



RESPONSE TO COMMENTS

Draft Remedial Action Plan

Shell Alameda Distribution Center
2015 Grand Avenue
Alameda, California 94501

November 2020

TABLE OF CONTENTS

1.0 INTRODUCTION..... 1
2.0 DRAFT REMEDIAL ACTION PLAN 1
3.0 PUBLIC REVIEW PROCESS..... 1
4.0 COMMENTS AND RESPONSES..... 2

Attachments

- 1. Water Board Fact Sheet
- 2. Caltrans letter

1.0 INTRODUCTION

This Response to Comments (RTC) has been prepared by the San Francisco Bay Regional Water Quality Control Board (Water Board) and responds to all public comments received during the 30-day public comment period on the Draft Remedial Action Plan (RAP) for the Pennzoil-Quaker State Company dba SOPUS Products (Shell) Alameda Distribution Center located at 2015 Grand Street in Alameda, California (Site). This RTC will be incorporated as an appendix to the Final RAP.

2.0 DRAFT REMEDIAL ACTION PLAN

After nearly 70 years of business, Shell permanently closed its Alameda Distribution Center and is readying the site for resale and redevelopment which includes remediation of contaminated areas. On May 27, 2020, Shell submitted the draft RAP to the Water Board to address contamination in soil and groundwater at the Site. The RAP presents the findings of environmental investigations conducted at the Site and recommends the following actions to address potential risks:

- Excavation and off-Site disposal of 11,400 cubic yards of soil within the northeast area, tank farm area, and a small area in one warehouse (see Figure 1).
- Confirmation sampling to ensure that bottom and sidewall samples collected from the excavations meet the remedial objectives for excavation extents and depths (or to the approximate water table, if necessary).
- Backfilling of excavations with acceptable fill material and restoring the Site to match the surrounding grade.
- Placement of a Deed Restriction and Land Use Covenant (LUC) for a portion of the northeast area where elevated concentrations of contaminants may remain. The LUC requires mitigation of any potential vapor intrusion to the indoor air of any future homes proposed for that area. It would also require ongoing monitoring and maintenance of those mitigation measures, if necessary.

3.0 PUBLIC REVIEW PROCESS

The Water Board conducted the following outreach as part of the public review process for the draft RAP.

Public Comment Period: The Water Board posted the draft RAP for public comments between September 21 and October 20, 2020.

Draft RAP Fact Sheet: On September 16, 2020, the Water Board distributed a Fact Sheet via U.S. Mail to owners and occupants at 229 residences and businesses located within

an approximately 350-foot radius of the Site; key Alameda County and City representatives; and local civic/community/environmental organizations. Additionally, the fact sheet was hand delivered to all businesses and residences within a two-block radius of the Site and emailed to representatives of the three major Homeowner Associations (HOAs) in the surrounding area. A copy of the Fact Sheet is provided in Attachment 1.

Information Repositories: Due to the COVID-19 pandemic, the local library is closed. However, the draft RAP and other Site-related documents were made available for public review online at the Water Board’s Geotracker database, which can be accessed using this link:

https://geotracker.waterboards.ca.gov/profile_report?global_id=SL373281185

The following documents were made available to the public during the 30-day public comment period:

1. Water Board Fact Sheet, September 2020
2. Draft Remedial Action Plan, May 2020
3. Draft Initial Study and Mitigated Negative Declaration, September 2020

4.0 COMMENTS AND RESPONSES

The public comment period ended on October 20, 2020. Two comments were received.

1. Comment from Tony Martin-Vegue/Grand Marina HOA

“The current plan for the Shell/Pennzoil factory demolition does not adequately plan for pedestrian safety.

There are no sidewalks along the entire length of the Shell/Pennzoil factory on Grand, between Fortmann Way and Buena Vista Ave. It is often used for parking for semis, tractor-trailers, boat trailers, and construction vehicles. This is a very dangerous situation as it forces pedestrians - including those with strollers, and people in wheelchairs - into the street. It is unsafe for all pedestrians but particularly dangerous for children, the elderly, and the disabled.

Pedestrians using this street are forced into bike lanes, which is dangerous for pedestrians and cyclists alike. There are no designated crosswalks for pedestrians to cross to the other side of the street to get to a sidewalk. Many families live in the houses at the end of Grand, in boats in Grand Marina, and the new houses on both sides of Clement. Pedestrians need safe access through the entirety of Grand St.

