



TETRA TECH, INC.

November 2, 2018

Lynn Nakashima  
Project Manager  
Department of Toxic Substances Control  
700 Heinz Avenue  
Berkeley, CA 94710

**Subject: University of California, Berkeley, Richmond Field Station Site  
Draft Soil Management Plan, Revision 2  
Removal Action Workplan, Attachment C  
Site Investigation and Remediation Order I/SE-RAO 07/07-004, Section 5.16**

Dear Ms. Nakashima:

Please find enclosed the Draft Soil Management Plan, Revision 2, Removal Action Workplan, Attachment C, dated November 1, 2018. Two hard copies and CDs are provided via mail; electronic copies were submitted via email. The soil management plan (SMP) has been updated based on technical updates and clarifications established during the implementation of the SMP since its inception in July 2014 and following Revision 1, dated April 12, 2017. Substantive updates to the document consist of the following:


- The term *Berkeley Global Campus at Richmond Bay* has been removed, except as needed to provide context regarding the land use designations identified in the Long Range Development Plan which includes the Richmond Field Station.
- Figure C-5 has been updated to include sampling locations within the RES sampled since the original C-5 drawing was presented in the original SMP dated July 18, 2014.
- Figures C-6 and C-7 have been added to identify additional level of detail regarding former and current facilities and buildings in the northern and central portions of Richmond Field Station. These figures were imported from Figures 2-4 and 2-5 of the *Final Removal Action Workplan*, dated July 18, 2014.
- Figure C-9 has been added to identify sensitive plant species mapped within the site.
- Figure C-10 has been added to identify wetlands and habitat mapped within the site. This figure was imported from Figure 2-2 of the *Final Removal Action Workplan*, dated July 18, 2014.
- Section 1.2 Approach and Section 3.1 Types of Work were clarified to define *de minimis* areas as those projects impacting soils less than 500 square feet of unexposed soil surfaces, which was not previously identified. This provides additional protection under the SMP for any projects which impact or disturb more than 500 square feet of surficial soil not currently exposed. Section 3.1 also provides the example of the removal or disturbance of groundcover which exposes previously-covered soil.

- Section 2.3 Chemicals of Concern clarifies the changes in cobalt, manganese, nickel, and aluminum documented in SMP Revision 1.
- Section 3.2 Potential Impacts to Protected Species or Wetlands has been added.
- Section 4.1 Prescriptive Sampling Design has been amended with the following text: *If PCBs are identified as the potential contaminant of concern, then incremental sampling methodology protocols will be used for sample collection, per request by U.S. EPA TSCA Division. Revision 2 provides an update to Exhibit C2, Sampling and Analysis Plan, presenting incremental sampling methodology protocols.*
- Exhibit C2, Section 3.3 Incremental Sampling Methodology provides a brief summary of the sampling method used to comply with U.S. EPA TSCA Division.

Once finalized, a hard copy will be delivered to the City of Richmond Public Library and the document is also available for public review at Building 478, Berkeley Global Campus.

If you have any questions or need further information regarding this submittal, please contact me at [jason.brodersen@tetrattech.com](mailto:jason.brodersen@tetrattech.com); 415-497-9060, or Alicia Bihler at [abihler@berkeley.edu](mailto:abihler@berkeley.edu); 510-725-2528.

Sincerely,



Jason Brodersen, PG  
Program Manager

Enclosure

cc: Alicia Bihler, UC Berkeley EH&S  
Bill Marsh, Edgcomb Law Group