

## Nowell, Keith, Env. Health

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**From:** Nowell, Keith, Env. Health  
**Sent:** Friday, December 22, 2017 4:17 PM  
**To:** Mona Hsieh; 'Patrick Kong'  
**Cc:** Forrest Cook (cook.forrest@gmail.com); Low, Tim (TLow@oaklandnet.com); Roe, Dilan, Env. Health; Khatri, Paresh, Env. Health  
**Subject:** Site Cleanup Case No. RO0003238, 3101 35th, Oakland, CA, Teleconference Call Follow-up  
**Attachments:** 3101 35th Ave\_1.jpg; 3101 35th Ave\_2.jpg; Construction\_Sequencing.pdf; Indoor Air Sampling Work Plan.pdf; VMS\_CQA\_Plan.pdf

Dear Ms. Hsieh,

Thank you, Forest Cook of Almar Environmental (Almar) and Alameda County Department of Environmental Health (ACDEH) staff Dilan Roe, Chief, Land Water Division, and case worker Keith Nowell for participating in our conference call today. The call was scheduled to discuss the status of the subject case and the path forward. On December 1, 2017, ACDEH became aware of the occurrence of site activities that were out of compliance with our letter dated November 11, 2017. ACDEH requested the work at the site be halted pending this conference call to discuss the compliance issues.

Item 1 of our November 11, 2017 letter stated "Prior to the start of site demolition and construction activities the following documents must be submitted to ACDEH for review and approval: Project Schedule (PS), Corrective Action Implementation Plan (CAIP), Probe Decommissioning Report, and Site Management and Contingency Plan for Redevelopment Construction (CSMP)". However, ACDEH has been made aware that site excavation activities have been performed prior to ACDEH's approval of a PS, CAIP and a CSMP. These activities included trench work, construction of foundation forms, concrete pours, and damaging/burying of on-site vapor probe bores. Further review of the time line of the non-compliant activities indicate they were initiated prior to our November 11 letter and continued following issuance of the letter until site activities were halted by our agency on December 1, 2017.

ACDEH is in receipt of recently submitted PS and CSMP. The PS was preliminarily reviewed prior to the conference call and noted not to contain all the tasks outlined in Item 1 of our November 11, 2017 letter. The PS will need to be updated and resubmitted. The CSMP has not been reviewed, but will be reviewed in the near future. However, all the elements of the CSMP should be implemented an interim measure prior to our review.

As discussed in our November 11, 2017 letter, the CAIP must include a basis of design for the vapor mitigation measures including the vapor mitigation system (VMS) and utility trench dams consistent the conceptual plans presented in the Draft Corrective Action Plan dated August 7, 2017. The CAIP must include the full set of building permit construction drawings incorporating the vapor mitigation measures. The CAIP must include a Construction Quality Assurance (CQA) Plan describing contractor and inspector qualifications and experience, procedures for a VMS and utility trench dam construction monitoring and documentation, and a construction sequencing plan (CSP) presenting the sequence of measures that will be used to protect the installed VMS during building construction activities; and a Work Plan for indoor air sampling (IASP) prior to building occupancy to verify the effectiveness of the VMS. ACDEH is concerned that installation of the site improvements to date may pose challenges to the VMS construction based on review of site photographs presented by Almar (see attached) concurrent with the conference call. The plans and basis of design for the VMS must address the existing site improvements and include any foundation corrective measures required to integrate the VMS with the foundation.

As discussed in the conference call, ACDEH is providing a sample VMS Basis of Design Report with a CQA Plan, CSP, and IASP documents for your reference (see attached).

Prior to the resumption of site development activities, the above listed documents must be submitted to and approved by ACDEH. ACDEH also requests the following additional items be performed:

Trench excavation for the construction of foundation footings has been performed in the areas demonstrated to have the highest concentrations of Total Petroleum Hydrocarbons as gasoline (TPHg) and tetrachloroethylene (PCE) in soil

vapor. As the site is bounded on two sides by residential units, ACDEH requests the recovery and analysis of outdoor air samples for an evaluation of residential exposure to soil vapor. Please recover at least one outdoor air sample in the areas demonstrated to have the highest concentrations of TPHg and PCE in soil vapor. Additionally ACDEH request an ambient air sample be included in the outdoor air exposure study.

Based on a review of the site photographs provided by Almar, ACDEH understands that the site will require stabilization prior to resumption of site activities. ACDEH requests minimal soil disturbance during the site stabilization measures and the provisions of the CSMP be followed.

ACDEH will discuss the disposition of the remaining soil vapor probes with James Yoo with the Alameda County Public Works Agency (ACPWA).

As discussed in the conference call, ACDEH will review the CSMP in the near future and will include providing comment with regard to soil excavation as a contingency, if warranted.

Regards,  
Keith Nowell

Keith Nowell PG, CHG  
Hazardous Materials Specialist  
Alameda County Department of Environmental Health  
1131 Harbor Bay Parkway  
Alameda , CA 94502-6540  
phone: 510 / 567 - 6764  
fax: 510 / 337 - 9335  
email: [keith.nowell@acgov.org](mailto:keith.nowell@acgov.org)

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