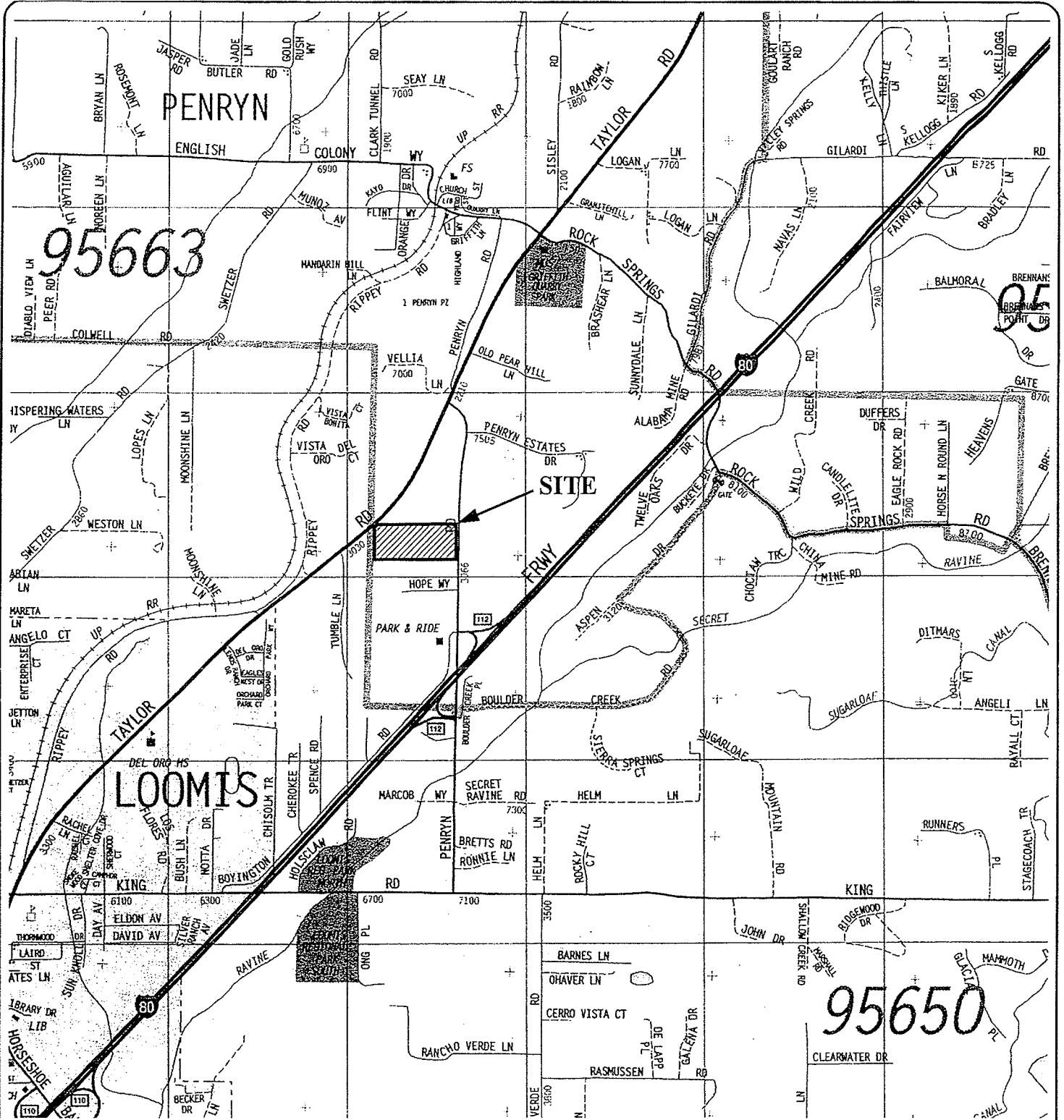
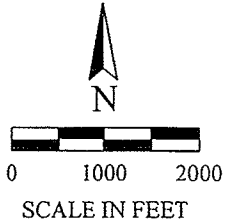


