

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Wednesday, April 13, 2016 5:49 PM
To: 'Divya Bhargava'
Cc: Shawn Munger; Roe, Dilan, Env. Health; Kristen Gates, P.E. (kgates@hanoverco.com)
Subject: RE: Drilling Permit for 25 DP Geoprobe bores
Attachments: CAP_PP_L_2016-03-02.pdf

Divya,

Thanks for your response and additional information, below, as well as on the phone a bit ago. As discussed, the 25 soil bores are to additionally pre-characterize near surface fill soils for offsite disposal, including defining the lateral extent of the contamination for the purpose of disposal segregation.

In regards to the difference between Interim Remedial Action and a Site Management Plan (SMP) at redevelopment sites, this has been a topic of internal discussion at the Alameda County Department of Environmental Health (ACDEH) due to a number of factors that I won't go into. One of the triggers for the Interim Remedial Action route, is the removal of a substantial amount of contamination, which this site meets. In further discussing the subject site internally, where essentially no residual contamination is anticipated to remain due to the depth of the excavation, it is agreed that it is appropriate to use the SMP route.

During the closure of the former Chevron service station LOP case, ACDEH identified metals (including lead) and SVOCs as potential contaminants of concern (CoC) for the site. Due to the documented levels of contamination in near surface soil at the site, ACDEH has been concerned with the potential exposure to contaminated dust to offsite receptors in a densely used urban area, both commercial and residential. The current SMP is limited to onsite construction worker exposure, and does not currently consider offsite receptors. This is an area that will require additional modification in the SMP (perhaps as an appendix). Contaminant exposure to offsite receptors, including children, is best determined by a statistical approach (95% UCL calculations) based on onsite analytical data. Appropriate dust control plans can then be identified and implemented (with perimeter dust monitoring, etc. to support actual exposure levels). The submittal of the draft revised SMP with the data tables as requested, quickly allowed ACDEH to review existing data, and illustrated that there may be insufficient analytical data to adequately determine the level of exposure to dust borne contaminants. As discussed, at present there are approximately 12 composite samples for multiple metals and SVOCs, and limited discrete samples, except for lead, for a fairly large area. The pre-characterization sampling is an opportunity to gather additional data.

Due to the removal of a substantial amount of contaminated soil at the site with the associated potential for offsite receptor exposure to contaminated dust, it is appropriate to conduct a 30-day public notification prior to starting excavations at the site. I have attached a copy of a recent example public notification with somewhat similar issues that ACDEH requests be modified for the subject site and returned to ACDEH in Word format to allow potential minor editing (tweaks usually). I can paste the site location image into the fact sheet, and can also place it in a two column format, so a simple write up is all that is necessary.

The intent of ACDEH with delaying the planned field work was to allow an opportunity to review existing data, allow review of an unknown site investigation report by Versar, and to create the opportunity to concurrently collect pre-characterization soil samples and sufficient additional discrete metals and SVOC samples to populate 95% UCL calculations. The end result was an intent to allow the site to move more quickly towards ground breaking.

As discussed this afternoon, should there be additional questions, let me know. If you believe a conference call is needed, let me know. Tomorrow is fully occupied, but I may have some very limited time Friday morning as I need to prep for another meeting; however, the best time may be Monday morning at 10.

Mark Detterman
Senior Hazardous Materials Specialist, PG, CEG

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

From: Divya Bhargava [mailto:dbhargava@engeo.com]
Sent: Monday, April 11, 2016 2:58 PM
To: Detterman, Mark, Env. Health
Cc: Shawn Munger; Roe, Dilan, Env. Health; Kristen Gates, P.E. (kgates@hanoverco.com)
Subject: RE: Drilling Permit for 25 DP Geoprobe bores

Mark and Dilan –

We were a bit taken aback with the sudden change in position that is reflected in your comments below. We met with both you and Dilan twice (once in June 2015 and once in February 2016) and spoke by telephone conference with you in December. Each time we agreed that this development could be managed with a soil management plan since, due to the fact we are excavating the site to a depth of 40 feet as part of our garage design, we are excavating not only all of the fill material but 20 to 25 feet into native soil. Based on our meeting at the County office on February 2, 2016, and your emailed comments the next day, it seemed that we just needed to add all the data/tables/figures that ACEH specifically requested to the SMP, which was resubmitted on March 30th. Residual impacted soil at our site will be removed as part of this excavation and thus there is nothing left to investigation or remediate. Of note, even the gas station has regulatory closure. We feel that we have answered all of your comments that were collectively discussed and that we agreed on these responses at our February meeting.

