May 26, 2017

Mr. Keith Nowell Hazardous Materials Specialist Alameda County Environmental Health Services 1131 Harbor Bay Parkway, Suite 250 Alameda, CA 94502



Re:

Addendum to the Remedial Action Plan City Ventures Oakland 2 Site 2240 Filbert Street, Oakland ACEH Site RO#0003157 Stantec PN: 185703027 **RECEIVED**By Alameda County Environmental Health 2:19 pm, Jun 19, 2017

Dear Mr. Nowell:

Enclosed with this cover letter is the Addendum to the Remedial Action Plan for Multiple Parcels for the above-referenced City Ventures Oakland 2 location.

As an authorized representative of City Ventures, I offer the following statement:

I, Andrew Warner, have read and acknowledge the content, recommendations, and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH's FTP server and the SWRCB's GeoTracker website.

Should you have any questions please contact me at (415) 845-0293 or andrew@cityventures.com.

Thank you,

Andrew Warner
Director Development

City Ventures



May 26, 2017

Mr. Keith Nowell Alameda County Health Care Services 1131 Harbor Bay Parkway, Suite 250 Alameda, California 94502-6577

SUBJECT: City Ventures Oakland 2 - MULTIPLE PARCELS, WEST GRAND AVENUE, FILBERT AND

MYRTLE STREET, OAKLAND, CALIFORNIA - RO0003157

REFERENCE: ADDENDUM TO THE REMEDIAL ACTION PLAN

Dear Mr. Nowell,

On behalf of City Ventures (CV) for the real property located at 2240 Filbert Street in Oakland, California (the "Site"; Figure 1), Stantec Consulting Services Inc. (Stantec) is submitting this Addendum to the previously submitted Remedial Action Plan (RAP), prepared by Stantec and dated March 2, 2017. This addendum discussed specifically the handling of minor lead impacted soil located at the West Grand Block, centered around sample location S-5 (Figure 2), and the removal of soil in that same general area, centered around SV-23, to address elevated benzene reported in soil vapor. Lead was detected at S-5 in shallow soil and benzene was reported in soil vapor from SV-23 during a 2017 assessment. It is proposed to remove the lead-impacted soil, and at the same time remove potential benzene-impacted soil to 7 feet below ground surface (bgs) during the grading for the site redevelopment. This Addendum is being prepared to satisfy the request from Alameda County Environmental Health (ACEH) during meetings between ACEH and CV on March 28, 2017, April 11, 2017, and May 12, 2017. This Addendum is a stand-alone supplement to the RAP and does not replace the requirements discussed in the RAP.

CV is proposing to redevelop the property for multi-unit residential housing. Based on findings of the 2017 assessment, one location remains where lead was reported in shallow soil above the regulatory screening level (boring S-5; 80 milligrams per kilogram [mg/kg]) at the West Grand Block. After confirmation that lead was above the screening level, additional step out soil samples were collected and analyzed for lead. The results of that step out sampling confirmed that the lead was isolated, and will also serve as the outer sidewall and bottom confirmation samples once excavation is performed (Table 1).

Based on findings of the 2017 assessment, one location remains where benzene was reported in soil gas collected from approximately 5 feet bgs, that contained benzene above the site specific screening level (boring S-23; 1,600 micrograms per meter cubed [ug/m3]) at the West Grand Block (S-5 and SV-23 are co-located). After confirmation that benzene was above the screening level, additional step out soil vapor samples were collected. The results of that step out sampling confirmed that the benzene was isolated (Table 2). The SV-23 excavation will encompass the above proposed S-5 excavation and allow for 7 feet of clean fill to be placed around the S-5/SV-23 area. Based on the lack of benzene reported in historical groundwater samples from this area, and the results of soil vapor sampling from locations circling SV-23 (i.e. SV-24, SV-25, SV-32,



#### ADDENDUM TO THE REMEDIAL ACTION PLAN

SV-33, and SV-34), following completion of the proposed excavation and import of clean fill, no further testing or remedial action will be required.

Soil excavation will be conducted in accordance with soil handling procedures outlined in the RAP and the December 17, 2015 *Soil Management Plan*. Details of the soil excavation, including soil stockpiling and proper disposal are discussed in the sections below.

## **Soil Excavation**

A properly licensed excavation contractor will be used to remove the impacted soil. The contractor will prepare a Site-specific Health and Safety Plan (HASP) in accordance with the requirements of 40 Code of Federal Regulation (CFR) 1910.120. The HASP will be provided to all field personnel and a copy will be maintained at the Site during all field activities. The proposed excavation area will be marked for clearance of underground utilities and obstructions, and notification will be made to the one-call Underground Service Alert (USA-North) prior to initiating ground disturbance activities.

