

ALAMEDA COUNTY
**HEALTH CARE SERVICES
AGENCY**

REBECCA GEBHART, Interim Director



DEPARTMENT OF ENVIRONMENTAL HEALTH
LOCAL OVERSIGHT PROGRAM (LOP) FOR
HAZARDOUS MATERIALS RELEASES
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July 18, 2017

Mr. Erik Foraker
PSAI Partners IV, LLC
155 Montgomery Street, Suite 1600
San Francisco CA 94104
(Sent via electronic mail to: eforaker@psai-cre.com)

Subject: Site Cleanup Case No. RO0003206 and GeoTracker Global ID T1000009064, Wood Street
Redevelopment, 1708 Wood and 1711 18th Streets, Oakland, CA 94607

Dear Mr. Foraker:

Alameda County Department of Environmental Health (ACDEH) has reviewed the case file in conjunction with the proposed corrective actions and proposed site redevelopment plans for the subject site presented in the following documents prepared by West Environmental Services & Technology (West) on your behalf:

- *Remedial Action Plan, 1708 Wood Street (RAP)*, dated February 2017. The RAP contains a site background which includes a discussion of historical site use and historical investigations conducted at the site from 1997 through 2016, a data evaluation which includes the conceptual site model, screening level assessment, and a discussion of planned or potential remedial actions including soil excavation, installation of vapor mitigation systems (VMS) to mitigate potential impacts of vapor intrusion into occupied structures, construction of trench dams in utility trenches to mitigate potential vapor migration, and soil and groundwater management protocols that will be implemented during site redevelopment to mitigate conditions potentially hazardous to human health or the environment during and after construction.
- *Residual Risk Management Plan, 1708 Wood Street (RRMP)*, dated March 2017. The RRMP details procedures and protocols for post-development management of soil and groundwater beneath the site and maintenance of the vapor mitigation system by future maintenance workers.

The above-listed documents were prepared to support redevelopment of the site and a change in site use from commercial/industrial to residential, as detailed in the following redevelopment plans prepared by Sandis Civil Engineers and submitted to the City of Oakland Planning and Building and Public Works Departments:

- *Planning Permit Number PLN16-007, Roadway Express Planning Submittal*. This submittal includes conceptual redevelopment plans for 1708 Wood and 1711 Campbell Streets (APNs 007-0563-001 and 007-0562-001), submitted to the City of Oakland Planning Department on January 11, 2016, as later revised on May 13, 2016 and approved by the City of Oakland on June 22, 2016.
- *PZ Permit Numbers PZ1700052 and PZ1700053, Roadway Express Condominiums Site Improvements, Parcels A and B, Permit Submittal*. This submittal includes plans dated January 20, 2017 and initially submitted to the City of Oakland Building Department on February 7, 2017 for construction of site improvements associated with a 128-unit townhome-style condominium project.
- *Grading Permit Numbers GR1700084 and GR1700085, Roadway Express Condominiums Site Improvements, Parcels A and B, Grading Permit Submittal*. This submittal includes plans dated April 20, 2017 and initially submitted to the Building Department on May 12, 2017 for grading of the subject property.

Based on information presented in the case file, and with the provision that the information provided to this agency is accurate and representative of site conditions, ACDEH conditionally approves of the corrective actions and soil and groundwater management activities presented in the RAP and RRMP and concurs that implementation of the proposed measures will prevent future exposure to construction workers and site occupants of the proposed redevelopment project from residual contamination at the site.

Therefore, at this juncture you may proceed with site redevelopment activities provided the approved remedial actions and mitigation measures presented in the RAP and RRMP are implemented and the documents listed in the Technical Report section below are submitted in accordance with the associated compliance dates. Case closure will be granted following completion of corrective actions.

