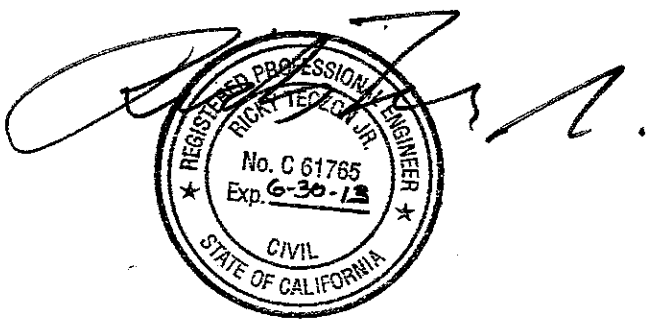
Kennedy/Jenks Consultants

303 Second Street, Suite 300 South
San Francisco, California 94107
415-243-2150
FAX: 415-896-0999

Soil Management Plan
Alviso Industrial Center

Disk Drive and Nortech Parkway
Alviso, California

17 June 2013



Prepared for

North First Developers, LLC
c/o Environmental Asset Services, Inc.
3501 Jamboree Road, Suite 230
Newport Beach, CA 92660

K/J Project No. 1365019*00

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Section 1: Introduction

Kennedy/Jenks Consultants (Kennedy/Jenks) has prepared this Soil Management Plan (SMP) on behalf of North First Developers, LLC (NFD) for an approximate 57-acre property located at Disk Drive and Nortech Parkway in Alviso, California (the "Site"; Figure 1). The Site consists of five parcels: Assessor's Parcel Number (APN) 015-44-011 (Parcel 5), APN 015-44-014 (Parcel 6), APN 015-44-015 (Parcel 7), APN 015-44-016 (Parcel 8), and APN 015-44-017 (Parcel 9). The Site is currently owned by NFD.

NFD intends to develop the Site for commercial use. The objective of this SMP is to provide technical and operational guidelines to be followed during site grading activities to address potential environmental issues that could be encountered. The SMP is organized as follows:

- Section 2 – Background: This section provides a description of the Site history and background about the Site.
- Section 3 – Project Description and Controls: This section describes the proposed project and controls that should be implemented during the project.
- Section 4 – Perimeter Air Monitoring Plan: This section describes the perimeter air monitoring that will be conducted during the project.
- Section 5 – Contingency Plan: This section identifies activities that could be implemented during the project if site conditions warrant.
- Section 6 – Reporting. This section discusses the reporting that will be completed at the end of the project.

Project contact information is as follows:

- Kennedy/Jenks Consultants
  Rick Teczon, Project Manager
  303 Second Street, Suite 300 South
  San Francisco, CA 94107
  (415) 243-2442 Office
  (650) 387-3615 Mobile
  RickTeczon@KennedyJenks.com
- Trammell Crow Company
  Tom Jodry, Sr. Vice President
  Development Management
  Oakland, CA 94607
  (510) 874-1929 Office
  (510) 224-8707 Mobile
  tjodry@trammellcrow.com
- Environmental Asset Services, Inc.
  Robert Chute, Sr. Project Manager
  3501 Jamboree Road, Suite 230
  Newport Beach, CA 92660
  (949) 477-4766 Office
  (949) 842-6188 Mobile
  rchute@trammellcrow.com

Section 2: Background

The Site is currently undeveloped in a mixed high-tech, agricultural, commercial, and residential area of Alviso, California. The property is immediately bounded by Disk Drive to the northeast followed by agricultural land and the Jubilee Christian Center, Nortech Parkway to the southeast followed by a paved parking area, Wilson Way and Tony P Santos Street to the southwest, and vacant land and the San Jose Fire Department followed by Grand Boulevard to the northwest (Figure 2).

2.1 Site Setting and Historical Usage

According to the Phase I Environmental Site Assessment (ESA) completed by Haley & Aldrich in 2013, the Site had been owned by Cisco Systems, Inc. since 2002. The Site has primarily been used for agricultural purposes. The northwestern corner of the Site was developed with structures for a period of time and reportedly included former uses for car maintenance activities.

2.2 South Bay Asbestos Area

The South Bay Asbestos Area Superfund Site (SBAA) in Alviso, California is divided into two operable units (OUs): the Ring Levee (OU-1) and the remainder of the SBAA Site (OU-2) (USEPA 2010). The Ring Levee was constructed in 1983 for flood protection and was built with serpentine soils containing naturally occurring asbestos. The Ring Levee was removed in 1993 as part of the remedy for OU-1. During the removal of the Ring Levee, samples were collected to confirm that soil had been excavated to a sufficient depth. The Ring Levee soil was buried and encapsulated within a highway bridge embankment constructed at Highway 237 and Zanker Road. Per the Third Five-Year Review Report for the SBAA Site (USEPA 2010):

> "The remedy at OU-1, the Ring Levee, is protective of human health and the environment because the major source of asbestos exposure that could result in unacceptable risks has been removed."

The former Ring Levee ran along the western portion of the Site. The former Ring Levee was remediated, and there are no land use restrictions associated with the Site.

Section 3: Project Description and Controls

3.1 Project Description

The project includes site development involving soil disturbing activities to facilitate the construction of the following site improvements:

- Underground utility infrastructure.
- Paving for parking.
- Building construction.

Soil disturbing activities that may be performed to implement these site improvements could include the following:

- Grading for paving, foundations, drainage, and landscaping.
- Trenching for underground utility infrastructure.
- Excavation for building foundations.

