



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
700 Heinz Avenue
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Edmund G. Brown Jr.
Governor

December 14, 2016

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 Draft *Soil Management Plan, Revision 1, Removal Action Workplan, Attachment C* (revised SMP) for the Berkeley Global Campus at Richmond Bay (formerly known as the Richmond Field Station), located in Richmond, California. The revised SMP, dated September 27, 2016, was prepared by Tetra Tech, Inc. on behalf of the University of California, Berkeley. The SMP supports the approved July 2014 Removal Action Workplan by providing guidance to soil disturbing activities during future construction, redevelopment or maintenance projects. The original SMP is being revised to reflect new technical updates and to provide clarification. DTSC has reviewed the revised SMP and has the following comments:

1. The revised SMP includes commercial environmental screening levels (ESLs) for TPH constituents using 2013 San Francisco Bay Regional Water Quality Control Board (SFRWQCB) values. The SFRWQCB updated its ESLs in February 2016; therefore, the 2016 values should be used. This includes Sections 2.3, 4.2.1, Table C-1, and Exhibit C-2 Table C2-3.
2. Page C-17, TPH – Clarify whether the soil excavation near Building 484 has been completed or whether additional work needs to be done.
3. Page C-20, Section 3.1, Types of Work, first bullet item: Revise this bullet item to include that installation and decommissioning of soil boreholes and monitoring wells would be considered a *de minimis* project, but all appropriate permits (i.e., from Contra Costa County Environmental Health Department) would be obtained and work plans approved prior to the start of work.

Mr. Greg Haet
December 14, 2016
Page 2

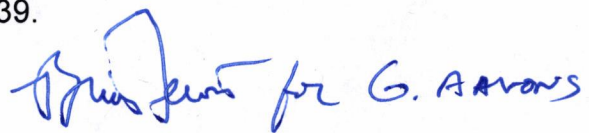
4. Page C-35, Confirmation Sampling: Include that the confirmation sampling frequency may be increased depending on the results of the initial or subsequent confirmation sampling results or based on visual observation.
5. Figure C-6, Historic Radiological Use and Sampling Locations: Revise the legend item that indicates that a full list of report references is included on the back of the figure, or include the references.
6. Table C-1: Category I and II Criteria: Revise the Category II On-Site Management criteria for barium from 100,000 to 21,100.
7. Add a subsection to Section 3 Types of Work titled: "*Dewatering Related to Construction Work*". In this subsection, include a requirement that states "In areas with known impacts to groundwater, the following is required:
 - a) perform an assessment of current groundwater monitoring reports to determine if there are impacts to groundwater in the work area, prior to installing dewatering wells;
 - b) prevent advancing any borings for dewatering purposes (or installing dewatering wells) which are screened across multiple water-bearing units;
 - c) secure all appropriate permits to discharge to sanitary sewer if dewatering is done in areas where impacts to groundwater are known;
 - d) enforce all groundwater discharge permit requirements including collecting/storing impacted groundwater, batch sampling it, and/or treating it prior to discharge to the sanitary sewer; or,
 - e) haul impacted groundwater off-site for proper disposal.

If you have any questions, please contact Lynn Nakashima at lynn.nakashima@dtsc.ca.gov or (510) 540-3839.

Sincerely,



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Senior Hazardous Substances Scientist
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Mr. Greg Haet
December 14, 2016
Page 3

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