We have further provided our responses to your comments below in red. Perhaps a call this week at your earliest convenience is appropriate to walk through the plan and comments to clarify any misunderstanding and move forward with processing the SMP.

Thanks,
Divya

Divya Bhargava, PE
Senior Engineer

From: Detterman, Mark, Env. Health [mailto:Mark.Detterman@acgov.org]
Sent: Tuesday, April 05, 2016 5:04 PM
To: Divya Bhargava
Cc: Shawn Munger; Roe, Dilan, Env. Health
Subject: RE: Drilling Permit for 25 DP Geoprobe bores
Importance: High

Hi Divya and Shawn,

It appears appropriate to place a temporary hold on the additional soil bores for off haul characterization. I've taken a quick read of the revised SMP, which may be better titled "Remedial Excavation Plan", and there are a number of items that appear to warrant a pause and determination if additional data is appropriate, and to get it incorporated into an investigation. **The document is not a "Remedial Excavation Plan". If the project was slab on**

grade construction we would conduct a risk assessment, which would show no exposure pathways and place an O&M on the site. The proposed excavation is performed strictly for construction purposes, not for remediation.

At a minimum these include the following:

- - Installation of at least nine groundwater monitoring wells by Versar in 2007 / 2008, prior to closure of the Chevron case; no report submittal, no analytical data included in current investigation previous submittals.

The LUST case associated with the former gas station at the site was closed in May 2014, with several years of groundwater monitoring data. The new case that has been opened at the Site is for the fill material associated with the former hospital, so the previous groundwater analytical data is irrelevant. Additionally, groundwater sampling conducted by ENGEO in 2015 found no impacts.

- - Installation of at least 13 vapor probes by Versar in 2007 / 2008 prior to case closure, with nearly all non-detects significantly above vapor ESLs; no submitted report for an evaluation of the data collected, and with elevated vapor data detected in areas not previously considered substantially contaminated.

The Versar report from 2008 containing the soil gas data has been submitted to you. Any potential soil with residual VOCs will be excavated (down to a depth of 40 feet) and removed, so there is no concern for vapor intrusion at the site (as described in the revised SMP).

- - Lack of inclusion of all site analytical data, including data from the Chevron site investigations. In addition to ACDEH understanding of the site, these documents will be used for, and are intended to, enable public communications at the time of any required public comment periods; currently considered to be pre-excavation (30 day), and at closure (30 day).

All of the historic soil data has been included in the tables of the revised SMP; we did not include historic groundwater data since the LUST case has been closed and no impacts were identified in the most recent groundwater sampling conducted in 2015.

- - Evaluation where additional data may be warranted based on new data not previously seen. This would include further delineation of notable atypical elevated contaminant detections below groundwater at the site, and to demonstrate that the vertical extent of documented contamination is determined prior to excavation (excavation or off haul precharacterization).

In our opinion, the vertical extent of the soil impacts has been delineated based on all the investigations conducted at the site. The impacts are primarily limited to a depth of 10 to 15 feet. One sample (S-8) collected in April 2015 at a depth of 25 feet had exhibited an elevated concentration of TPH-gasoline. We believe this may be due to smearing from the Geoprobe. We collected samples in February 2016 from a boring adjacent to the previous location, and TPH-gasoline was not detected in the samples collected from this new boring, at depths of 20 and 25 feet.

We should probably talk, but let me know if you have questions; I'm sure they are there!

Mark Detterman
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From: Divya Bhargava [<mailto:dbhargava@engeo.com>]

Sent: Tuesday, April 05, 2016 3:10 PM

To: Detterman, Mark, Env. Health

Cc: Shawn Munger

Subject: RE: Drilling Permit for 25 DP Geoprobe bores

Hi Mark,

The additional borings proposed at the site are being conducted for offhaul characterization purposes.

Thanks,

Divya

Divya Bhargava, PE
Senior Engineer

From: Detterman, Mark, Env. Health [<mailto:Mark.Detterman@acgov.org>]

Sent: Tuesday, April 5, 2016 2:42 PM

To: Divya Bhargava

Subject: Drilling Permit for 25 DP Geoprobe bores

Hi Divya,

I got word that Engeo was planning to install 25 soil bores at the site, and I wanted to explore the reasoning, and if it made sense to collect environmental data at the same time; perhaps to fill data gaps. I've not had a chance to review the report you sent by email the other day, so may not be aware of everything planned.

Let me know.

Thanks,

Mark Detterman

Senior Hazardous Materials Specialist, PG, CEG

Alameda County Department of Environmental Health

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