

## Detterman, Mark, Env. Health

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**From:** Detterman, Mark, Env. Health  
**Sent:** Friday, July 15, 2016 3:05 PM  
**To:** 'Scott Youdall'; Kristen Gates  
**Cc:** Divya Bhargava (dbhargava@engeo.com); Roe, Dilan, Env. Health  
**Subject:** RE: 2630 Broadway

Scott and Kristen,

I've had a chance to review the revised SMP and had a few more comments that should be quick to incorporate. Although the SMP is not final, I think it is sufficiently far along that the public comment period can start while the final revisions are incorporated and posted to our ftp site and to Geotracker. In regards to notification to the city that ACDEH has approved or will be approving a SMP, ACDEH has generally been providing the city with a letter documenting the status of the SMP (under review and nearing completion) with respect to the proposed development. In regards to the distribution of the public comment flyer, it is generally sent to potentially affected citizens in the general area around a project, as such we do not always send it to agencies; however, we can additionally and easily include them. If you have a list of agencies that should be included (addresses, contacts, and emails) please forward them. Please additionally forward Bill's email address. I already have Sheryl Skillern's. If you can get these back to me by early next week, I can probably get the public comment flyer out a few days later, likely for a start date a few days after that. I'll generate the list of addresses for the flyer this afternoon.

Divya,

Here's a short list of comments. If you can get them back by Wednesday or Thursday, the document can be online for the opening of the public comment period.

- Demolition and Excavation Activities (Section 4.0); Construction Activities (Section 5.1); Soil Excavation (Section 5.4); These sections do not clearly define the basis for segregation protocols for off haul of contaminated soil vs. uncontaminated soil, but at this point merely imply it for hydrocarbons (staining etc.), nor the anticipated disposal facilities. There also are not segregation protocols yet for metals. In part the intent of the SMP is a corrective action document (an important reason for the 30 day comment period) and is not simply a SMP for clean soil with potential incidental hits of contamination. It is intended to document practices to be used at the site for site workers as well for the general public during the public comment period so as to give the public a level of comfort about the work. It should be fairly quick to incorporate some standard language into one or more of these sections to clarify the segregation process which may in part be driven by disposal sites.

- Debris Management (Section 5.5); The section states that excavated or removed material will be disposed of offsite, or reused. How will reuse be determined? This is not defined. As before, ACDEH requires fill to meet DTSC clean fill guidance, including any recycled material / baserock. A brief discussion of reuse guidance, protocols, and references should be incorporated into the section for contractor use.

- An "Agency or Emergency Contacts" section is not present and should be incorporated into the SMP. This is to handle potential unexpected discoveries, so that a road map is available for site workers to quickly contact appropriate people for the unexpected. ACDEH cannot respond quickly (as you are aware) so this is intended to have a decision process in place in the event something unexpected happens. There is always the potential to encounter something at a former facility. Perhaps another UST, perhaps at the former Chevron site, perhaps even an old heating oil UST for the hospital (perhaps at S-37?), and a contact for the ACDEH CUPA program (no longer Oakland CUPA) for a quick response would also be appropriate to include.

- A couple of easily incorporated items ACDEH asks for in SMPs is the inclusion of the redevelopment name in the title of the SMP, so the SMP is linked to a specific redevelopment, as well as a introductory statement that the SMP is intended to provide management of soil and groundwater associated with the specific redevelopment (name) in accordance with architect plans entitled "XYZ" and dated "ABC".

That's it. Let me know if you have questions.  
And thanks for the well wishes.

Mark Detterman  
Senior Hazardous Materials Specialist, PG, CEG Alameda County Department of Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
Direct: 510.567.6876  
Fax: 510.337.9335  
Email: mark.detterman@acgov.org

PDF copies of case files can be downloaded at:

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

-----Original Message-----

From: Scott Youdall [mailto:SYoudall@hanoverco.com]  
Sent: Wednesday, July 13, 2016 9:42 PM  
To: Detterman, Mark, Env. Health; Kristen Gates  
Cc: Divya Bhargava (dbhargava@engeo.com); Roe, Dilan, Env. Health  
Subject: RE: 2630 Broadway

Mark,

Thank you for the response and sorry to hear of your mother's health.

The Oakland Building Department is looking for the approved SMP as part of their checklist to approve the CMP. Ideally we will be notified once the ACEH is ready to be circulated for public review, and we could then push the City to approve the SMP based on your staff approval. Once you have reviewed the SMP and (hopefully) deemed it ready for circulation, it would be appreciated if you can contact Bill Quesada at the Oakland Building Department at that time to make him aware of the status.

Also, when the ACEH is publicly circulated, does it go to other agencies? Bill asked that we send the documentation to Oakland Fire Services (Sheryl Skillern, Hazardous Materials Inspector, 238-7253) once it is approved. We would like to get the document into Sheryl's hands, though I don't think we should send them our draft until you have completed your review.

