



WSP USA  
2025 Gateway Place  
Suite 348  
San Jose, CA 95110  
  
Tel.: +1 408 453-6100  
Fax: +1 408 453-0496  
wsp.com

March 26, 2019

Mr. Lorenzo Perez  
Hazardous Materials Specialist  
Santa Clara County Fire Department  
14700 Winchester Blvd.  
Los Gatos, CA 95032

Subject: Closure Plan for Former Sears Automotive Center, Former Vallco Shopping Mall

Dear Mr. Perez,

This Closure Plan documents and presents a specific plan to address each of the items identified and discussed during your October 9, 2018 inspection of the former Sears Automotive Center located in the southwestern corner parking area of the former Vallco Shopping Mall (Site). It also includes items noted in your e-mail to Rick Freudenberger of WSP on March 12, 2019. The purpose of the inspection and the e-mail was to identify the items to be addressed in connection with final closure of the former service center. Present during the inspection were you, on behalf of the Santa Clara County Fire Department (SCCFD); and Rick Freudenberger; Mike Rohde of Sand Hill Property Company; and Paul Hansen of Sand Hill Construction Management.

## PRE-DEMOLITION ACTIVITIES

Prior to demolition of the building, WSP will conduct the following activities to assure the proper identification and management of any potentially hazardous building materials during demolition activities:

- 1 Elevator: The elevator within the building has been decommissioned and the hydraulic oil removed for proper disposal. Documentation regarding this disposal will be provided to the SCCFD.
- 2 Battery Storage Areas: Wipe samples from the floors and lower portions of the walls in the battery storage areas in the basement and first floor will be collected and analyzed for lead. Locations of wipe samples are shown in the attached photo log. A total of approximately 52 wipe samples for analysis of lead are proposed. Results will be reported to the SCCFD and include comparisons to the applicable lead wipe standard of two hundred and fifty micrograms per square foot ( $250\mu\text{g}/\text{ft}^2$ ) for interior horizontal surfaces;. The results of the Report will provide the demolition contractor with the necessary information to ensure that any lead containing materials have been properly identified and will be safely removed and properly disposed of during demolition activities.
- 3 Polychlorinated Biphenyls (PCBs): Samples will be taken of any caulk/building materials suspected of containing PCBs. Locations of material samples will be determined based on field observations. Results will be reported to the SCCFD and include comparisons to applicable PCB standards.
- 4 Piping: Piping that formerly distributed grease, oil, and other petroleum fluids remains along interior building walls, ceilings and the basement. In some areas, concrete floor and walls show staining from residual petroleum liquids, most notably in the basement. Oil stains on the floor were also observed in the area of two former air compressors. Major stained areas will be cleaned prior to demolition and the



piping and oil stained concrete will be segregated and disposed of properly. Documentation for the disposal of any hazardous materials will be provided to the SCCFD.

- 5 Hydraulic Lifts: There are a number of former hydraulic lifts within the service bay. The lift cylinders have been removed and the steel casings filled with concrete. The lifts in the northern portion of the building do not extend into the basement and hydraulic fluid piping and reservoirs may remain in these lifts. The steel casings for all of the former hydraulic lifts will be removed and the area around/within the casings will be inspected to ensure that any residual piping/reservoirs are cleaned/removed and any residual oil is removed for proper disposal. Documentation for the disposal of any hazardous materials will be provided to the SCCFD.
- 6 Alleged Underground Storage Tank (UST) Location: Two exploratory trenches that are approximately 10 feet long will be excavated to about five feet below ground surface in the area of the alleged UST; the trenches will be perpendicular to each other to create an 'X' with the center of the 'X' located at a concrete square located west of the former Sears automotive building (Figure 1). This concrete square location has been presumed to be a possible access point for an alleged UST that would have been located east of and between two former oil USTs removed in 1994.

For your information, to address the possibility that any USTs remain onsite, WSP performed a geophysical GPR survey on January 25, 2019 around the former Sears Automotive Center. The survey consisted of a metal sweep performed with a Fisher TW-6 MiScope to determine the presence of any metal pipes leading to or from the suspected area of the former tanks removed in 1994 and a ground penetrating radar (GPR) scan performed with a MALA easy locator to determine if there were any indications of any underground storage tank present beneath the ground surface. The survey extended across the area proposed above for the exploratory trenches and showed no evidence of any existing underground tanks there or on the west or east sides of the Sears automotive building. The geophysical survey report is attached.