FIGURES



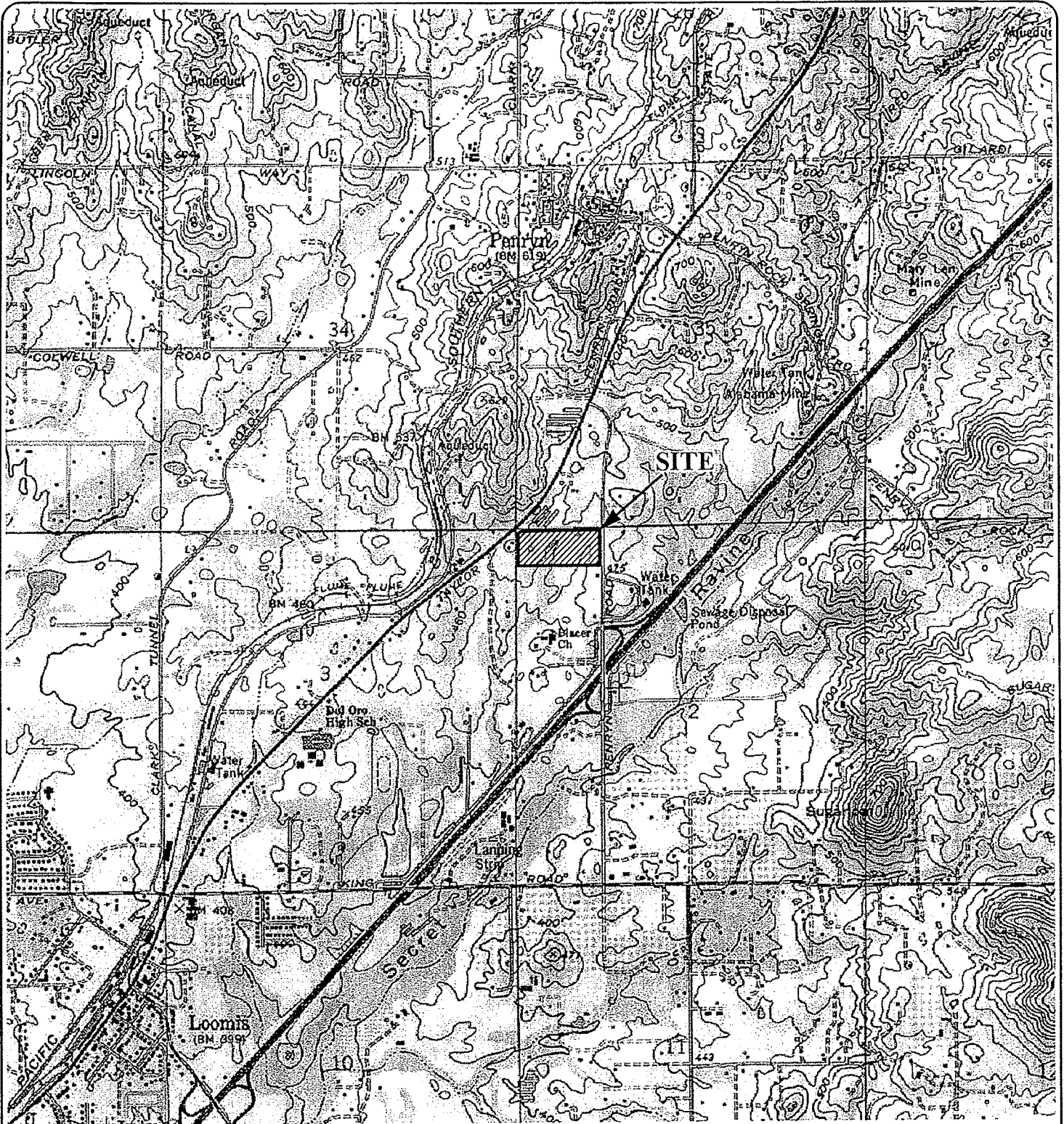


Adapted from the Thomas Guide
 Sacramento and Solano Counties
 Street Guide and Directory, 2005 edition.

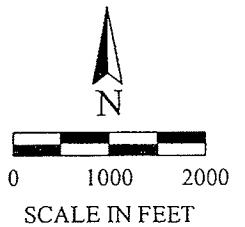


VICINITY MAP
 PENRYN PROPERTY
 Penryn, California

FIGURE 1	
DRAWN BY	TJC
CHECKED BY	WMF
PROJECT MGR	WMF
DATE	5/07
WKA NO. 5887.06	



Adapted from the U.S. Geological Survey
7.5 minute topographic map of the Rocklin
quadrangle, California, 1981.