3.2 Project Controls

Control measures to mitigate potential construction-related impacts during the soil disturbing activities will be performed to facilitate site and public safety.

3.2.1 Dust Control

To mitigate the potential emission of fugitive dust at the perimeter of the Site during soil disturbing activities, air monitoring and dust control practices will be implemented to minimize the occurrence of visual dust at the perimeter of the construction site.

Specific procedures will be followed during implementation of the soil disturbing activities to reduce potential impacts. Basic construction mitigation measures will be performed in accordance with the Bay Area Air Quality Management District (BAAQMD). Dust control techniques may include the following:

- Apply water to areas to be excavated before starting soil excavation.
- Monitor excavation activities and excavation rates.
- Designate personnel with hoses or other watering equipment to supplement the sprinkler or misting measures.
- Mist or spray the exposed areas with water to prevent formation of dust while excavating, transferring material onsite, or loading transportation vehicles.

- Cover soil stockpiles with weighted plastic sheeting.
- Limit drop heights to a minimum while loading transport vehicles.
- Limit vehicle speeds on the Site.
- Sweep streets as needed.

Perimeter air monitoring will be performed at select locations around the perimeter of the Site as detailed in Section 4 and dust control measures may be increased and/or modified as necessary to minimize fugitive dust. If either observations or measurements during perimeter air monitoring indicate the need for more stringent dust control, the magnitude and frequency of the dust control measures may be increased. Palliatives may be added to the dust control water as an engineering control. If further dust control measures are needed due to meteorological conditions, windscreens may be constructed, or enclosed loading operations may be implemented.

3.2.2 Stormwater Management and Erosion Control

A Stormwater Pollution Prevention Plan (SWPPP) will be prepared by NFD's general contractor in compliance with the State Water Resources Control Board's regulatory requirements for construction stormwater pollution management. The SWPPP will include specific descriptions and proposed measures to address the following:

- Identify a risk category for the project in accordance with regulatory requirements.
- Identify the relevant drainage areas to be protected during construction activities.
- Identify pollutant sources, including sources of sediment that may affect the quality of stormwater discharges associated with construction activities.
- Identify non-stormwater discharges.
- Identify, construct, implement in accordance with a time schedule, and maintain best management practices (BMPs) to reduce or eliminate pollutants in stormwater discharges and authorized non-stormwater discharges from the Site during construction, including control of stormwater, erosion control, control of drainage from stockpile areas, and monitoring and control of truck loading areas.
- Develop a maintenance schedule for BMPs installed during construction that are designed to reduce or eliminate pollutants after construction is completed (post-construction BMPs).

The identified BMPs will be employed to reduce the sediment load in runoff from the Site. Possible practices to reduce the sediment load in stormwater runoff from the Site include the following:

- Grading the Site to prevent stormwater from running offsite, installing stormwater control devices (diversion ditches, hay bale barriers, fiber rolls, etc.) around the perimeter of the Site, and protecting existing storm drains and culverts with hay bales or filter inserts.

- Placement of fiber rolls or straw bales at the toe and top of slopes and slope faces to minimize run-on to and runoff from the access and staging areas in advance of an anticipated rainfall.

- Material that must be stockpiled for further characterization will be held in a separate stockpile staging area and covered with plastic sheeting.

- Fuel and chemicals will be stored in such a manner as to prevent accidental spills from being released to the environment and/or impacting stormwater.

Regular inspections will be scheduled to maintain, adjust, and update the stormwater pollution controls implemented as described in the SWPPP, as needed.

3.2.3 Health and Safety

Health and safety protocols will be prepared and implemented that, at a minimum, conform to the general requirements of Occupational Safety and Health Administration (OSHA) standards. The contractor will take responsibility for all job-site safety issues as required by the general industry safety orders and all laws and regulations. Actual, potential, or anticipated hazards to be addressed by the health and safety protocols include, but are not limited to:

- Hazardous substances.
- Fall protection.
- Confined spaces.
- Trenches or excavations.
- Lockout/tagout.
- Heat/cold stress.
- Water hazards.
- Respiratory hazards.
- Hearing conservation.

It is anticipated that the health and safety protocols will include the following:

- The name and contact information of individual(s) who has been designated as the Project Manager and Project Health and Safety Representative.
- Requirements for workers training.
- Site controls to be implemented during construction activities to prevent the public from entering the limits of work.
- Identification of potential physical and chemical hazards.
- Requirements for personal protective equipment (PPE).
- An emergency action plan in the event of an accident, or serious unplanned event (e.g. fire, structure collapse, etc.) that requires notifying any response agencies (e.g.: fire departments, PG&E, rescue teams, etc), including emergency telephone numbers and hospital routes.

The health and safety protocols will apply to all personnel working at, or visiting the Site including, but not limited to, contractor's employees, suppliers, vendors, and truckers. The

Contractor will verify that site workers and visitors are in compliance with applicable health and safety requirements, and take action to ensure compliance where deficiencies are identified.

Section 4: Perimeter Air Monitoring Plan

The Air Monitoring Plan (AMP) describes the dust monitoring activities to be conducted at select locations along the perimeter of the Site during soil disturbing activities associated with the site development project. The AMP provides a rationale and development of action levels for dust monitoring and the framework for anticipated dust monitoring activities during the soil disturbing activities.