During soil excavation activities, dust control measures shall be implemented to minimize dust generation. Additionally, a photo ionization detector (PID) will be used to monitor the work zone to ensure no elevated VOCs are present. All excavation work will be performed in accordance with the Occupational Safety and Health Administration (OSHA) and Cal/OSHA regulations.

During excavation activities, dust control measures, such as application of water, will be used if necessary to minimize generation of airborne dust. Basic dust control measures for construction related projects are outlined by the Bay Area Air Quality Management District (BAAQMD) in Chapter 8 of their 2011 California Environmental Quality Act (CEQA) guidelines and per VTPM 8551-8555, Exhibit C, Conditions of Approval, Section 15, Dust Control Measures (Oakland City Council, 2005). These measures include covering soil stockpiles, watering construction areas, and street sweeping. Additionally, the contractor will continuously monitor airborne dust at the upwind and downwind Site perimeters during all potential dust-generating activities (i.e., operation of heavy equipment, excavation, stockpiling, and loading) using direct-reading instruments (e.g., Mini-Ram pDR 1000<sup>TM</sup>) for measurement of total suspended particulate matter. Electronic data logs of real-time measurement will be used to determine the maximum and average dust concentrations at the upwind and downwind perimeter monitoring locations. If the daily average from any day exceed 50 micrograms per cubic meter (µg/m³), corrective actions will be taken to increase dust control.

Impacted soil/soil vapor which exceeds screening levels has been identified in shallow samples collected during the recent assessment from borings S-5 and SV-23. Soil in this area will be removed during the planned Site grading. The area of soil to be removed is approximately 30 feet by 30 feet and centered around the S-5/SV-23 location (Figure 2). Excavation to address benzene vapors will extend to the locations of borings SV-32, SV-33, and SV-34, where benzene was not detected. The proposed excavation depth is to 7 feet below grade. This will ensure all lead is removed to below screening levels, as delineated by the S-5@3' sample, and ensure that clean fill is replaces benzene-affected soil in order to remove the risk from benzene-affected vapors. As shown on Figure 2, samples were collected from the planned sidewall and bottom extents of the proposed excavation. Analytical results for the soil collected from S-5 and the step-out confirmation sample locations are presented in Table 1. Soil vapor analytical results for SV-23 and surrounding soil vapor locations are presented on Table 2.



#### ADDENDUM TO THE REMEDIAL ACTION PLAN

Because step-out confirmation soil samples have already been collected, the site will be marked with white paint to delineate the excavation boundaries. Soil will be excavated from the marked location to a depth of 7 feet below grade. Previous assessment data will serve as confirmation samples to document the extent of impacted soil has been removed.

# Soil Waste Characterization and Disposal

Excavated soil shall be stockpiled or loaded directly into trucks for off-site disposal. Stockpiled soil will be placed on plastic or pavement and covered at the end of each work day. The method of covering will be determined based on the anticipated time that the stockpile will be in place, weather conditions, and other practical factors such as the size of the stockpile. Storm water management practices shall be consistent with all applicable rules and regulations.

The excavated soil will be disposed of off-Site at an approved landfill. The soil shall be profiled for constituents as requested by the appropriate receiving landfill facility (e.g., hazardous, non-hazardous, or recycling). It is anticipated that testing will be required to evaluate, at a minimum, the presence of lead and volatile organic compounds.

Excavated soil will be transported offsite by a state of California registered hazardous waste hauler, as appropriate. Typical trucks can transport approximately 10 to 20 cubic yards of excavated soil. Based on the expected volume of soil to be generated during the excavation proposed above, multiple truck loads will be necessary to remove soil from the site. Trucks will be properly placarded and the appropriate paperwork will accompany all waste shipments. All trucks transporting soil will be covered or maintain of the required freeboard. Appropriate measures will be taken to ensure soil is not tracked offsite, such as brushing down the trucks and wheel washing of truck tires, as appropriate. Trucks hauling waste will exit onto West Grand Avenue and use Grand Avenue to access Interstate 880 (I-880) or Interstate 980 (I-980).

## Soil Backfill

Following excavation of the S-5 and SV-23 area, imported soil will be placed in the excavation to bring the surface back to finished grade. A low-permeable backfill material will be used from a depth of 7 feet below grade to the finished surface. This 7-foot low-permeable cover will help eliminate the potential for exposure to vapors by future workers or residence. Import soil will be tested and approved in accordance with criteria presented in the Second Addendum to the RAP (Stantec, 2017).



