January 23, 2006

Teresita Salire
Targeted Brownfields Assessment, Project Manger
United States Environmental Protection Agency - Region 9
75 Hawthorne Street (WST-8)
San Francisco, CA 94105

Dear Teresita:

This letter outlines Weston Solutions, Inc.'s (WESTON's) responses to comments from the US Army Corp of Engineers (USACE), and East Bay Habitat for Humanity, Inc. (EBHH) regarding the Targeted Brownfields Assessment Phase II Investigation for 10800 Edes Avenue, Phase II Targeted Brownfields Assessment, Draft Final Report, dated January 2006. The comments and concerns are presented in bold, followed by WESTON's responses. The submission of the Final Report and appendices are attached.

US Army Corp of Engineers - Teresita Salire:

TPH and lead were detected in areas outside of the debris area above the action levels. If the plan is to cleanup or excavate the areas where there are high hits of PAHs (debris area), then what is the proposed remedy for areas with high TPH and lead? For example, sampling points #9 and #23 have levels of lead above the DTSC cleanup goal of 269 ppm (the 10900 Edes Avenue standard). Is there going to be a delineation of the extent of contamination in these areas for lead before remediation? The same question applies for sampling points #49 and #50 where TPH-motor oil is above 700 ppm. These two points are located in the north-west corner of the property, where only one sampling location detected PAH above action level. Is there going to be delineation of extent of contamination in that area or will the soil be excavated within the grid of the high TPH detection?

Comment noted. The remedial action plan for 10900 Edes Avenue only developed action levels for benzo[a]pyrene equivalents, lead, and PCBs. However, the August 25, 2005 *Removal Action Implementation Report*, prepared by PES Environmental, Inc for 10900 Edes Avenue documents the excavation of oil stained areas. Post excavation confirmation samples were analyzed for TPH and compared to RWQCB ESLs. According to Brighton Environmental Consultants, "hot spots" were excavated at the 10900 Edes Avenue independent of the 95 percent UCL of mean

concentrations cleanup goals. The extent of contamination the areas of samples EBHH-9, -23, -49, and -50 could possibly be evaluated during the development and implementation of a remedial action workplan.

WESTON has added the statement "Remediation of localized areas of elevated TPH, lead, and arsenic contamination should be addressed in the remedial action workplan" in Section 5.2 of the final report.

If the 10900 Edes Avenue cleanup goals will be used for this site to determine levels of cleanup, please include the cleanup levels for PAH, TPH, lead, arsenic, and pesticides in the recommendation section.

Comment noted. Section 5.2 of the final report cites cleanup levels used for 10900 Edes Avenue for PAHs and lead. If a remedial action workplan is developed for 10800 Edes Avenue, then cleanup levels for TPH and arsenic should be included.

Based on the data collected, will the crushed bricks be considered nonhazardous waste if disposed off in a landfill? Or will the EBHH still need to do additional testing prior to disposal? If the bricks were to be recycled (beneficial reuse) then testing might not be necessary.

Comment noted. Hazardous waste determination of soil and crushed bricks was not specified in the SAP, and analytical procedures to profile the material were not conducted. Based on the existing lead and arsenic data of soil and crushed brick debris, some sampling locations warrant additional analysis using Waste Extraction Test (WET) procedure to obtain Soluble Threshold Limit Concentration (STLC) and Toxicity Characteristic Leaching Procedure (TCLP) values in order to evaluate disposal options.

Piles of whole bricks were present at the site at the time of the investigation, the majority of the bricks appear to be worn (chipped and rounded corners) and may not be suitable for reuse as building materials.