4.1 Purpose and Objectives

The AMP will be implemented at the Site to monitor possible offsite airborne migration of dust generated by onsite soil disturbing activities. The monitoring results will be evaluated to assess whether earthwork practices during soil disturbing activities are adequate, or if additional dust control measures are warranted. This evaluation will be made by comparing measured airborne dust concentrations to action levels identified in this AMP. Earthwork activities will be halted if concentrations exceed the "stop work" action level, and work will not resume until adequate dust control measures are implemented to reduce measured concentrations of airborne dust below the applicable action levels.

The monitoring program described by this AMP is intended to help protect human health and the environment offsite and enhance onsite worker health and safety during the soil disturbing activities. Specifically, the objectives of the monitoring program are to:

- Identify site-specific action levels intended to be protective of public health.
- Assess the need and effectiveness of dust controls.
- Quantify background dust levels along the perimeter of the Site prior to onsite soil disturbing activities.
- Document perimeter air quality during onsite soil disturbing activities.

This AMP outlines the location and timing of air monitoring activities, target compounds to be monitored, action levels, and the rationale behind these selections. Specific field procedures, analytical descriptions, and quality assurance and quality control practices are also described in this AMP.

4.2 Particulate Action Levels

The following section proposes "project action levels" that are intended to reduce the possibility of adverse health impacts to nearby offsite receptors. Procedures will be in place to monitor for the presence of respirable particulate matter along the Site perimeter.

Airborne particles can be classified by their particle diameter and health effects. Large particles typically settle out of the air rapidly and pose a limited health risk, but small particles may remain in the air for longer time periods and can penetrate deeply into the human respiratory system where they can cause harmful health effects. Particles 10 microns or smaller in diameter

(PM10) and particles 2.5 microns or smaller in diameter (PM2.5) pose the greatest health risk because they can penetrate deeply in to the respiratory system. In addition to the health effects caused by the particles themselves, chemicals sorbed to the dust particles can also pose a risk. PM10 is primarily associated with fugitive dust.

An action level at the perimeter of the Site will be established to monitor for potential migration of airborne dust. The recommended action level for respirable dust (PM10), which will trigger an increase in dust suppression efforts is based on the California Ambient Air Quality Standard of 50 micrograms per cubic meter ($\mu g/m^3$), which is a 24-hour time-weighted average (TWA; California Code of Regulations, Title 17, Section 70200). Available data from San Francisco Bay Area air monitoring stations indicate that annual average regional background PM10 concentrations are approximately 20 $\mu g/m^3$ (BAAQMD). Site specific background data will be collected prior to grading activities to confirm that 20 $\mu g/m^3$ is a reasonable estimation of average background PM10 concentrations at the Site. The 8-hour TWA PM10 concentrations of up to 110 $\mu g/m^3$ could occur during soil disturbing activities at the Site without exceeding the 24-hour TWA of 50 $\mu g/m^3$ for PM10.

Instantaneous perimeter dust concentrations will be measured using dust monitors during dust-generating activities, as discussed in Section 4.3. If dust concentrations measured using the monitors exceed 110 $\mu g/m^3$, dust suppression efforts will be increased. The dust monitoring equipment measures concentrations of airborne particles of any size ranging from PM10 down to PM1. Compliance with the 8-hour TWA PM10 action level of 110 $\mu g/m^3$ will be confirmed by the dust monitors as discussed in Section 4.3.

To account for short-term variations in dust emissions, an equivalent five (5) minute TWA of approximately one (1) milligram per cubic meter (mg/m^3) may serve as the “stop work” action level as described in Section 4.3.

4.3 Perimeter Air Monitoring Activities

The activities associated with baseline and perimeter air monitoring for dust and the collection of meteorological measurements are discussed below. The proposed perimeter air monitoring approach for the Site will involve real-time monitoring with stationary instruments. Direct reading real-time monitor measurements will be retained with the field notes. The conceptual layout of monitoring locations and the specific protocols for conducting the perimeter air monitoring are also discussed below.

4.3.1 Methods and Equipment

Perimeter air monitoring will be accomplished using stationary real-time direct-reading instruments that provide continuous measurement of particulate concentrations. The instruments are also capable of collecting a sample of dust present in ambient air for analysis at an offsite analytical laboratory per the Contingency Plan described in Section 5.

4.3.1.1 Perimeter Dust

Air monitoring will be conducted to assess whether airborne dust in excess of typical ambient concentrations is present at the Site perimeter as a result of the soil disturbing activities. The

traditional method of monitoring fugitive dust is based on a weight-to-volume measurement in which a sample of dust suspended in ambient air is collected on a filter and subsequently weighed. However, the dust particle size of most interest with regard to human health has a very small measurable mass. Consequently, larger volumes of air are needed to collect sufficient particulate mass to be gravimetrically measured, which can require increased air flows or sampling times that could limit the usefulness of the monitoring effort. For instance, the results of this type of sampling methodology could lag behind active soil disturbing activities such that any potential instance of unacceptable exposure is only realized after the exposure has already occurred.