Thanks,  
Scott

Scott Youdall  
Development Partner  
The Hanover Company  
syoudall@hanoverco.com  
Direct: (925) 490-2990  
Cell: (650) 380-0014

-----Original Message-----

From: Detterman, Mark, Env. Health [mailto:Mark.Detterman@acgov.org]  
Sent: Wednesday, July 13, 2016 10:44 AM  
To: Scott Youdall; Kristen Gates  
Cc: Divya Bhargava (dbhargava@engeo.com); Roe, Dilan, Env. Health  
Subject: RE: 2630 Broadway

All,

Thank you for your emails and phone calls in regards to the status of the site, including news that the City of Oakland has paused review of the project pending our review of the SMP. I have unfortunately needed to take several unplanned trips to Washington state over the past month to deal with my mother's poor health, and this has caused me to lose more time than I care to think of in regards to a review loop. In regards to a time frame for re-

review of the SMP, I have a number of meetings this week and I must respond to several other cases early this week to remain in compliance with other commitments the county has. I intend on revisiting the SMP in the near term, likely later this week. The review may require input from Dilan, and she is over committed at the present time; however, we will connect. The draft CAP public notification is complete and only awaits the review of the SMP.

In regards to providing documentation to the city to allow them to restart their review of the CMP, and to document the approval of the SMP, who should the communications be directed to?

Mark Detterman  
Senior Hazardous Materials Specialist, PG, CEG Alameda County Department of Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
Direct: 510.567.6876  
Fax: 510.337.9335  
Email: mark.detterman@acgov.org

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-----Original Message-----

From: Scott Youdall [mailto:SYoudall@hanoverco.com]  
Sent: Tuesday, July 12, 2016 9:00 AM  
To: Roe, Dilan, Env. Health; Detterman, Mark, Env. Health  
Cc: Divya Bhargava (dbhargava@engeo.com); Kristen Gates  
Subject: RE: 2630 Broadway

Dilan and Mark,

Good morning. The City of Oakland has now put a hold on reviewing our Construction Management Plan (CMP), which needs to be approved before any permits are released, until we produce an approved Soil Management Plan from ACEH. Our project is now on hold pending your review and approval of the SMP. Could you please provide us an update and assist in any way to expedite this review? Furthermore, once the SMP is deemed approved by staff to start the 30 day public notice, could you please send us an email indicating that staff has approved pending public review? I would try to use said documentation to get the City to restart their review of our CMP.

Please let us know if there is anything we can do to help push this along. We greatly appreciate your assistance at this critical time.

Thanks,  
Scott

Scott Youdall  
Development Partner  
The Hanover Company  
syoudall@hanoverco.com  
Direct: (925) 490-2990  
Cell: (650) 380-0014

-----Original Message-----

From: Kristen Gates  
Sent: Monday, July 11, 2016 1:57 PM  
To: Roe, Dilan, Env. Health; Detterman, Mark, Env. Health  
Cc: Divya Bhargava (dbhargava@engeo.com); Scott Youdall

Subject: RE: 2630 Broadway

Good afternoon Dilan and Mark -

I'm just following up on this email to see if you all have had a chance to discuss the 2630 Broadway project. We are anxiously awaiting the go ahead to circulate the public notice. Thanks.

-----Original Message-----

From: Roe, Dilan, Env. Health [mailto:Dilan.Roe@acgov.org]  
Sent: Wednesday, July 06, 2016 5:31 PM  
To: Kristen Gates; Detterman, Mark, Env. Health  
Cc: Divya Bhargava (dbhargava@engeo.com); Scott Youdall  
Subject: RE: 2630 Broadway

Hi Kristen:

Mark has had a family emergency that he needs to deal with and will not be back in the office until next Monday. I will wrap around with him on this matter when he gets back.

Dilan

-----Original Message-----

From: Kristen Gates [mailto:kgates@hanoverco.com]  
Sent: Wednesday, July 6, 2016 7:58 AM  
To: Detterman, Mark, Env. Health <Mark.Detterman@acgov.org>  
Cc: Divya Bhargava (dbhargava@engeo.com) <dbhargava@engeo.com>; Scott Youdall <SYoudall@hanoverco.com>; Roe, Dilan, Env. Health <Dilan.Roe@acgov.org>  
Subject: RE: 2630 Broadway

Hi Mark -

I am with the Hanover predevelopment team. We are nearing the date in which we need to pull our grading permit to keep the project on schedule. We would like to see the public notice circulated by the end of the week. We feel we have addressed the ACDEH comments on several rounds of good discussions and meetings including the additional testing that was performed at the site requested by ACDEH.

I understand that you were going to push our SMP through final review once you addressed your fiscal year end on June 30th. Can you please advise the status of approval of SMP and a date to have the public notice circulated. Every day we lose is a delay to our construction start. Thanks for your help!

