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Peter Solar
Managing Director

Mr. Gabe Stivala, P.G.
ATC Group Services LLC
915 Highland Point Drive, Suite 250
Roseville, CA 95678

Subject: **Amendment to RSGMP – Revised Air Monitoring Procedures**
2820 and 2855 Broadway, Oakland, CA
Alameda County LOP No. RO 3198

Dear Mr. Stivala:

I 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.

Sincerely,

A handwritten signature in blue ink, appearing to be "PS", is written above a horizontal line.

Peter Solar
Managing Director
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December 26, 2017

Mr. Jonathon E. Sanders
Alameda County
Environmental Health Services
1131 Harbor Bay Parkway, Suite 250
Alameda, California 94502

Subject: Amendment to RSGMP – Revised Air Monitoring Procedures
Broadstone on Broadway
2820 and 2855 Broadway
Oakland, California
Alameda County LOP No. RO 3198
City of Oakland Building Department Permit Numbers B1604083 and B1604077

Dear Mr. Sanders:

On behalf of Broadstone on Broadway, LLC, ATC Group Services LLC (ATC) is submitting this amendment to the Revised Soil and Groundwater Management Plan (RSGMP), dated April 28, 2017. This amendment modifies the air monitoring procedures outlined in the SGMP.

ATC has determined that some the air monitoring procedures and equipment previously proposed and submitted in the *Revised Soil and Groundwater Management Plan (SGMP)*, dated April 28, 2017, are unnecessary. The original air monitoring procedures were intended to apply to both properties (i.e. 2820 and 2855 Broadway) based on the assumption that construction activities and associated air monitoring would be completed concurrently for both properties. Since the construction activities will not be performed concurrently, a revision to the air monitoring procedures to reflect the property-specific conditions and potential health and safety implications is warranted. As such, revised air monitoring procedures were developed for both the 2820 and 2855 Broadway properties. The revised air monitoring procedures are intended to reflect potential property-specific conditions and provide sufficient instrumentation to adequately characterize upwind, downwind, and worker related exposures during the construction period at each property.

For reference, the original air monitoring procedures are detailed in SGMP section 6.8 - *Dust Control and Air Monitoring* of the SGMP. The following paragraphs provide a summary of the original dust control and air monitoring procedures and highlight the rational and nature of the monitoring changes.

Section 6.8.1 Dust Control describes best management practices to control dust. ***This section remains unchanged;***

Section 6.8.2, On-Site Ambient Air Monitoring describes dust and volatile organic compound (VOC) monitoring performed by the ATC technician, and describes the use of personal VOC monitoring instruments to be worn by the excavator operator and one other employee. This section sets VOC action level at 0.5 ppm. ***The original VOC action level was based on the OSHA Permissible Exposure Limit for benzene. While benzene may be encountered***

during excavation and construction, its presence would generally be associated with refined petroleum distillates rather than pure benzene. An adjusted VOC action level of 2.0 ppm was developed based on the conservative assumption that the refined petroleum distillate contains up to 25% benzene.

Section 6.8.3, Worker Personal Air Monitoring expands on Section 6.8.2 and describes (for the excavator operator and one other employee) continuous personal VOC monitoring, continuous personal dust monitoring, and two samples collected with personal sample pumps with dust collection media to be analyzed for arsenic, lead, and nickel. Two samples to be collected for the excavator operator and two samples for the one other employee). **This Section remains unchanged for the 2820 Broadway Property. However, given the relatively low concentrations VOCs and metals detected at the 2855 Broadway Property, continuous personal monitoring and air sampling will not be performed at this location. Instead, periodic VOC and dust monitoring will be performed using hand-held instruments during the course of each workday.**

Section 6.8.4 Site Perimeter Air Monitoring describes dust and VOC monitoring at four periphery locations using four dust monitors that differentiate particulate matter (PM) into sizes, and using four PID's. **Since construction activities will not be performed concurrently at the two properties, the site perimeter monitoring was adjusted to include periodic monitoring at representative upwind and downwind locations at each property and placement of stationary dust and VOC monitors near the property line between the 2820 Broadway Property and the adjacent apartment building to the southeast. This revised approach reduces the cost associated with placement of multiple stationary meters, while still providing representative data pertaining to conditions at the perimeter of each construction site during the course of each workday,**

6.8.5 Personal Protective Equipment and Hygiene describes Personal Protective Equipment. **This Section remains unchanged.**

Additional details regarding the modified air monitoring procedures to be utilized during construction at the 2820 and 2855 Broadway properties are presented below. The revised air monitoring procedures supersede Section 6.8 *Dust Control and Air Monitoring* of the SGMP dated April 28, 2017.

