

Soo, Kit, Env. Health

From: Soo, Kit, Env. Health
Sent: Wednesday, October 19, 2016 8:48 AM
To: 'Grant, Jason'
Cc: Steve Dunn; 'Debbie Patterson' (dpatterson@reisservice.com); Bajsarowicz, Voytek; Roe, Dilan, Env. Health; Khatri, Paresh, Env. Health
Subject: RE: USL Pleasanton - Proposed Import Soil

Hi Jason,

As indicated below, if you need to revise the Soil Management Plan (Appendix C of the Development Plan) with the proposed language, please do so and resubmit the document as a REVISED document. It would make sense that the section for characterizing fill material also include a regulatory criteria for assessing whether the material is acceptable or not. A more detailed description of assessment rather than a general description would be more useful and practical. We will review the document once it has been uploaded to both the ACDEH ftp and geotracker sites and provide our comments then.

Thank you, Kit

Kit Soo, PG

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From: Grant, Jason [mailto:JGrant@haleyaldrich.com]
Sent: Tuesday, October 18, 2016 3:23 PM
To: Soo, Kit, Env. Health <Kit.Soo@acgov.org>
Cc: Steve Dunn <SDUNN@steelwavellc.com>; 'Debbie Patterson' (dpatterson@reisservice.com) <dpatterson@reisservice.com>; Bajsarowicz, Voytek <VBajsarowicz@haleyaldrich.com>
Subject: RE: USL Pleasanton - Proposed Import Soil

Hi Kit,

I reviewed Section 3.4 Import Fill Material of the Soil Management Plan (Appendix C of the Development Plan). This section references the DTSC Information Advisory, Clean Imported Fill Material, dated October 2001, for characterizing fill material being proposed for import to the USL Pleasanton site. However, it does not specify what environmental regulatory criteria would be used to assess whether this material is acceptable for import. Rather, it is stated that the characterization sampling results would be reviewed for approval by the Environmental Professional. Given our discussion this morning, it appears that ACDEH may want more specifics on how the Environmental Professional would review the analytical data. Therefore, I would like to propose the following language be added to Section 3.4,

“The analytical characterization results will be compared against the Tier 1 ESLs established by the SFRWQCB. If no Tier 1 ESL is exceeded, no further evaluation is warranted and the proposed import material would be deemed acceptable for placement anywhere within the Site. If a Tier 1 ESL is exceeded, further evaluation of the analytical results will be performed by the Environmental Professional. If the analytical results do not exceed the ESL established by the SFRWQCB

for residential, shallow soil direct exposure, then the proposed import material would be deemed acceptable for placement anywhere within the Site. If the analytical results do not exceed the ESL established by the SFRWQCB for construction worker, any depth soil direct exposure, then the proposed import material would be deemed acceptable 2 feet bgs and deeper for placement in landscape areas, or 1 feet bgs and deeper for placement in hardscape areas.”

Please note that I left in the reference to the Tier 1 ESLs as this document, the Soil Management Plan, will need to be easily understood by the contractors working on this project. These contractors know how to reference the Tier 1 ESLs, but may be confused if we reference only the residential, shallow soil direct exposure ESLs. Therefore, it is simplest to state that if a Tier 1 ESL is met, then the soil is acceptable. However, if a Tier 1 ESL is not met, then the Environmental Professional needs to become involved to conduct the further evaluation.

Let me know if the above additional to Section 3.4 is reasonable to ACDEH. If so, I will incorporate with any other comments ACDEH may want addressed given your review of this document.

Regards,

Jason

Jason Grant, P.E.
Senior Project Manager

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From: Grant, Jason

Sent: Tuesday, October 18, 2016 11:55 AM

To: 'Soo, Kit, Env. Health' <Kit.Soo@acgov.org>

Cc: 'Steve Dunn' <SDUNN@steelwavelc.com>; 'Debbie Patterson' (<dpatterson@reisservice.com>'
<dpatterson@reisservice.com>); Bajsarowicz, Voytek <VBajsarowicz@haleyaldrich.com>

Subject: RE: USL Pleasanton - Proposed Import Soil

Hi Kit,

Thank you for speaking with me this morning regarding ACDEH's review of the analytical results characterizing this proposed import soil. As we discussed, I compared the residential direct-exposure ESLs to the reporting limits, and unfortunately, the reporting limits for some of the SVOC analytes that were non detect do exceed this ESL. Note that for the organochlorine pesticides, the reporting limits are all less than the residential direct-exposure ESLs. Therefore, in order to meet ACDEH's requirements for evaluating this soil, further sampling and analysis is needed, specifically, the collection of 8 shallow soil samples submitted for analysis of PAH using USEPA Method 8270SIM. We will update ACDEH should this additional sampling and analysis be performed.

