 sumps are not accounted for and do not appear to have been substantively investigated. The sump along 36th Street, south of Sump 2 is in the vicinity of Clayton soil bore B-7 (now known as C-7) and Kleinfelder bores B-1 and B-6 (now known as KB-1 and KB-6). Bore C-7 detected concentrations of 2,200 ug/l TPHg, 3,400 ug/l TPHd, and 370 ug/l TPHmo in groundwater. Soil bore KB-1 detected 15,000 ug/l TPHd, was “ND” for TPHmo while TPHg was not analyzed. Soil bore KB-6 detected 2,300 ug/l TPHd, <0.5 ug/l TPHmo, while TPHg was not analyzed. Volatile compounds (BTEX) in groundwater in each bore were somewhat limited. Groundwater from each bore suggests that the sump in this vicinity was the source of groundwater contamination, and based on soil analytical results, apparently very limited soil contamination was discovered.
- d. **Preferential Pathway Study** – Shallow groundwater has been documented at the site at depths of 8 to 10 feet below grade surface (bgs). The offsite extent of shallow groundwater contamination is not documented downgradient of soil bores C-7, KB-1, and KB-6. It also does not look like a preferential pathway study has been conducted at the site or vicinity. A storm drain trunk line is also known to be present beneath 36th Street and it discharges to the SF Bay. It appears appropriate to determine the depth and location of underground utilities in 36th Street in order to determine if these may act as a conduit for potential offsite shallow groundwater contamination. Using the preferential pathway knowledge, it also appears appropriate to support the extent of the groundwater plumes (shallow and deep) by the generation of separate maps depicting the known or estimated extent of the plumes; use of the LTCP technical justification papers may be useful in the generation of these maps.
- e. **Site Timeline** – Due to the complexity of the site, involving many consultants, multiple regulatory review entities, and multiple UST environmental investigation case opening and closures, it appears appropriate to generate a site timeline for the site as a whole. This should include the opening and closing of the multiple cases (RO0000879 and RO0002973) associated with this site. This table will be incorporated into the SMP.
- f. **Infrastructure Status Tables** – Due to the unknown status of site structures, the generation of a table documenting known USTs, sumps, hydraulic hoist, and other underground structures at the site, their date of removal, depth below the former and existing (new) grade surface, depth of recent excavation at their locations, and references to document removal confirmation sampling and subsequent environmental sampling appears appropriate. This table will be incorporated into the SMP.
- g. **Residual Soil Contamination Cross-Sections** – Due to the unknown status of site structures, the generation of additional cross-sections and plan views with soil and analytical data placed relative to current (new) features, (such as current grade, building foundations, new use areas, etc.) in order to understand and document residual contamination beneath the site appears appropriate. These figures will be incorporated into the SMP.

1) **Site Management Plan** – In order to manage risk and document procedures associated with residual contamination beneath the new recently constructed building, ACEH will require that a SMP be generated. The SMP will be available for quick implementation in the event that maintenance or construction require entry into the subsurface and residual contamination beneath the site. The SMP should provide a method to document standard contaminant sampling, handling, and management methodologies, and include but not be limited to details associated with:

- a. Use of Photoionization Detectors (or equivalent) to identify impacted soil and to identify sampling locations;
- b. Appropriate sample collection procedures and preservation techniques;
- c. Appropriate excavation confirmation sampling;
- d. Segregation of impacted from non-impacted soil and documentation of segregation;
- e. Appropriate stockpile best management practices;
- f. Protocols for off-site waste disposal at a permitted facility or protocols for soil reuse (either onsite or offsite) in accordance with the San Francisco Bay Regional Water Quality Control Board Draft Technical Reference

Document entitled *Characterization and Reuse of Petroleum Hydrocarbon Impacted Soil as Inert Waste*, dated October 20, 2006;

- g. Contaminated groundwater sampling, handling, and management procedures.

If contamination is encountered during maintenance or construction, please notify ACEH within 24 hours. Handling contaminated soil &/or groundwater using the SMP must be documented in a final report to be submitted to the County's ftp site.

TECHNICAL REPORT REQUEST

Please upload technical reports to the ACEH ftp site (Attention: Mark Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with the following specified file naming convention and schedule:

- **February 18, 2014** – SCM Addendum
File to be named: RO2973_SCM_ADEND_R_yyyy-mm-dd
- **February 21, 2014** – Site Management Plan
File to be named: RO2973_SITE_MANAGE_R_yyyy-mm-dd

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

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.

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PDF copies of case files can be downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>

From: Jessica Sheldon [<mailto:JSheldon@rcdev.org>]
Sent: Monday, January 27, 2014 11:14 AM
To: Nick Patz (nick.patz@adanta-inc.com); Detterman, Mark, Env. Health; Roe, Dilan, Env. Health
Subject: FW: Ambassador

Mark,

I will ask Nick to upload the report to geotracker ASAP. Is there anything else you need at the moment? You mentioned wanting the data in tabular format – can you be more specific about which pieces?

Thanks,
Jessica

Jessica Sheldon
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From: Detterman, Mark, Env. Health [<mailto:Mark.Detterman@acgov.org>]
Sent: Thursday, January 23, 2014 3:28 PM
To: Jessica Sheldon; Roe, Dilan, Env. Health
Subject: RE: Ambassador

Jessica,

As per our telephone call this afternoon, please have Adanta finalize and submit the SCM to ACEH and Geotracker. Dilan and I have set aside time next week to review the report together and will let you know what additional information we will need. The information can be submitted as addendums. We believe that the majority of the data should be available, and could be submitted, in a tabular format, which should keep the response time down.

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