

Drogos, Donna, Env. Health

From: Greg Stahl <GStahl@groundzeroanalysis.com>
Sent: Friday, December 13, 2013 1:44 PM
To: Drogos, Donna, Env. Health
Cc: Roe, Dilan, Env. Health; Mike Parker
Subject: THE GREEN, 5411 MARTINELLI WAY, DUBLIN
Attachments: Hazards - Admin Draft Impacts and MMs.doc; POTENTIAL ISSUES V2.doc; Site Plan.pdf; final report opt.pdf

Follow Up Flag: Follow up
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Categories: Mail_Cases_Plopping

Hello Donna:

I spoke with Dilan this morning regarding this project and she indicated that I should be in touch with you as well. We are the environmental consultants for Stockbridge BHV who are the owners of the 27-acre site known as “the Green”. Mixed use development is planned and the City of Dublin is preparing an EIR. Certain mitigation measures in the EIR require Alameda Co. EHD review of contamination issues. In order for this to proceed, Dilan believes it may be necessary to re-open a case.

Please take a look at the attached documents. I’ll give you a call early next week to discuss.

Thanks,
Greg Stahl
Ground Zero Analysis
(209) 522-4119

Supplemental Impacts. The proposed project would include grading of the entire site to allow construction of proposed buildings parking areas and similar improvements as described in the Project Description. Trenching of portions of the site would also occur for placement of underground utilities. Installation of proposed landscaping would also require soil excavation for installation of plant material and irrigation lines. Any of these activities could disturb previously-identified on-site contamination and release this into the environment. Under the Standards of Significance, this would be a significant impact.

Supplemental Impact HAZ-1 (potential for release of hazardous materials into the environment during construction). The site has been remediated for commercial and other non-residential land uses. As a part of the site management terms that were approved when the remediation occurred in 2010, the Alameda County Department of Environmental Health (ACDEH) required that if any residential or other conservative land use is proposed at the site, the ACDEH must be notified. ACDEH will then re-evaluate the case upon receipt of approved development/construction plans. *(potentially significant impact and mitigation required).*

Adherence to the following supplemental mitigation measure will reduce this impact to a less-than-significant level by requiring additional site testing and remediation, if required.

Supplemental Mitigation SM-HAZ-1 (potential for release of hazardous materials into the environment during construction). The Applicant/Developer shall notify ACDEH of the proposed project and the intent to utilize the site for residential uses. If directed by ACDEH, a Phase II site investigation or site health risk assessment shall be completed for portions of the site anticipated for residential development and excavation prior to commencement of construction. The site investigation plan shall include a description of the work to be performed, the laboratory analytical methods to be used and requirements for quality control. If additional remediation is necessary, a remediation plan shall be prepared and approved by the ACDEH. Grading or excavation of any identified contaminated residential area on the site shall not occur until closure is granted by the ACDEH. The Applicant/Developer shall provide the City with documentation that the above actions have taken place.

To protect the health and safety of construction workers, Health and Safety Plan that meets the federal Occupational Safety and Health Administration requirements shall be prepared and implemented if additional remediation is required.

Approval of the proposed project could result in a significant impact by causing a release of hazardous materials into the environment if dewatering of the site is

required by appropriate regulatory agencies prior to commencement of construction.

Supplemental Impact HAZ-2 (potential for release of hazardous materials into the environment during construction). If required, construction dewatering activities could release identified accumulations of residual hydrocarbons, solvents, and other contaminants into the environment, possibly exposing construction workers, and surrounding residents and visitors during construction (*potentially significant impact and mitigation required*).

Adherence to the following supplemental mitigation measure will reduce this impact to less than significant by requiring preparation and approval of necessary permits to safely dewater the site and appropriate treatment of dewatered material to be reused. Permits and approvals may be required from the California Department of Toxic Substances Control, the San Francisco Bay Regional Water Quality Control Board, Alameda County Health Department, State Water Resources Control Board discharge permits or potentially an air quality permit from the Bay Area Air Quality Control Board if Volatile Organic Compounds (VOCs) are found.