To overcome the shortcomings of traditional monitoring methods, dust monitors utilizing a light-scattering technique with size-selective features, combined with the traditional filter sampling capability will be used to provide real-time monitoring data with quantitative particle sizing that also allows the collection of a dust sample for traditional gravimetric and/or chemical analysis, if desired. A sampling pump is used to continuously draw ambient air through a sensing chamber where laser light is scattered by dust particles, collected by a high resolution optical cell, and measured by a photodiode detector. This signal is processed to give a result that is correlated with the atmospheric mass concentration and particle size to provide readings of instantaneous as well as averaged dust concentrations. The monitors will also be capable of providing information regarding maximum and average daily dust concentrations in the form of a printed report through use of a data logger or similar printing apparatus. Following the light-scattering process, the air sample is captured on a filter for subsequent gravitational and/or elemental analysis, if desired.

4.3.1.2 Meteorological Conditions

The wind speed and direction will be measured using an anemometer and wind direction sensor, which utilizes a potentiometer. Wind speed and direction measurements will be measured continuously at the Site during soil disturbing activities. The wind speed and direction measurements will be checked at least once per hour. Average wind speed and direction will be recorded daily on the field logs.

4.3.2 Air Monitoring Station Locations

The locations of air monitoring stations will be chosen so that risks of exposure to dust can be adequately monitored. The optimum number and location of the perimeter air monitoring locations will be chosen based on assessment of the following factors:

- Security of Site perimeter and potential offsite locations.
- Length of perimeter boundaries.
- Proximity of Site activities to nearby offsite receptors.
- Directional location of soil disturbing activities with respect to nearby offsite receptors.
- Predominant wind directions, based on meteorological measurements.
- Ability and ease of repositioning monitors.

It is anticipated that local meteorological conditions in the immediate Site vicinity will be monitored daily during the soil disturbing activities. The anemometer and direction sensor will be mounted at least 20 feet away from and four (4) feet above site features or other obstructions that could affect ambient air flow patterns.

Perimeter air monitoring stations could be placed along the interior side of the fenced perimeter of the Site at breathing height based on the predominant wind direction predicted for the workday, as suggested below and shown on Figure 2.

- Station No. 1: Fire Station 25 at the northwest side of the Site.
- Station No. 2: George Mayne Elementary School at the west side of the Site.
- Station No. 3: Either IBM or Cisco Systems at the south or southeast side of the Site.
- Station No. 4: The Jubiliee Christian Center at the east side of the Site.
- Station No. 5: A roving monitoring station along Disk Drive on the north side of the Site.

4.3.3 Tasks and Frequency

Routine continuous real-time perimeter air monitoring will be conducted only during dust-generating activities, such as soil grading, excavation, loading, and transport. Dust monitors will be used continuously during the workday to monitor particulate matter concentrations at the proposed perimeter air monitoring stations. Field personnel will operate, maintain, and calibrate the air monitoring equipment in accordance with the manufacturer's recommendations. The instantaneous and daily data collected at each perimeter air monitoring station will be recorded on air monitoring field data sheets. An example air monitoring field data sheet is provided as Appendix A. At all times during air monitoring activities, proper health and safety procedures will be followed.

4.3.3.1 Baseline Sampling

To characterize baseline airborne dust concentrations at the perimeter of the Site, baseline air monitoring will be conducted prior to beginning soil disturbing activities. Baseline air monitoring will be performed at the Site during the typical work hours for the project. Monitoring will be performed using the same methods and equipment that will be used for perimeter air monitoring during the soil disturbing activities. Potential dust-generating activities will not be conducted at the Site on the days that baseline air monitoring is being performed.

4.3.3.2 Perimeter Dust Monitoring

For monitoring of particulate matter, the following activities will be performed during soil disturbing activities that could potentially generate nuisance airborne dust and/or particulate matter, such as soil grading, excavation, loading, and hauling. The frequency of dust monitoring may be increased or decreased depending on specific Site conditions, activities involved, and field observations.

- Monitors will be calibrated in accordance with the manufacturer's recommendations.

- Monitors will be zeroed with pure air and checked for functioning monitor and charged battery at the beginning and end of each workday following the manufacturer's instructions.

- Monitoring parameters, including the times when the pumps are turned on and off, and the flow rates at the beginning and end of the monitoring period, will be recorded on the field data sheets.

- Monitor readings will be collected along the Site perimeter to set baseline conditions prior to initiating and at the completion of soil disturbing activities.

- Monitors will be placed at breathing height at the designated perimeter air monitoring stations or other locations if it is determined that such locations would better monitor soil disturbing activities and dust generation and migration. Each monitor will be secured and locked to prevent theft or damage. All monitors will remain within the fenced perimeter area.

- Each monitor will be set to continuously record dust concentrations throughout the duration of the workday. Each monitor will be checked periodically to assess the continued proper operation of the unit.

- If stabilized readings exceeding the respirable dust action level of 110 µg/m^3 are observed, the location of the reading will be recorded in the field logs and dust suppression efforts will be increased. If stabilized readings exceeding the 5-minute TWA stop work action level of 1 mg/m^3 are observed, the location of the reading will be recorded in the field logs and the soil disturbing activities will be suspended until more stringent dust control practices are implemented. The actions associated with exceedance of respirable dust action levels were described in Section 3.

- At the end of the day, the monitors and all associated field equipment will be retrieved and the data downloaded. All associated equipment will be stored securely. Average and maximum dust concentrations for the day will be printed out from the monitors using the datalogger. Once the daily information has been recorded, each monitor will be turned off and locked away until activities resume the following workday.

4.3.3.3 Meteorological Measurements

Wind speed and direction measurements will be collected continuously at the Site during soil disturbing activities. The wind speed and direction measurements will be checked at least once per hour, and if there is an indication that a significant and sustained shift in wind direction has occurred, the perimeter air monitoring stations may be repositioned, as appropriate.