TOPOGRAPHIC MAP
PENRYN PROPERTY
Penryn, California

FIGURE 2	
DRAWN BY	TJC
CHECKED BY	WMF
PROJECT MGR	WMF
DATE	5/07
WKA NO. 5887.06	

TAYLOR ROAD

VACANT LAND
032-243-003
GORDON

N 88°03'59" E 872.73'

390.77'

481.96'

1.30 acres

CHAVEZ PROPERTY

MOTT PROPERTY

PURTEE
043-013-001

N 00°10'28" E 495.52'

043-013-002
MACOLA

RURAL RESIDENCE

2.32 acres

481.50'

BLOSS SETBACK UNIT

15' CL. OF SOUTH EDMT

043-060-032
MOTT
PARCEL 2
12/24/2003

PENRYN ROAD

321.25'

850.56'

N 88°03'59" E

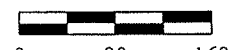
872.08'

VACANT LAND
043-060-045

043-060-032
PINEBROCK

Note:

Adapted from a Tentative Parcel Map prepared by Spannagel and Associates, dated June 2003.



SCALE IN FEET



WallaceKuhl
& ASSOCIATES INC

PARCEL MAP/SITE PLAN

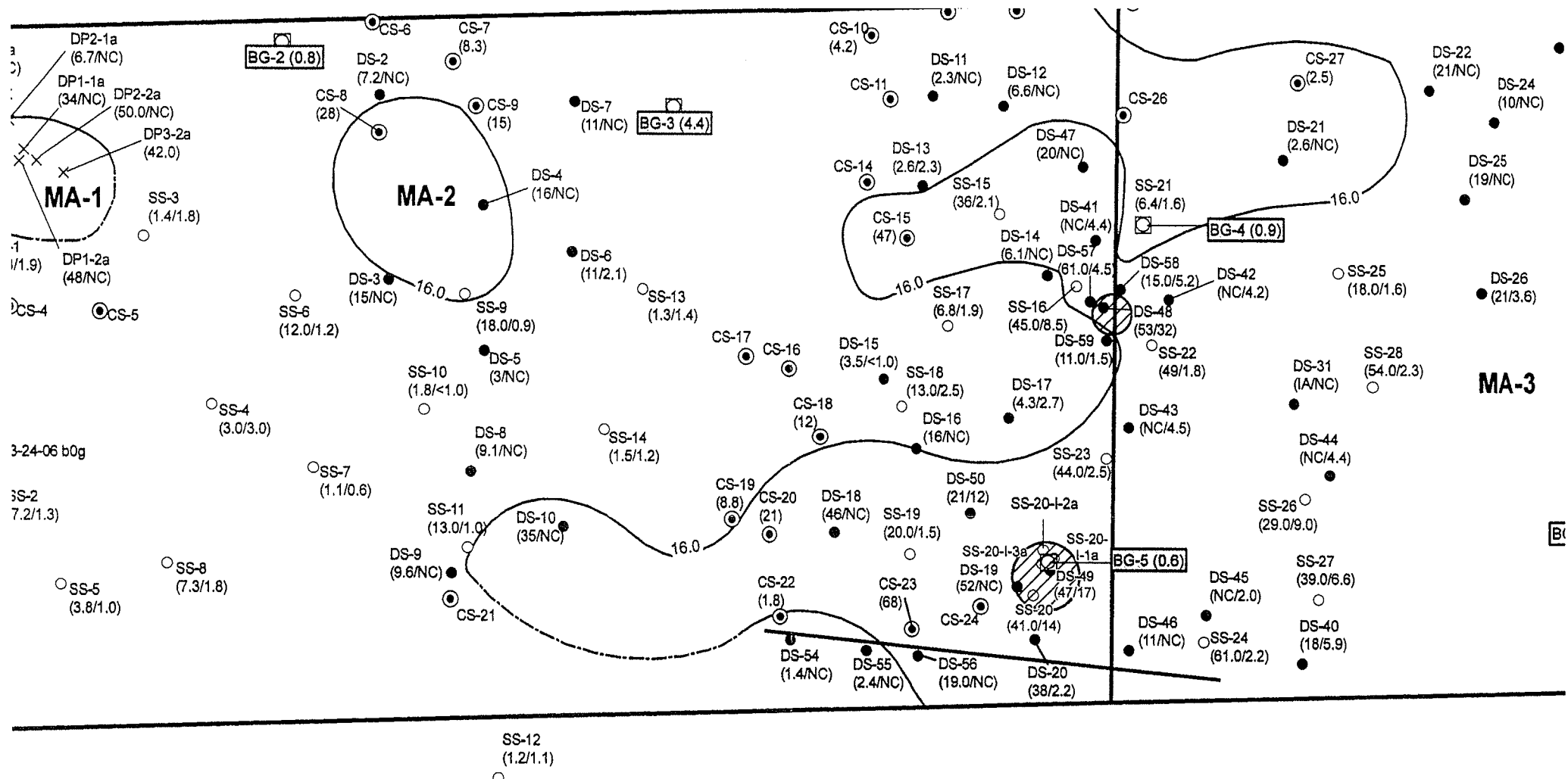
PENRYN PROPERTY

Penryn, California

FIGURE 3

DRAWN BY	TJC
CHECKED BY	WMF
PROJECT MGR	WMF
DATE	5/07

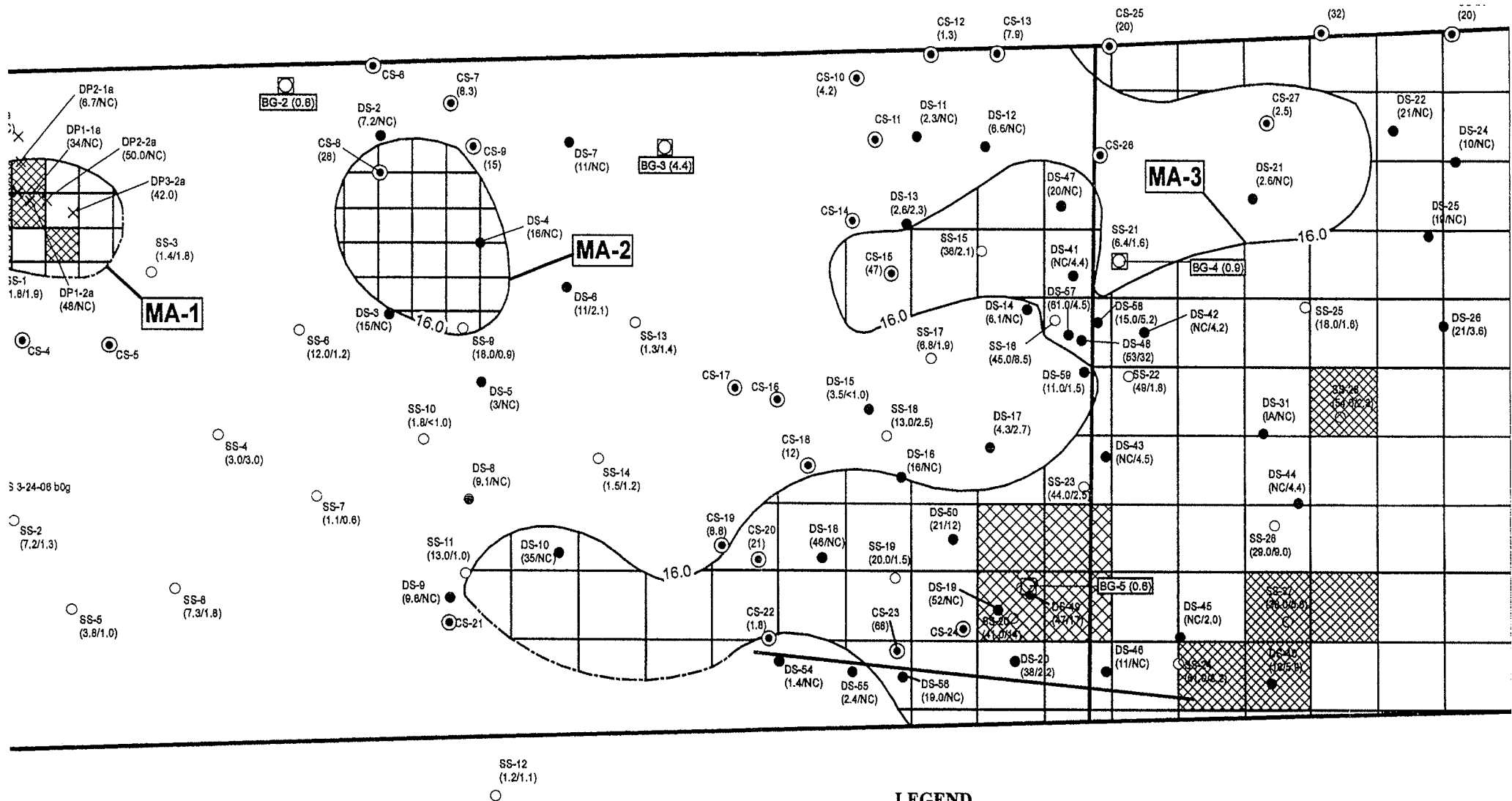
WKA NO. 5887.06



3-24-06 b0g
3S-2
7.2/1.3

LEGEND

- Background Sample Location
- Soil Sample Location
- Soil Sample Location
- Water Sample Location
- Soil Sample Location
- Debris Pile Sample Location
- Sediment Sample Location
- 16.0 mg/kg Arsenic Isoconcentration C
- Approximate 16.0 mg/kg Arsenic Isoconcentration
- Site
- Area recommended for deeper excavation to approximately 1.5 to 2 ft bgs
- (1.8/1.9) Previous Arsenic Concentration (0-0.5'/1'-1.5' DS or 0-0.5'/2-2.5' SS depth interval)
- Fence
- SS-27 (39.0/6.6)
- SS-26 (29.0/9.0)
- SS-24 (61.0/2.2)