In addition, as we discussed, I will be reviewing the Development Plan and associated Soil Management Plan to make sure the evaluation of import material against the appropriate ESLs is clearly explained. Once ACDEH completes their review of these documents, we can discuss whether the language within these documents regarding the ESL evaluation should be revised for better clarification.

Warm regards,

Jason

Jason Grant, P.E.

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From: Grant, Jason

Sent: Friday, October 14, 2016 11:41 AM

To: 'Soo, Kit, Env. Health' <Kit.Soo@acgov.org>

Cc: 'Steve Dunn' <SDUNN@steelwavelc.com>; 'Debbie Patterson' (dpatterson@reisservice.com) <dpatterson@reisservice.com>; Bajsarowicz, Voytek <VBajsarowicz@haleyaldrich.com>

Subject: USL Pleasanton - Proposed Import Soil

Hi Kit,

Thank you for taking the time to talk with Voytek and me regarding the soil being proposed for import to the USL Pleasanton site. As we discussed, this soil is to be characterized per the DTSC's October 2001 *Information Advisory Clean Imported Fill Material*. The site from which this soil is to be obtained is identified as the Workday Office Project, located at 6110 Stoneridge Mall Drive, Pleasanton, California. Per the *Advisory*, the Workday Office Project site is an approximate 7 acre "Individual Borrow Area" with native soil material as this property has never been developed. In addition, per the *Advisory*, the Workday Office Project site is "Land near to an existing freeway". Given these conditions, per the *Advisory* the characterization of this soil proposed for import would require a minimum of 8 soil samples to be analyzed for lead and PAHs.

Attached to this email are a figure showing the location of 8 borings advanced 2 feet bgs on the Workday Office Project. Two soil samples were collected from each boring, one at 0.5 feet bgs and a second at 2 feet bgs. The soil samples were submitted for the following analyses: TPHg/d/mo; VOCs; SVOCs; California Title 22 Metals; and organochlorine pesticides. The analytical results are summarized in the attached table and compared against the SFRWQCB Tier 1 ESLs. The evaluation of the analytical soil results indicates the following:

- None of the detected TPHd/mo and California Title 22 metals concentrations exceeded Tier 1 ESLs (note that arsenic is to be compared against the natural background level agreed to by the SFRWQCB, 11 mg/kg).
- The only Tier 1 ESL exceeded was the naphthalene concentration detected in sample SS-1-2'. However, this Tier 1 ESL exceedance is based on assessing the risk associated with leaching to a drinking water resource, which is not a concern for the USL Pleasanton site. The naphthalene concentration detected in SS-1-2' of 110 µg/kg is below the ESL established for assessing direct exposure risk for residential land use, 3,300 µg/kg, which is the next lowest ESL.
- The remaining SVOCs were all non detect. It is noted that three of these SVOCS, benzo(a)pyrene, dibenz(a,h)anthracene, and naphthalene, had reporting limits that exceeded their respective Tier 1 ESLs. This is a result of the analyses not being performed using 8270SIM.
- Five soil samples contained a few organochlorine pesticides at concentrations well below their respective Tier 1 ESLs. It is noted that five organochlorine pesticides, dieldrin, endrin, heptachlor, heptachlor epoxide, and toxaphene, had reporting limits that exceeded their respective Tier 1 ESLs.

Given the above, it is Haley & Aldrich's opinion that the soil sampling activities conducted at the Workday Office Project site generally followed the conditions of the DTSC *Advisory*. This sampling included collecting double the number of soils

samples required, and conducting several additional analyses. Although one sample exceeded a Tier 1 ESL, and some reporting limits were greater than Tier 1 ESLs, the overall data indicates that these deviations should not be a concern.

As we agreed to during our call, we would appreciate if ACDEH could review these characterization results by early next week and confirm whether this soil would be acceptable for import to the USL Pleasanton site. Please let me know if you require any further information to complete your review.

Warm regards,

Jason

Jason Grant, P.E.

Senior Project Manager

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