Department of Toxic Substances Control

Matthew Rodriquez
Secretary for
Environmental Protection

Barbara A. Lee, Director
5796 Corporate Avenue
Cypress, California 90630

Edmund G. Brown Jr.
Governor

March 21, 2016

Mr. Robert Beers
Project Manager
Friends of the Riverside Airport, LLC
PO Box 3517
Jurupa Valley, California 92519

CONDITIONAL APPROVAL OF ADDITIONAL CLEANUP UNDER THE 2006 CALIFORNIA LAND REUSE & REVITALIZATION ACT RESPONSE PLAN, RIVERSIDE AGRICULTURAL PARK, 7020 CREST AVENUE, RIVERSIDE CALIFORNIA

Dear Mr. Beers:

The California Department of Toxic Substances Control (DTSC) conditionally approves the Friends of the Riverside Airport, LLC, February 10, 2016 Soil Sampling and Excavation Work Plan (Attachment 1) to conduct assessment and removal of Polychlorinated Biphenyl (PCB) impacted soil in excess of the approved cleanup goal of 0.22 milligrams per kilogram (mg/kg) for the property located at 7020 Crest Avenue, Riverside, California (Site). DTSC has determined that this additional cleanup, which will be conducted in accordance with the California Land Reuse & Revitalization Act Response Plan approved by DTSC on August 4, 2006, will ensure that overall exposure concentrations at the Site will remain below 1 mg/kg. The 1 mg/kg is considered protective of public health in a residential setting and falls within the acceptable risk range by both the U.S. Environmental Protection Agency (U.S. EPA) and DTSC.

U.S. EPA reviewed the Soil Sampling & Excavation Work Plan and indicated in an e-mail dated February 11, 2016, that they had no comments (Attachment 2). The South Coast Air Quality Management District (SCAQMD) reviewed the Air Monitoring Plan, originally included in the 2006 Response Plan and provided suggestions that would enhance community protection during the removal process (Attachment 3). DTSC's review of the plan indicated minor comments (Attachment 4).

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The Soil Sampling & Excavation Work Plan is approved with the following conditions:

1. Sampling may proceed immediately;
2. DTSC and SCAQMD comments must be incorporated as part of the implementation of the field efforts;
3. Figures depicting the cut lot and fill lot locations must be updated to reflect the most current development plans;
4. The Soil Sampling & Excavation Work Plan must be updated and provided to DTSC and EPA for review prior to initiation of excavation activities;
5. DTSC, EPA and SCAQMD must be notified of field work schedules so that oversight, inspections and co-location sampling can be arranged by each agency as applicable;
6. Field notes and dust/air monitoring logs should be provided on a daily basis for EnviroStor posting; and,
7. DTSC and/or EPA may request slight modification or adjustment of sample locations based on field conditions and other project related considerations.

We expect cleanup to occur expeditiously, and look forward to overseeing the collection of data that should allow DTSC and EPA to make a determination regarding the future reuse of the Riverside Agricultural Park as a residential development.

Attachments

Sincerely,

Peter Garcia
Branch Chief
Brownfields and Environmental Restoration Program

cc: The Honorable Richard D. Roth
California State Senate
State Capitol, Room 4034
Sacramento, California 95814

The Honorable Eric Linder
California State Assembly
State Capitol, Room 5135
Sacramento, California 95814

Mr. John A Russo
City Manager
City of Riverside
3900 Main Street
Riverside, California 92522

cc: Ms. Penny Newman
Executive Director
Center for Community Action and Environmental Justice
P.O. Box 33124
Riverside, California 92519

Mayor Rusty Bailey
Riverside City Hall
3900 Main Street
Riverside, California 92522

Ms. Dot Lofstrom
Division Chief
Brownfields & Environmental Restoration Program
1001 I Street
PO Box 806
Sacramento, California 95812-0806

Ms. Barbara A. Lee
Director
1001 I Street
PO Box 806
Sacramento, California 95812-0806

ATTACHMENT 1

SOIL SAMPLING & EXCAVATION WORK PLAN

TRC
9685 Research Drive
Irvine, CA 92618

949.727.9336 PHONE
949.727.7311 FAX

www.trcsolutions.com

February 10, 2016

Ms. Maryam Tasnif-Abassi
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, California 90630

SITE: FORMER AGRICULTURAL PARK
7020 CREST AVENUE
RIVERSIDE, CALIFORNIA

RE: SOIL SAMPLING AND EXCAVATION WORK PLAN

Dear Ms. Tasnif-Abassi:

This Work Plan is provided to describe upcoming activities that will be conducted at the former Riverside Agricultural Park located at 7020 Crest Avenue in Riverside, California. Based on soil sampling efforts conducted in November 2015, as documented in the *Former Riverside Agricultural Park Soil Sampling Report* dated January 6, 2016, it was determined that surface soil with polychlorinated biphenyl (PCB) concentrations above the cleanup goal of 0.22 milligrams per kilogram (mg/kg) was present at select locations. A description of previous remediation activities and planned future work activities are presented in this Work Plan.

Phase I Activities - 2009

The scope of the first phase of soil removal was to excavate, remove, and properly dispose of soils containing PCB concentrations in excess of 50 mg/kg from locations determined by previous Site investigation efforts. In addition, soil samples were collected from select locations and analyzed for dioxins, furans and metals.

The remedial excavation alternative selected for the project included the removal, transportation, and proper disposal of PCB and metals-impacted soil. Between April and July 2009, Friends of the Riverside Airport LLC (FRA) removed soil containing PCB concentrations above 50 mg/kg. All remedial excavation activities were completed in July 2009. Excavation areas were concluded only after all confirmation samples from the excavation sidewalls and bottoms returned laboratory data results that verified the remaining soil was <50 mg/kg for PCBs.

All excavated soil with PCB concentrations at or above 50 mg/kg was transported offsite to the Waste Management, Incorporated, Kettleman Hills facility in Kettleman City, California. Soil containing PCB concentrations above 50 mg/kg at locations identified during previous Site

characterization efforts has been removed, transported offsite, and disposed of properly. A total of ~8,666 tons of PCB- and /or metals-impacted soil were transported offsite for disposal. Additional items removed from the site include brush debris (green waste), PCB-contaminated concrete, sewer pipe, and utility poles.

