

## Wickham, Jerry, Env. Health

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**From:** Wickham, Jerry, Env. Health  
**Sent:** Thursday, March 13, 2014 9:53 AM  
**To:** 'Peter Sims'  
**Subject:** RE: Ashland Housing Project

Peter,

I have reviewed the stockpile soil sampling results. Alameda County Environmental Health requests the following disposition for the stockpiles:

SP-1 No restrictions for use on site  
SP-2 Dispose off-site  
SP-3 No restrictions for use on site  
SP-4 If used on site, only in parking/driveway areas where covered by pavement or concrete  
SP-5 Dispose off-site  
SP-6 Dispose off-site  
SP-7 No restrictions for use on site

Please document the management of the soil stockpiles and off-site disposal and placement of the fill on-site in the Remedial Action Completion Report for the site.

Regards,  
Jerry Wickham  
Alameda County Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502-6577  
phone: 510-567-6791  
jerry.wickham@acgov.org

-----Original Message-----

From: Peter Sims [mailto:psims@ninyoandmoore.com]  
Sent: Wednesday, March 12, 2014 3:45 PM  
To: Wickham, Jerry, Env. Health  
Subject: RE: Ashland Housing Project

Jerry,

Attached is the second round of soil stockpile sample laboratory analytical results.

Thank you,

Peter D. Sims, LEED AP  
Project Environmental Geologist  
Ninyo & Moore  
Geotechnical & Environmental Sciences Consultants  
1956 Webster Street, Suite 400  
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-----Original Message-----

From: Peter Sims  
Sent: Wednesday, March 05, 2014 2:22 PM  
To: 'Wickham, Jerry, Env. Health'  
Subject: RE: Ashland Housing Project

Jerry, I have answered your questions below. The attached figures describe locations of the fill source and stockpile IDs/locations.

Peter D. Sims, LEED AP  
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-----Original Message-----

From: Wickham, Jerry, Env. Health [mailto:jerry.wickham@acgov.org]  
Sent: Tuesday, March 04, 2014 9:01 AM  
To: Peter Sims  
Subject: RE: Ashland Housing Project

Peter,

Here is the information I would need to go with analytical results in order to review the fill for reuse:

1) A map or aerial photo showing the general area where the fill came from.

See attached. Stockpiles SP1 through SP3 came from trenching in Kent Avenue. Stockpiles SP4 through SP7 came from trenching in E 14th Street.

2) The volume of the stockpiles and volume that each sample represents and which sample goes with which stockpile

SP1-1 through SP1-4 were collected from stockpile SP1 (approximately 48 cubic yards) each sample represents approximately 12 cubic yards.

SP2-1 through SP2-4 were collected from stockpile SP2 (approximately 10 cubic yards) each sample represents approximately 2.5 cubic yards.

SP3-1 through SP3-4 were collected from stockpile SP3 (approximately 45 cubic yards) each sample represents approximately 11 cubic yards.

SP4-1 through SP4-4 were collected from stockpile SP4 (approximately 28 cubic yards) each sample represents approximately 7 cubic yards.

SP5-1 through SP5-4 were collected from stockpile SP5 (approximately 47 cubic yards) each sample represents approximately 12 cubic yards.

SP6-1 through SP6-4 were collected from stockpile SP6 (approximately 8 cubic yards) each sample represents 2 cubic yards.

SP7-1 through SP7-4 were collected from stockpile SP7 (approximately 5 cubic yards) each sample represents approximately 1 cubic yard.

- 3) The type of samples - composite or discrete  
Discrete samples were collected and composited by the laboratory. VOC and SVOC analyses were performed on discrete samples. All other analyses were performed on composite samples.
- 4) The type of fill and the heterogeneity  
The fill was described as generally homogenous silty sand.
- 5) Whether the fill contains any debris or construction material  
Debris or construction material were not observed in the stockpiles at the time of the sampling. Some construction material (broken concrete) had been removed from stockpile SP7.
- 6) Whether any staining or odor was observed  
Staining and odor were not observed in the stockpiled fill.
- 7) Where the soil is to be reused - In this case, will the soil be used in housing areas or under a street?  
The site is made up of housing/communal areas and driveway/parking areas. The stockpiled soil is currently planned to be used across the entire site. However, if certain stockpiles could only be used under parking/driveway areas then the grading plan could be modified to accommodate.
- 8) Whether this is a variance from the Work Plan  
Stockpile sampling was performed in accordance with the Interim Remedial Action Plan.
- 9) Laboratory analytical results  
Lab results for stockpiles SP1, SP2, and SP3 are attached. Results for SP4 through SP7 will be provided when they are completed by the laboratory.

