



**Jared Blumenfeld**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

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



**Gavin Newsom**  
Governor

June 17, 2020

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  
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Email: [ghjaet@berkeley.edu](mailto:ghjaet@berkeley.edu)

Dear Mr. Haet:

The Department of Toxic Substances Control (DTSC) received the *Corporation Yard, Triplicate Sampling Approach* letter (Sampling Approach) dated June 3, 2020, for the Richmond Field Station site, located at 1301 South 46<sup>th</sup> Street in Richmond, California. The Sampling Approach prepared by Tetra Tech, Inc. on behalf of the University of California, Berkeley proposes to conduct additional data gap sampling at the Corporation Yard, and provides clarifications regarding the calculation of the relative standard deviation presented in a November 22, 2019 data summary letter. DTSC program, Human and Ecological Risk Office (HERO) and Geologic Services Unit staff have reviewed the proposal and have the following comments. Also enclosed is a memorandum with comments prepared by Dr. Karen DiBiasio of HERO.

1. Page 4 of 5: In regard to applying the weighted UCL to the first laboratory triplicate sample reported instead of the average of the three laboratory triplicates, a data quality objective for the relative standard deviation of laboratory triplicates should be articulated in the Sampling Approach. DTSC would not support the representativeness of a singlet when its replicate samples yield poor precision. If sufficient precision in laboratory replicates cannot be obtained, then use of the laboratory triplicate mean value to represent the field sample concentration could be used. (See also Comment 5 of the enclosed memorandum)
2. Page 4 of 5: Decision units with PCB concentrations above laboratory reporting limits should be selected for triplicate sampling to provide the basis for a RSD of field replicates. The use of a surrogate value of half the reporting limit or the method

detection limit would add uncertainty in the measure of the RSD critical to the project approach. Therefore, DU15, DU16 or DU17 should be sampled in triplicate in lieu of DU 13 to reduce the uncertainty in the true observed variance in field triplicates. DTSC acknowledges that these recommended DUs have been covered with gravel recently but is concerned that ND surrogate or J-flagged values would not appropriately inform a measure of triplicate RSD. (See also Comment 2 of the enclosed memorandum)

3. Page 2 of 5: The document states that health and safety measures will adhere to the Final Field Sampling Workplan, Appendix B, Health and Safety Plan dated June 2, 2010. Please ensure that the Health and Safety Plan is updated to address all state and local COVID-19 requirements.

The Sampling Approach needs to be revised to address the above comments and those found in the enclosed memorandum. Please submit a revised document within 30 days of the date of this letter. If you have any questions regarding this letter, please contact Lynn Nakashima at [lynn.nakashima@dtsc.ca.gov](mailto:lynn.nakashima@dtsc.ca.gov).

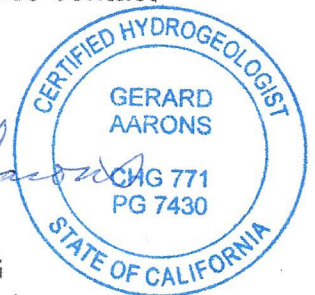
Sincerely,

*Lynn Nakashima*

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

*Gerard F. Aarons*

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



Enclosure

cc: See next page

Mr. Greg Haet  
June 17, 2020  
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cc: Sent via Email

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