Revised Air Monitoring Procedure for 2855 Broadway

Some proposed procedures and equipment are unwarranted for the types and concentrations of chemicals that are present at 2855 Broadway. Due to the relatively low concentrations of metals and VOC's reported in the soil at 2855 Broadway, ATC has revised the air monitoring procedures to provide for perimeter air monitoring without the need for installing stationary equipment. The revised air monitoring procedures are presented below, and supersede Section 6.8 *Dust Control and Air Monitoring* of the SGMP dated April 28, 2017.

Section 6.8.2, On-Site Ambient Air Monitoring; Personal datalogging for the excavator operator will not be conducted and the VOC action level at the property line will be increased from 0.5 ppm to 2 ppm. These changes are reasonable given the relatively low concentration of VOCs

identified on this property and composition of VOCs that may be liberated during construction activities.

Section 6.8.3, Worker Personal Air Monitoring: *Continuous* personal dust and organic vapor monitored for select site construction workers will not be performed. Instead, measurements of dust and VOC concentrations will be obtained periodically using hand-held instruments (e.g., TSI 8534 Dustrak DRX and RAE MiniRAE 3000 PID) operated by an ATC field technician. Measurements will be obtained within the breathing zone of representative construction workers during the course of each workday and recorded on field data sheets.

Section 6.8.4 Site Perimeter Air Monitoring: Dust and organic vapor monitoring will be performed at various locations, including representative upwind and downwind locations adjacent to the construction site, during the course of each workday. Dust and VOC measurements will be obtained using hand-held instruments (e.g., TSI 8534 Dustrak DRX and RAE MiniRAE 3000 PID) operated by an ATC field technician and recorded on field data sheets. Specifically, the ATC field technician will:

- Maintain and calibrate hand-held monitoring instruments prior to each work day,
- Obtain baseline VOC and dust readings both upwind and downwind each morning prior to commencing daily site construction activities;
- Set the instruments on “data logging” mode, and periodically monitor the site perimeter, including upwind and downwind locations, throughout the course of each workday.
- Observe the instrument readouts and communicate with the excavation crew in the event of an exceedance of dust or VOC action levels at the site perimeter,
- Recommend implementation of additional dust or VOC control measures, if necessary, and
- Maintain daily field logs containing field instrument readings, monitoring locations (e.g., upwind, downwind), visual observations, and additional actions taken in response to an exceedance of dust or VOC action levels, if necessary.

Revised Air Monitoring Procedure for 2820 Broadway

In consideration of the project-specific conditions, planned activities, and proximity of the residential apartment building to the east, ATC has revised the air monitoring protocol for the 2820 Broadway property to reflect the following changes to *Section 6.8.4 Site Perimeter Air Monitoring:*

One stationary monitoring location will be established for dust and organic vapor monitoring at the site perimeter near the property line between the construction site and adjacent residential apartment building to the southeast. The stationary monitoring location will be equipped with one dust monitor (i.e., TSI 8530 Dustrak II) and one PID (i.e., RAE MiniRAE 3000 PID) set in continuous datalogging mode. Particulate concentrations (PM10 and smaller) and VOC concentrations will be measured continuously and data stored in the instruments for subsequent download and analysis.

In addition to the stationary monitoring location, dust and VOC measurements will be obtained periodically during the course of each work day at various locations around the site perimeter

using hand-held instruments (e.g., TSI 8534 Dustrak DRX and RAE MiniRAE 3000 PID). Perimeter monitoring will be performed at upwind and downwind locations and measurements obtained will supplement the data collected continuously from the stationary monitoring location. Specifically, the ATC field technician will:

- Maintain and calibrate hand-held and stationary monitoring instruments prior to each work day,
- Obtain baseline VOC and dust readings both upwind and downwind each morning prior to commencing daily site construction activities;
- Set the instruments on “data logging” mode, and monitor the site perimeter, including upwind and downwind locations, periodically throughout the course of each workday.
- Observe the instrument readouts and communicate with the excavation crew in the event of an exceedance of dust or VOC action levels at the site perimeter,
- Recommend implementation of additional dust or VOC control measures, if necessary,
- Maintain daily field logs containing field instrument readings, monitoring locations (e.g., upwind, downwind), visual observations, and additional actions taken in response to an exceedance of dust or VOC action levels, if necessary, and
- Download data from the stationary dust and VOC monitoring equipment for subsequent review and analysis at the conclusion of each work day.

No other previously proposed equipment or air monitoring activities will change.

Please let me know if you have any questions or require additional information.

CLOSING

Please contact Gabe Stivala at (925) 223-7123 if you have questions or comments.

Respectfully submitted,
ATC Group Service LLC



Gabe Stivala, P.G.
Senior Project Manager
CA Professional Geologist No.7780



Andrew D. Stuart
National Program Director

cc Peter Solar, Broadstone on Broadway, LLC
Elizabeth Mack, Locke Lord
GeoTracker and ACEH FTP upload