Just in my own family, I’ve observed the following dangerous situations:

- *I've tripped over the dilapidated asphalt in front of the Pennzoil factory, falling down and injuring my knees and hands.*
- *My son (11) has run into debris in front of Pennzoil in the dark, injuring himself.*
- *I have had to push a stroller, with a baby in it, into the street because the shoulder is impassable due to thick gravel, utility boxes, parked cars, and garbage blocking passage.*
- *I have personally witnessed the elderly on crutches, people in wheelchairs and baby strollers move into the street with oncoming traffic because the area in front of Pennzoil is impassible.*

*I previously asked about how this can be addressed during demolition. The response I received is that the area in front of Pennzoil will be blocked off and pedestrians will be instructed to cross the street to the other side of Grand. **This makes an already dangerous situation even worse.***

- *Grand St. has heavy car traffic due to the Grand Marina*
- *There is not a cross-walk for pedestrians to safely cross the street. We will just have to run across, dodging cars? What about wheelchairs and strollers?*
- *There's an entire block of Grand across the street from Pennzoil that **also does not have a sidewalk.** We will be instructed to cross the street, just to have to walk into the street.*

Please take 20 minutes on a Saturday afternoon (when Marina traffic is busiest) and walk down Grand, down the Pennzoil property. Now imagine you have a baby stroller, are on crutches, in a wheelchair, on a kid's bike with training wheels or a walker. Then cross the street and walk back. You will see how dangerously unsafe it is.

We would like Pennzoil/Shell to create a safe way for pedestrians to walk along Grand before, during, and after demolition. It is currently very unsafe and demolition will make it much worse. Please consider the safety of your neighbors when completing demolition of the property."

Response by Alyx Karpowicz, Water Board Project Manager:

Thank you for your comments. The City of Alameda Public Works Department provides oversight of public rights of way and safety including sidewalks, streets and crosswalks near the project Site. The Water Board does not have the authority to require Shell to create a sidewalk or cordoned off area for pedestrians, or to install crosswalk improvements, such as permanent striping on the street during temporary demolition and remediation activities, however your concerns have been forwarded to the City of Alameda Publics Works Department.

Prior to construction, notices shall be posted onsite to notify residences, businesses and the public that temporary construction activities shall occur. A Traffic Control Plan will also describe how onsite traffic shall be managed and identify routes of entry and egress to the Site, construction entrances, material and equipment staging areas, loading and unloading areas, and parking areas. Additionally, based on correspondence between the Water Board and the City of Alameda Planning Department, the construction of permanent sidewalks along both sides of Grand Street between Fortmann Way and Ellen Craig Avenue will be required as part of any future redevelopment of the Site.

Should you have any further concerns or questions about this issue or wish for the City to make additional changes to increase safe pedestrian access along this portion of Grand Street, please contact the City Public Works Department at 510-747-7900 or pw@alamedaca.gov.

2. Excerpted Comment from Mark Leong/Department of Transportation District 4 Branch Chief*

“Thank you for including the California Department of Transportation (Caltrans) in the environmental review process.... We are committed to ensuring that impacts to the State’s multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the September 2020 draft MND.

Project-Related Impacts

Potential impacts to the State Right-of-Way (ROW) from project-related temporary access points should be analyzed. Mitigation for significant impacts due to construction and noise should be identified in the environmental documents. Project work that requires movement of oversized or excessive load vehicles on state roadways requires a transportation permit that is issued by Caltrans. To apply, visit: <https://dot.ca.gov/programs/traffic-operations/transportation-permits>.”

*A copy of the full comment is provided in Attachment 2.

Response by Alyx Karpowicz, Water Board Project Manager:

Thank you for your comment regarding project-related impacts to the State ROW from temporary access points. State Route (SR-) 61 provides local access to the Site and the proposed project involves heavy truck trips to transfer demolition materials, construction debris, and the aboveground storage tanks (ASTs) off site. The proposed project also included Best Management Practices for noise abatement to minimize the potential impacts associated with construction noise, as summarized in Section 2.11 *Best Management Practices*.

