

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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August 14, 2017

3000 Broadway SPE LLC
c/o Lowe Enterprises Real Estate Group
595 Market Street, Suite 2550
San Francisco, CA
Attn.: Alan Chamorro
(Sent via electronic mail to achamorro@loweenterprises.com)

Subject: Site Cleanup Case No. RO0003236 and GeoTracker Global ID T10000010020, 3000 Broadway
Redevelopment Project, 250 30th Street, Oakland, CA 94611

Dear Mr. Chamorro:

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 Langan Engineering and Environmental Services, Inc. (Langan) on behalf of 3000 Broadway SPE LLC:

- *Supplemental Demolition Information Memorandum, 3000 Broadway Redevelopment*, dated June 22, 2017. The Supplemental Demolition Information memorandum presents actions to be implemented during the demolition activities associated with the proposed site development as it relates to two areas of concern (AOC):
 - Portions of the 3020 Broadway and 3007/3009 Brook Street properties with State of California Class 1 hazardous materials detected in shallow soil; and
 - Soil beneath the 260 30th Street property with total petroleum hydrocarbon (TPH), volatile organic compound (VOC), and polycyclic aromatic hydrocarbon (PAH) contamination.
- *Supplemental Environmental Information Memorandum, 3000 Broadway Redevelopment*, dated June 16, 2017. The Supplemental Environmental Information memorandum presents a summary of environmental information acquired subsequent to the submittal of the Soil and Groundwater Management Plan (SGMP) dated May 17, 2017 including groundwater monitoring well data, current use of the properties surrounding the site, the proposed placement of utility conduits and connections, and an updated table summarizing environmental activities and concerns by parcel.
- *Basis of Design for Vapor Mitigation System, 3000 Broadway Redevelopment: 260 30th Street, Oakland, California* (VMS BOD Report), dated May 22, 2017. The BOD Report provides a preliminary basis of design and preliminary draft design drawings depicting the major system components of a vapor mitigation system (VMS) proposed to be installed beneath the 260 30th Street portion of the redevelopment site due to elevated levels of chlorinated hydrocarbons and petroleum hydrocarbons in groundwater. The proposed VMS will consist of a continuous, spray-applied vapor barrier membrane located beneath a portion of the structural building slab, combined with a horizontal collection and venting system installed below the vapor barrier membrane to allow any soil vapors that would collect

beneath the slab to migrate and vent to the atmosphere outside the building. The balance of the foundation slab will be underlain by a waterproofing membrane that is made by the same manufacturer as the vapor barrier membrane. Where the transition occurs between the vapor barrier membrane and the waterproofing products, the gravel layer will be interrupted by a lateral barrier constructed of controlled density fill, concrete, or similar low-permeability material to migrate against the potential lateral migration of VOCs along the gravel layer into areas that are not covered by the vapor barrier membrane. The BOD Report also proposes to limit potential vapor migration via utility trenches beneath the proposed building with trench dams consisting of controlled density fill installed in utility trenches, as appropriate, at the perimeter of the building during construction. The BOD Report proposes to evaluate the performance of the VMS by collecting air samples from the VMS risers and measuring airflow within the riser. The initial round of monitoring is proposed to be conducted when the VMS is substantially complete with monitoring continuing on a quarterly basis until two consecutive sampling events indicate that all primary COCs are present at concentrations at or below 75% of their respective ESLs for soil gas. If this milestone is not achieved within one year, or if the monitoring data or other observations indicate any cause for concern, the BOD Report proposes that additional monitoring or mitigative measures will be discussed with ACDEH.

- *Soil and Groundwater Management Plan, 3000 Broadway Redevelopment, 3000 and 3020 Broadway; 3007 and 3009 Brook Street; and 250, 260, and 288 30th Street, Oakland, California (SGMP)*, dated May 17, 2017. The SGMP presents soil and groundwater practices and procedures to be employed during the construction of the redevelopment project. The SGMP describes site conditions associated with past property use and specifically proposed excavation activities to mitigate soil and groundwater impacts currently present in the subsurface at the site. The SGMP also describes measures that will be implemented during development activities to mitigate potential risks to the environment and to protect on-site construction workers and/or pedestrians, site visitors, and off-site receptors from potential exposure to hazardous substances present at the site. Site development activities related to soil and groundwater impacts may include, but are not limited to, shoring, soil excavation and off-site disposal, construction dewatering and treatment, and soil handling and grading activities.
- *Feasibility Study and Corrective Action Plan, 3000 Broadway Redevelopment, Oakland, California (FS/CAP)*, dated May 2, 2017. The FS/CAP evaluates corrective action alternatives for soil, groundwater and soil gas that can be implemented to meet corrective action objectives (CAO) to mitigate risks to human health due to site contamination.
 - Corrective Action for Soil. Petroleum hydrocarbons, VOCs, PAHs and heavy metals (including lead), have been detected at elevated concentrations in soil. The proposed CAO for soil is to excavate and dispose of soil containing concentrations of chemicals of concern (COCs) that exceed Tier 1 ESLs which will significantly reduce or eliminate concentrations of contaminants in soil to levels protective of construction workers and future site users. The proposed development plan includes excavating soil up to 18 feet below ground surface (bgs). Therefore, the selected corrective action alternative for soil is to excavate and dispose of soil during site construction. Over-excavation is proposed in the southeastern corner of the site (260 30th Street) to remove soil containing concentrations exceeding Tier 1 ESLs.
 - Corrective Action for Groundwater. The proposed CAO for groundwater are to 1) reduce the petroleum hydrocarbon related and VOC mass in the subsurface contributing to groundwater impacts, such that concentrations in groundwater will be at or below water quality objectives in a reasonable time frame; 2) eliminate the potential for groundwater to pose an unacceptable vapor intrusion concern; and 3) reduce potential risk of construction worker exposure to groundwater during site development. Based on groundwater elevations, it is anticipated that groundwater dewatering, treatment and discharge during construction is needed to achieve proposed excavation depths. Groundwater extraction and treatment during construction