The wind speed and direction will be measured using an anemometer and wind direction sensor, which utilizes a potentiometer. The anemometer and direction sensor will be mounted at least 20 feet away from and 4 feet above site features or other obstructions that could affect ambient air flow patterns. Average wind speed and direction will be printed out daily in a tabular format and retained with the field logs.

4.3.4 Quality Assurance/Quality Control

Calibration and data management procedures will be documented to establish and maintain data quality records. Instrument maintenance activities will be documented on the field logs to demonstrate the proper application of quality control measures to the monitoring equipment. Typically, the manufacturer's manuals provided with the monitoring equipment are sufficient guides for conducting calibrations, but the calibration results should be documented.

Calibration and check out procedures for the dust monitor will be performed in accordance with manufacturer's recommendations. Because monitoring equipment may be influenced by changes in environmental parameters such as ambient temperature and humidity, the monitoring equipment may also be calibrated during the middle of the workday. Each instrument will be zeroed at the beginning of the workday using pure air or Dräger tubes provided by the manufacturer. Prior to each use, the monitor response and battery charge will be checked. No other quality control procedures are anticipated for the monitoring activities.

Section 5: Contingency Plan

The following contingency plans will be followed during implementation of the soil disturbing activities. EASI will be notified if the contingency actions listed below are triggered during the course of the field activities.

5.1 Drums or Other Containers

Should drums or other containers containing contents of unknown origin be discovered during the soil disturbing activities, the contents will be sampled and the container will be handled in accordance with proper waste management protocols. Once the contents are indentified, the drums/containers will be placed in lab-packs, overfill drums, and/or other suitable containers for transportation and offsite disposal at an appropriately permitted facility. Although not anticipated, if underground storage tanks (USTs) are encountered, then UST removal, excavation, confirmation sampling and analysis, and stockpile profiling and disposal activities will be implemented in accordance with local, state, and federal guidance and regulations. Hazardous materials, if any, will be removed and disposed of at a licensed disposal facility.

5.2 Asbestos-Containing Materials

As discussed in Section 2.2, the former Ring Levee containing asbestos material was completely remediated. Onsite data collected did not indicated asbestos in the Site soils and therefore asbestos-containing materials are not anticipated to be present at the Site. In the unlikely event that asbestos-containing materials are found within debris at the Site, monitoring and mitigation measures for worker and public safety during excavation will be required as described in this SMP. Should asbestos-containing material be found during the soil disturbing activities, the material will be handled in accordance with applicable laws and regulations. BMPs will be followed during the soil disturbing activities to reduce airborne emissions from asbestos-containing materials and minimize impacts to the environment and the public.

In accordance with the asbestos airborne toxic control measure for construction operations (California Code of Regulations, Title 17, Section 93105), the soil disturbing activities will be monitored to ensure that activities do not emit visible dust that crosses the perimeter. In general, visible dust typically occurs at approximately 500 µg/m^3, which is higher than the 8-hour TWA PM10 action level of 110 µg/m^3 discussed in Section 4.2.1.

In addition to implementing measures to prevent visible dust, perimeter samples may be analyzed for asbestos and compared with an asbestos action level of 0.016 total structures per cubic centimeters of air, which is a trigger level that has been used by the BAAQMD for protection of human health. Sampling and analysis for asbestos will be considered if material suspected as asbestos-containing is encountered during the soil disturbing activities.

Should asbestos-containing debris be encountered during soil disturbing activities, dust samples may be collected for analysis in conjunction with the stationary dust monitoring. Dust samples would be collected over the 8-hour workday using a high-volume air sampler with a quartz fiber filter insert sampling at a flow rate of at least 1 cubic meter per minute. These stationary

samplers would be placed at the perimeter monitoring location nearest to the encountered asbestos-containing debris. Samples collected by the stationary dust samplers would be submitted to an offsite laboratory for analysis of asbestos in accordance with the California Air Resources Board-modified Asbestos Hazard Emergency Response Act (AHERA) method, as described in California Code of Regulations, Title 17, Section 93105. Following sample collection, all filter cases will be labeled, capped, and cooled for shipment to the laboratory for analysis.

5.3 Contaminated Soil

The following actions may be implemented should potentially contaminated soil be encountered during the soil disturbing activities at the Site.

5.3.1 Waste Characterization/Profile Sampling and Analysis

Should soil deposits exhibiting discoloration or odors suggesting potential contamination be encountered during the soil disturbing activities, characterization and potential waste profiling activities will be initiated. Soil and groundwater sampling and analysis may be performed to characterize potential soil and/or groundwater contamination and profile materials for potential offsite disposal in accordance with Title 22 of the California Code of Regulations.

Depending on field observations of suspected contamination, samples may be analyzed for the following constituents:

- Total petroleum hydrocarbons (TPH) as gasoline, diesel, and motor oil.
- Benzene, toluene, ethylbenzene, and xylenes (BTEX).
- LUFT metals, including cadmium, chromium, lead, nickel, and zinc.
- Waste Extraction Test (WET).
- Toxicity Characteristic Leaching Procedure (TCLP).
- Pesticides and polychlorinated biphenyls (PCBs).

