

Nowell, Keith, Env. Health

From: Nowell, Keith, Env. Health
Sent: Tuesday, October 20, 2015 4:26 PM
To: 'Molly Maybrun'
Cc: 'Andrew Warner'; 'Claire Han'; 'Angus McGrath'; 'Eva Hey'; Roe, Dilan, Env. Health
Subject: Draft SMP Review, Voluntary Remedial Action Case RO3157 and GeoTracker Global ID T1000006445, City Ventures, 2240 Filbert St., Oakland

Dear Ms. Maybrun:

Alameda County Environmental Health (ACEH) staff has reviewed the case file including the draft *Soil Management Plan* (SMP) dated September 11, 2015, which was prepared by Stantec Consulting Services Inc. for the subject site. The SMP addresses soil and groundwater handling and sampling for residual contamination which may be encountered at the site.

ACEH requests that you finalize the SMP, addressing the Technical Comments provided below.

Technical Comments:

1. Section 2.5.1 – Grand Avenue Block 1994 Soil and Groundwater Investigations
 - A. Table 1: Each Environmental Screening Level (ESL) listed in Table 1 is incorrect. ACEH is not a proof reading agency and will selectively review FINAL draft documents. This is not a final draft document.
 - B. Table 1: Page 2 of Table 1 contains a minimum of 14 soil samples with sample depths that do not appear to correspond with sample identification numbers. There is no explanation of the apparent lack of correlation. Please address this inconsistency in the final SMP requested below.
2. Section 2.5.3 – Grand Avenue Block 2014 Soil and Soil Vapor Investigation
 - A. Addresses volatile organic compounds (VOCs) ESLs and states detection in soil were below Tier 1 screening levels. However, ACEH has not located an ESL for cumene, propylbenzene and 4-cymene. Please identify the ESL table or reference that determines these contaminants are below acceptable residential values.
 - B. Freon 113 screening level is reported as 31,000,000 micrograms per cubic meter (ug/m3). Please identify the source of this value. ACEH notes the US EPA Regional Screening Level (RSL) for Freon 113 (1,1,2-Trichloro-1,2,2-Trifluoroethane) is 31,000 ug/m3; however, ACEH has not located an ESL for Freon 113.
3. Section 2.6 – Constituents of Concern
 - A. This section states the primary constituents of concern (COCs) are petroleum hydrocarbons at the Grand Avenue block. The purpose of the SMP is to alert report users of the potential for encountering potential COCs during activities at the site. Based on the site history and detects of VOCs at the site, VOCs detected at the site should be added to the list of potential COCs.
 - B. This section also states that VOCs were not present in soil at concentrations above the screening criteria. It is unclear if this statement is referring to direct contact, vapor intrusion, etc. Please reference the screening criteria.
4. Section 4.0 - Grand Avenue Block 4 Soil Management
 - A. States if during the construction activities petroleum affected soil or other suspect materials are encountered, the contractor should immediately notify the site owner. Please define what is meant by suspect materials. Areas of

obvious contamination would include chemical odors and/or staining. Additionally, if suspect materials are encountered, the contractor should stop work in the area then notify the site owner and ACEH. This Technical Comment also applies to Section 5.0.

5. Section 4.1 – Soil Excavation

- A. First paragraph should be rewritten. “Visibly impacted soil” should be changed to *suspect material* as not all evidence of impact is visual. This Technical Comment also applies to Section 5.1.
- B. It is unclear to ACEH that if impacted soil is identified, why three feet would be the maximum depth of removal. The site has been regraded and the distribution of contaminants would need to be defined. The excavation dimensions should be based on confirmation sampling and consultation with ACEH. This Technical Comment also applies to Section 5.1.
- C. It is unclear to ACEH why the material can be reused under hardscaped areas without analytical profile sampling. If contaminated soil is determined to be present, the material should be characterized prior to a determination of how it should be handled.. This decision should be made after consulting with ACEH. This Technical Comment also applies to Section 5.1.
- D. Please insert language to the effect that, when encountering unexpected contingencies, such as an unknown underground storage tank (UST), during site development activities, work will be halted in this area, the owner notified, and, if applicable, the ACEH Certified Unified Program Agency (CUPA) contacted for further instructions. This Technical Comment also applies to Section 5.1 and Section 5.7.

6. Section 4.3 – Off-Site Soil Disposal or Reuse

- A. Please add notation indicating the receiving facility also should be contacted for profile requirements and acceptance of import soil. This Technical Comment also applies to Section 5.4

7. Section 4.5 – Dust Control

- A. This section does not outline common measures of on-site dust control, such as the application of water for soil wetting or minimizing drop heights during soil transfers. Please expand this section to include typical dust control measures. This Technical Comment also applies to Section 5.6.

8. Section 5.1 – Soil Excavation

- A. Refers to soil impacted by petroleum hydrocarbons. Non petroleum hydrocarbons have also been identified at the site; hence this statement should include all contaminants in soil.

9. Section 5.2 – Confirmation Sampling

- A. Please review the sampling plan as outlined in this section has concurrence with the San Francisco Bay Region, Regional Water Quality Control Board (SFBR-RWQCB) per Mr. Mark Johnson. Add a note to this effect if appropriate.
- B. Please confirm that a 30-sample sub-sample composite as indicated in this section is acceptable to the SFBR-RWQCB.

10. Section 5.6- Dust Control

- A. Please add a section discussing air monitoring during excavation of lead contaminated soil. Include the results of the air monitoring in the Interim Remediation Report documenting the lead contaminated soil removal. Please submit the Interim Remediation Report by the date specified below.

11. Section 6.1- Guidelines for Groundwater Management

- A. The City of Oakland Public Works Department should be notified prior to discharge of groundwater to the storm drain system. Please add a sentence to this effect.

12. Section 8.0 – Scope, Representations, and Limitations

- A. This section states that this SMP does not address issues related to other chemicals or media that may be encountered during construction activities and that contractors and workers are responsible for complying with laws pertaining to handling and disposal of these materials. The function of an SMP includes procedures for access control, dust control, soil stockpile management, groundwater management, soil and/or groundwater disposal, and management of **any** residual contamination discovered during redevelopment activities. The statement in Section 8.0 should be revised to reflect the SMP function. Identify contingencies should other chemicals or media be encountered during construction activities, e.g. work stoppage and appropriate notifications.

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 – Site Management Plan** (file name: RO0003157_SMP_R_YYYY-mm-dd)
- **TBD – Interim Remediation Report** (file name: RO0003157_IR_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

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

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