A total of 31 soil samples were analyzed for dioxin/furan congeners. Of the samples analyzed, 13 contained 2,3,7,8-TCDD Equivalent concentrations in excess of the health-based screening level for residential land-use (i.e., 4.5 picograms per gram [pg/g] or 4.5E-6 mg/kg). This health-based screening level represents the USEPA Regional Screening Level (RSL) established by Region IX (USEPA, 2008). The samples that contained the highest concentrations of 2,3,7,8-TCDD Eq. are TP-30E (4,817.7), TP-30S (8,372.8), and TP-30W (300.7). These three samples are co-located with PCB-impacted soil. Six additional samples exceeded the health-based screening level (B-67, TP-29, S-22+20E, TP-30N, TP-30B, and TP-103). These nine samples are co-located with PCB-impacted areas, and were removed during Phase 2 mass grading activities.

Phase II Activities – 2013/2014

The scope of the second phase of soil removal was to excavate, remove, and properly dispose of soils containing PCB concentrations in excess of 0.22 mg/kg from locations determined by previous site investigation efforts. In addition, soil samples were collected from select locations and analyzed for dioxins, furans and metals.

Between July 2013 and January 2014, FRA removed soil containing PCB concentrations above 0.22 mg/kg. Excavation areas were concluded only after all confirmation samples from the excavation sidewalls and bottoms returned laboratory data results that verified the remaining soil was <0.22 mg/kg for PCBs.

PCB-impacted soil (165,226.64 tons) generated during excavation activities was characterized as a non-hazardous waste and transported to the Waste Management, Inc. Azusa Land Reclamation facility in Azusa, California, for recycling. Additional materials that were removed from the Site included clean soil (30,782 tons), concrete (4,481.37 tons), green waste (422.26 tons), and asbestos-cement pipe (50.82 tons).

Thirteen dioxin/furan-impacted locations identified during Phase 1 activities were addressed by conducting additional excavation and confirmation sampling. Of the 50 confirmation samples collected, 17 were above the health-based screening level (4.5 pg/g). Consequently, additional soil was removed from these locations and more confirmation samples were collected. This procedure was repeated until all final confirmation sample results were below 4.5 pg/g.

Planned Remediation Activities for 2016

Work activities will begin following approval of this work plan by DTSC and EPA and are anticipated to take place over a two to three month period. The work will be conducted based on four distinct types of areas or phases as described below:

- Cut Lots - lots where soil was removed to achieve the final grade in Tract 28987;
- Fill Lots - lots where soil was imported and compacted to achieve the final grade in Tract 28987;
- Outside Areas - areas outside of the planned Phase I housing development; and
- Final Lot Sampling - final confirmation soil sampling of all lots in Tract 28987 (Phase I) housing development.

Soil sampling and removal activities for each of these areas will proceed in the following manner:

Cut Lots

- Collect step-out soil samples in four directions at 25 feet and 50 feet from sample location exceeding PCB cleanup goal. Collect samples prior to soil removal. See Figure 1 for proposed sample locations.
- Remove soil around sample location exceeding cleanup goal to 1 foot deep and out to step-out sample limits (minimum 50 foot by 50 foot square excavation). Do not excavate within 2 feet of existing concrete curbs and gutters or driveway aprons on Jurupa Avenue, Clemente Court, and Drysdale Street. Leave curbs, gutters, and driveway aprons in place.
- Collect one bottom sample per 1,000 square feet with a minimum of three samples per removal area.
- Continue step-out sampling an additional 10 feet until results are below cleanup goal (0.22 mg/kg).
- Dispose of excavated soil offsite.

Fill Lots

- Collect step-out soil samples in four directions at 60 feet from sample location exceeding PCB cleanup goal. Collect samples prior to soil removal. See Figure 2 for proposed sample locations.
- Remove soil around sample location exceeding cleanup goal to 1 foot deep and out to step-out sample limits (minimum 120 foot by 120 foot square excavation). Do not excavate within 2 feet of existing concrete curbs and gutters or driveway aprons on Jurupa Avenue, Clemente Court, and Drysdale Street. Leave curbs, gutters, and driveway aprons in place.

- Collect one bottom sample per 1,000 square feet with a minimum of three samples per removal area.
- Continue step-out sampling an additional 10 feet until results are below cleanup goal.
- Dispose of excavated soil offsite.

Outside Areas

- Re-sample the outside areas on a 62.5 foot grid. If a historic result is within 2 feet of the grid point and is below the cleanup goal then no sample required. See Figure 3 for proposed sample locations.
- Collect step-out soil samples in four directions at 25 and 50 feet from sample location exceeding PCB cleanup goal. Collect samples prior to soil removal.
- Remove soil around sample location exceeding cleanup goal to 1 foot deep and out to step-out sample limits (minimum 50 foot by 50 foot square excavation).
- Collect one bottom sample per 1,000 square feet with a minimum of three samples per removal area.
- Continue step-out sampling an additional 10 feet until results are below cleanup goal.
- Dispose of excavated soil offsite.
- Note: a minimum of 5 feet of clean fill will be imported and placed over all lots included in the future Phase II development area which is still in the planning phase.

Tract 28987 Final Lot Sampling - See Figure 4 for proposed sample locations.

- For small lots, as defined in Table 1, collect 6 samples per lot (2 front yard, 2 side yard, and 2 back yard. Soil samples will not be collected in the location of a planned house.
- For large lots, as defined in Table 1, collect 8 samples per lot (2 front yard, 4 side yard, and 2 back yard. Soil samples will not be collected in the location of a planned house.
- For cut lots, collect only surface samples (0-6 inches).
- For fill lots, collect surface samples, two foot deep samples, and for fill 8 feet or deeper, 50% of the depth of the fill (not including concrete fill material).
- For all lots, if any result exceeds the cleanup goal, remove soil in the area 2 feet deep and laterally to adjacent sample location meeting the cleanup goal, then resample.
- Continue removing and sampling until results are below cleanup goal.
- Dispose of excavated soil offsite.

Backfilling

Excavations created during these additional remediation activities will be backfilled and compacted. The import soil will come from a stockpile located south of Jurupa Avenue near the intersection of Jurupa Avenue and Van Buren Boulevard approximately 0.4 mile east of the site. This stockpile has been previously tested and meets the DTSC criteria for import fill soil. However, the soil will be resampled in accordance with DTSC import sampling criteria (12 samples for the first 5,000 cubic yards, then 1 sample for every 1,000 cubic yards thereafter) and the analytical results will be provided to DTSC for approval prior to beginning backfill activities.