Traffic access and circulation impacts were fully evaluated in Section XVII, *Transportation* in the Draft IS/MND. This section concludes that construction-related heavy truck trips and construction worker trips would be minor and would only temporarily increase traffic volumes on local and regional roads due to construction workers traveling to/from the Site and from trucks hauling equipment and materials, exporting excavated soil, and importing clean backfill material (see Section XVI(a)). The analysis also references a focused construction-traffic impact analysis that evaluated worker and heavy haul truck trips associated with remediation activities (Appendix E, *Focused Construction-Related Traffic Analysis Memorandum*). This analysis concluded that traffic impacts from construction workers and construction-related vehicles would be considered potentially significant if the proposed project would materially interfere with the area traffic flow and capacity of the street, system, cause unsafe conditions, or introduce substantial truck and construction worker traffic (i.e., greater than 110 vehicles trips) through a residential area. Because the proposed project would only generate 65 trips per day during peak construction activities, which is less than the 110 trips per day threshold identified by the OPR *Technical Advisory on Evaluating Transportation Impacts in CEQA*, these additional construction and heavy haul truck trips would not result in a measurable long-term impact on VMT. These trips would also be temporary, and relatively small compared to the annual average daily trips on major roadways in the project vicinity and would cease once proposed remediation activities are complete. Hauling operations would also be scheduled to occur during off-peak hours on the surrounding road network between 10:00 a.m. and 3:00 p.m., as outlined in a Waste Management and Transportation Plan and a Traffic Control Plan (see Section XVI(b)).

The proposed project will include the completion of a Caltrans Transportation Permit for oversized/overweight vehicles (e.g., heavy haul trucks) pursuant to the Caltrans Transportation Permit requirements. The reference to the Caltrans Transportation permit was added to Table 2-6, *Required Permit Approvals* in Section 2, *Project Description* in the Final IS/MND.

Conclusion

No changes were made to the RAP based on comments received.



SEPTEMBER 2020

Fact Sheet

Shell Alameda Distribution Center – Remediation Plan
2015 Grand Street, Alameda, California



Figure 1 – Site Map

Introduction

The San Francisco Bay Regional Water Quality Control Board (Water Board) oversees environmental investigation and remediation projects in the Bay Area and notifies the public of progress at key steps. This fact sheet provides information about a proposed remediation plan, known as a draft Remedial Action Plan (RAP) for the Pennzoil-Quaker State Company dba SOPUS Products (Shell) Alameda Distribution Center located at 2015 Grand Street in Alameda (Site). The RAP describes the demolition of structures, and excavation and off-site disposal of shallow soil impacted with petroleum products in the northeast and southwest portions of the Site (see Figure 1). These activities will ensure the long-term protection of human health and the environment, and will be conducted concurrent with the closure of the Distribution Center in support of future property sale. The California Environmental Quality Act (CEQA) Initial Study has been prepared to address the potential environmental impacts of the proposed project.

PUBLIC COMMENT PERIOD

**September 21 to
October 20, 2020**

The Water Board invites you to review and comment on the Draft Remedial Action Plan and California Environmental Quality Act (CEQA) Initial Study for the Shell Alameda Distribution Center Site. All comments must be received by 5 p.m. on October 20, 2020. Comments can be sent to:

Alyx Karpowicz
San Francisco Bay Regional Water
Quality Control Board
Alyx.Karpowicz@waterboards.ca.gov

FOR MORE INFORMATION

To view the proposed RAP, CEQA Initial Study, and other technical reports for the Site, please visit the State Water Board's [GeoTracker website](https://geotracker.waterboards.ca.gov/search.asp): <https://geotracker.waterboards.ca.gov/search.asp> (search for case ID/global ID **SL373281185**, then click on the "Report" link).

You may also contact Tracy Craig, Community Relations Consultant, at 510/334-4866 or tracy@craig-communications.com.

Fact Sheet

September 2020

Background

The approximately 4.1-acre Alameda Distribution Center has been in operation since 1951 as a blending, packaging and distribution center for petroleum lubricant products. Blending and packaging operations ceased in 1995 and the distribution of bulk and pre-packaged industrial lubricants ceased at the end of August 2020.

Previous Environmental Work

Numerous environmental investigations have been conducted at the Site to characterize the presence, nature, and extent of contamination. Investigations have found the presence of petroleum products in shallow soil and groundwater in the southwest tank farm, northeast maintenance yard area and a small area within one of the warehouses. Chemicals of concern include total petroleum hydrocarbons (TPH) and benzene, toluene, ethylbenzene, and xylenes (collectively, BTEX).

In 1985, gasoline and diesel underground storage tanks (USTs) and associated piping were removed from the northeast area and in 1996 two additional USTs were removed from inside one of the warehouses at the Site. In August 2002, approximately 410 cubic yards of soil was excavated from several targeted locations within the tank farm area following spills from some of the aboveground storage tanks (ASTs) in that area. In December 2013, 37 ASTs were removed from the tank farm area leaving only 11 remaining.

