

Nowell, Keith, Env. Health

From: Nowell, Keith, Env. Health
Sent: Tuesday, October 20, 2015 11:40 AM
To: 'Molly Maybrun'
Cc: 'Andrew Warner'; 'Claire Han'; 'Angus McGrath'; 'Eva Hey'; Roe, Dilan, Env. Health
Subject: Amended ESS Review, Voluntary Remedial Action Case RO3157 and GeoTracker Global ID T10000006445, City Ventures, 2240 Filbert St., Oakland

Dear Ms. Maybrun

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the draft *Amended Environmental Site Summary* (AESS) dated September 11, 2015, which was prepared by Stantec Consulting Services Inc. for the subject site. The AESS provides an evaluation of residual contamination for residential development consideration.

ACEH requests that you review the AESS, incorporating the Technical Comments provided below.

Technical Comments:

1. Comprehensive Data Tables

- A. Please assemble a set of comprehensive analytical tables for the project. If it is appropriate and to simplify review, please segregate the data by areas of study, e.g. individual underground tanks, former garage and former auto shop repair area, etc. Place the tables in one location typically near a comprehensive set of figures, rather than scattered throughout the text. Page flipping to find the data of interest does not speed a review.

2. Section 1.2 – Screening Levels

- A. Concentrations identified in the California State Water Resources Control Board (SWRCB) Low Threat Underground Storage Tank Case Closure Policy (LTCP) are not suitable for use in health risk evaluations which include non-petroleum contaminants. Therefore, comparison tables of concentrations of residual petroleum hydrocarbon- related compounds and volatile organic compounds (VOCs) in the Amended Environmental Site Summary (AESS) should use the RWQCB ESLs values or alternate site specific values. In cases where the ESLs are not listed for a chemical, the U.S. EPA Regional Screening Levels (RSLs) can be consulted. Please update the tables in the AESS to reflect the ESLs and verify the sample concentrations listed in the tables.

3. Section 2.4 – Proposed Property Use

- A. This section describes the residential properties as having a parking garage on the ground floor with the primary living spaces on the second and third floors. A review of the development plans has shown floor plans that have primary living space on the first floor. Please modify this paragraph to reflect the first floor living space.

4. Section 2.8.1 – Alameda County Department of Environmental Health Local Oversight Program (LOP)

- A. Second bullet item: Tank 2- states the underground storage tank (UST) was closed in-place. The section should be updated to reflect that following the in-place closure, the UST was removed. Include the closure and removal dates for the UST. This Technical Comment may also apply to Section 3.2.6 - Other Areas of Interest.
- B. Tanks 1, 2, 4, 5, and 6 have their storage contents identified, but Tank 3 does not. Additionally, Tank 3 is stated that it is believed to be removed. Please include the contents of Tank 3 in the discussion of this tank, and include a discussion of the laboratory analysis reporting the potential tank contents. Please also discuss the findings of recent studies performed to determine the presence/ absence of the tank. This Technical Comment also applies to Section 3.2.3 – Tank 3 Investigation.

C. The locations of the six USTs are said to be shown on Figure 3. Only Tanks 2, 4 and 5 appear to be indicated on the figure. Please include a figure which clearly shows the locations of the six USTs.

5. Section 3.2.1 – Tank 1 Investigation

A. Please indicate the total number of soil samples recovered and specify which of the petroleum hydrocarbons (e.g. TPHg, BTEX, etc.) were not detected. This Technical Comment also applies to Sections – Tank 2 Investigation, 3.2.3, 3.2.4 – Tank 4 and 5 Investigation, 3.2.5 – Tank 6 Investigation, and 3.2.6 – Other Areas of Interest.

B. Five grab groundwater (GGW) samples were collected from the soil bores advanced in the vicinity of Tank 1. Concentrations of TPHg and benzene were reported for one sample. Please identify the sample number. Indicate if the other analyte compounds were non-detect, and if other compounds were reported. This Technical Comment also applies to Sections 3.2.2, 3.2.3, 3.2.4, 3.2.5, 3.2.6, 3.3 – 1996 Groundwater Investigation, and 3.5.1 – Petroleum Hydrocarbon Investigation (2005 Market Street Block Soil Investigation).

