Department of Toxic Substances Control

Matthew Rodriquez Secretary for Environmental Protection Barbara A. Lee, Director 700 Heinz Avenue Berkeley, California 94710-2721



April 3, 2018

Mr. Greg Haet EH&S Associate Director, Environmental Protection Office of Environment, Health & Safety University of California, Berkeley University Hall, 3rd Floor, #1150 Berkeley, California 94720

Dear Mr. Haet:

The Department of Toxic Substances Control (DTSC) received the *Phase IV, EPA North Meadow, Supplementary PCB Sampling Results* (Report), dated February 28, 2018, for the Richmond Field Station, University of California, Berkeley located at 1301 South 46th Street, Richmond, California. The Report, prepared by Tetra Tech, Inc. on behalf of the University of California, Berkeley, provides the results of soil sampling from two soil piles on November 14 and 15, 2017 and soil/dry sediment from the collars of two storm drains located downgradient of each soil pile collected on December 14, 2017. Based upon our review of the Report, we have the following comments:

- 1. Include in the text the sample collection dates for both the soil pile and storm drain samples.
- 2. Figure 1 indicates that some soil pile increment locations were relocated. Include a discussion in the main text explaining the reason the locations were relocated.
- 3. Figure 1's legend includes to symbols for EPA NE triplicate locations. Delete the incorrect symbol from the legend.
- 4. Page 2, Sampling Protocols:
 - a. The text states that soil increments from each borehole were collected at random locations with the soil pile, thus ensuring a random distribution of increment volumes. Discuss in the text how the sampler ensure that the sample increment depths were randomized.
 - b. The sampling protocols do not mention whether or not the auger attached to the track loader was decontaminated between ISM sample points. Revise the text to include a description as to how the auger was decontaminated between sample points.







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- 5. Page 3, Analysis and results: Provide a copy of Enthalpy's ISM protocols for drying, sieving, and subsampling.
- 6. Include a detailed figure showing the dimensions of the collection areas around the two storm drain inlets.
- 7. The report does not present any conclusions. There are inferences to conclusions in the Notes section (below the table of results page 4) which, in essence states:
 - a. the results of this incremental sampling event indicate that concentrations of Total Aroclors (PBCs) in soils <u>do not exceed</u> the PCB Remediation Waste criteria of 50 mg/Kg for either of the two imported soils piles (EPA NW and EPA NE);
 - b. Total Aroclors (PCB) concentrations in imported soils piles <u>exceed</u> the TSCA criteria for high occupancy areas with no cap (TSCA Cleanup Self-implementing goal = 1 mg/Kg). This is the case for each of the two designated imported soils piles (EPA NW imported soils pile = Total Aroclors at 2.0 mg/Kg, and EPA NE imported soils pile = Total Aroclors at 5.1 mg/Kg, 2.0 mg/Kg, and 2.4 mg/Kg from triplicate samples T1, T2 and T3, respectively); and,
 - c. the sediment sample from Storm Inlet Drain at EPA NW imported soil pile had a Total Aroclor concentration of 1.1 mg/Kg, which exceeds the TSCA Cleanup Selfimplementing goal of 1 mg/Kg.

Add to the text of the report a Conclusions section.

Please submit the revised Memorandum within 60 days of the date of this letter. If you have any questions, please contact Lynn Nakashima at (510) 540-3839 or <u>lynn.nakashima@dtsc.ca.gov</u>.

Sincerely,

Lym Nokoshin

Lynn Nakashima, Project Manager Senior Hazardous Substances Scientist Brownfields and Environmental Restoration Program Berkeley Office - Cleanup Operations

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