TECHNICAL REPORT REQUEST

1. Prior to the start of building construction the following documents must be submitted to ACDEH for review and approval:
 - a. **Project Schedule.** A baseline project schedule providing details of the sequencing of corrective actions and site redevelopment activities. The schedule must incorporate at a minimum the following activities: submittal of a remedial excavation completion report, submittal of building permit plans incorporating a VMS and utility trench dams for the building(s) identified in the RAP; submittal of analytical data from proposed imported soil sources prior to import to the site; installation and inspection the sub-slab depressurization system and vapor barrier beneath the foundation, installation and inspection of the VMS vertical piping and risers, submittal of a VMS record report of construction, recordation of land use covenants for the VMS, and date of site occupancy. The schedule must include reporting of field investigation activities to collect additional soil vapor samples pursuant to paragraph 5.1 of the RAP (*Task 1: Supplemental Vapor Sampling*). The baseline schedule must be updated during the project as required to update ACDEH on the status of corrective action implementation and site redevelopment activities.
 - b. **Soil Excavation Report.** A soil excavation report documenting volumes of excavated petroleum, metal, and PAH-impacted soil, laboratory analytical reports for soil characterization for disposal of excavated soil at an approved landfill, and waste manifests if disposed of off-site. The soil excavation will be performed consistent with paragraph 5.2 (*Task 2: Soil Excavation and Reuse*) of the RAP.
2. Prior to the import of soil to the site the following documents must be submitted to ACDEH for review and approval:
 - a. **Soil Import Documentation.** Requisite documentation for permeable and non-permeable material including information on proposed sources, sampling and profiling protocols, analytical laboratory reports, and tables with analytical results and applicable environmental screening levels must be submitted to ACDEH for review prior to importing fill material to the site, consistent with paragraph 5.2.8 (*Backfilling*) of the RAP.
3. Prior to building occupancy of the new residential redevelopment the following documents must be submitted to ACDEH for review and approval:
 - a. **Institutional Controls (ICs)** – A land use covenant (LUC) documenting long-term site use has been prepared and shall be recorded, and includes the following site use restrictions: (1) implementation of the RRMP, which shall be incorporated therein by reference, including preservation of the cap and maintenance of the vapor mitigation systems and trench dams; (2) prohibition on the extraction of groundwater for any use, including but not limited to domestic, potable or industrial uses; and (3)

prohibition on growing fruits or vegetables for consumption using site soils (edible gardening shall only be permitted using imported soil in raised beds). ACDEH agrees that delays in obtaining a certificate of occupancy should be avoided and will work with the property owner to ensure that the Land Use Covenant is finalized during redevelopment for recording immediately thereafter.

- b. **VMS System Record Report of Construction.** A VMS record report of construction with as-built drawings and other information relevant to the installation of the VMS and certifying the VMS was installed in accordance with the design plans.

TECHNICAL REPORT/WORK SCHEDULE

Please perform the requested work and submit technical reports to Alameda County Environmental Health Environmental Health (Attention: Keith Nowell) in accordance with Attachment 1 and the schedule below. The technical reports may be combined as appropriate. The submittal compliance date for reports with a "Date to be Determined" notation will be finalized in a subsequent Directive Letter and will be based on the date(s) proposed in the Project Schedule.

- **September 18, 2017** – Project Schedule
- **Date to be Determined** – Soil Excavation Report
- **Date to be Determined** – Soil Import Documentation
- **Date to be Determined** – Financial Assurance Mechanism Plan
- **Date to be Determined** – Institutional Controls
- **Date to be Determined** – VMS Record Report of Construction

Thank you for your cooperation. ACDEH looks forward to working with you and your consultants to advance the case toward closure. Should you have any questions regarding this correspondence or your case, please call me at (510) 567-6767 or send an electronic mail message at dilan.roe@acgov.org.

Sincerely,

Dilan Roe

Dilan Roe, PE
Chief – Land Water Division

Cc: Tom Graf, GrafCon, (Sent via email to tom@grafcon.us)
Peter Morris, West (Sent via email to peterm@westenvironmental.com)
Keith Nowell, ACDEH, (Sent via email to keith.nowell@acgov.org)
Paresh Khatri, ACDEH, (Sent via email to paresh.khatri@acgov.org)
Ronald Browder, ACDEH, (Sent via email to ronald.browder@acgov.org)
Electronic File, GeoTracker