
San Francisco Bay Regional Water Quality Control Board

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Cost Recovery ID 2020842

City of Livermore
Attn: Rick Teczon
1052 South Livermore Avenue
Livermore, CA 94550
rteczon@cityoflivermore.net

Subject: Approval of Site Assessment and Summary Report and Site History Technical Report and Request for Data Gap Workplan and Interim Remedial Action Plan – Old Train Depot, 20, 22 & 24 S. L Street & 2009 to 2073 Railroad Ave, Livermore, Alameda County

Dear Mr. Lanphier:

This letter approves the [April 18, 2020, Site Assessment and Summary Report](#) (Site Assessment) and [May 22, 2020, Site History Technical Report](#) (Report) submitted by the City of Livermore (City) in response to the Regional Water Board's [April 24, 2020, directive letter](#). As explained below, we request the City submit a Data Gap Assessment Workplan and an Interim Remedial Action Plan for the Old Train Depot (Site).

Background

The Site is located within the Livermore Downtown Core Development project area and historically was used as a lumber yard and a train depot with multiple railroad lines. Prospective development of the Site consists of multiple residential and commercial buildings and a Veteran's park.

Soil, groundwater, and soil vapor sampling were conducted at the Site to assess the presence of chemicals from operations at and nearby the Site. Nearby properties historically included a dry cleaner, auto body operations, and other commercial and industrial uses. Results of investigations conducted since 2009 identified select metals in soil, petroleum hydrocarbons in soil and groundwater, and volatile organic compounds, including tetrachloroethene (PCE) and its breakdown products, in groundwater and soil vapor. The Deep Zone groundwater (approximately 100 to 390 feet below ground surface [bgs]) is used by the California Water Service for drinking water. The closest water supply well is located approximately ½ mile downgradient of the Site and is reportedly screened from 22 to 192 feet bgs. The Report concludes the following:

- Soil containing metals at concentrations greater than environmental screening levels will require management during site grading and use.

- Additional action, focused on soil vapor and groundwater, is warranted to assess, remediate, and/or mitigate PCE and its breakdown products at the Site.

Comments

- Water Board staff concur with the Report's conclusions that soil management will be necessary during Site development and that additional assessment is needed to further characterize the extent of PCE and its breakdown products in soil vapor and groundwater.
- Water Board staff request additional evaluation be conducted to assess whether operations as a lumber yard could have impacted the Site. Chemicals historically used to treat lumber (e.g., pentachlorophenol, dioxin) could potentially have been released if treated lumber was stored at the Site or if lumber was treated onsite.
- Prior to construction and Site redevelopment, a Site Management Plan that has been reviewed and approved by the Water Board will be necessary to address handling, management, and disposal of contaminated media during construction activities.

Request for Data Gap Assessment Workplan and Interim Remedial Action Plan

The Water Board requests the City submit the following two reports:

1. Data Gap Assessment Workplan (Workplan)
2. Interim Remedial Action Plan (IRAP).

No deadline is set for submittal of these documents; however, we request the City work with the Water Board case manager to submit the reports in a reasonable timeframe.

The Workplan should propose soil, groundwater, and/or soil vapor sampling to collect data that will fill identified data gaps and develop a robust conceptual site model (CSM) considering the proposed future use of the Site. The Workplan should include the rationale for the proposed investigative activities, sampling locations, sampling methods, and analytical testing methods.

The IRAP should present the results of the investigation conducted under the Workplan, including, but not limited to maps showing sampling locations and chemical concentration data, tabulated data, lithologic logs, and analytical laboratory reports. In addition, the IRAP should include the updated CSM and describe the remedial alternatives evaluated, remedial alternative selected, and proposed implementation method and timeframe.

The City is required to submit all documents in electronic format to the State Water Resources Control Board's GeoTracker database, pursuant to the California Code of Regulations (Title 23, Section 3890, et seq.). See [Electronic Submittal of Information](#) for guidance on submitting documents to GeoTracker. Please note that this requirement includes all analytical data, monitoring well information (latitudes, longitudes, elevations, and water depth), site maps, and boring logs.

Basis for Request

The information required in these reports is needed to further understand the extent of site contamination and identify remedial options that can reduce or eliminate future impacts to human health or water quality from site contamination. The City is named in its capacity as the current landowner.

If you have any questions, please contact me at elizabeth.wells@waterboards.ca.gov.

Sincerely,

Elizabeth Wells
Senior Water Resource Control Engineer

Copy by email:

Joel Waxdeck, City of Livermore, jhwaxdeck@cityoflivermore.net

Paul Spence, City of Livermore, prspence@cityoflivermore.net

Bob Vinn, City of Livermore, bgvinn@cityoflivermore.net

Bob Clark-Riddell, Pangea Environmental Services, Inc., briddell@pangeaenv.com

Dilan Roe, Alameda County Environmental Health, dilan.roe@acgov.org