- SS-24 (18.0/1.6)
- SS-28 (54.0/2.3)
- SS-25 (18.0/1.6)
- SS-22 (49/1.8)
- SS-23 (44.0/2.5)
- SS-20-I-2a
- SS-20-I-3a
- SS-20-I-1a
- SS-20 (41.0/14)
- SS-19 (20.0/1.5)
- SS-18 (13.0/2.5)
- SS-17 (6.8/1.9)
- SS-16 (45.0/8.5)
- SS-15 (36/2.1)
- SS-14 (1.5/1.2)
- SS-13 (1.3/1.4)
- SS-12 (1.2/1.1)
- SS-11 (13.0/1.0)
- SS-10 (18.0/0.9)
- SS-9 (18.0/0.9)
- SS-8 (7.3/1.8)
- SS-7 (1.1/0.6)
- SS-6 (12.0/1.2)
- SS-5 (3.8/1.0)
- SS-4 (3.0/3.0)
- SS-3 (1.4/1.8)
- SS-2 (7.2/1.3)
- SS-1 (1.1/1.9)
- SS-21 (6.4/1.6)
- SS-20 (47/17)
- SS-20 (38/2.2)
- SS-19 (20.0/1.5)
- SS-18 (13.0/2.5)
- SS-17 (6.8/1.9)
- SS-16 (45.0/8.5)
- SS-15 (36/2.1)
- SS-14 (1.5/1.2)
- SS-13 (1.3/1.4)
- SS-12 (1.2/1.1)
- SS-11 (13.0/1.0)
- SS-10 (18.0/0.9)
- SS-9 (18.0/0.9)
- SS-8 (7.3/1.8)
- SS-7 (1.1/0.6)
- SS-6 (12.0/1.2)
- SS-5 (3.8/1.0)
- SS-4 (3.0/3.0)
- SS-3 (1.4/1.8)
- SS-2 (7.2/1.3)
- SS-1 (1.1/1.9)
- SS-21 (6.4/1.6)
- SS-20 (47/17)
- SS-20 (38/2.2)
- SS-19 (20.0/1.5)
- SS-18 (13.0/2.5)
- SS-17 (6.8/1.9)
- SS-16 (45.0/8.5)
- SS-15 (36/2.1)
- SS-14 (1.5/1.2)
- SS-13 (1.3/1.4)
- SS-12 (1.2/1.1)
- SS-11 (13.0/1.0)
- SS-10 (18.0/0.9)
- SS-9 (18.0/0.9)
- SS-8 (7.3/1.8)
- SS-7 (1.1/0.6)
- SS-6 (12.0/1.2)
- SS-5 (3.8/1.0)
- SS-4 (3.0/3.0)
- SS-3 (1.4/1.8)
- SS-2 (7.2/1.3)
- SS-1 (1.1/1.9)
- SS-21 (6.4/1.6)
- SS-20 (47/17)
- SS-20 (38/2.2)
- SS-19 (20.0/1.5)
- SS-18 (13.0/2.5)
- SS-17 (6.8/1.9)
- SS-16 (45.0/8.5)
- SS-15 (36/2.1)
- SS-14 (1.5/1.2)
- SS-13 (1.3/1.4)
- SS-12 (1.2/1.1)
- SS-11 (13.0/1.0)