activities is proposed as the primary, selected corrective action alternative for onsite groundwater. Off-site groundwater well installation and sampling is proposed to evaluate the extent of groundwater impacts migrating off-site. If groundwater results indicate that additional groundwater treatment is necessary, the FS/CAP proposes that groundwater impacts will be addressed by one of the following treatment alternatives: enhanced bioremediation, in-situ chemical oxidation or zero valent iron (ZVI). If additional groundwater treatment is necessary, the final groundwater corrective action alternative and implementation plan will be presented in an FS/CAP Addendum.

- Corrective Action for Soil Vapor. The proposed CAO for soil vapor is to mitigate potential risk of vapor intrusion into indoor air related to petroleum hydrocarbons and VOCs detected at elevated concentration in soil and groundwater. Due to elevated petroleum hydrocarbon and VOC concentrations in soil and groundwater under the eastern portion of the site, the proposed soil vapor corrective action alternative is a VMS under the area currently occupied by the 260 30th Street property. Additionally, the proposed development consists of a one to two-story concrete podium garage. The partial below grade parking level will be naturally ventilated along the southern and eastern faces and mechanical ventilation will be provided on the interior parking area.

The above-listed documents were prepared to support redevelopment of the site and a change in site use from commercial to residential, as detailed in the site development plans prepared by BDE Architecture dated January 16, 2017 and associated City of Oakland Planning and Building Department permits (Planning Permit Number PLN16-1222 and Building Permit Number B1604162).

The site is located in a fully developed mixed-use area of Oakland, commonly referred to as Auto Row. The proposed redevelopment area consists of 3000 and 3020 Broadway; 3007 and 3009 Brook Street; and 250, 260, and 288 30th Street in Oakland, California. ACDEH understands that the approved development plans include a five story mixed use development with 127 new residential units and 8,000 square feet of retail space. The development will consist of lot line to lot line construction with two levels of concrete podium. The lowest level will consist entirely of parking and will be both naturally and mechanically ventilated. Two elevators will service the new development from what is now the 3000 Broadway parcel. All residential and commercial units will be situated above the parking podium. A maximum excavation depth of approximately 18 feet is expected along Broadway and a minimum excavation of seven to eight feet along Brook Street is expected for construction purposes. The site is currently vacant of tenants and until recently the warehouse-like structures at 3020 Broadway and 250, 260 and 288 30th Street were utilized as automobile sales, repair service shops and a restaurant (3000 Broadway). Two private residences are located at the 3007 and 3009 Brook Street site properties, but are either currently vacant and planned for either relocation or demolition.

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 FS/CAP, VMS BOD Report and the SGMP 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 FS/CAP, VMS BOD Report and SGMP and all required addendums and implementation plans 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/WORK SCHEDULE

Please prepare 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: onsite groundwater monitoring well destruction and protection of off-site groundwater monitoring wells, site demolition/private residence relocation and sequencing of concrete slab removal to minimize volatilization of VOCs, dust monitoring, soil excavation and backfill import, installation, inspection and surveying of utility trench dams, installation and inspection the sub-slab vapor barrier membrane and vapor collection piping beneath the foundation, foundation construction, installation of subslab vapor monitoring points, installation and inspection of the VMS vertical piping and risers, and indoor air sampling prior to occupancy. The schedule must also incorporate the sequencing of submittals of documents and reports including submittal of analytical data from proposed imported soil sources prior to import to the site, a remedial excavation completion report prior to foundation construction, a work plan to further delineate onsite and offsite soil vapor and groundwater impacts and installation of additional off-site groundwater and soil vapor monitoring wells, a revised VMS BOD Report and building permit plans incorporating additional details on the extent and specifications of the VMS/moisture barrier design based on results of additional groundwater and soil vapor delineation, a VMS Operations, Maintenance and Monitoring Plan (OM&M Plan) with proposed post-construction performance measures, monitoring and reporting in accordance with the Department of Toxic Substances Control Vapor Intrusion Mitigation Advisory (October 2011) to ensure that the VMS is operating correctly and preventing unacceptable volatile chemical concentrations from migrating up and into the overlying structure, a VMS Record Report of Construction, recordation of land use covenants for the VMS prior to building occupancy, and an FS/CAP Addendum for remediation of groundwater impacts migrating off-site if required based on findings from the additional environmental sampling and monitoring. 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.

Please 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** – Groundwater and Soil Vapor Delineation Work Plan
- **Date to be Determined** – Revised VMS BOD Report and Building Permit Plans
- **Date to be Determined** – VMS OM&M Plan
- **Date to be Determined** – VMS Record Report of Construction
- **Date to be Determined** – Land Use Covenant & Institutional Controls Recordation
- **Date to be Determined** – FS/CAP Addendum for Remediation of Offsite Groundwater Impacts
(if applicable)
- **Date to be Determined** – Post Construction Monitoring Reports

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 Clyman, Lowe Enterprises Real Estate Group, 1901 Harrison Street, Suite 1430, Oakland, California 94612 (*Sent via electronic mail to: tclyman@loweenterprises.com*)

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Electronic File, GeoTracker