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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.

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. The TRC site superintendent will be Mike Kilbarger (mobile # 562-577-9207).

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

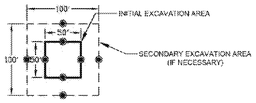
Ross Surrency, PG
Senior Project Geologist

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

- Proposed Soil Sample Locations
- 1732 0.18 PCB Sample Location (Total PCBs < 0.22 mg/kg)
- 1731 131 PCB Sample Location (Total PCBs ≥ 0.22 mg/kg)
- Cut Lots (50 total)
- Fill Lots (59 total)



NOTES:

PCB concentrations shown represent the highest value from the two different laboratory extraction methods (Soxhlet and Method 3545).

REV.	DATE	BY	APP.	DESCRIPTION
	12/17/2015			DRAFT - ISSUED FOR REVIEW

DESIGNED	DATE	DRAWN BY	DATE	CHECKED	DATE
R.S.	12/17/15	R.M.C.	12/17/15	R.S.	12/17/15

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IRVINE, CALIFORNIA 92618
(949) 727-9336

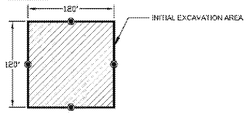
PROJECT: 234976.0000.0000
FACILITY: FORMER AGRICULTURAL PARK
7020 CREST AVENUE
RIVERSIDE, CALIFORNIA

TITLE: PROPOSED SOIL SAMPLE LOCATIONS FOR CUT LOTS

FILE NAME: FRA RIVERSIDE SP-REV2015.dwg
REVISION: -
DATE: 12/17/2015
Page: 2 of 2
SHEET: 1

LEGEND

- Proposed Soil Sample Locations
- 1732 0.18 PCB Sample Location (Total PCBs < 0.22 mg/kg)
- 1731 131 PCB Sample Location (Total PCBs ≥ 0.22 mg/kg)
- Cut Lots (50 total)
- Fill Lots (59 total)



NOTES:

PCB concentrations shown represent the highest value from the two different laboratory extraction methods (Soxhlet and Method 3545).

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1" = 100'

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PROJECT: 234976.0000.0000
FACILITY: FORMER AGRICULTURAL PARK
7020 CREST AVENUE
RIVERSIDE, CALIFORNIA

TITLE: PROPOSED SOIL SAMPLE LOCATIONS FOR FILL LOTS

FILE NAME: FRA-RIVERSIDE-SP-REV2015.dwg
REVISION: -
DATE: 12/17/2015
Page: 2 of 2
SHEET: 2

LEGEND

- Proposed Soil Sample Locations (New 62.5 Grid)
- 1752 0.18 — PCB Sample Location (Total PCBs < 0.22 mg/kg)
- 1731 131 — PCB Sample Location (Total PCBs ≥ 0.22 mg/kg)
- Cut Lots (50 total)
- Fill Lots (59 total)
- 50' × 20' — INITIAL EXCAVATION AREA

NOTES:

PCB concentrations shown represent the highest value from the two different laboratory extraction methods (Soxhlet and Method 3545).