- SS-10 (18.0/0.9)
- SS-9 (18.0/0.9)
- SS-8 (7.3/1.8)
- SS-7 (1.1/0.6)
- SS-6 (12.0/1.2)
- SS-5 (3.8/1.0)
- SS-4 (3.0/3.0)
- SS-3 (1.4/1.8)
- SS-2 (7.2/1.3)
- SS-1 (1.1/1.9)
- SS-21 (6.4/1.6)
- SS-20 (47/17)
- SS-20 (38/2.2)
- SS-19 (20.0/1.5)
- SS-18 (13.0/2.5)
- SS-17 (6.8/1.9)
- SS-16 (45.0/8.5)
- SS-15 (36/2.1)
- SS-14 (1.5/1.2)
- SS-13 (1.3/1.4)
- SS-12 (1.2/1.1)
- SS-11 (13.0/1.0)
- SS-10 (18.0/0.9)
- SS-9 (18.0/0.9)
- SS-8 (7.3/1.8)
- SS-7 (1.1/0.6)
- SS-6 (12.0/1.2)
- SS-5 (3.8/1.0)
- SS-4 (3.0/3.0)
- SS-3 (1.4/1.8)
- SS-2 (7.2/1.3)
- SS-1 (1.1/1.9)
- SS-21 (6.4/1.6)
- SS-20 (47/17)
- SS-20 (38/2.2)
- SS-19 (20.0/1.5)
- SS-18 (13.0/2.5)
- SS-17 (6.8/1.9)
- SS-16 (45.0/8.5)
- SS-15 (36/2.1)
- SS-14 (1.5/1.2)
- SS-13 (1.3/1.4)
- SS-12 (1.2/1.1)
- SS-11 (13.0/1.0)
- SS-10 (18.0/0.9)
- SS-9 (18.0/0.9)
- SS-8 (7.3/1.8)
- SS-7 (1.1/0.6)
- SS-6 (12.0/1.2)
- SS-5 (3.8/1.0)
- SS-4 (3.0/3.0)
- SS-3 (1.4/1.8)
- SS-2 (7.2/1.3)
- SS-1 (1.1/1.9)
- SS-21 (6.4/1.6)
- SS-20 (47/17)
- SS-20 (38/2.2)
- SS-19 (20.0/1.5)
- SS-18 (13.0/2.5)
- SS-17 (6.8/1.9)
- SS-16 (45.0/8.5)
- SS-15 (36/2.1)
- SS-14 (1.5/1.2)
- SS-13 (1.3/1.4)
- SS-12 (1.2/1.1)
- SS-11 (13.0/1.0)
- SS-10 (18.0/0.9)
- SS-9 (18.0/0.9)
- SS-8 (7.3/1.8)
- SS-7 (1.1/0.6)
- SS-6 (12.0/1.2)
- SS-5 (3.8/1.0)
- SS-4 (3.0/3.0)
- SS-3 (1.4/1.8)
- SS-2 (7.2/1.3)
- SS-1 (1.1/1.9)
- SS-21 (6.4/1.6)
- SS-20 (47/17)
- SS-20 (38/2.2)
- SS-19 (20.0/1.5)
- SS-18 (13.0/2.5)
- SS-17 (6.8/1.9)
- SS-16 (45.0/8.5)
- SS-15 (36/2.1)
- SS-14 (1.5/1.2)