C. Screening Level Evaluation – Please indicate which ESL Table is used for the referenced values. ACEH was unable to locate a benzene ESL of 100 ug/L. Insert a separate row in the summary table for each ESL Table should more than one ESL Table be referenced. This Technical Comment also applies to Sections 3.2.2, 3.2.3, 3.2.4, 3.2.5, 3.3, and 3.5.1.

6. Section 3.2.3 – Tank 3 Investigation

A. Soil analytical results included 1,000 milligrams per kilogram (mg/kg) total petroleum hydrocarbons (TPH) as mineral spirits (TPHms), and under the Screening Level Evaluation section, states there is no ESL for TPHms. Though technically correct, TPHms is a mid-range hydrocarbon and the ESLs for TPH as gasoline (TPHg) and for TPH as diesel (TPHd), which bracket the TPHms carbon range, are both 100 mg/kg, additionally TPH as motor oil (TPHmo) ESL, a higher C-range hydrocarbon, is also 100 mg/kg. Therefore, it is appropriate to use an ESL of 100 mg/kg. This Technical Comment also applies to Section 3.2.5 and 3.2.6.

7. Section 3.2.5 – Tank 6 Investigation

A. States one soil bore was advanced for the collection of a GGW sample at this location. Additionally, the first bullet item states the grab groundwater sample contained 300 ug/L of TPHg. Soil bores B-7 and B-8 collected in the vicinity of Tank 6, as shown on Figures 10 and 11, are reported to contain a concentration of TPHg of 1,200 ug/L and 17,000 ug/L, respectively. Why were these concentrations not mentioned? The concentration of 300 ug/L may be associated with the un-referenced UST to the north of Tank 6; however, this has not been reported or supported in this document. As requested in Technical Comment 3C above, please identify the UST on the figure(s) and include the sample identification number to reference concentration data used in the text (Technical Comment 4B).

B. Screening Level Comparison – discusses a singular vinyl chloride (VC) Residential ESL exceedance out of 16 GGW samples. Include in the discussion the proximal locations of other groundwater samples in which VC was an analyte in order to delineate the VC exceedance area. As the sample is not identified, ACEH has not verified the location. The referenced ESL Table in Table 3.2.5, Table F-1a, is for groundwater screening levels, not groundwater to indoor air. Additionally, it is unclear to ACEH if the environment in which the VC exceedance sample was recovered is located within an aerobic or anaerobic environment, nor is there a presentation of the rate potential VC degradation.

Please document the extent of the VC ESL exceedance with data from the surrounding samples recovered. Include in your evaluation a discussion of the source, incorporating what is known about the previous land use. Alternatively, please propose a strategy to identify if VC is an issue at the site in the Recommendations section of the Updated ESS.

8. Section 3.2.6 – Other Areas of Interest

- A. Addresses three areas- Northwest, Western, and Elevator Sump- having soil exceedances of one or more of the ESL tables. Additionally, concentrations of 59,000 ug/L TPHg, 270,000 ug/L TPHms, and 59 ug/L benzene are reported. Please address the delineation of both soil and groundwater contamination and adequacy of the analysis scope. Propose a scope of work in the Recommendations section of the Updated ESS to evaluate this area should your review determine if insufficient investigation has been conducted.
 - B. The AESS states free phase product (FP) was encountered in several borings located in the northwest location of the site. Please include in your discussion of this area a review of the bore logs and soil concentration data to aid in determining the source of the FP.
9. Section 3.9 – Freight Elevator #2 Vault Soil Removal
- A. Please address the delineation of both soil and groundwater contamination from the release(s) associated with the elevator, and adequacy of the analysis scope. Propose a scope of work in the Recommendations section of the Updated ESS to evaluate this area should your review determine an incomplete investigation was executed. This Technical Comment also applies to Section 3.11 – 2015 Freight Elevator #1 Vault Soil Removal and Section 3.13 – 2015 Truck Wash Clarifier Removal.

Technical Report Request

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

- **October 30, 2015 – Environmental Site Summary Update** (file name: RO0003157_SITE_SUM_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.

Thank you for your cooperation. ACEH looks forward to working with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6764 or send an electronic mail message at keith.nowell@acgov.org.

Respectfully,
Keith Nowell

Keith Nowell PG, CHG
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502-6540
phone: 510 / 567 - 6764
fax: 510 / 337 - 9335
email: keith.nowell@acgov.org

PDF copies of case files can be reviewed/downloaded at:

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