<u>EBHH's via Brighton Environmental Consulting - Robert Roat, P.E.:</u>

I am confused about the conceptual model for distribution of PAHs at the site. My understanding is that the site was originally used as a plant nursery, therefore we tested for pesticides in soil related to the nursery at the original grade of the greenhouses and deeper, as identified in the field during borings. We tested for metals in soil across the site based on its former use as a plant nursery and brick recycling facility. We tested for PAHs in soil in the debris areas along the property line with 10900 Edes Ave., along the northwest property line adjacent to the warehouse, and at the southwest corner of the property where a former gasoline UST was suspected. Was the conceptual model for

PAHs that they were associated with the former debris piles or with the crushed brick fill? Or are the PAHs associated with near surface soils, whatever their origin, because of site grading and mixing over the years of brick reclaim operations? Can we make any conclusions based on the data collected?

Comment noted. WESTON targeted PAHs sampling in areas of a potential contamination which included the former debris piles, fuel tanks, boiler rooms. PAHS were detected in all areas sampled, only a few of these areas were sampled from crushed brick. It is presently unknown if the crushed brick fill and soil beneath the crushed brick fill in the central portion of the site are contaminated with PAHs. The only conclusion one can make is that PAH contamination exist beneath the former debris piles and may or may not be distributed throughout the entire site.

As noted in the report, it appears that there is a data gap for PAHs in surface soils in the middle of the site. Were there any physical observations which would allow us to estimate extent of the PAHs

Comment noted. No visual indications (odors or staining) of PAH contamination were observed in the soil samples collected from the central portion of the site.

To what are we comparing PAH values? E&E is using an entirely different set of standards for the Vernon-Castro site (also and EPA Brownfields site), based on a nationwide study of urban levels of PAHs in soil. Is there a justification for different approaches, or is this just inconsistency between consultants? My personal bias is towards the Weston approach, which uses locally developed risk values, as opposed to the E&E approach which uses a background level for urban areas an order of magnitude above risk-based levels and raises, in my mind at least, questions of environmental justice. Maybe there is a compromise position between the two extremes.

Comment noted. Action levels as specified in the Sampling and Analysis Plan (SAP) were mostly based on the Oakland Urban Land Redevelopment (URL) Program risk based screening levels (RBSLs). Ecology and Environment, Inc., presumptively, did not use Oakland URL RBSLs as the Vernon-Castro site is located in the City of Richmond. The panning team developed appropriate action levels for the 10800 Edes Avenue site.

Where they are available, please add the cleanup goals used for 10900 Edes Avenue to the Action Level tables (that would be 62ug/kg for B(a)P equivalents, 269 mg/kg for lead, and 250 ug/kg for PCBs). All these goals were set based on the 95 percent UCL of the mean concentrations.

Comment noted. The development of site clean up goals is beyond the scope of this Phase II Targeted Brownfields Assessment. The planning team established the action levels for the SAP which were not based on the cleanup goals for 10900 Edes Avenue site. However, Section 5.2 of the Draft Final Report recommends using the 10900 Edes Avenue site cleanup goals for remedial activities at the 10800 Edes Avenue Site. Section 5.2 of the final report has been changed to

specifically state cleanup levels for benzo[a]pyrene equivalents and lead based on a 95 percent UCL of mean concentrations.

The Phase II report lists arsenic as a chemical of concern, and compares the data to the Roberts Landing site in San Leandro. The Removal Action Workplan for 10900 Edes Avenue (DTSC, 2003) referenced Caltrans' Final Feasibility Study Remedial Action Plan, South Prescott Neighborhood Park, Cypress Replacement Project located in Oakland, California, dated March 1998, in which background concentrations of arsenic range from 1.1 mg/kg to 25 mg/kg. It is likely that the cleanup goals for 10800 Edes will be similar to those for the neighboring 10900 Edes, therefore the arsenic results should be compared to the same background concentrations.

Comment noted. Oakland ULR sites the utilization of background levels for arsenic as screening levels for different lithologies found in the City of Oakland. The Roberts Landing Site was the closest location for the referenced background referenced concentrations. Section 4.1.1 of the Draft Final Report states that typical background concentrations of arsenic in California soil range from 1 to 50 mg/kg. A reference to the Caltran's study has been added to Section 5.2 of the Final Report.