- SS-13 (1.3/1.4)
- SS-12 (1.2/1.1)
- SS-11 (13.0/1.0)
- SS-10 (18.0/0.9)
- SS-9 (18.0/0.9)
- SS-8 (7.3/1.8)
- SS-7 (1.1/0.6)
- SS-6 (12.0/1.2)
- SS-5 (3.8/1.0)
- SS-4 (3.0/3.0)
- SS-3 (1.4/1.8)
- SS-2 (7.2/1.3)
- SS-1 (1.1/1.9)
- SS-21 (6.4/1.6)
- SS-20 (47/17)
- SS-20 (38/2.2)
- SS-19 (20.0/1.5)
- SS-18 (13.0/2.5)
- SS-17 (6.8/1.9)
- SS-16 (45.0/8.5)
- SS-15 (36/2.1)
- SS-14 (1.5/1.2)
- SS-13 (1.3/1.4)
- SS-12 (1.2/1.1)
- SS-11 (13.0/1.0)
- SS-10 (18.0/0.9)
- SS-9 (18.0/0.9)
- SS-8 (7.3/1.8)
- SS-7 (1.1/0.6)
- SS-6 (12.0/1.2)
- SS-5 (3.8/1.0)
- SS-4 (3.0/3.0)
- SS-3 (1.4/1.8)
- SS-2 (7.2/1.3)
- SS-1 (1.1/1.9)
- SS-21 (6.4/1.6)
- SS-20 (47/17)
- SS-20 (38/2.2)
- SS-19 (20.0/1.5)
- SS-18 (13.0/2.5)
- SS-17 (6.8/1.9)
- SS-16 (45.0/8.5)
- SS-15 (36/2.1)
- SS-14 (1.5/1.2)
- SS-13 (1.3/1.4)
- SS-12 (1.2/1.1)
- SS-11 (13.0/1.0)
- SS-10 (18.0/0.9)
- SS-9 (18.0/0.9)
- SS-8 (7.3/1.8)
- SS-7 (1.1/0.6)
- SS-6 (12.0/1.2)
- SS-5 (3.8/1.0)
- SS-4 (3.0/3.0)
- SS-3 (1.4/1.8)
- SS-2 (7.2/1.3)
- SS-1 (1.1/1.9)
- SS-21 (6.4/1.6)
- SS-20 (47/17)
- SS-20 (38/2.2)
- SS-19 (20.0/1.5)
- SS-18 (13.0/2.5)
- SS-17 (6.8/1.9)
- SS-16 (45.0/8.5)
- SS-15 (36/2.1)
- SS-14 (1.5/1.2)
- SS-13 (1.3/1.4)
- SS-12 (1.2/1.1)
- SS-11 (13.0/1.0)
- SS-10 (18.0/0.9)
- SS-9 (18.0/0.9)
- SS-8 (7.3/1.8)
- SS-7 (1.1/0.6)
- SS-6 (12.0/1.2)
- SS-5 (3.8/1.0)
- SS-4 (3.0/3.0)
- SS-3 (1.4/1.8)
- SS-2 (7.2/1.3)
- SS-1 (1.1/1.9)
- SS-21 (6.4/1.6)
- SS-20 (47/17)
- SS-20 (38/2.2)
- SS-19 (20.0/1.5)
- SS-18 (13.0/2.5)
- SS-17 (6.8/1.9)