## ADDENDUM TO THE REMEDIAL ACTION PLAN

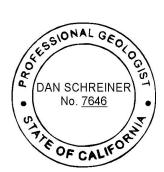
Thank you for your cooperation on this project. Should you have any questions or need additional information, please contact either of the undersigned.

Regards,

## STANTEC CONSULTING SERVICES INC.

Dan Schreiner, P.G. Senior Geologist Tel. 916.472.3915

dan.schreiner@stantec.com



Cc. Mr. Andrew Warner, City Ventures

Geotracker (upload)

## Attachments:

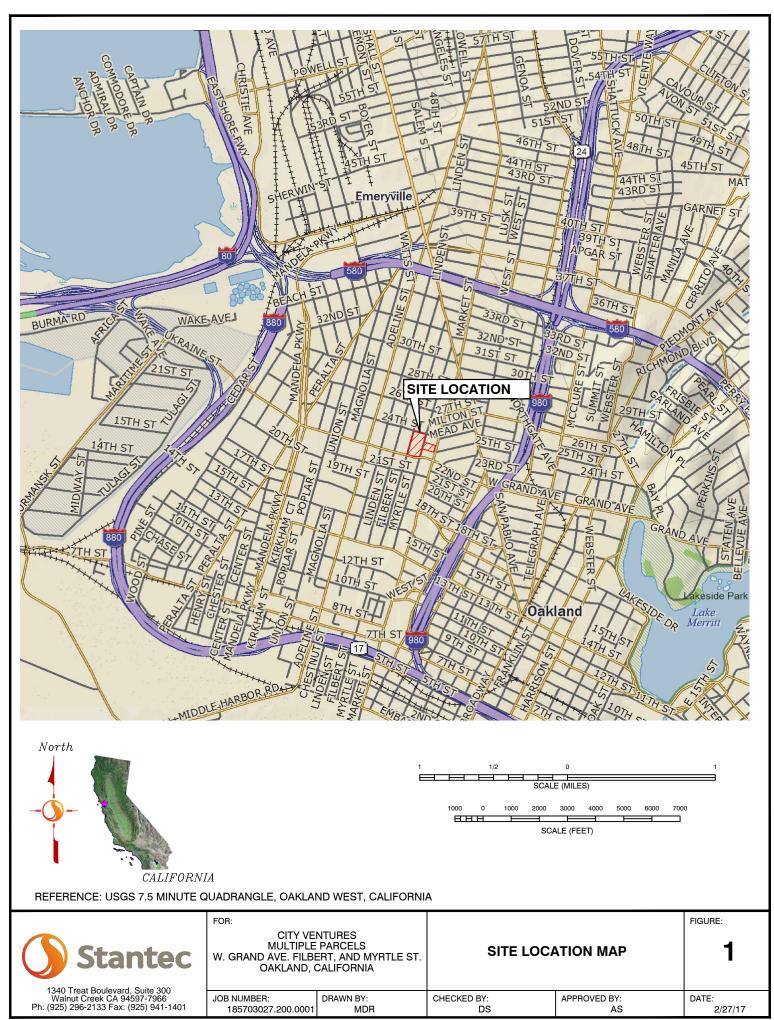
Figure 1 – Site Location Map

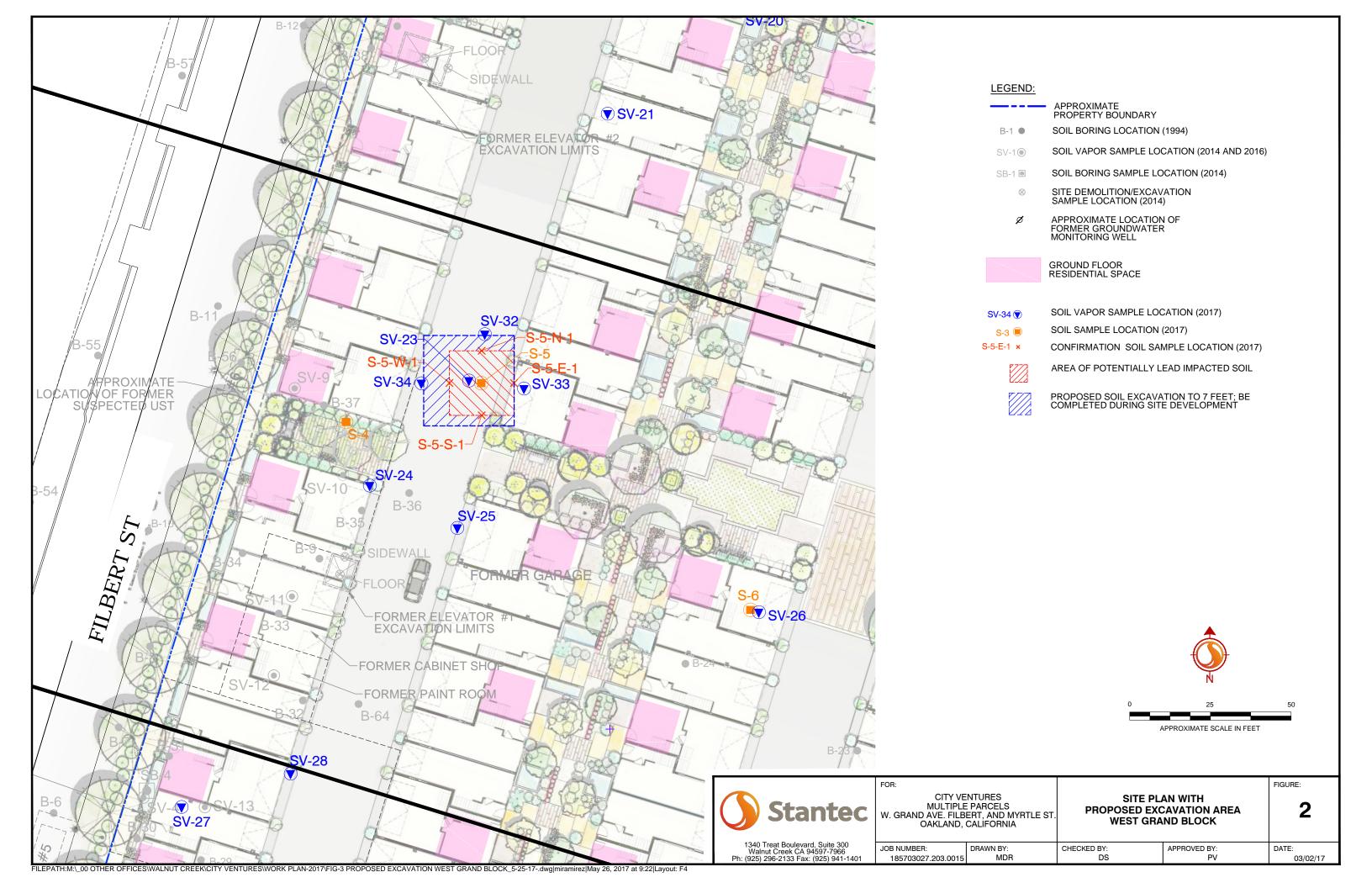
Figure 2 – Site Plan with Proposed Soil Excavation Area

Table 1 – Analytical Results for Boring S-5 Samples

Table 2 - Soil Vapor Analytical Results Near SV-23

**Figures** 





# **Tables**

TABLE 1
Analytical Results for Boring S-5 Soil Samples
2240 Filbert Street, Oakland, California

			EPA 6010B (mg/Kg)	
Sample Location and ID	Sample Date	Sample Depth (ft. bgs)	Lead	Comments
S-5@0.5'	3/31/2017	0.5	240	
S-5@3'	3/31/2017	3	6	excavation bottom
S-5-N-1	3/31/2017	1.5	26	excavation sidewall
S-5-S-1	3/31/2017	1.5	30	excavation sidewall
S-5-E-1	3/31/2017	1.5	17	excavation sidewall
S-5-W-1	3/31/2017	1.5	30	excavation sidewall

#### Notes:

mg/kg: milligrams per kilogram ft. bgs: feet below ground surface

**Bold cells** indicate constituent detected above the regulatory screening level (80 mg/kg)

TABLE 2 Soil Vapor Analytical Results Near SV-23 2240 Filbert Street, Oakland, California

Sample		Sample	EPA 8260B (ug/m³)	Comments
Location and ID	Sample Date	Depth (ft. bgs)	benzene	
SV-23	5/3/2017	5	1,600	duplicate sample had highest reported concentration (shown)
SV-24	5/2/2017	5	<35	
SV-25	5/2/2017	5	<35	
SV-32	5/3/2017	5	<35	
SV-33	5/3/2017	5	<35	
SV-34	5/3/2017	5	<35	

#### Notes:

ug/m3: micrograms per meter cubed

R. bgs; feet below ground surface

Bold indicates benzene detected above the site specific environemental screening level

< = not reported above laboratory reporting limit, as indicated