Regards,  
Jerry Wickham

Alameda County Environmental Health  
1131 Harbor Bay Parkway  
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-----Original Message-----

From: Peter Sims [mailto:psims@ninyoandmoore.com]  
Sent: Monday, March 03, 2014 12:18 PM  
To: Wickham, Jerry, Env. Health  
Subject: RE: Ashland Housing Project

That's right, thanks for the reminder. Attached are the lab results for the three soil stockpiles that originated from trenching activities in Kent Avenue.

Peter D. Sims, LEED AP  
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-----Original Message-----

From: Wickham, Jerry, Env. Health [mailto:jerry.wickham@acgov.org]  
Sent: Monday, March 03, 2014 11:55 AM  
To: Peter Sims  
Subject: Re: Ashland Housing Project

Our 12/11/2013 approval of the IRAP requested that analytical results for reuse of stockpiles be submitted to ACEH for approval prior to reuse on site. There are other factors in addition to cleanup goals that could enter into decisions on reuse.

Jerry Wickham  
Alameda County Environmental Health  
Sent from my iPad

> On Mar 3, 2014, at 11:22 AM, "Peter Sims" <psims@ninyoandmoore.com>  
> wrote:  
>  
> Will do, samples from the stockpile of unknown origin (hereafter known

> as SP-7), will be analyzed for the full suite of analyses as detailed  
> in the IRAP.

>  
> I had previously thought that we would be using the May 2013 Tier 1  
> ESLs as our screening levels for on-site reuse of stockpiled soil as  
> well as cleanup goals. Should we be using different numbers for  
> on-site reuse screening and cleanup goals?

>  
> Thanks,  
>  
> Peter D. Sims, LEED AP  
> Project Environmental Geologist  
> Ninyo & Moore  
> Geotechnical & Environmental Sciences Consultants  
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> -----Original Message-----  
> From: Wickham, Jerry, Env. Health [mailto:jerry.wickham@acgov.org]  
> Sent: Monday, March 03, 2014 10:02 AM  
> To: Peter Sims  
> Subject: Re: Ashland Housing Project

>  
>  
> Peter,  
>  
> Given the conditions and time that has passed for the stockpile of  
> unknown origin, it should not be treated the same as any other  
> stockpile generated during the project. In addition to the analyses  
> proposed below, please include PAHs by Method 8270 and PCBs by Method  
> 8082.

>  
> I do not see a need to revise the cleanup goal of 500 mg/kg for TPHmo  
> at this time. However, the ceiling value may be considered along with  
  
> other factors in making decisions on reuse of soil.

>  
> Regards,  
> Jerry Wickham  
> Alameda County Environmental Health

>  
>  
> Sent from my iPad  
>

> On Feb 28, 2014, at 11:45 AM, "Peter Sims"  
> <psims@ninyoandmoore.com<mailto:psims@ninyoandmoore.com>> wrote:  
>  
> Hi Jerry,  
>  
> The stockpile of unknown origin at the site has been identified.  
> According to the remediation contractor and site owner, it was  
> generated during utility trenching in East 14th Street. As such, I'd  
> like to treat it the same as any other soil stockpiled on site from  
> trenching in adjacent streets. The stockpile would be sampled for  
> on-site reuse at a rate of one 4-point composite per 50 cubic yards.  
> The composite sample would be analyzed for TPHg, TPHd, TPHmo, Title 22  
> Metals, and BTEX. Is this acceptable?  
>  
> The new Tier 1 ESL (December, 2013) for TPHo is 100 mg/kg (based on  
> Ceiling Value) which is lower than the previous ESL (May, 2013) for  
> TPHo of 500mg/kg which is our proposed cleanup goal for TPHo. Since  
> the residential direct exposure ESL for TPHo is 1,000 mg/kg and  
> impacts to groundwater have shown to not be a concern, I believe the  
> 500mg/kg cleanup goal will be sufficient for the planned site use.  
> What's your take?  
>  
> Thanks,  
>  
>  
> Peter D. Sims, LEED AP  
> Project Environmental Geologist  
> Ninyo & Moore  
> Geotechnical & Environmental Sciences Consultants  
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