Supplemental Mitigation SM-HAZ-2. If construction dewatering is necessary, the appropriate permit shall be obtained from the Regional Water Quality Control Board (RWQCB), Dublin San Ramon Services District, or other agency with jurisdiction, if the water is to be discharged into a storm or sanitary sewer system. Groundwater removed during construction dewatering shall be treated to the extent required by the permit agency prior to discharge. A construction dewatering plan shall be prepared and submitted with the dewatering permit application. Reuse of groundwater as an on-site dust palliative or for soil compaction is acceptable if requisite testing and comparison to CAL-EPA screening thresholds indicate that the groundwater is suitable for reuse. If reuse is not possible, contaminated water shall be safely removed to an approved site.

Demolition of the existing building on the site could result in a significant impact by causing a release of lead based paint and asbestos containing material into the environment if these materials are present in the building.

Supplemental Impact HAZ-3 (potential for release of lead based paint and asbestos containing material). Prior to issuance of a demolition permit for the existing on-site building, testing shall be performed by a qualified and licensed environmental professional to determine the present of significant quantities of lead based paint and asbestos containing material. If detected, such material shall be removed by a qualified contractor and disposed of in an approved disposal facility. Necessary permits shall be obtained from

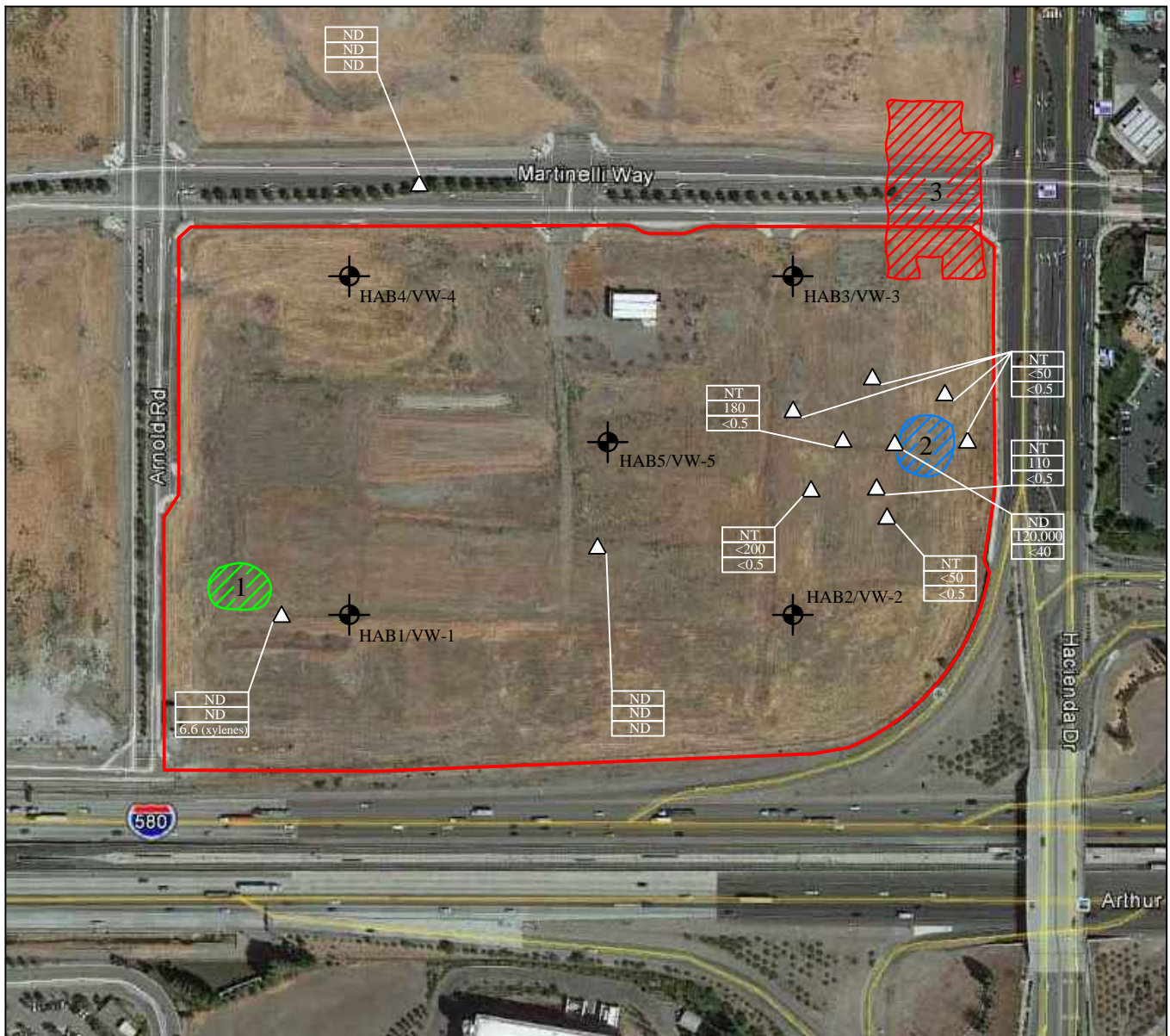
appropriate regulatory agencies prior to remediation (*potentially significant impact and mitigation required*).