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PROJECT: 234976.0000.0000

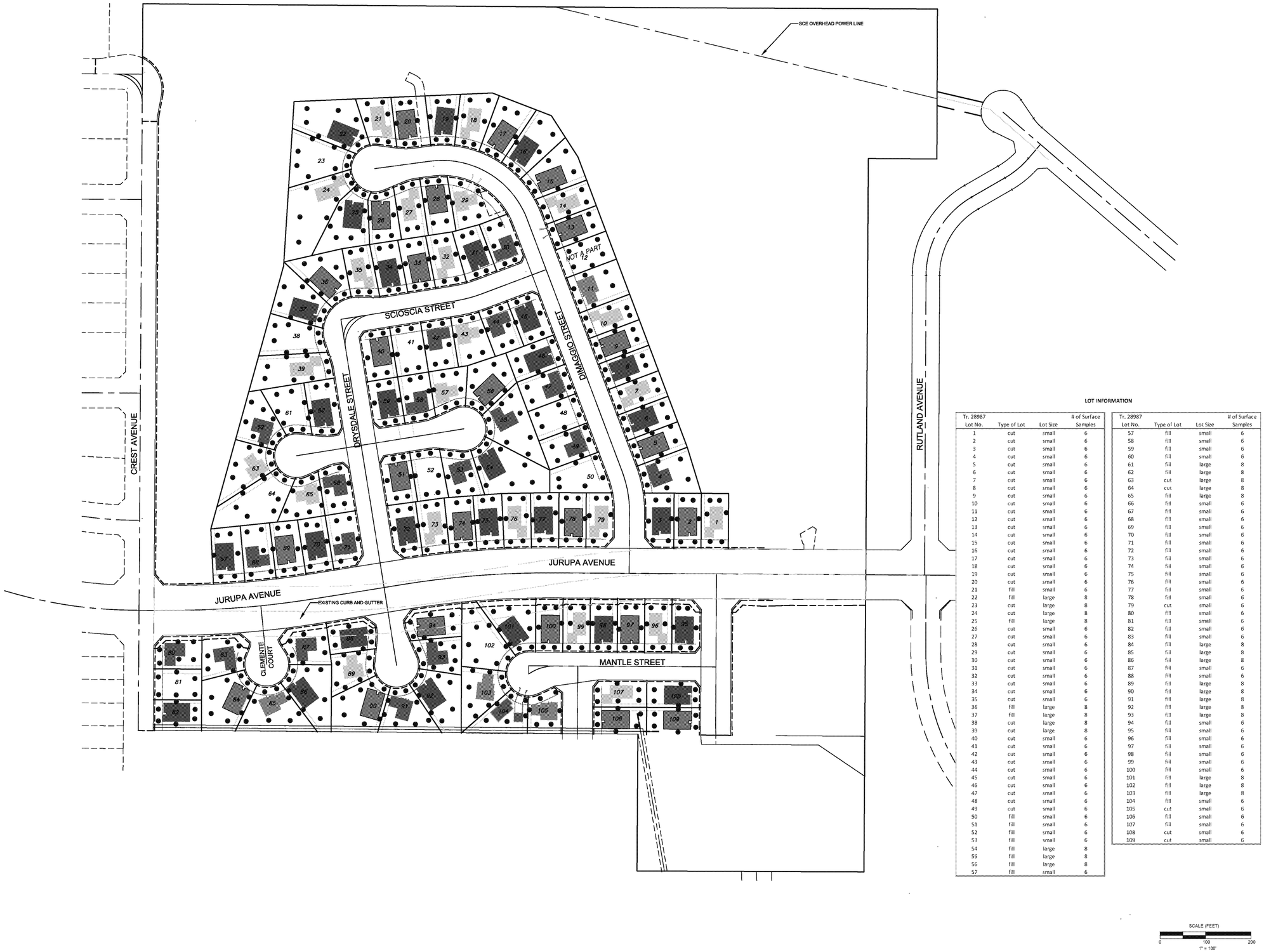
FACILITY: FORMER AGRICULTURAL PARK
7020 CREST AVENUE
RIVERSIDE, CALIFORNIA

TITLE:
PROPOSED SOIL SAMPLE LOCATIONS FOR OUTSIDE AREAS

FILE NAME: FRA-RIVERSIDE-SR-REV2015.dwg
REVISION: -
DATE: 12/17/2015
Page 2 of 2
SHEET: 3

LEGEND

● Proposed Soil Sample Locations



LOT INFORMATION

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
84	fill	large	8
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

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IRVINE, CALIFORNIA 92618
(949) 727-9336

PROJECT: 234976.0000.0000

FACILITY: FORMER AGRICULTURAL PARK
7020 CREST AVENUE
RIVERSIDE, CALIFORNIA

TITLE: PROPOSED SOIL SAMPLE LOCATIONS FOR FINAL LOT SAMPLING

FILE NAME: FRA RIVERSIDE-SP-REV2015.dwg

REVISION: -

DATE: 12/17/2015

Page: 2 of 2

SHEET: 4

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LEGEND

Soil Transportation Route

SCALE (FEET)

0 500

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

N

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 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
84	fill	large	8
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