- SS-16 (45.0/8.5)
- SS-15 (36/2.1)
- SS-14 (1.5/1.2)
- SS-13 (1.3/1.4)
- SS-12 (1.2/1.1)
- SS-11 (13.0/1.0)
- SS-10 (18.0/0.9)
- SS-9 (18.0/0.9)
- SS-8 (7.3/1.8)
- SS-7 (1.1/0.6)
- SS-6 (12.0/1.2)
- SS-5 (3.8/1.0)
- SS-4 (3.0/3.0)
- SS-3 (1.4/1.8)
- SS-2 (7.2/1.3)
- SS-1 (1.1/1.9)
- SS-21 (6.4/1.6)
- SS-20 (47/17)
- SS-20 (38/2.2)
- SS-19 (20.0/1.5)
- SS-18 (13.0/2.5)
- SS-17 (6.8/1.9)
- SS-16 (45.0/8.5)
- SS-15 (36/2.1)
- SS-14 (1.5/1.2)
- SS-13 (1.3/1.4)
- SS-12 (1.2/1.1)
- SS-11 (13.0/1.0)
- SS-10 (18.0/0.9)
- SS-9 (18.0/0.9)
- SS-8 (7.3/1.8)
- SS-7 (1.1/0.6)
- SS-6 (12.0/1.2)
- SS-5 (3.8/1.0)
- SS-4 (3.0/3.0)
- SS-3 (1.4/1.8)
- SS-2 (7.2/1.3)
- SS-1 (1.1/1.9)
- SS-21 (6.4/1.6)
- SS-20 (47/17)
- SS-20 (38/2.2)
- SS-19 (20.0/1.5)
- SS-18 (13.0/2.5)
- SS-17 (6.8/1.9)
- SS-16 (45.0/8.5)
- SS-15 (36/2.1)
- SS-14 (1.5/1.2)
- SS-13 (1.3/1.4)
- SS-12 (1.2/1.1)
- SS-11 (13.0/1.0)
- SS-10 (18.0/0.9)
- SS-9 (18.0/0.9)
- SS-8 (7.3/1.8)
- SS-7 (1.1/0.6)
- SS-6 (12.0/1.2)
- SS-5 (3.8/1.0)
- SS-4 (3.0/3.0)
- SS-3 (1.4/1.8)
- SS-2 (7.2/1.3)
- SS-1 (1.1/1.9)
- SS-21 (6.4/1.6)
- SS-20 (47/17)
- SS-20 (38/2.2)
- SS-19 (20.0/1.5)
- SS-18 (13.0/2.5)
- SS-17 (6.8/1.9)
- SS-16 (45.0/8.5)
- SS-15 (36/2.1)
- SS-14 (1.5/1.2)
- SS-13 (1.3/1.4)
- SS-12 (1.2/1.1)
- SS-11 (13.0/1.0)
- SS-10 (18.0/0.9)
- SS-9 (18.0/0.9)
- SS-8 (7.3/1.8)
- SS-7 (1.1/0.6)
- SS-6 (12.0/1.2)
- SS-5 (3.8/1.0)
- SS-4 (3.0/3.0)
- SS-3 (1.4/1.8)
- SS-2 (7.2/1.3)
- SS-1 (1.1/1.9)
- SS-21 (6.4/1.6)
- SS-20 (47/17)
- SS-20 (38/2.2)
