

Detterman, Mark, Env. Health

From: Detterman, Mark, Env. Health
Sent: Thursday, June 02, 2016 1:09 PM
To: 'Divya Bhargava'
Cc: Roe, Dilan, Env. Health; Shawn Munger
Subject: RE: 2630 Broadway

Hi Divya,

Thanks for the updated info and data. It is good to know that the data supports that potential (likely) excavation dust generation is protective of local inhabitants, and that the contaminants can be managed essentially as planned.

It appears reasonable to update the remedial excavation plan / SMP with the additional data and to incorporate changes / modifications to the document at this time. The intent of the update is to provide a single document for interested members of the public to review during the comment period. Toward that purpose, and to provide data support for the eventual case closure, ACDEH requests the following changes / modifications to the remedial excavation plan / SMP. I could send this in a formal letter, but this seemed to be quicker method to moving the project along.

- Tables A and B still contain the generic “ND” in extensive sections. These have been, and are, requested to be updated with individual detections (< x) to help document or support the public understanding, our understanding, and eventual case closure.
- The previous version of Table A contained analytical data from the Chevron site investigations. It remains valid data, unless removed by excavation. While I don’t suspect the data will change the dust calculations, but higher lead contamination (5,000 at P5 and 6,800 mg/kg at UO2 which was missing from the table I seem to recall) was documented by the older Chevron data. I would request all of that info be brought into the updated remedial excavation plan / SMP.
- Excavation dewatering is essentially not discussed in the remedial excavation / SMP and should be included. What contingency plans are there for contaminated groundwater management (I presume storage / treatment [if needed] and discharge to SD or sewer, but we’re left with an unaddressed potential concern). If EBMUD is satisfied with the data, it would be best to document their input / comments as support. I would bring the groundwater table into the table section as the analytical data is equally as valid as the soil data.
- Dust Control – As mentioned, it is good to know that contaminant concentrations are protective. Minimum standards for a dust control plan should be incorporated into the remedial excavation plan, including active monitoring to ensure that dust suppression is sufficient, especially for the upper 15 to 20 feet and / or first critical period as the contractor gets it’s feel for the site, and is thus documented in the final report due to the urban vicinity. The excavation contractor may likely generate their own dust control plan, but this will set the minimum standard.
- Minimum standards for site access / traffic control should also be incorporated into the excavation plan / SMP.
- Debris Management – A section on how debris management of former hospital foundations and fill debris will be managed should be included as a minimum environmental standard. In the event of the potential reuse of debris as fill materials (it is understood this is a mass export job) should conform to DTSC clean fill guidance.

I’ve reviewed the public notification and have already tweaked it, so it is ready for issuing once a finalized version of the remedial excavation plan / SMP is uploaded. I don’t think that should take too long to generate; probably the tables will be the most time intensive.

I think that is it. Let me know if you have questions,

Mark Detterman

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PDF copies of case files can be downloaded at:

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

From: Divya Bhargava [mailto:dbhargava@engeo.com]
Sent: Wednesday, June 01, 2016 2:38 PM
To: Detterman, Mark, Env. Health
Cc: Roe, Dilan, Env. Health; Shawn Munger
Subject: 2630 Broadway

Good afternoon Mark,

We completed the last round of characterization activities at the Broadway site, as discussed and agreed upon our call and emailed dated April 25, 2016. As a part of this characterization, we collected samples from an additional 25 borings at the Site (S-34 to S-58; see attached figure). Samples were collected at depths of 5, 7.5, 10, 15, and 18 feet (bgs), and all the samples (total of 125 samples) were analyzed for lead (EPA 6010) on a discrete basis. Additionally, 30% of the samples collected from the vadose zone (above the groundwater table) – a total of 22 samples (2 samples each from 11 borings shown as yellow dots on the attached figure) were analyzed for CAM-17 metals (EPA 6010/7471A) and SVOCs (EPA 8270 SIM). A summary of all analytical data is presented in the attached tables.

We want to reiterate and confirm the proposed construction scope has not changed. We will be excavating all residual impacted fill (as well as native soil) from the Site, and disposing it at an appropriate facility.

We performed dust calculations based on the equation recommended by Cal/EPA to calculate the fenceline action level for lead and benzo(a)pyrene equivalent. As presented on Table E, a benzo(a)pyrene equivalent was calculated. The calculations are attached. The maximum concentration of lead detected at the Site and the maximum benzo(a)pyrene equivalent concentrations were used to calculate the Site fenceline action level. As per typical Bay Area Air Quality Management District (BAAQMD) standards, the action level for the project based on a 50 µg/m³ differential will be protective of the offsite receptor exposure.

Also attached is the draft fact sheet for your review. Our client is scheduled to pull the grading permit on or around July 15, 2016. We respectfully request review and approval of the SMP and distribution of the fact sheet by June 17, 2016 in order to maintain the current project timeline. Please let us know if you would like a quick call to discuss the results or plan in the next week.

Thanks,
Divya

Divya Bhargava, PE
Senior Engineer



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