Underground Utility Excavation

Excavated soil from underground utility excavations in street areas for water, sewer, storm drain, telephone, gas, electric, and cable television will be stockpiled, tested, and then disposed of offsite at one of the soil disposal facilities listed below. The utility trenches will be backfilled with clean imported material. This work will be conducted after receipt of the certificate of completion from DTSC.

Offsite Soil Disposal

- The proposed soil disposal facilities for soil containing PCBs below 50 mg/kg include the following:
    - Waste Management, Incorporated (WMI) facility at 2801 Madera Road, Simi Valley, California.
    - WMI Azusa Land Reclamation facility at 1211 W. Gladstone Street, Azusa, California.
    - WMI El Sobrante Landfill at 10910 Dawson Canyon Road, Corona, California.
- The proposed soil disposal facility for soil containing PCBs at or above 50 mg/kg is the Waste Management facility at 35251 Old Skyline Road, Kettleman City, California.
- Proposed haul route maps are provided as Figures 5 and 6.

Laboratory Analysis

The soil samples collected during confirmation sampling will be analyzed for PCBs using EPA Method 8082 with extraction by the Soxhlet method. The contract laboratory for this sampling effort will be Test America in Irvine, California. Chain of custody protocol will be followed for all samples. The chain of custody form accompanies the samples from the sampling locality to the laboratory, providing a continuous record of possession prior to analysis.

Air Monitoring

Air monitoring will be performed during soil excavation activities according to Appendix E (Workplan for Air Monitoring) of the Frey Environmental *Revised Response Plan* dated June 19, 2006.

Cleanup Goal

In accordance with the Response Plan that was approved by DTSC in 2006, all known PCBs found above the original cleanup level of 0.22 mg/kg in the November 2015 sampling event will be removed during this remediation. The 0.22 mg/kg used throughout the project is a conservative cleanup goal and lower than the level of 1 mg/kg, which EPA and DTSC considers health protective in a residential setting and falls within both agencies' acceptable risk range.

Confirmation samples will be collected during and after soil removal to ensure that the site is suitable for residential development, including sampling of each residential lot with up to eight sample locations. While it is possible that individual residual concentrations above 0.22 mg/kg may be found after the cleanup, the site will still be safe for residential use if the 95% upper confidence limit (UCL) concentrations for individual lots meet the cleanup goal of 0.22 mg/kg. A post-remediation risk evaluation will be developed in such cases for approval by DTSC.

Reporting

Following the completion of excavation activities, a summary report will be prepared.

- The report will include findings, tabulated laboratory results, sample location figures, and copies of manifests.
- A post-removal health risk analysis will be included in the report.

General

TRC will provide field oversight of excavation activities and will perform confirmation soil sampling.

A site-specific health and safety plan will be prepared by TRC and will be available at the site for use by TRC personnel and agency representatives.

The sampling requirements described in this Work Plan can be modified in the field by DTSC or EPA if necessary to meet project objectives.

If you have any comments, please contact David Lennon at (949) 341-7458.