Based on these results, areas of contaminated material will be delineated for removal and offsite disposal at a properly permitted facility. It is anticipated that the frequency of waste profile sampling and analysis required by the landfill could be one four-point composite per 250 cubic yards of material. Confirmation sampling may be conducted following the removal activities to document the condition of soil and groundwater remaining onsite.

5.3.2 Off Hauling Operations

The transportation and disposal of waste materials will be coordinated in accordance with applicable laws and regulations. Waste management protocols will require the following minimum information:

- Name of the disposal/recycling facilities to which the waste materials will be shipped.
- Method of shipment and an estimate of the number of loads needed for the identified waste shipment.
- Method for tracking the waste leaving the Site and arriving at the disposal/recycling facility.
- Established truck hauling routes.

- Bills of lading/waste manifests for waste/recycle material leaving the Site.

Following acceptance of the waste material by the disposal facility, the material will be loaded into trucks and transported directly to the permitted disposal facility. Trucks will maintain DOT safety regulations and procedures during off hauling operations. All vehicles carrying waste will be securely tarped before leaving the Site. Disposal will be documented with appropriate manifests, weight tickets, and bills of lading.

5.3.3 Decontamination

The decontamination process will involve the removal of contaminants such as accumulated soil, dust, and other contamination from earthwork equipment, vehicles, and personnel, while these items are physically located in the decontamination station. The proper onsite management and offsite disposal of decontamination wastes such as wash water and contaminated protective equipment used by onsite personnel will be required.

Decontamination procedures will be used during removal of contaminated soil to reduce the soil tracking offsite. The principal components of the decontamination process are summarized below:

- Location of facilities for removal of soil and debris from personnel, equipment, and vehicles prior to egress from the Site.

- Removal and containment of soil and other material from equipment and transportation vehicles. Decontamination will likely entail the use of physical devices such as brushes, brooms, sponges, rags, and may include the use of rinse water. The use of water for decontamination will be minimized to the extent reasonable. Use of solvents to decontaminate equipment or use of petroleum products to prevent soil from adhering to the excavation equipment will not be allowed.

- Decontamination of personnel and equipment exiting exclusion zones. Every item of any sort mobilized to the Site that has been exposed to any contamination including dust, soil, or debris will either be treated as contaminated material and disposed of in accordance with applicable laws or will be decontaminated prior to leaving the Site or prior to demobilization from the Site.

- Plans for temporary storage, characterization, and treatment or offsite disposal of decontamination wastes generated during decontamination activities.

5.4 Spill Contingency Plan

Spill contingency planning is intended to address potential releases from and routine fueling required for equipment. A spill kit will be maintained at the fueling locations and a fire extinguisher will be on hand during fueling operations. Additional requirements related to spill contingency planning will be incorporated into the SWPPP.

5.5 Storm Contingency Plan

The relevant pollution prevention measures described in the SWPPP will be implemented in preparation for and during predicted storm events. Sufficient supplies of BMP materials (e.g. fiber rolls, straw bales, erosion control fabric, etc.) will be available onsite to be deployed as necessary to satisfy the stormwater management and erosion control requirements outlined in the SWPPP.

5.6 Emergency Planning

Emergency planning and response actions will be described in the site-specific Health and Safety Plan. For an emergency involving human life or property, the site personnel will obtain help immediately by calling one or more of the following telephone numbers:

- Police – 911.
- Ambulance – 911.
- Fire Department – 911.

Section 6: Reporting

The following documents will be prepared during and following management of soil disturbing activities.

6.1 Record Keeping

Records of the perimeter dust monitoring activities will be prepared for each day of monitoring and will include the following information:

- Date and time of monitoring.
- Field personnel name.
- Instrument type.
- Date/time of last calibration.
- General weather conditions (wind speed and direction, temperature, precipitation, cloud cover).
- Location and measurement of background concentration.
- Location and stabilized measurement for elevated readings.
- Summary of contractor activities and suspected source of elevated readings (only needed if elevated readings are encountered).
- Asbestos sampling (if initiated) or other response actions.

An example Field Data Sheet is included as Appendix A.

6.2 Air Monitoring Report

An Air Monitoring Closure Report (Closure Report) will be prepared to summarize and present field observations and data collected during the soil disturbing activities, including:

- Summary description of soil disturbing activities performed.
- Tabulated perimeter air monitoring data.
- Copies of the laboratory analytical reports and chain-of-custody records, if asbestos sampling and analysis is performed.
- Copies of field data forms.
- Photographic documentation of the field work.

References

Bay Area Air Quality Management District (BAAQMD). Bay Area Air Pollution Summary – 2008, available at: http://www.baaqmd.gov/Divisions/Communications-and-Outreach/Air-Quality-in-the-Bay-Area/Air-Quality-Summaries.aspx

Haley & Aldrich. 2013. *Report on ASTM Phase I Environmental Site Assessment, Vacant Parcels 5 Through 9, Disk Drive and Nortech Parkway, Alviso, California*. March 2013.

National Oceanic and Atmospheric Administration (NOAA). 1998. Climatic Wind Data for the United States. NOAA National Climatic Data Center. November 1998.

United States Environmental Protection Agency (USEPA). 2010. Third Five-Year Review Report for South Bay Asbestos Superfund Site, Alviso, San Jose, California. September 2010.