Labels for sample locations on the figures and sample locations on the tables do not agree (EEBH-xx on the Figures, EBHH-xx on the tables). Please check that the number of samples and duplicates referenced in the text matches the number in the tables.

Comment noted. The sample labels on the figures were changed to "EBHH-xx".

As in the case of 10900 Edes, any remediation of the site will likely be based on a statistical evaluation of the site data, specifically a calculation of the 95 percent upper confidence level of the mean concentration. Comparison of the 95 percent UCL of the mean lead concentration indicates that lead is not a primary concern at the site, although removal of hot spots may be warranted.

Comment noted. Section 5.2 of the Final Report has been changed to include the recommendation of using cleanup goals as established for the 10900 Edes Avenue site.

The report alludes to brick fill of up to three feet. The sampling designations appear to indicate the depth of the fill. Please call out the fill depth on a table or a figure. This will aid in estimating costs of removal if that is needed.

Comment noted. Determining the depth of crush brick fill was not specified as a task in the SAP. However, the depth of fill can be extrapolated from sampling depths stated on the data summary tables. Specifically, samples denoted with the suffix "B" were collected at the contact between the crushed brick fill and the "original" ground surface. Sampling depths and intervals are further explained in Section 3.1 of the Final Report.

During onsite inspections near the site entrance, it appeared that there was a crushed asphalt fill (a fact confirmed by Evans Brothers) placed on part of the site. Was this

observed during sampling? If so, what was the aerial extent and depth of the crushed asphalt fill.

Comment noted. Crushed asphalt fil was not observed in any of the borings drilled by WESTON.

Conversations with Weston staff indicate that they observed a black ash-like material during sampling. Evans Brothers indicated that a building which they had moved onto the site was burned by vandals during the 1980s. What was the aerial extent and depth of the observed ash? Does it correlate with the locations of high PAH results.

Comment noted. WESTON described the material has black grit or sand and not as ash. The location of the imported house that had caught fire is unknown to WESTON. The black sand was found in two sample locations (EBHH-41B and EBHH-43B) collected from northwestern former debris area. Field screening of these samples exhibited the elevated organic vapor concentrations (35 and 40 ppm) as measured with a flame ionization detector (FID), photo ionization detector (PID) measurements were slightly above background (3.7 and 2.5 ppm). The samples were submitted for PAH analyses based on these measurements. PAHs were detected in the samples at concentrations above action levels, but were not the maximum concentrations detected at the site. Brighton Environmental Consultants noted that this portion of the property was once occupied by a transient's encampment.

Two samples, EBHH 1B and EBHH 29B, are described in Table 4-2 as sampled at depth of 3-4 feet bgs, however the description of subsurface samples (section 3.1) lists the interval for "B" samples as 0.5 to 1.5 feet bgs. Please explain.

Comment noted. Section 3.1 of the Draft Final Report explains two scenarios for sampling intervals, one for samples collected in areas of crushed brick fill and one for samples collected in areas of no crushed brick fill. Sampling depths stated on the data summary tables were measured from the existing ground surface.

Because it appears that PAHs will drive remediation at this site, any information Weston can provide to allow us to place an upper bound on potential removal volumes will be greatly appreciated.

Comment noted. The scope of work for this Phase II Brownfields Site Assessment was to assess the presence of contamination at the site based on the sites history. The assessment was not conducted to define the lateral and vertical extent of contaminants at the site. Based on the existing data, there is a potential of wide spread PAH contamination through out the site. There is also the potential that PAH contamination may be isolated the areas around the former debris piles as they were the suspected source of contamination. Further sampling of the central portion will confirm wether the site has ubiquitous contamination beneath the crushed brick fill from unknown sources. With the available data, WESTON could only calculate a worst case scenario of potential removal volumes based on the removal of all soil to a depth of two to three feet below the original grade.