Kristen Gates, P.E.  
The Hanover Company  
5847 San Felipe, Suite 3600  
Houston, Texas 77057  
Direct: 713.580.1321  
Mobile: 281.450.9617  
Fax: 713.580.2321  
www.hanoverco.com

-----Original Message-----

From: Divya Bhargava [mailto:dbhargava@engeo.com]  
Sent: Wednesday, June 29, 2016 7:40 PM  
To: Kristen Gates; Scott Youdall  
Subject: Fwd: 2630 Broadway

FYI from Mark.

Sent from my iPhone.

Begin forwarded message:

From: "Detterman, Mark, Env. Health" <Mark.Detterman@acgov.org<mailto:Mark.Detterman@acgov.org>>  
Date: June 29, 2016 at 5:33:36 PM PDT  
To: 'Divya Bhargava' <dbhargava@engeo.com<mailto:dbhargava@engeo.com>>  
Subject: RE: 2630 Broadway

Hi Divya,

I'm trying to respond to all the emails that accumulated while I was out. The trip was good, but not very relaxing.

I've not had a chance to review it due to the accumulation of emails, and due to the end of our fiscal year tomorrow. I (we) must attend to state reporting requirements before then to document the extent of progress on all LOP cases. We've also had to pushed off a number of responses due to the state requirement, and will need to attend to those next after July 1st. My notes indicate that we were trying for a May 15 start for the public notification and that was difficult, but even more difficult at this time due to the confluence of events. I will definitely try to get to it after the 4th, will move it up closer to the top, but am not sure exactly when.

Mark Detterman

Senior Hazardous Materials Specialist, PG, CEG Alameda County Department of Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
Direct: 510.567.6876  
Fax: 510.337.9335  
Email: mark.detterman@acgov.org<mailto:mark.detterman@acgov.org>

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

From: Divya Bhargava [mailto:dbhargava@engeo.com]  
Sent: Wednesday, June 29, 2016 10:02 AM  
To: Detterman, Mark, Env. Health  
Subject: RE: 2630 Broadway

Hi Mark,

Hope you had a good vacation. Just following up on this to see if you had a chance to review and if you have any questions?

Divya Bhargava, PE  
Senior Engineer

From: Divya Bhargava  
Sent: Wednesday, June 22, 2016 1:34 PM  
To: 'Detterman, Mark, Env. Health'  
Subject: RE: 2630 Broadway

Hi Mark,

Just wanted to check if you had a chance to review the revised SMP. Sorry to bug you again, the client is about 20 days from needing to pull the grading permit and needs to get public notice out this week, if possible.

Thanks,  
Divya

Divya Bhargava, PE  
Senior Engineer

From: Detterman, Mark, Env. Health [mailto:Mark.Detterman@acgov.org]  
Sent: Friday, June 17, 2016 1:05 PM  
To: Divya Bhargava  
Subject: RE: 2630 Broadway

Hi Divya,  
I've not had a chance to review it, but will try next week. We're at the end of the fiscal year, and have a number of administrative tasks that the State requires before the 30th that will need to take precedence in most cases. I'll try to fit it in around those for the time being.

Mark Detterman  
Senior Hazardous Materials Specialist, PG, CEG Alameda County Department of Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502  
Direct: 510.567.6876  
Fax: 510.337.9335  
Email: mark.detterman@acgov.org<mailto:mark.detterman@acgov.org>

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From: Divya Bhargava [mailto:dbhargava@engeo.com]  
Sent: Friday, June 17, 2016 12:40 PM  
To: Detterman, Mark, Env. Health  
Subject: RE: 2630 Broadway

Hi Mark,

Just wanted to follow up on this to see if you have any questions.

Thanks,  
Divya

Divya Bhargava, PE  
Senior Engineer

From: Divya Bhargava  
Sent: Monday, June 13, 2016 5:11 PM  
To: 'Detterman, Mark, Env. Health'  
Cc: Roe, Dilan, Env. Health  
Subject: RE: 2630 Broadway

Good afternoon Mark,

We revised the SMP based on your comments below. See attached revised version. Please let us know if you have any questions or comments.

Thanks!

Divya

Divya Bhargava, PE

Senior Engineer

From: Detterman, Mark, Env. Health [mailto:Mark.Detterman@acgov.org]  
Sent: Thursday, June 2, 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  
Senior Hazardous Materials Specialist, PG, CEG Alameda County Department of Environmental Health  
1131 Harbor Bay Parkway  
Alameda, CA 94502

Direct: 510.567.6876  
Fax: 510.337.9335  
Email: mark.detterman@acgov.org<mailto:mark.detterman@acgov.org>

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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 fence line 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 fence line action level. As per typical Bay Area Air Quality Management District (BAAQMD) standards, the action level for the project based on a 50 µg/m<sup>3</sup> 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

[cid:image001.jpg@01D125F4.CE8585C0]  
ENGEO Incorporated  
2010 Crow Canyon Pl, Suite 250  
San Ramon, CA 94583  
(925) 395-2559 Phone  
(888) 279-2698 Fax  
[www.engeo.com](http://www.engeo.com)<<http://www.engeo.com/>>

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