Table

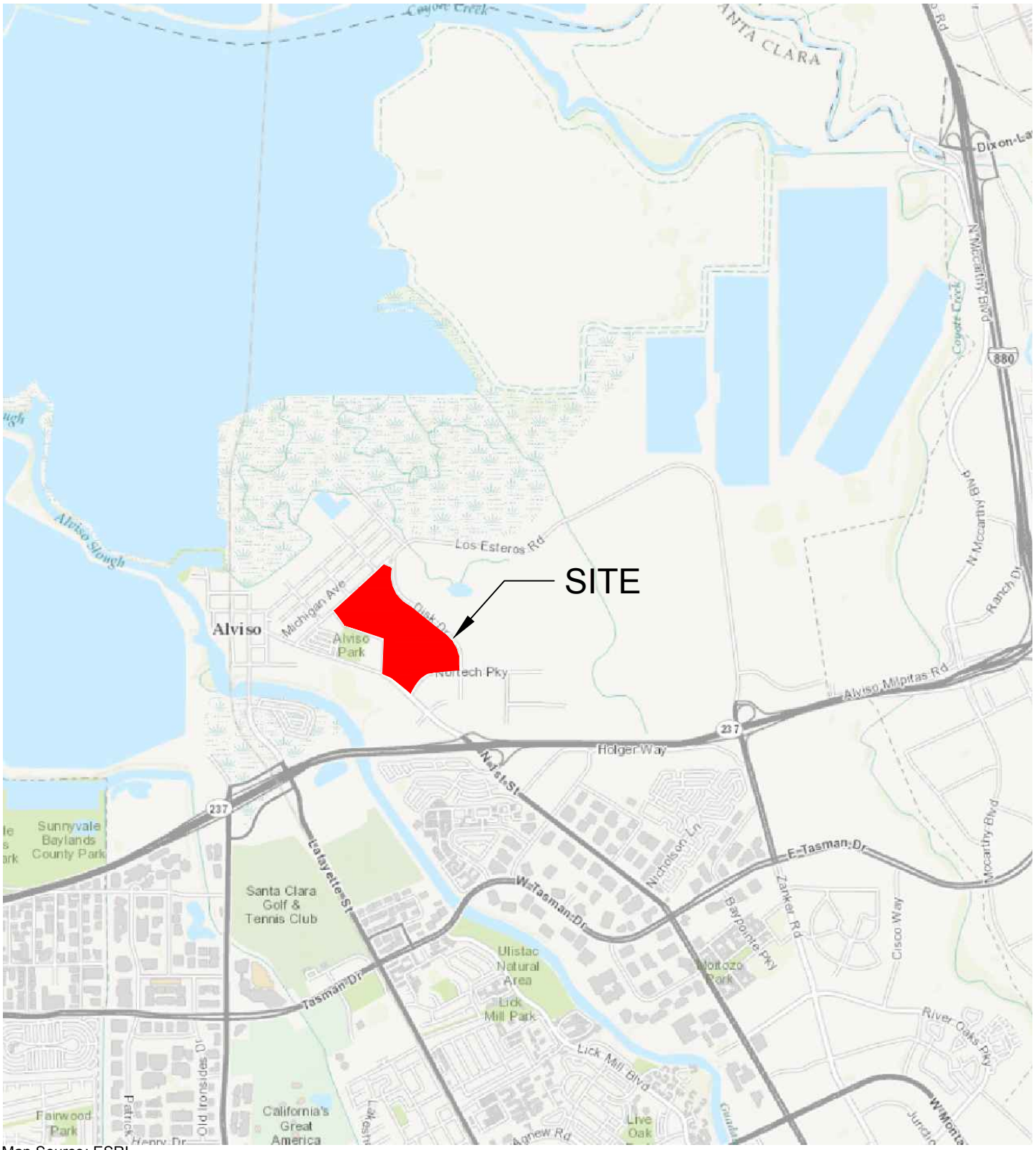
Table 1: Summary of Perimeter Air Monitoring Program

Dust Action Levels for PM10	
Regional Background	20 µg/m^3
California Ambient Air Quality Standard	50 µg/m^3 24-hour TWA
Project Action Level (increase dust controls)	110 µg/m^3 8-hour TWA
Instantaneous Project Action Level	1 mg/m^3 5-minute TWA
Monitoring Tasks and Frequencies	
Baseline	• Once prior to commencing with soil disturbing activities at each location using stationary real-time monitoring instruments. • Once daily prior to beginning work during soil disturbing activities at each location using stationary real-time monitoring instruments.
Perimeter Dust	• Continuously daily during soil disturbing activities at each location using stationary real-time monitoring instruments.

Notes:

(a) PM10 = Particles 10 microns or smaller in diameter.
(b) µg/m^3 = micrograms per cubic meter.
(c) TWA = Time Weighted Average.