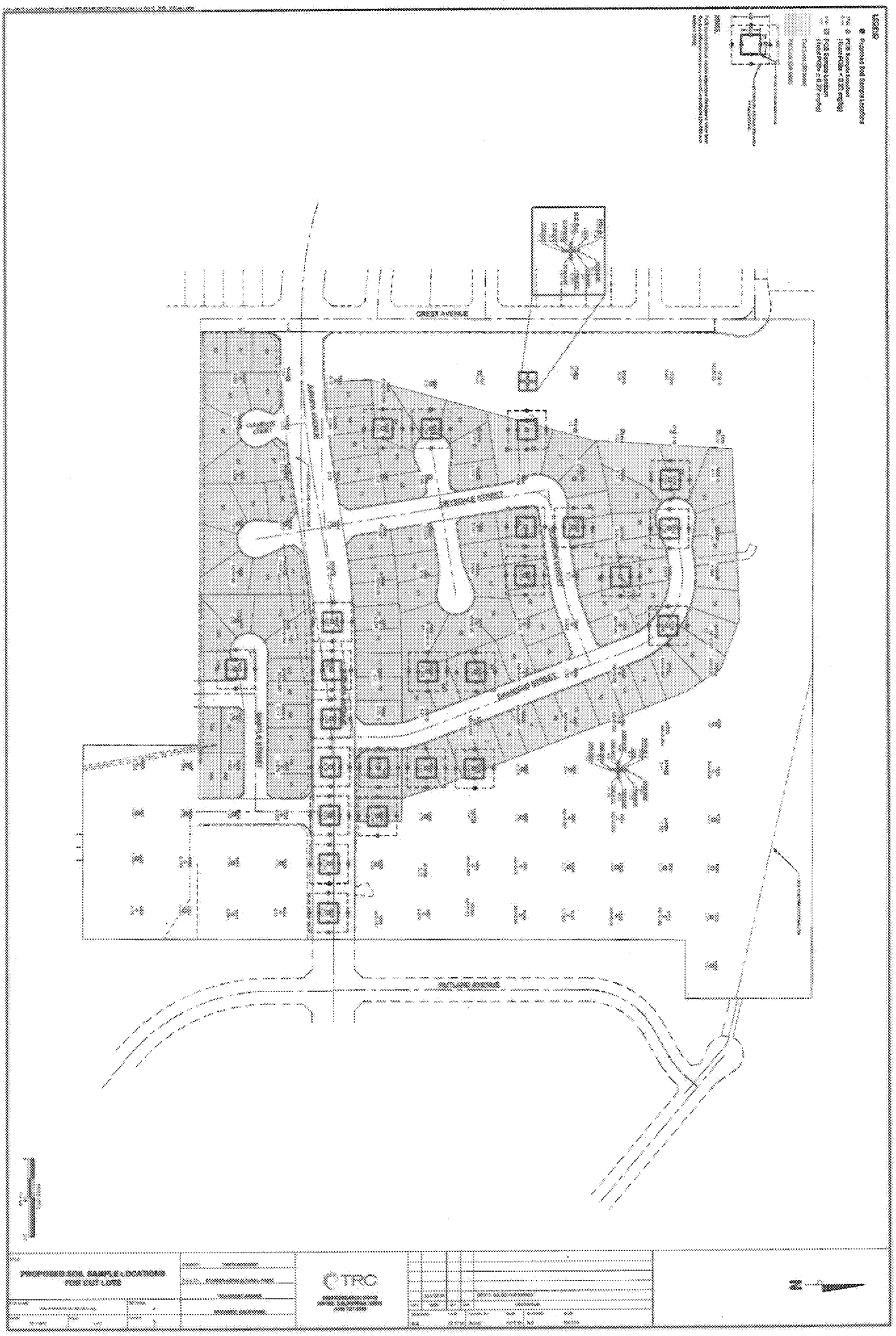
Sincerely,

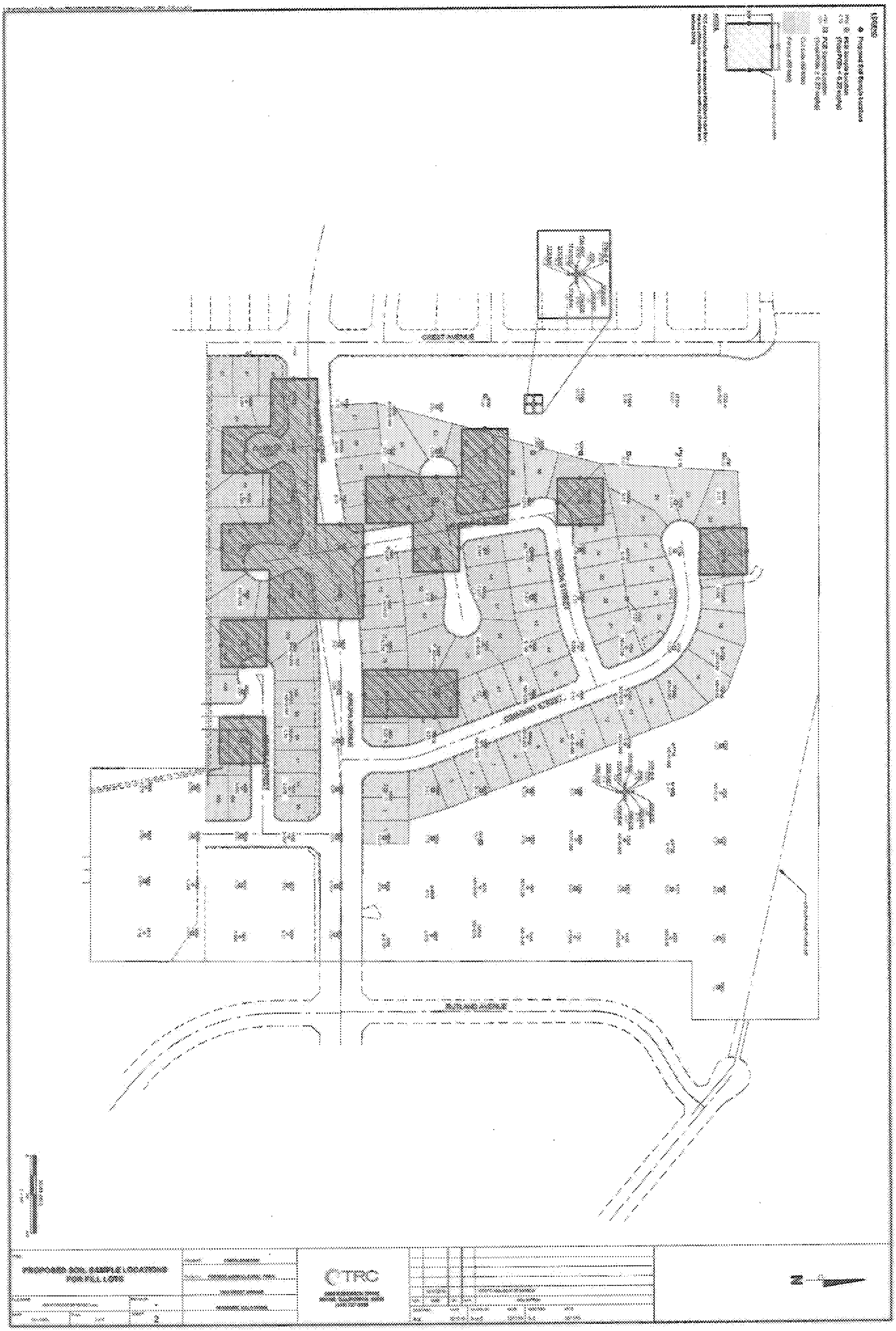
David Lennon
Principal Consultant

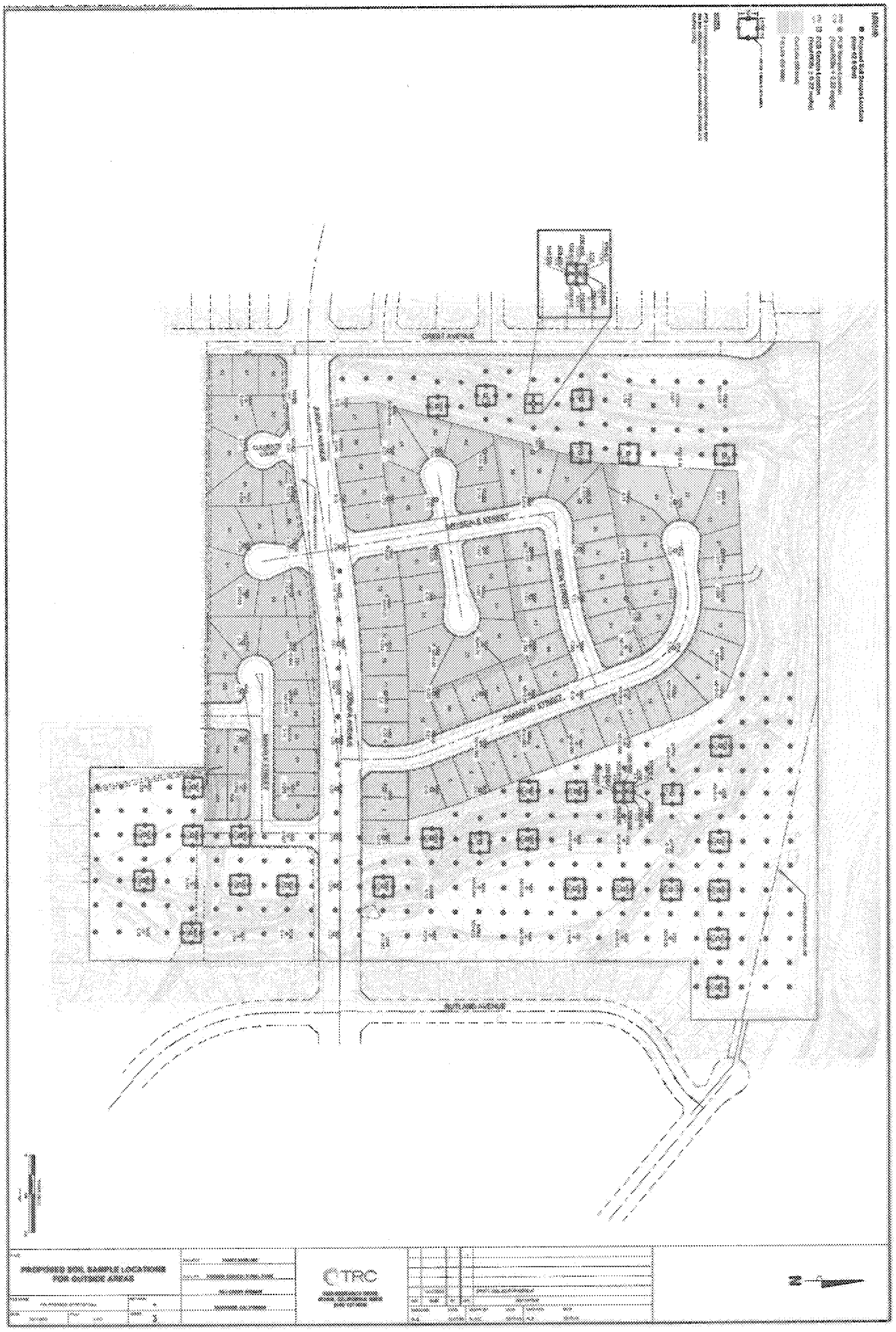
Ross Surrency, PG
Senior Project Geologist

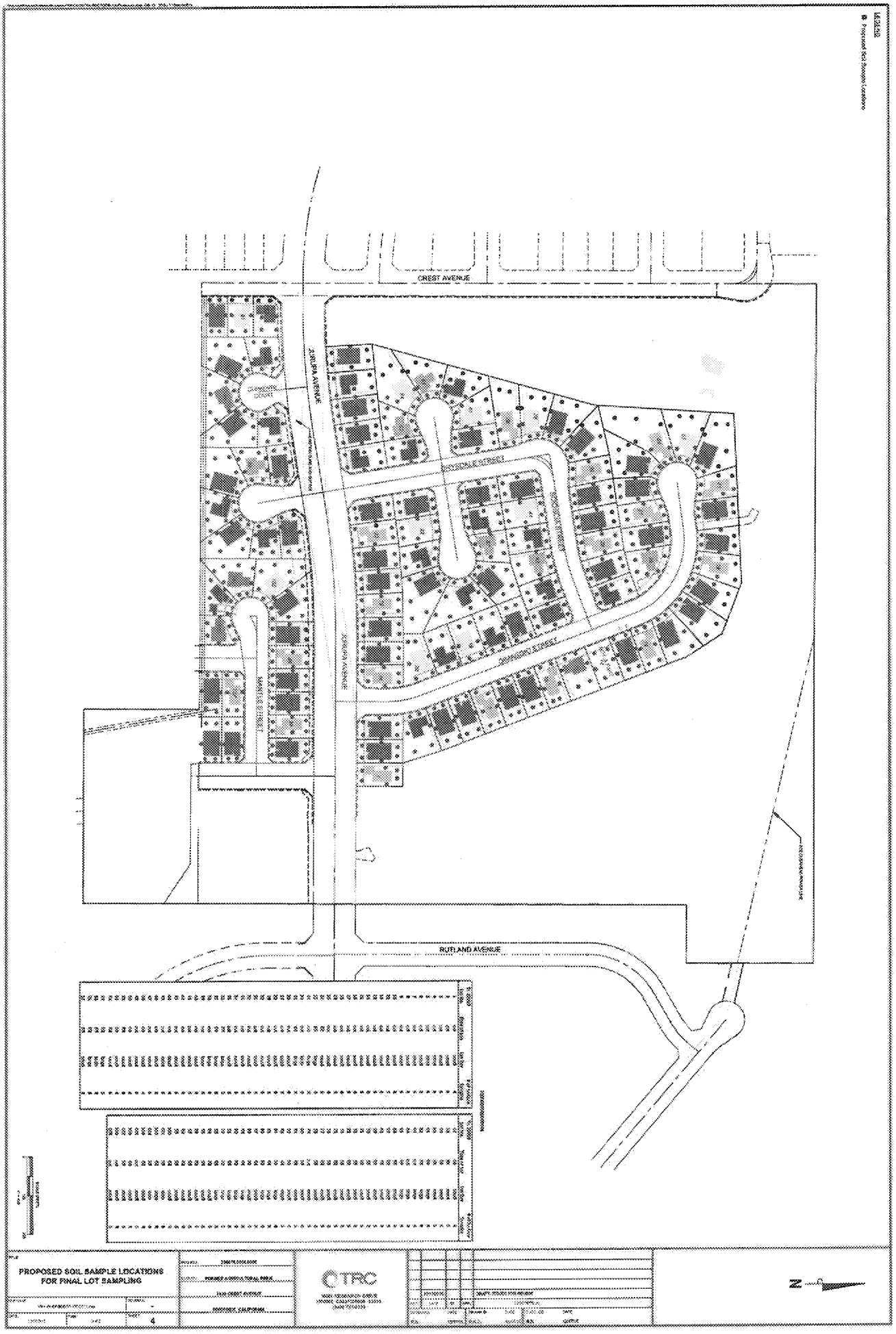
Attachments: Figure 1 - Proposed Soil Sample Locations for Cut Lots
Figure 2 - Proposed Soil Sample Locations for Fill Lots
Figure 3 - Proposed Soil Sample Locations for Outside Areas
Figure 4 - Proposed Soil Sample Locations for Final Lot Sampling
Figure 5 - Soil Transportation Route to Van Buren Boulevard
Figure 6 - Soil Transportation Route from Van Buren Boulevard to Highway 60
Table 1 - Individual Lot Information

cc: Sara Ziff, EPA (electronic copy)
Katherine Baylor, EPA (electronic copy)
Greg Neal, DTSC (electronic copy)


