

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Tuesday, December 29, 2015 4:02 PM
To: 'Peter Cusack'; 'Pianca, Brian'
Cc: Roe, Dilan, Env. Health
Subject: Tribune Site Reuse (RO3149) Feedback on Recent Submittals

Brian and Peter,

In order to keep forward movement at the site, it appears appropriate to send a response and feedback in regards to recent submittals for the site. As you are aware, ACEH has recently received a site investigation and a Phase 1 report that documents investigations at 2342 Valdez Street, located on an APN parcel that ACEH was not aware should be included in the redevelopment until the information was submitted on December 21st, (and reviewed after that). It is apparent that this work was conducted in January 2015 without regulatory oversight at a time a Site Cleanup Program (SCP) case had already been opened. As previously communicated with Peter, ACEH must consider the site investigation report to be a partial submittal based on the lack of documentation of the installation of well MW-10 and CPT-7, and associated rationales for their installation. ACEH has also previously requested revised cross sections that depict all residual contamination that will remain beneath the proposed development, including parcel 17 (2342 Valdez) which have not been forwarded (the initial cross sections area start). While ACEH understands this is a relatively fast paced project, ACEH does not currently have the time to fully evaluate the data as it comes in, in a piecemeal fashion. Additionally, it is clear that documentation in one report is necessary and appropriate in order to communicate the site assessment data, and the rationale for resulting decisions, to others in addition to ACEH (such as during public comment). In order for ACEH or others to understand the entire redevelopment project as a whole, ACEH requests the submittal of a complete report package with all data and an assessment of the impacts of residual contamination with respect to the proposed redevelopment, including any deficiencies if present. If it is not appropriate to leave contamination at one or more locations, then the extent of that contamination must be understood as it may be possible to manage the excavation of that contamination at the time of excavation. The key is that the extent of this contamination is defined, and any appropriate corrective actions have been identified to be appropriate for that excavation timeframe. Conducting some of this work prior to the redevelopment excavation is also an option.

To support your assessment (“Assessment of Residual Contamination with Respect to Proposed Redevelopment”), and to assist ACEH in its site evaluation, ACEH requests the following be included in the assessment:

Revised / Additional Figures:

1. Plan View of Existing Site Plan – inclusive of Parcel 17 / 2342 Valdez Street.
2. Plan View of Proposed Redevelopment - With analytical locations (bores, wells, former UST, hoist, or sump locations, or other sample points, etc.) located with respect to the lowest floor of the proposed redevelopment (using Sheet A2.00), including elevator pit or stair wells, or other vertical conduit locations.
3. Plan View of Offsite Improvement Plans – With former UST location and sampling points located using Sheets 3.01 (street furniture, tree wells, transformer, or other) and 5.01 (utilities, including storm drain)
4. Cross Sections in Areas of Residual Contamination or Sensitive Areas – Including depth of proposed foundations, slab depth, includes former excavations, bores, wells, or other sampling locations depicted, and residual analytical concentrations remaining beneath the building slab / foundation. Sensitive Areas include outdoor air seating above the former UST, tree wells (gardener exposure to lead or other contaminates), elevator pits, storm drain, transformer pads, or other infrastructure relative to former UST. Well screen intervals should appear on well bore log locations in cross sections.

Revised / Additional Tables:

1. Tables for soil analytical – ACEH requests that all tabulated analytical data indicate if the contamination will be excavated or if it will remain. This can be done with shading of appropriate cells on the table (preferred) or other means that still allow data to be readable.
2. Appropriate use of ESLs – The Regional Water Quality Control Board (RWQCB) promulgated Environmental Screening Levels (ESLs) contain a series of assumptions that must be met to use the ESLs. For example, groundwater ESLs include a required 10 foot separation distance between groundwater and the point of exposure. Please be aware that upon excavation, the point of exposure elevation will in reality be as much as 12 feet lower and that the ESL required separation distance will not be present beneath the site to use the ESL tables. The ESL tables are in essence a Tier 1 Health Risk evaluation. The RWQCB defined additional levels of health risk evaluation (Tier 2 or site specific Tier 3) in the text document that accompanied the tables.
3. Subslab Soil Vapor Data – This data provides relevant data only for the existing grade. Because the site grade will change significantly, it should be removed from the tables for the requested assessment on the affect of residual contamination on site redevelopment.
4. Non-Detectable Concentrations (“ND”) – NDs must be quantified (<x) on tables, and residual contamination must be verified to be less than applicable ESLs (or somehow highlighted for quick checking).
5. Non-Metals Data (Table 1) Note – Naphthalene, pyrene, floranthene are not ND as noted in the a footnote on the table. The detections are requested to be included in cells in a table. This is intended to allow a quick review of the data and eliminate footnote or laboratory report reviews.
6. Groundwater Data (Table 2) Note – ACEH requests a column to document well screen intervals. Additionally, similar to the “Table 1 Note”, SVOCs and VOCs cannot be indicated by “ND”, and each detection limit is requested to be verified to be below applicable ESLs, or other goals, and highlighted if not.
7. Grab Groundwater Metals (Table 4) – The table is missing applicable ESLs, or other site goals.
8. Soil Vapor Data (Table 5) Note – Was methane and oxygen collected? If so, please include on table.
9. All Tables Note – In addition to the depth of the sample collection (i.e. 10 feet), ACEH requests the addition of a column for “Depth Below Proposed Foundation”
10. Parcel Data Table – ACEH additionally requests additional columns to communicate, by APN parcel number, historic use, sampling points, and RECs or BRECs.

Revised SMP:

1. ACEH requests that the Site Management Plan be revised to include mitigation measures by location that were identified (if any) in the requested “Assessment of Residual Contamination with Respect to Proposed Redevelopment”.

Lastly, ACEH requests the following statement be contained in a cover letter to “The Assessment”, and be signed and stamped by a professional engineer or geologist: “The following plan sets, (list of sets, including applicable dates) submitted to the City of Oakland, have been reviewed and are consistent with the Assessment results, recommendations, and with the proposed mixed use redevelopment.”

Please let us know if you have questions in regards to this email.

Mark Detterman
Senior Hazardous Materials Specialist, PG, CEG
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
Direct: 510.567.6876
Fax: 510.337.9335
Email: mark.detterman@acgov.org

PDF copies of case files can be downloaded at:

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