Figures



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Map Source: ESRI

0 0.25 0.5 1 1.5 2 Miles

N

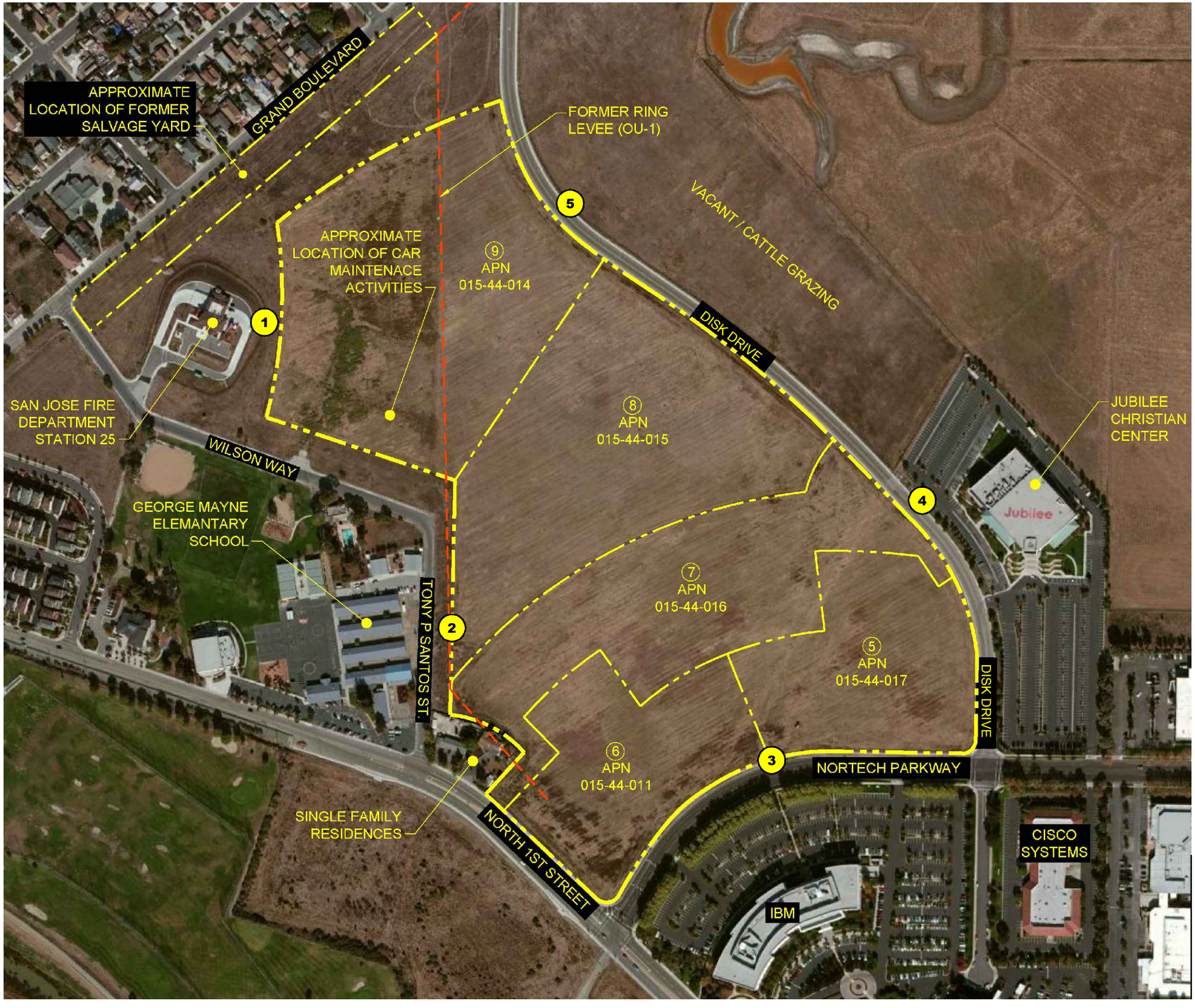
Kennedy/Jenks Consultants

North First Developers, LLC
Alviso Industrial Center
Alviso, California

Site Vicinity Map

K/J 1365019*00
June 2013

Figure 1



Legend

- Property Boundary
- Former Ring Levee
- 1 Perimeter Air Monitoring Location

Source

Mapping reproduced from Haley & Aldrich 2013

N

0 300 600

SCALE IN FEET

Kennedy/Jenks Consultants

North First Developers, LLC
Alviso Industrial Center
Alviso, California

Site Plan and Air Monitoring Locations

K/J 1365019*00
June 2013

Figure 2

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Appendix A

Field Data Form

Air Monitoring Program Field Data Sheet No. _____

Kennedy/Jenks Consultants

Project: Alviso Industrial Center **Page:** _____ of _____

Location: Disk Drive and Nortech Parkway **Date:** _____

Alviso, California **K/J Job No.:** 1365019*00

NOTES / SUMMARY OF CONTRACTOR'S ACTIVITIES:

DAILY MONITORING STATISITICS:

Sample Location		Sample Location		Sample Location	
TWA Concentration (mg/m^3)		TWA Concentration (mg/m^3)		TWA Concentration (mg/m^3)	
MAX Concentration (mg/m^3)		MAX Concentration (mg/m^3)		MAX Concentration (mg/m^3)	
AVG Wind Direction (From)		AVG Wind Direction (From)		AVG Wind Direction (From)	
AVG Wind Speed (mph)		AVG Wind Speed (mph)		AVG Wind Speed (mph)	
Exceedances?		Exceedances?		Exceedances?	
Sample Location		Sample Location		Sample Location	
TWA Concentration (mg/m^3)		TWA Concentration (mg/m^3)		TWA Concentration (mg/m^3)	
MAX Concentration (mg/m^3)		MAX Concentration (mg/m^3)		MAX Concentration (mg/m^3)	
AVG Wind Direction (From)		AVG Wind Direction (From)		AVG Wind Direction (From)	
AVG Wind Speed (mph)		AVG Wind Speed (mph)		AVG Wind Speed (mph)	
Exceedances?		Exceedances?		Exceedances?	

Distribution: Addressee (original)
Office File
Field File

By: _____