LEGEND
CREST AVENUE
TRC


PROPOSED SOIL SAMPLE LOCATIONS
FOR FILL LOTS
TRC


TRC


CREST AVENUE
EUROPA AVENUE
RUTLAND AVENUE
PROPOSED SOIL SAMPLE LOCATIONS
FOR FINAL LOT SAMPLING
TRC
4

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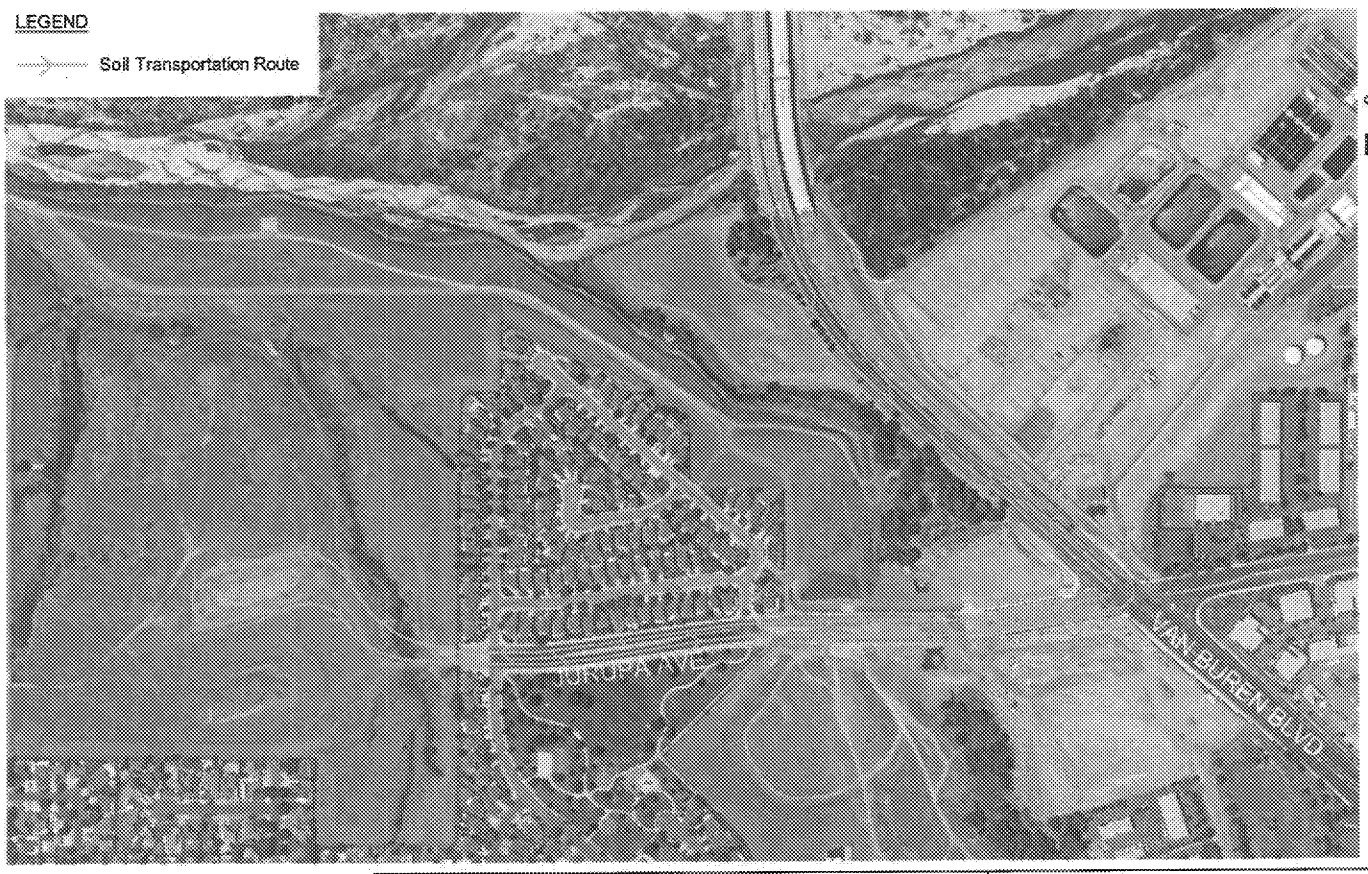

SCALE (FEET)

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NOTE:

Map provided by Google Earth Professional, dated 6/7/12.

TRC

PROJECT: 167991

FACILITY:

FRIENDS OF THE RIVERSIDE AIRPORT, LLC
7020 CREST AVENUE
RIVERSIDE, CALIFORNIA

SOIL TRANSPORTATION ROUTE TO VAN BUREN BOULEVARD

FIGURE 5

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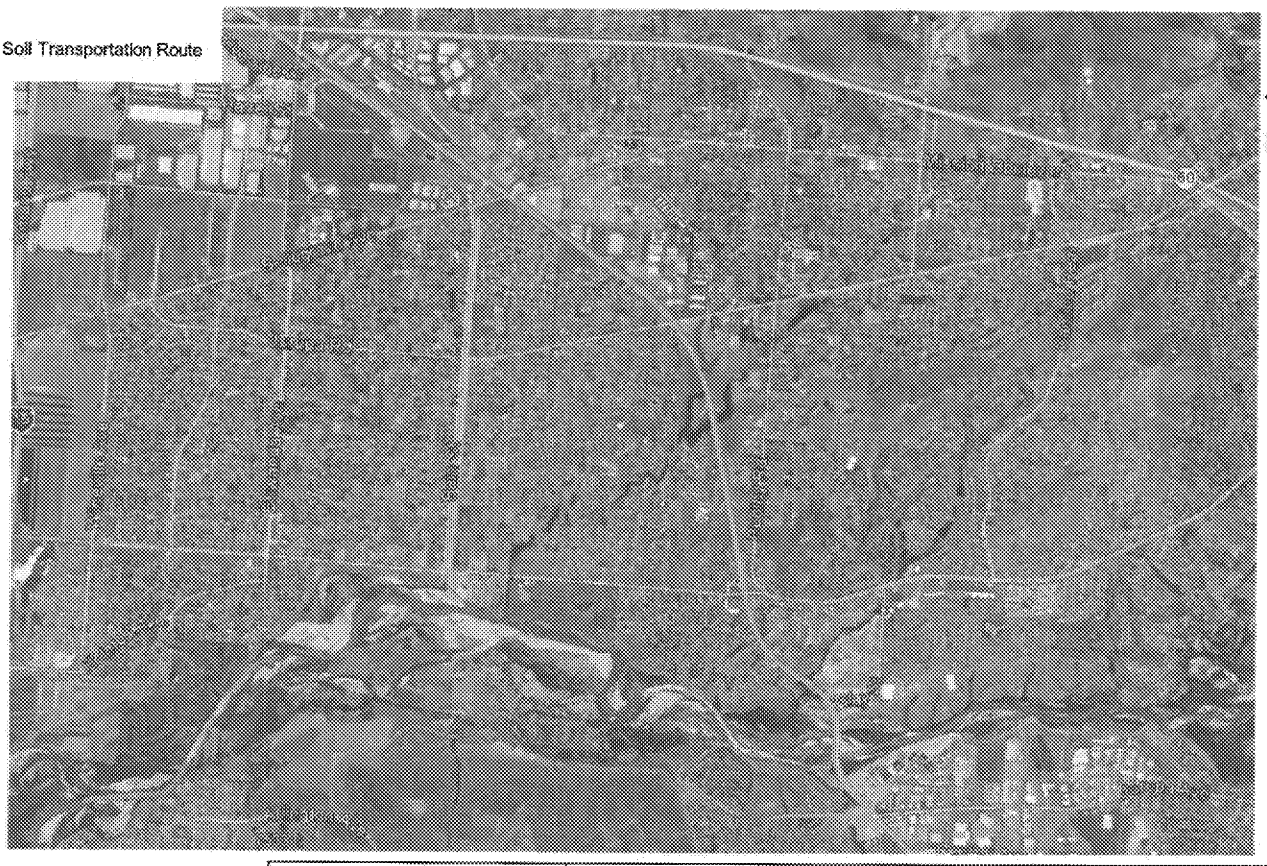
LEGEND

Soil Transportation Route



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NOTE:

Map provided by Google Earth Professional, dated 6/7/12.

TRC

PROJECT: 167991

FACILITY:

FRIENDS OF THE RIVERSIDE AIRPORT, LLC
7020 CREST AVENUE
RIVERSIDE, CALIFORNIA

SOIL TRANSPORTATION ROUTE FROM VAN BUREN BOULEVARD TO HIGHWAY 60

FIGURE 6

Table 1
Individual Lot Information
Former Agricultural Park, Riverside, California

Tr. 28987 Lot No.	Type of Lot	Lot Size	# of Surface Samples
1	cut	small	6
2	cut	small	6
3	cut	small	6
4	cut	small	6
5	cut	small	6
6	cut	small	6
7	cut	small	6
8	cut	small	6
9	cut	small	6
10	cut	small	6
11	cut	small	6
12	cut	small	6
13	cut	small	6
14	cut	small	6
15	cut	small	6
16	cut	small	6
17	cut	small	6
18	cut	small	6
19	cut	small	6
20	cut	small	6
21	fill	small	6
22	fill	large	8
23	cut	large	8
24	cut	large	8
25	fill	large	8
26	cut	small	6
27	cut	small	6
28	cut	small	6
29	cut	small	6
30	cut	small	6
31	cut	small	6
32	cut	small	6
33	cut	small	6
34	cut	small	6
35	cut	small	6
36	fill	large	8
37	fill	large	8
38	cut	large	8
39	cut	large	8
40	cut	small	6
41	cut	small	6
42	cut	small	6
43	cut	small	6
44	cut	small	6
45	cut	small	6
46	cut	small	6
47	cut	small	6
48	cut	small	6
49	cut	small	6
50	fill	small	6
51	fill	small	6
52	fill	small	6
53	fill	small	6
54	fill	large	8
55	fill	large	8
56	fill	large	8
57	fill	small	6

Tr. 28987 Lot No.	Type of Lot	Lot Size	# of Surface Samples
57	fill	small	6
58	fill	small	6
59	fill	small	6
60	fill	small	6
61	fill	large	8
62	fill	large	8
63	cut	large	8
64	cut	large	8
65	fill	large	8
66	fill	small	6
67	fill	small	6
68	fill	small	6
69	fill	small	6
70	fill	small	6
71	fill	small	6
72	fill	small	6
73	fill	small	6
74	fill	small	6
75	fill	small	6
76	fill	small	6
77	fill	small	6
78	fill	small	6
79	cut	small	6
80	fill	small	6
81	fill	small	6
82	fill	small	6
83	fill	small	6
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85	fill	large	8
86	fill	large	8
87	fill	small	6
88	fill	small	6
89	fill	large	8
90	fill	large	8
91	fill	large	8
92	fill	large	8
93	fill	large	8
94	fill	small	6
95	fill	small	6
96	fill	small	6
97	fill	small	6
98	fill	small	6
99	fill	small	6
100	fill	small	6
101	fill	large	8
102	fill	large	8
103	fill	large	8
104	fill	small	6
105	cut	small	6
106	fill	small	6
107	fill	small	6
108	cut	small	6
109	cut	small	6

ATTACHMENT 2

E-MAIL FROM U.S. EPA

From: ZIFF, SARA
To: Surrency, Ross
Cc: Neal, Greg@DTSC; Vince Bartleman (v.bartleman@verizon.net); rmbeers777@hotmail.com; Lennon, David; Tasnif-abbasi, Maryam@DTSC; Armann, Steve; Baylor, Katherine; Wilson, Patrick
Subject: RE: Former Riverside Agricultural Park
Date: Thursday, February 11, 2016 9:04:26 AM
Importance: High

Good morning Ross,

EPA has reviewed the revised work plan, and we have no comments. Please continue to keep EPA updated as you solidify the schedule for the sampling effort.