Adherence to the following supplemental mitigation measure will reduce this impact to a less than significant level by requiring the safe remediation of potentially hazardous material that could be located in the existing building.

Supplemental Mitigation SM-HAZ-3 (*potential for release of lead based paint and asbestos containing material*). Prior to issuance of a demolition permit for the existing on-site building, testing shall be performed by a qualified and licensed environmental professional to determine the present of significant quantities of lead based paint and asbestos containing material. If detected, such material shall be removed by a qualified contractor and disposed of in an approved disposal facility. Necessary permits shall be obtained from appropriate regulatory agencies prior to remediation.

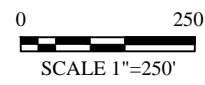
THE GREEN
POTENTIAL CONTAMINATION ISSUES FOR CEQA

- 1) 1,000-gallon LUST near southwest corner of property. This was remediated by excavation (545 yards of soil) and groundwater extraction (9,240 gallons) and the case was closed by Alameda County Health Care Services Agency in September 2010 under commercial property use standards. The only residual contamination was 114 ppb TPHd in groundwater. *Shown on map as area "1".*
- 2) Contamination associated with former fuel depot on east side of property. Erler and Kalinowski investigated potential USTs at the former fuel depot area in 1998. No USTs were found, debris was removed from the backfilled tankpit area. Groundwater samples were collected, one of which had 120,000 ppb TPHd with no associated BTEX. Stepout borings were advanced and the downgradient borings contained TPHd up to 180 ppb with no associated BTEX. E&K performed a screening level risk assessment for vapor intrusion of HVOCs for the entire site and Alameda County issued a closure letter July 10, 1998 stating that the "primary COCs in groundwater...do not pose a significant health risk...for current or proposed uses of the subject sites". *Shown on map as area "2".*
- 3) Contamination associated with former burn pit on east side of property, intersection of Hacienda and Martinelli. A former incinerator and burn debris was associated with the military base. 3,400 cubic yards of lead-contaminated soil was excavated in 2001. Case was closed by Alameda County Health Care Services Agency in 2003 as "clean-closed with no restrictions on future development". The DTSC issued a second closure letter in December 2005 which concluded "... the incinerator/Burn Dump at Hacienda Drive and Martinelli Drive does not appear to pose a threat to human health or the environment under a residential land use scenario." *Shown on map as area "3".*
- 4) Question of area-wide or limited contamination with VOC vapors. E&K in 1998 found no detectable HVOCs in groundwater. GZA found low levels in soil vapor in 2013, below residential screening levels. *Borings and results are shown on map.*
- 5) Question of herbicides in shallow soil. GZA found none in 2013.
- 6) Question of OCPS, phenols, creosote and PCBs associated with former rail spur. Levine Fricke sampled 4 borings in 2003 and analyzed for the above. All were non-detect except for DDT which was detected at a maximum concentration of 60 ppb. This is below the residential screening levels of 1,600 – 1,700 ppb.



- APPROXIMATE PROPERTY LINE
- SOIL BORING/TEMPORARY VAPOR PROBE LOCATION (2013)
- GROUNDWATER SAMPLE LOCATION (1998)
- | |
|-------|
| VOCs |
| TPH-D |
| BTEX |

 CONCENTRATION OF VOC'S IN GROUNDWATER (ug/L)
CONCENTRATION OF TPH-D IN GROUNDWATER (ug/L)
CONCENTRATION OF BTEX IN GROUNDWATER (ug/L)
- 1,2,3 AREAS OF REMEDIATION



SITE PLAN
THE GREEN
5411 MARTINELLI WAY
DUBLIN, CA

FIGURE
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