Department of Toxic Substances Control

Matthew Rodriquez
Secretary for
Environmental Protection

Barbara Lee, Director
5796 Corporate Avenue
Cypress, California 90630

Edmund G. Brown Jr.
Governor

July 16, 2018

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

APPROVAL AND CERTIFICATION OF PHASE 3 RESPONSE PLAN IMPLEMENTATION REPORT, RIVERSIDE AGRICULTURAL PARK, 7020 CREST AVENUE, RIVERSIDE, CALIFORNIA - CALIFORNIA LAND RE-USE AND REVITALIZATION ACT (CLRRA) AGREEMENT, DOCKET NO. HSA-A 05/06-162 (MAY 19, 2006)

Dear Mr. Beers:

On May 23, 2018, the Department of Toxic Substances Control (DTSC) received the Phase 3 Response Plan Implementation Report (Phase 3 Report) for the Riverside Agricultural Park, located at 7020 Crest Avenue, Riverside, California (Ag Park). The document was submitted by TRC, Irvine, California, on behalf of the Friends of the Riverside Airport, LLC, (FRA). DTSC also received a copy of the June 7, 2018 letter from Mr. Jeff Scott, Director of Land Division, United States Environmental Protection Agency (US EPA) to TRC indicating that based on the results of the sampling data, US EPA concurs that the health-based remedial goals for PCB-impacted soils were achieved.

Please note that DTSC has completed its review of the Phase 3 Report and the US EPA letter. Based on the information provided in the Phase 3 Report and the US EPA letter, DTSC also concurs that the health-based remedial goals for this project have been achieved. Therefore, DTSC is hereby approving the Phase 3 Report.

Phase 3 activities were initiated to address the areas of PCB concentrations that were previously unknown. The goal was to excavate, remove, and properly dispose of soils containing PCB concentrations above the following remedial goals:

1. 0.23 mg/kg (the current US EPA Regional Screening Level [RSL]) for soils from 0 to 10 feet below ground surface (bgs), and;

2. 1 mg/kg for soils 10 feet bgs or greater and for soil beneath the proposed roadways covered by pavement.

Phase 3 cleanup activities were implemented by FRA between August 2016 and January 2018. DTSC provided direct and significant field oversight of the Phase 3 cleanup activities. In addition, a rigorous air monitoring and dust suppression program was implemented during Phase 3 of the cleanup. Excavation was concluded only after verification that PCB concentrations were at or below their respective cleanup goal. The total amount of PCB-impacted soil removed from the Ag Park during Phase 3 was approximately 303,000 tons.

DTSC has completed its review of the Phase 3 Report, which indicates that the cleanup activities were completed in accordance with the requirements of the California Land Reuse and Revitalization Act (CLRRA) Response Plan approved by DTSC on August 4, 2006, the Soil Sampling and Excavation Work Plan approved by the US EPA on July 27, 2016 and by DTSC on August 5, 2016, and the Request for Alternative Soil Cleanup Goal, approved by DTSC and US EPA on January 31, 2018. As mentioned earlier, DTSC also completed its review of the June 7, 2018, US EPA letter in which US EPA determined that based on the results of the sampling data presented in the Phase 3 Report, the health-based remedial goals for PCB-impacted soils were achieved.

US EPA and DTSC have determined that the Ag Park has met the health-based remedial goals for this site. Based on this determination, Ag Park is now suitable for unrestricted use. Therefore, in accordance with the requirements of CLRRA, DTSC issues the enclosed Certificate of Completion for the Ag Park for the Phase 3 response action.

Should you have any further questions, please feel free to contact Mr. Peter Garcia, Southern California Division Chief at (714) 484-5459 or by email at Peter.Garcia@dtsc.ca.gov or contact me at (714) 484-5321 or by email at Mohsen.Nazemi@dtsc.ca.gov.

Sincerely,

Mohsen Nazemi, M.S., P.E.
Deputy Director
Site Mitigation and Restoration Program
Department of Toxic Substances Control

Enclosure: Certificate of Completion

cc: Mr. David Lennon (via e-mail)
Project Manager
TRC
17911 Von Karman Avenue, Suite 400
Irvine, California 92614
DLennon@trcsolutions.com

Mr. Jeff Scott (via e-mail)
Director
Land Division
U.S. EPA, Region 9
75 Hawthorne Street (LND-1)
San Francisco, CA 94105
Scott.Jeff@epa.gov

Ms. Sara Ziff, P.E. (via e-mail)
Project Manager
Corrective Action Section
U.S. EPA, Region 9
75 Hawthorne Street (LND-4-1)
San Francisco, CA 94105
Ziff.Sara@epa.gov

