



County of Santa Cruz

HEALTH SERVICES AGENCY

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ENVIRONMENTAL HEALTH

August 31, 2017

Phil and Martha Oneto
c/o: Mr. Robert E. Bosso
Bosso Williams, A Professional Corporation
rbosso@bossowilliams.com

SUBJECT: *Response to Feasibility Study and Remedial Action Plan and Associated Documents, E. 5th Street Warehouse Property (GeoTracker Global ID T10000008129), 25 E. 5th Street, Watsonville, CA*

Dear Mr. and Mrs. Oneto:

The County of Santa Cruz Environmental Health Division (CSCEHD) has reviewed the following documents for the subject site: (1) *Feasibility Study and Remedial Action Plan* (dated June 21, 2017, by Weber, Hayes & Associates [WHA]); (2) *Results of Follow-up Soil Vapor Sampling and Request to Destroy Three SV Wells* (email dated August 23, 2017, by WHA); (3) *Mirafi Orange Delineation Geotextile* (email dated August 25, 2017 by WHA); (4) *Soil Disposal Profiling Info* (email dated August 25, 2017, by WHA); and (5) *Draft Public Notice and Interested Parties List* (multiple email draft submittals from July 21 to August 29, 2017, by WHA). Thank you for the submittals. This letter presents our response to each item.

Feasibility Study and Remedial Action Plan

The *Feasibility Study and Remedial Action Plan* reports on (1) the site assessment and characterization work completed in 2016, (2) the semi-annual groundwater and soil vapor monitoring program, (3) a Feasibility Study (FS) performed to compare remedial action alternatives and select an appropriate remedial action for the subject site, (4) a Remedial Action Plan (RAP) designed to minimize risks to public and environmental health. The proposed RAP is Remedial Alternative No. 2 from the FS and involves removal of the accessible and well-defined soil impacts to a depth of 1.5 feet below ground surface (bgs) within the parking lot area, capping these areas with compacted, clean fill/base rock and asphalt pavement, and recording a deed restriction that would restrict property use to commercial only. This alternative includes an Environmental Site Management Plan, which will require annual cap inspections. Our agency does not object to the RAP providing it is implemented in accordance with the comments in this and the following sections of this letter:

- The RAP may only be implemented following a 30-day public notice period and resolution to our satisfaction of any comments received during the public notice period (see *Draft Public Notice and Interested Parties List* below).
- Implementation of the RAP will require placement of a delineation geotextile between clean soil and chemically impacted soil where exposed during remediation activities (see *Mirafi Orange Delineation Geotextile* below).

- Semi-annual groundwater and soil vapor monitoring (at the current locations of SV-1 through SV-5) must continue at the site in accordance with all of the requirements of our previous letter to you dated March 8, 2017 (revised). Although, our agency is conditionally approving the proposed RAP, potential additional remedial action requirements and eventual case closure will be partially subject to the results of the ongoing monitoring.

Results of Follow-up Soil Vapor Sampling and Request to Destroy Three SV Wells

This submittal includes soil vapor sampling results for soil vapor sampling points that were unable to be sampled earlier in the year, at least partially due to the heavy and late rains in the first quarter of 2017. We appreciate your extensive efforts to monitor and sample the subject soil vapor wells. We have updated our records accordingly. Please note the following comments:

- We were unable to find this submittal and data in GeoTracker. This information and all project reports and data must be uploaded to GeoTracker before the start of the public notice period. We understand from WHA that the submittals have been uploaded to GeoTracker, and they should be available for viewing soon.
- As you know, our agency has reviewed and approved your applications to destroy SV-2, SV-3, and SV-5 for logistical reasons. These approvals are contingent upon your agreement to continue to semi-annually sample soil vapors at these locations using methods in accordance with DTSC guidance, such as temporary or permanent soil vapor wells.

Mirafi Orange Delineation Geotextile

This submittal included technical applications and specifications for this delineation geotextile. We understand that WHA may use this material to delineate between clean soil and chemically impacted soil where exposed during remediation activities.

- Our agency does not object to the use of this or technically similar material for the intended purpose of delineating between clean and chemically impacted soil.

Soil Disposal Profiling Info

WHA provided information indicating their methods and results for pre-profiling soils and obtaining landfill acceptance for soil planned for excavation.

- This submittal supplements the RAP and helps provide assurance that appropriate characterization was performed and that excavated soils will be appropriately disposed.
- CSCEHD requires that any project-generated soil and water that may contain chemicals of concern must be properly characterized, handled, treated, and/or disposed of in accordance with applicable regulations. The project report must describe these activities and include copies of the fully signed manifests or other appropriate shipping and disposal documentation.

Draft Public Notice and Interested Parties List

WHA submitted to our office several draft Public Notices and draft Interested Parties Lists. Our agency reviewed and commented on these drafts in multiple emails. Our agency does not object to the final submitted versions of these documents as reviewed by our agency. CSCEHD concurs that you may now distribute the Public Notice to all entities on the Interested Parties List for a 30-days public notice period prior to implementing the RAP. The Public Notice must be uploaded to GeoTracker.

General Conditions

- In accordance with Title 23 of the California Code of Regulations, you are required to complete Electronic Submittal of Information (ESI) reporting for all applicable documents and data, including data in Electronic Deliverable Format (EDF), to the SWRCB GeoTracker database. Refer to the GeoTracker web page for electronic reporting requirements at http://www.waterboards.ca.gov/ust/electronic_submittal/index.shtml.
- To ensure that import fill does not contain chemical concentrations above acceptable levels, our agency recommends that fill planned for import is sampled and evaluated in accordance with the *Information Advisory, Clean Imported Fill Material* issued by the California Department of Toxic Substances Control (DTSC, 2001) and compared to applicable ESLs, RSLs, HERO HHRA Note Number 3 levels, background levels, and California TTLCs prior to being placed at the fill receiving site.
- Our agency requires notification of all field dates, estimated start and end times, field contact person, and contact-person phone number at least 5 business days in advance of all field activities.
- Appropriately licensed and qualified professionals must perform or direct all work requiring engineering, geologic, and/or other professional evaluations or judgments and must properly sign and stamp all reports containing professional evaluations or judgments.
- You are responsible for complying with all regulatory and permitting requirements.
- This letter does not relieve you or your consultant of additional requirements if further review indicates that additional activities are warranted. Our agency may modify our requirements for soil and/or groundwater samples and/or for other field activities based on field conditions and observations or project findings.

You are responsible for having the specified work performed and for submitting the project report as well as a draft Environmental Site Management Plan and a draft environmental deed restriction to our agency, DTSC, and GeoTracker by **December 15, 2017**. The copies for our agency should be submitted electronically directly to my email (Scott.Carson@santacruzcounty.us) or to the County FTP website (FTP submittal is required if greater than 8 MB; contact me for FTP submittal instructions). If you have any comments or questions regarding this letter, you may contact me at (831) 454-2758, 8:00 a.m. to 9:30 a.m., Monday through Friday.

Sincerely,



Scott E. Carson, P.G., C.E.G.
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County of Santa Cruz Health Services Agency
Environmental Health Division
Site Mitigation Program
701 Ocean Street, Suite 312
Santa Cruz, CA 95060

Cc: Phil and Martha Oneto, 102 Carl Avenue, Santa Cruz, CA 95062-1322
Mr. Pat Hoban, Weber, Hayes & Associates (pat@weber-hayes.com)
Mr. Henry Chui, DTSC (HChui@dtsc.ca.gov)

References:

California Department of Toxic Substances Control. 2001. *Information Advisory, Clean Imported Fill Material*, October 2001, 4 p.