Best regards,

Sara

^^^^^^^^^^^^^^^^^^^^
Sara Ziff, P.E.
Project Manager
Corrective Action Section
U.S. EPA, Region 9
75 Hawthorne Street (LND-4-1)
San Francisco, CA 94105
(415) 972-3536
ziff.sara@epa.gov

From: Surrency, Ross [mailto:RSurrency@trcsolutions.com]
Sent: Wednesday, February 10, 2016 2:25 PM
To: Maryam Tasnif-Abbasi (maryam.tasnif-abbasi@dtsc.ca.gov) <maryam.tasnif-abbasi@dtsc.ca.gov>
Cc: Greg Neal (greg.neal@dtsc.ca.gov) <greg.neal@dtsc.ca.gov>; ZIFF, SARA <ZIFF.SARA@EPA.GOV>; Vince Bartleman (v.bartleman@verizon.net) <v.bartleman@verizon.net>; rmbeers777@hotmail.com; Lennon, David <DLennon@trcsolutions.com>
Subject: Former Riverside Agricultural Park

Maryam,

The revised Work Plan for the former Riverside Agricultural Park is attached for your review.

Respectfully,

Ross Surrency, PG
Senior Project Geologist

9685 Research Drive, Irvine, CA, 92618
T: 949.727.7324 | F: 949.727.7311 | C: 949.283.9257

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ATTACHMENT 3

COMMENTS FROM SCAQMD ON 2006 RESPONSE PLAN

AIR MONITORING PLAN

Appendix E WP Review for Air Monitoring Riverside AG Park

Section	Paragraph	Comment
1	3	Since this area is far less than 50 acres, notification of the SCAQMD and submission of a monitoring plan for approval are not required. Not consistent with Section 2.1, Sentence 1, "The site consists of approximately 62 acres of undeveloped land, with a simple roofed structme positioned near its center .."
2.2	1	Operated, maintained, and calibrated in accordance with 40 Code of Federal Regulations (CFR), part 50, Appendix J, or appropriate EPApublished documents for EPA-approved equivalent methods for PMIO - This is only for fugitive dust, other compounds?
2.2	2	Protocol established for Rule 403 compliance testing require simultaneous sampling upwind and downwind of a suspected source for a period of five hours. - Recommend 24 Hours for This
3.3	2	Protocol established for Rule 403 compliance testing require simultaneous sampling upwind and downwind of a suspected source for a period of five hours. - Recommend 24 Hours for This
3.3	2	Thermo Andersen DataRam Aerosol Monitors, Model 4000.; Needs to be an FEM approved method, not sure this meets that criteria
3.3	2	What is the averaging time of the measurement proposed (same as recording time - 30 minutes or is at an instantaneous measurement every 30 minutes)?
4	1	"Standard Scientific protocol" - needs more definition
4	1	Checks on calibration devices
4	1	Intercomparison should be added if possible
4	1	Sampling media inspections
4	1	Checks on continuous instruments
3	4	The NIOSH REL for PCBs is a time-weighted average of 0.001 mg/m3 for up to 10 hours a day for up to 40 hours a week. The setting of the exposure could be indoors or outdoors, so to answer your question it would be relevant to what you describe as ambient air exposures. But unlike airborne concentrations that the EPA might have that would be for 24-hour per day exposure, the REL is intended as a limit for workers exposure for up to 10 hours a day for a 40-hour work week.

ATTACHMENT 4

DTSC MEMORANDUM ON SOIL SAMPLING & EXCAVATION WORK PLAN

Matthew Rodriquez
Secretary for
Environmental Protection

Department of Toxic Substances Control

Barbara A. Lee, Director
5796 Corporate Avenue
Cypress, California 90630

Edmund G. Brown Jr.
Governor

MEMORANDUM

TO: Maryam Tasnif-Abbasi
Senior Environmental Scientist
Brownfields and Environmental Restoration Program

FROM: Greg Neal, P.G.
Engineering Geologist
Geological Services Branch
Cypress Office

DATE: February 22, 2016

SUBJECT: REVIEW OF "SOIL EXCAVATION WORK PLAN" FORMER RIVERSIDE AGRICULTURAL PARK, 7020 CREST AVENUE, RIVERSIDE, CALIFORNIA

DOCUMENT REVIEWED

Soil Excavation Work Plan, Former Riverside Agricultural Park, 7020 Crest Avenue, Riverside, California, prepared by TRC Solutions, dated January 7, 2016.

COMMENTS

1. There is no provision for sampling the bottom of excavations as a result of the lot-by-lot sampling if removals are necessary. Bottom sampling should be conducted on the same frequency as other excavation bottom sampling (i.e. 1 per 1000 square feet with a minimum of 3 per excavation).
2. The text indicates that offsite backfill material will be sampled pursuant to the DTSC clean fill advisory. However, the frequency is identified but the constituents are not. We should reiterate that the guidance has provisions for minimum analytical methods based upon the fill source and should be followed.

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3. Lot 68 only has 5 sample points on Figure 4. An additional sample point should be placed on the map for clarity and consistency with other lots.
4. The document includes the cell phone number of field staff. Since this document will become public information, his cell phone number should be removed.
5. Downwind fenceline dust monitoring laboratory samples should be collected daily for the duration of soil excavation activities to ensure that dust suppression activities are adequate.
6. DTSC has requested support from the South Coast Air Quality Management District (SCAQMD) regarding compliance with Rule 403 dust monitoring activities.

FINDINGS AND RECOMMENDATIONS

The Geologic Services Branch (GSB) finds that the proposed soil excavation and investigation work plan meets the requirements to address the known contamination of PCB concentrations above the screening level of 0.22 milligrams per kilogram (mg/kg) as well as provide for further investigation to ensure that the site will be safe for the proposed residential development.

Please notify DTSC with as much lead time as possible prior to field implementation of the program, such that appropriate oversight of the field activities can be conducted.

The GSB notes that recommendations and comments presented in this memorandum are site specific and should not be applied to other projects without consultation of the Project Geologist. If you have any questions, please contact me by telephone at (714) 484-5455 or by e-mail at greg.neal@dtsc.ca.gov.

Date document reviewed: February 22, 2016

Peer review: Jose Marcos, P.G.

cc: Alfredo Zanoria, C.E.G, C.HG.