Proposed Remedy

Shell plans to demolish all structures, including the remaining ASTs, and conduct remediation work to prepare the property for sale. The RAP describes the proposed remedy that will be protective of the health of future Site users under City of Alameda residential zoning in the area, the health of the general public, and the environment. The proposed remedy includes:

- Excavation and off-Site disposal of 11,400 cubic yards of soil within the northeast area, tank farm area, and a small area in one warehouse (see Figure 1)
- Confirmation sampling to ensure that the excavations have adequately removed impacts in soil to proposed excavation extents and depths (or to the approximate water table, if necessary)
- Backfilling of excavations with clean fill material and restoring the Site to match the surrounding grade

A deed restriction and Land Use Covenant (LUC) would also be established in a portion of the northeast area where elevated concentrations of contaminants may remain. The LUC would require mitigation of any potential vapor intrusion to the indoor air of any future homes proposed for that area. It would also require ongoing monitoring and maintenance of those mitigation measures, if needed.

Next Steps

The Water Board will review and consider all public comments before making a final decision on the draft RAP. All comments must be provided to the Water Board by October 20, 2020. At the end of the public comment period, the Water Board will evaluate the comments received and make any changes to the RAP. A Responsiveness Summary will be distributed to all those who commented and provided contact information.

Fact Sheet

September 2020

Schedule

Shell anticipates demolishing existing structures and ASTs this October to allow access to underlying soils. Upon RAP approval, Shell anticipates conducting excavation work this fall. Work will last roughly six months.

Community Protection Measures

All work will be conducted with permits from the City of Alameda, Bay Area Air Quality Management District, East Bay Municipal Utilities District, and the California State Water Board. Site work will follow a Site-specific Health and Safety Plan, Waste Management and Transportation Plan, and Dust, Odor, and Vapor Control Monitoring Plan. These plans include a variety of proven dust, odor, noise and traffic controls to protect the nearby community and minimize impacts to the greatest extent possible. It also includes measures to reduce the risks associated with COVID-19 in accordance with all state and local guidelines.

For More Information

To view the proposed RAP, (CEQA) Initial Study, and other technical reports for the Site, please visit the State Water Board's [GeoTracker website](https://geotracker.waterboards.ca.gov/search.asp): <https://geotracker.waterboards.ca.gov/search.asp> (search for case ID/global ID **SL373281185**, then click on the "Report" link).

You may also contact:

- Water Board Case Manager Alyx Karpowicz at alyx.karpowicz@waterboards.ca.gov
- Tracy Craig, Community Relations Consultant, at 510/334-4866 or tracy@craig-communications.com

DEPARTMENT OF TRANSPORTATION
DISTRICT 4
OFFICE OF TRANSIT AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D
OAKLAND, CA 94623-0660
PHONE (510) 286-5528
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

October 22, 2020

SCH # 2020090420
GTS # 04-ALA-2020-00558
GTS ID: 20702
Alameda / 61 / 20.832

Alyx Karpowicz
San Francisco Bay Regional Water Quality Control
Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Shell Alameda Distribution Center Remediation Project- Draft Mitigated Negative Declaration (MND)

Dear Alyx Karpowicz:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Cargill Solar Salt System Maintenance Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the September 2020 draft MND.

Project Understanding

The proposed project intends to support a Remedial Action plan to remove contamination sources at the project site. Remediation activities would include mobilization and staging of construction equipment; demolition and removal of existing on-site pavement, buildings, and other infrastructure; excavation, dewatering, import of clean backfill, compaction and re-grading; and demobilization. Construction activities would consist of the operation of heavy equipment; vehicle parking, and construction equipment and material storage; and heavy haul truck traffic along Grand Street, Clement Avenue, and State Route (SR)-61.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Alyx Karpowicz, SF Bay Regional Water Quality Board
October 22, 2020
Page 2

Project-Related Impacts

Potential impacts to the State Right-of-Way (ROW) from project-related temporary access points should be analyzed. Mitigation for significant impacts due to construction and noise should be identified in the environmental documents. Project work that requires movement of oversized or excessive load vehicles on state roadways requires a transportation permit that is issued by Caltrans. To apply, visit: <https://dot.ca.gov/programs/traffic-operations/transportation-permits>.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Laurel Sears at laurel.sears@dot.ca.gov. Additionally, for future notifications and requests for review of new projects, please contact LDIGR-D4@dot.ca.gov.

Sincerely,



Mark Leong
District Branch Chief
Local Development - Intergovernmental Review

cc: State Clearinghouse