

From: Rogge, Erdmann, Env. Health <Erdmann.Rogge@acgov.org>
Sent: Friday, May 2, 2025 3:00 PM
To: Jeremy Scott; Patterson, Monty
Cc: Mora, Pedro; Randall Barbour; Roe, Dilan, Env. Health
Subject: RE: RO0003666 - Alameda High School Swim Center - Approval of Fill Import Application

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Good afternoon, Monty,

Alameda County Environmental Health Department (ACEHD) has reviewed the case file for the subject CPS case (the “Case”) associated with the Alameda High School (AHS) located at the above referenced property (the “Site”). ACEHD is providing regulatory oversight of the Case under a Voluntary Remedial Action Agreement (VRAA) entered into by ACEHD and Alameda Unified School District (AUSD) dated December 23, 2024.

ACEHD’s review the Case file included, but was not limited to, the following documents, prepared on your behalf by Kleinfelder and submitted to ACEHD:

- *Fill Material Characterization Technical Memorandum (CPS Case No. RO0003666)*, dated March 14, 2025 (the “Fill Material Tech Memo”)
- *Fill Material Characterization Technical Memorandum (CPS Case No. RO0003666)*, dated April 25, 2025 (the “Revised Fill Material Tech Memo”).

I. ACEHD Findings

The Revised Fill Material Tech Memo, which include the Application for the Determination of Fill Material Suitability, proposes to import approximately 4,000 to 5,000 cubic yards of soil material from CEMEX Clayton Aggregate Quarry (CEMEX) located at 515 Mitchel Canyon Road in Clayton, CA. The Revised Fill Material Tech Memo documents that:

1. Soil material is proposed for use within the excavation area at the Site.
2. Soil samples from a total of 9 soil stockpile samples of fill material collected at CEMEX on December 11, 2023, and February 17, 2025, were analyzed for total petroleum hydrocarbons (TPH) as diesel (TPH-d), and TPH as motor oil (TPH-mo) by U.S. Environmental Protection Agency (EPA) EPA Method 8015B, total petroleum hydrocarbons as gasoline (TPH-g) and volatile organic compounds by EPA Method 8260B, semi-volatile organic compounds (SVOCs) by EPA Method 8270C, and metals by EPA Method 6010B and EPA Method 6020 and mercury by EPA Method 7471B.
3. Soil sample results were compared against 2019 San Francisco Bay Regional Water Quality Control Board (RWQCB) Human Health Risk Environmental Screening Levels (ESLs), except for arsenic. The selected screening level for arsenic was 11 milligrams per kilogram (mg/Kg), which is based on the 99th percentile for regional background concentrations for arsenic in the urbanize San Francisco Bay Region. Soil sample results indicated all chemicals of concern (COCs) analyzed were below the selected screening levels.

Based on ACEHD's review of the submitted documents, ACEHD has no objection to you proceeding with importation of 4,000 to 5,000 cubic yards of soil material outlined in the Revised Fill Material Tech Memo, provided the conditions below are met:

1. The information provided to ACDEH in the documents in the Case file on the State Water Resources Control Board's (SWRCB) GeoTracker website is accurate and representative of currently known fill material conditions.
2. The deliverable requirements presented in Section II below are provided.

I. Deliverable Request

ACEHD request that upon completion of soil import activities at the project Site that the following document be provided and uploaded to the Case file on the SWRCB's GeoTracker website:

Soil Import Summary Report

File Name: Soil_Import_RPT_YYYY-MM-DD

A report documenting the import/export of soil (if not disposed of at a permitted disposal facility) must be drafted in accordance with the ACDEH's Soil Import/Export Characterization Requirements which was last revised on August 9, 2019 (ACDEH's Fill Guidance). At a minimum, the report must include the following:

1. A cover letter from the owner of the proposed fill source material that states, at a minimum, the following: "I have read and acknowledge the content, recommendations, and/or conclusions contained in the attached document or report submitted on my behalf to ACDEH." This cover letter must be signed by the owner of the proposed fill source material or a legally authorized representative of the owner of the proposed fill source material.
2. A statement that fill material characterization was conducted under the responsible charge of a Qualified Professional. This statement must be accompanied by the signed and dated seal of the Qualified Professional with responsible charge.
3. Summary tables of soil import logs. These logs must include the following information for each delivery of fill material: arrival date, manifest number or truck tag, quantity of fill material delivered, originating facility, and profile number.
4. A figure depicting the location and depth of imported soil at the project Site.
5. Copies of all manifests or other documentation of soil import as an appendix.
6. Copies of all fill characterization profiles as an appendix.

An additional Application for the Determination of Fill Material Suitability will be required if additional fill material other than the fill material approved in this directive letter is needed.

Please feel free to contact me should you have any questions or comments.

Erdmann Rogge, PG

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