



**Jared Blumenfeld**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Meredith Williams, Ph.D.  
Acting Director  
700 Heinz Avenue  
Berkeley, California 94710-2721



**Gavin Newsom**  
Governor

November 25, 2019

Greg Haet, P.E.  
EH&S Associate Director, Environmental Protection  
Office of Environment, Health & Safety  
University of California, Berkeley  
University Hall, 3<sup>rd</sup> Floor, #1150  
Berkeley, California 94720  
Email: [gjhaet@berkeley.edu](mailto:gjhaet@berkeley.edu)

Dear Mr. Haet:

The Department of Toxic Substances Control (DTSC) received the November 21, 2019 Northern Regional Library Facility (NRLF) Phase 4 – Bio Retention Pond Soil Management Plan, Sampling Approach for the University of California Berkeley Richmond Field Station Site located in Richmond, California. The purpose of the sampling is to characterize the soil remaining in place under the retention pond stormwater mitigation feature. The bio retention pond is located within SMP Areas 13 and 17, which is a low sampling density area. UC also provided SMP Form B with the sampling approach plan. DTSC has reviewed the field sampling protocols included in the letter and has the following comments.

1. The sampling approach states that the analytical laboratory will be instructed to homogenize the soil mass provided. Homogenization of soil samples is not included in the Removal Action Workplan Soil Management Plan and typically homogenization of the sample is done in the field so that all foreign materials (plants, debris, pebbles or rocks) are removed from the sample prior to placing the soil in the sample jar. Homogenization of the sample may be done by the laboratory; however, modify the sampling approach to indicate that all foreign materials must be removed from the sample prior to placing the soil in the sample jar.
2. The Soil Management Plan, Exhibit C2 (Sampling and Analysis Plan), Table C2-2 indicates that 8-ounce glass jars or sleeves will be used for the collection of soil samples for analysis of metals, PAHs and PCBs. The sampling approach indicates that one 16-ounce jar per sample will be used to collect soil for analysis. Please confirm with the laboratory that the proposed sample volume is adequate for the analysis.

Mr. Greg Haet  
November 25, 2019  
Page 2

Please submit a revised sampling approach addressing the above comments within 30 days of the date of this letter.

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

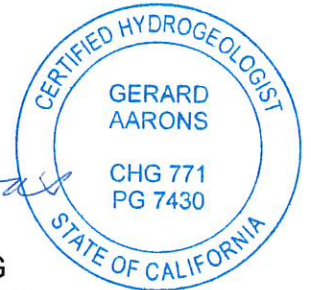
Sincerely,



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



Gerard F. Aarons, PG, CHG  
Senior Engineering Geologist  
Site Mitigation and Restoration Program  
Geological Services Branch



cc: Alicia Bihler  
University of California, Berkeley  
Environment, Health & Safety  
317 University Hall, No 1150  
Berkeley, California 94720  
[abihler@berkeley.edu](mailto:abihler@berkeley.edu)

Jason Brodersen, PG, QSD  
Tetra Tech, Inc.  
1999 Harrison Street, Suite 500  
Oakland, CA 94612  
[Jason.Brodersen@tetrattech.com](mailto:Jason.Brodersen@tetrattech.com)