

## Nowell, Keith, Env. Health

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**From:** John Lucio <John.Lucio@erm.com>  
**Sent:** Tuesday, August 21, 2018 4:30 PM  
**To:** Nowell, Keith, Env. Health  
**Cc:** Roe, Dilan, Env. Health; Khatri, Paresh, Env. Health; Conner, Anne P; LePage, Ben; Arun Chemburkar; Gina Sperinde; Xiaodong Huang  
**Subject:** Conditional Report Approval Letter - 205 Brush Street

Hi Keith,

As we discussed late last week, we received your 16 August 2018 letter providing conditional approval of the reports that we submitted in May 2018 and early June 2018 including:

- 1) Soil Import Management Plan (SIMP) submitted on 4 May 2018;
- 2) Construction Soil and Groundwater Management Plan (CSGMP) submitted on 11 May 2018; and
- 3) Corrective Action Implementation Plan (CAIP) submitted 11 June 2018.

As we discussed, the team would like to meet with you and Dilan Roe to go over the requirements outlined in the letter. Some of these requirements differ from the agreed upon path outlined by you and Dilan in our most recent meeting and conference calls. The following summarize the more impactful changes from the previously agreed upon path forward:

- 1) SIMP – The SIMP was completed based on a template provided by Alameda County Environmental Health (ACEH) as requested in the meetings. As discussed in the earlier meetings, the purpose of the SIMP was to determine what the import criteria was in advance of the work and obtain ACEH approval of the plan so that ACEH would not have to provide approvals during the work activities. This was suggested by Dilan Roe as a way to keep vital work moving forward. As Dilan pointed out, ACEH would require PG&E and its subcontractors to sign an agreement stating that they have read and will follow the SIMP. PG&E would be responsible for ensuring that these import criteria were met and the SIMP would be documented in a future submittal. Your 16 August 2018 letter conflicts directly with this process by citing guidance put in place almost 3 months after submittal of the SIMP, requiring PG&E to obtain ACEH approval of the import fill prior to importing by submitting a Fill Material Characterization Report.
- 2) CSGMP – Your 16 August 2018 letter requests a number of modifications to this plan. Some of the requirements are reasonable and can be implemented; others are complete departures from agreed upon procedures. For example, the 16 August 2018 letter requests confirmation samples. As stated in the approved Feasibility Study/Remedial Action Plan (FS/RAP) and the CAIP, the purpose of the pre-construction sampling was to provide depths of impacted soil, with the results serving as confirmation sampling. Therefore, the request for samples from the excavation bottoms is a last-minute deviation from the approved FS/RAP. The request for confirmation samples from the sidewalls also deviates from the agreed path forward and is something that should have been discussed during the FS/RAP process, not during the redevelopment. The majority of the excavation extends to the property boundaries. As you may recall from many previous discussions, PG&E has agreed to remediate issues within the property boundary proper. Offsite issues are the responsibility of the Port of Oakland. Additionally, shallow impacts to soil at this site are most likely due to historical fill material used prior to development of the site. In addition, the “few samples ....collected from the base of the shallow excavation in the area of TPH and VOC soil impacts” referenced in your letter was only to provide a reference level for potential residual impact at the water table. Sample results from this interval would be conservative, as this interval is the target of in situ chemical oxidation product that will be added and mixed into to base of these deeper excavations.
- 3) Groundwater Delineation and Monitoring – Your 16 August 2018 letter states that the groundwater plume has not been defined. As discussed, PG&E completed multiple characterization investigations and submitted a number of reports including the October 2016 *Site Characterization Summary Report* and the 4 August 2017 *Additional Investigation – Monitoring Well and Soil Vapor Installation Summary Report*. As part of the approval of the 4 August 2017 investigation report, ACEH submitted a letter requesting the preparation of an FS/RAP for the site. An FS/RAP is completed once the site has been characterized to evaluate the potential remedial alternatives for the site and select the remedial alternative. Therefore, we believe this comment was made in error. Should ACEH be referring to the extent of offsite impacts from the former underground storage tank (UST), PG&E is only responsible for cleanup of the site within the property boundaries, and any offsite issues are the Port’s

responsibility. It should be noted, however, that the chosen remedy will address the soil source of total petroleum hydrocarbons (TPH) to groundwater from the former UST area, which will significantly reduce any offsite TPH contribution from this source.

Given the requests and the ongoing redevelopment of this site, we would like to meet soon to discuss these changes to see if we can come to a mutually agreeable solution.

Thank you for your consideration.

John Lucio  
Program Director

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