## DURING DEMOLITION ACTIVITIES

WSP will conduct the following additional activities during demolition:

- 1 Stained Equipment: Any equipment/tanks/surfaces stained with petroleum products (not identified above) will be segregated and disposed of properly. Documentation for the disposal of any hazardous materials will be provided to the SCCFD.
- 2 Oil-Water Separator and Acid Neutralization Chamber: A below-ground oil/water separator exists outside the northeast corner of the building and a former acid neutralization chamber (previously emptied and closed by and filling with gravel) is located near the southeastern corner of the building (Figure 1). The oil/water separator and the acid neutralization chamber will be cleaned, as necessary, and the units removed for proper disposal. Following removal of the oil-water separator and acid neutralization chamber and any associated piping, soil samples will be collected from beneath the units and along the underground piping paths to determine if there were any significant releases. Preliminary proposed sample locations are shown on Figure 1 (attached). The soil samples will be analyzed for the following constituents per Santa Clara County guidelines :
  - TPHG and TPHD by EPA method 8015 (fuel scan)
  - Hexane Extractable Materials by EPA 9071B



- Volatile Organic Compounds, w/chlorinated hydrocarbons (full scan) by EPA method 8260B
- PCB's by EPA method 8082A
- Cd, Cr, Pb, Ni, and Zn by EPA 6010B
- Semi Volatile Organic Compounds (SVOCs) including Polycyclic Aromatic Hydrocarbons (PAHs) by EPA method 8270

- 3 Unknown UST : If any previously undetected UST and/or associated piping is discovered during the exploratory trenches proposed above, appropriate measures will be taken and regulatory permits will be obtained to arrange for removal and appropriate sampling of surrounding soils (beneath any piping and the UST) to obtain tank closure.

Documentation for the disposal of any hazardous materials removed during demolition activities will be provided to the SCCFD.

Following your review and approval of this Closure Plan, we will provide information concerning scheduling of the noted activities.

Please don't hesitate to contact us if you have any questions, comments, or require additional information.

Kind regards,

A handwritten signature in black ink that reads "Richard E. Freudenberger". The signature is written in a cursive style with a large, looped 'R' and 'F'.

Richard E. Freudenberger  
Executive Vice President

Encl.

cc: Mike Rohde, Sand Hill Property Company  
Paul Hansen, Sand Hill Construction Management

# PHOTOGRAPHIC LOG

Sand Hill Properties	Former Vallco Mall Cupertino, California	31401588.001
----------------------	---	--------------

Photo No.	Date	
1	March 25, 2019	
<p>Northeast corner of former Sears Automotive Building, first floor.</p> <p>Three wipe samples will be collected along the floor and three along the wall.</p>		


Photo No.	Date	
2	March 25, 2019	
<p>South portion of former Sears Automotive Building, first floor.</p> <p>Former battery storage area. Three wipe samples will be collected along the floor and three along the wall.</p>		




**PHOTOGRAPHIC LOG**

<b>Sand Hill Properties</b>	<b>Former Valico Mall Cupertino, California</b>	<b>31401588.001</b>
-----------------------------	---	---------------------

<b>Photo No.</b>	<b>Date</b>	
3	March 25, 2019	
<p>Basement level of the former Sears Automotive Center. Two wipe samples to be collected in areas of staining on the floor and two wipe samples along the wall.</p>		

<b>Photo No.</b>	<b>Date</b>	
4	March 25, 2019	
<p>Basement level of the former Sears Automotive Center. Three wipe samples to be collected along the floor, adjacent to each side of the side walls and one in the corner. Three wipe samples will be taken on the wall above where each floor sample is collected.</p>		

PHOTOGRAPHIC LOG		
Sand Hill Properties	Former Valico Mall Cupertino, California	31401588.001

Photo No.	Date	
5	March 25, 2019	
Basement level of the former Sears Automotive Center. Two wipe samples to be collected in areas of staining on the floor and two wipe samples along the wall, above the areas of staining.		



PHOTOGRAPHIC LOG		
Sand Hill Properties	Former Vallco Mall Cupertino, California	31401588.001



Photo No.	Date	
6	March 25, 2019	
Basement level of the former Sears Automotive Center. Two wipe samples to be collected in areas of staining on the floor and two wipe samples along the wall, above the areas of staining.		

Photo No.	Date	
7	March 25, 2019	
Basement level of the former Sears Automotive Center. Three wipe samples to be collected in areas of staining on the floor and three wipe samples along the wall.		

PHOTOGRAPHIC LOG		
Sand Hill Properties	Former Vallco Mall Cupertino, California	31401588.001



