

T E C H N I C A L M E M O R A N D U M

TO: Carolyn (Neer) Mogollon, AICP – David J. Powers & Associates, Inc.

cc: Jamie Hamilton – CenterPoint Properties (CenterPoint)

FROM: Scott Allin, R.E.P.A., Principal Environmental Scientist

DATE: July 27, 2023

RE: **RESPONSE TO CALIFORNIA ENVIRONMENTAL QUALITY ACT QUESTIONS
INDUSTRIAL PARKWAY RUUS ROAD REDEVELOPMENT
HAYWARD, CALIFORNIA
FARALLON PN: 1353-070**

Farallon Consulting, L.L.C. (Farallon) has prepared this Technical Memorandum to provide responses to questions by David J. Powers & Associates, Inc., on environmental documents prepared by Farallon on behalf of CenterPoint. Below are the questions in italics followed by Farallon responses.

1. *The Phase I, Phase II, and DGI Work Plan reports all mention that groundwater beneath the site is impacted by petroleum from the adjacent GGP site and/or other industrial uses in the area. However, none of these documents discuss whether this would result in impacts to future site users or result in vapor intrusion issues within the building.*

During the Phase II investigation, numerous soil gas samples were collected along the eastern property boundary proximate to the Golden Gate Petroleum (GGP) property for laboratory analysis. These included locations FSS-7, FSS-11, and FSS-14. As indicated in Table 9 of the *Phase II Environmental Site Assessment Report, 1571, 1581, and 1593 Industrial Parkway West, Hayward, California* dated December 1, 2021 prepared by Farallon, volatile constituents were not detected in these soil gas samples at concentrations exceeding the commercial regulatory standards. Consequently, Farallon identified no evidence that releases from the GGP property have resulted in vapor intrusion concerns to the Site under a commercial setting. As indicated in Section 4.8 of the *Data Gap*



Investigation Work Plan, 1571, 1581, 1593, and 1617 Industrial Parkway West, and 29469 Ruus Road, Hayward, California dated March 31, 2023 prepared by Farallon (DGI Work Plan), benzene and chloroform were detected in 5-foot soil gas samples collected from select borings on the northern portion of the Site at concentrations slightly exceeding the commercial regulatory standards, but benzene and chloroform were detected in subslab soil gas samples at concentrations less than the commercial regulatory standards. The northern portion of the Site does not have proposed buildings; consequently, no future vapor intrusion concerns were identified. However, the DGI Work Plan proposes confirmation soil gas sampling beneath the future building footprint to further document that engineering controls are not warranted for the future building (see section 4.8.2 of the DGI Work Plan). In the event engineering controls are found to be necessary, measures may include installation of subslab venting and/or foundation vapor barriers.

2. The Phase II reports and DGI Work Plan mention that a Media Management Plan (MMP) would be drafted and implemented to govern earthwork and manage residual impacts identified. I understand that some of the measures in this MMP would be identified once all of the data gaps are explored, but does Farallon know what measures might be implemented in the MMP based on the contaminants that have been fully explored and what they may encounter once they begin the Data Gap Investigation itself?

Given the long industrial history of the Site and access limitations that exist with current development and uses, the MMP is proposed to primarily manage the potential for unknown conditions to be encountered. As indicated in Section 4.3 of the DGI Work Plan, the presumptive remedy for the Site is soil excavation and off-site disposal of chemically impacted soil discovered at both known and unknown areas. The two areas where known impact exists that will likely require removal via soil excavation include tetrachloroethene and trichloroethene beneath the 1581 Building (DGI Work Plan Section 4.4), and residual petroleum impacts at former waste oil underground storage tank 6 (DGI Work Plan Section 4.7). The known areas of impact will be managed by environmental professionals in a manner dictated in the MMP and in accordance with industry standards. Based on the fairly robust existing data set, unknown conditions, if present, are anticipated to consist of shallow isolated releases that would be discovered through visual or olfactory observations during demolition and grading. The MMP will define procedural actions for unknown conditions if encountered based on confirmation testing and regulatory standards. The MMP will also outline screening procedures for determining if chemically impacted soils are encountered, the criteria for determining if response actions are required, and general construction



management procedures for managing and minimizing the spread of suspect materials, such as stockpile management and dust suppression.

3. *Would all constituents be removed from the site, or would some be left on-site? If some would be left, what measures would be required to ensure the safety of users on- and off-site?*

Farallon anticipates that all contaminants exceeding commercial regulatory standards or background concentrations will be removed from the Site under the presumptive remedy. As immediately adjoining properties proximate to the areas of impact are also used for commercial-industrial purposes, the remedy would also be protective of off-site occupants. In the unlikely event that conditions that cannot be remediated to the commercial standards are identified during redevelopment, CenterPoint will work with the County of San Mateo regulator to establish procedures for monitoring the in-place remedy in the future, such as annual impervious cover inspections, as the hazards posed by the constituents of concern do not warrant the cost of removal.