Mr. Peter Garcia (via e-mail)
Southern California Division Chief
Site Mitigation and Restoration Program
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, California 90630
Peter.Garcia@dtsc.ca.gov

Ms. Maryam Tasnif-Abbasi (via e-mail)
Senior Supervisory Scientist
Site Mitigation and Restoration Program
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, California 90630
Maryam.Tasnif-Abbasi@dtsc.ca.gov

CERTIFICATE OF COMPLETION

California Land Reuse and Revitalization Act (CLRRA)
California Health and Safety Code, Division 20, Chapters 6.82 and 6.83
Riverside Agricultural Park, County of Riverside, Assessor's Parcel Numbers 155-040-004 and 155-040-005

The Department of Toxic Substances Control (DTSC) entered into CLRRA Agreement, Docket No. HSA-A 05/06-162 with the Friends of the Riverside Airport, LLC, (FRA) on May 16, 2006, to specify the process that will be used to evaluate the property located at 7020 Crest Avenue, Riverside, California, under CLRRA, facilitate the assessment and remediation of such property, provide a framework for terms and conditions for qualifying for immunities afforded under CLRRA and provide a framework for reimbursement of DTSC's costs.

The Response Plan (Phases 1 and 2) prepared pursuant to Health and Safety Code section 25395.96 underwent a thirty-day public comment period from December 22, 2005, to January 31, 2006, and was approved by DTSC on August 4, 2006 and certified in April 2014. An additional cleanup plan, the Soil Sampling and Excavation Work Plan, for the Phase 3 cleanup, underwent a public comment period from March 7, 2016 to March 21, 2016, and was approved by DTSC on August 5, 2016.

In accordance with Health and Safety Code section 25395.97, DTSC has determined that:

1. All response actions for the Phase 3 cleanup have been satisfactorily completed in accordance with the approved Response Plan documents. Response actions taken are described in the attached Exhibit A.

Therefore, conditioned upon continuing compliance with the CLRRA Agreement, DTSC finds that FRA has properly completed the Response Plan and thus exercised appropriate care with respect to the release or threatened release of hazardous materials identified in the approved Response Plan for this Site.

Issued this 16th day of July, 2018 by

Name: Mohsen Nazemi, M.S., P.E.
Deputy Director, Site Mitigation & Restoration Program

Signature:

ED_005263_00001665-00004

EXHIBIT A

Riverside Agricultural Park, located at 7020 Crest Avenue, Riverside, was first developed as a sewage treatment plant by the United States Army in 1942. The sewage treatment plant was constructed to handle wastewater generated at Camp Anza, which operated under the supervision of the United States Army until approximately 1947. Anza Realty Company operated the sewage treatment plant from approximately 1947 to 1953. Subsequently, the Anza Realty Company, later known as the Arlington Utility Company, operated the sewage treatment plant from 1953 to 1962. The City of Riverside operated the sewage treatment plant from 1962 to 1965. The sewage treatment plant accepted waste from industrial, commercial, and residential customers. The treatment plant was decommissioned in 1965. The City continuously owned the Site from 1962 through May 1, 2006. The Site is currently owned by the Friends of the Riverside Airport, LLC (FRA).

A series of investigations indicated the presence of elevated concentrations of polychlorinated biphenyls (PCBs) throughout the 62-acre property. Remedial excavation activities were conducted to remove and dispose of soil containing primarily PCBs, with concentrations of metals and dioxins/furans as well. The purpose of the remedial excavation was to prepare the property for unrestricted land use. The work was performed in accordance with the Revised Response Plan, Excavation of Soils Containing PCBs, approved by DTSC on August 4, 2006. The response action was conducted in two phases. Phase 1, removal of PCB-impacted soil to a target level of 50 milligrams per kilogram (mg/kg), was conducted in 2009. Approximately 8,666 tons of soil were excavated and transported to an off-site location for disposal. The goal of the second phase was to remove soils containing PCB concentrations above the United States Environmental Protection Agency (US EPA) residential regional screening level of 0.22 mg/kg from locations determined by previous investigation efforts. Approximately 165,226 tons of soil were excavated and transported for off-site disposal during Phase 2 work conducted in 2013-14. A Certification of Completion was issues in April 2014. However, after residual impacts were discovered at the property in late 2015, additional work was performed in accordance with the 2006 Response Plan, the Soil Sampling and Excavation Work Plan approved by the US EPA on July 27, 2016 and by DTSC on August 5, 2016, and the Request for Alternative Soil Cleanup Goal, approved by DTSC and the US EPA on January 31, 2018. The Phase 3 Response Plan Implementation Report includes information associated with the additional excavation, confirmation sampling and offsite disposal of approximately 303,000 tons of PCB impacted soil.