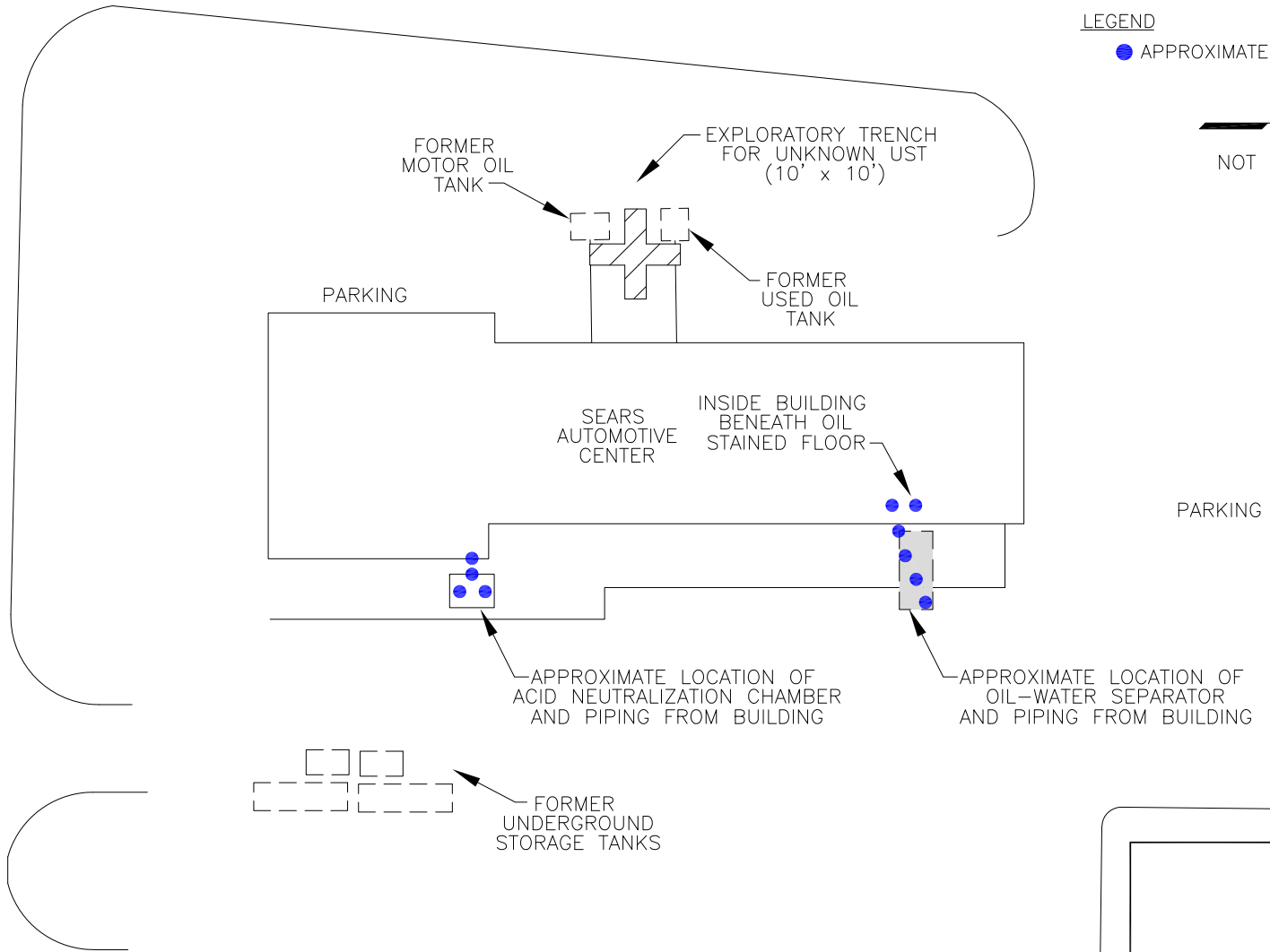
Photo No.	Date	
8	March 25, 2019	
Basement level of the former Sears Automotive Center. Three wipe samples to be collected in areas of staining on the floor and three wipe samples along the wall, above the areas of staining.		

Photo No.	Date	
9	March 25, 2019	
Basement level of the former Sears Automotive Center. Three wipe samples to be collected in areas of staining on the floor and three wipe samples along the wall, above the areas of staining.		



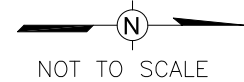
PHOTOGRAPHIC LOG		
Sand Hill Properties	Former Vallco Mall Cupertino, California	31401588.001

Photo No.	Date	
10	March 25, 2019	
Basement level of the former Sears Automotive Center. Two wipe samples to be collected on the floor and two along the walls.		



LEGEND

● APPROXIMATE WSP SAMPLING LOCATION



THE ORIGINAL VERSION OF THIS DRAWING IS IN COLOR. BLACK AND WHITE COPIES MAY NOT ACCURATELY DEPICT CERTAIN INFORMATION.

DRAFT

A



WSP USA Inc.  
2025 GATEWAY PLACE  
SUITE 348  
SAN JOSE, CA 95110  
TEL: +1 408.453.6100

Figure 1

APPROXIMATE SAMPLING LOCATIONS –  
SEARS AUTOMOTIVE CENTER

VALLCO FASHION MALL  
10123 NORTH WOLFE ROAD  
CUPERTINO, CALIFORNIA  
PREPARED FOR  
SAND HILL PROPERTY COMPANY  
PALO ALTO, CALIFORNIA

Drawn By: LS 3/21/2019

Checked:

Approved:

DWG Name: 314MN1588-009