- SS-19 (20.0/1.5)
- SS-18 (13.0/2.5)
- SS-17 (6.8/1.9)
- SS-16 (45.0/8.5)
- SS-15 (36/2.1)
- SS-14 (1.5/1.2)
- SS-13 (1.3/1.4)
- SS-12 (1.2/1.1)
- SS-11 (13.0/1.0)
- SS-10 (18.0/0.9)
- SS-9 (18.0/0.9)
- SS-8 (7.3/1.8)
- SS-7 (1.1/0.6)
- SS-6 (12.0/1.2)
- SS-5 (3.8/1.0)
- SS-4 (3.0/3.0)
- SS-3 (1.4/1.8)
- SS-2 (7.2/1.3)
- SS-1 (1.1/1.9)
- SS-21 (6.4/1.6)
- SS-20 (47/17)
- SS-20 (38/2.2)
- SS-19 (20.0/1.5)
- SS-18 (13.0/2.5)
- SS-17 (6.8/1.9)
- SS-16 (45.0/8.5)
- SS-15 (36/2.1)
- SS-14 (1.5/1.2)
- SS-13 (1.3/1.4)
- SS-12 (1.2/1.1)
- SS-11 (13.0/1.0)
- SS-10 (18.0/0.9)
- SS-9 (18.0/0.9)
- SS-8 (7.3/1.8)
- SS-7 (1.1/0.6)
- SS-6 (12.0/1.2)
- SS-5 (3.8/1.0)
- SS-4 (3.0/3.0)
- SS-3 (1.4/1.8)
- SS-2 (7.2/1.3)
- SS-1 (1.1/1.9)
- SS-21 (6.4/1.6)
- SS-20 (47/17)
- SS-20 (38/2.2)
- SS-19 (20.0/1.5)
- SS-18 (13.0/2.5)
- SS-17 (6.8/1.9)
- SS-16 (45.0/8.5)
- SS-15 (36/2.1)
- SS-14 (1.5/1.2)
- SS-13 (1.3/1.4)
- SS-12 (1.2/1.1)
- SS-11 (13.0/1.0)
- SS-10 (18.0/0.9)
- SS-9 (18.0/0.9)
- SS-8 (7.3/1.8)
- SS-7 (1.1/0.6)
- SS-6 (12.0/1.2)
- SS-5 (3.8/1.0)
- SS-4 (3.0/3.0)
- SS-3 (1.4/1.8)
- SS-2 (7.2/1.3)
- SS-1 (1.1/1.9)
- SS-21 (6.4/1.6)
- SS-20 (47/17)
- SS-20 (38/2.2)
- SS-19 (20.0/1.5)
- SS-18 (13.0/2.5)
- SS-17 (6.8/1.9)
- SS-16 (45.0/8.5)
- SS-15 (36/2.1)
- SS-14 (1.5/1.2)
- SS-13 (1.3/1.4)
- SS-12 (1.2/1.1)
- SS-11 (13.0/1.0)
- SS-10 (18.0/0.9)
- SS-9 (18.0/0.9)
- SS-8 (7.3/1.8)
- SS-7 (1.1/0.6)
- SS-6 (12.0/1.2)
- SS-5 (3.8/1.0)
- SS-4 (3.0/3.0)
- SS-3 (1.4/1.8)
- SS-2 (7.2/1.3)
- SS-1 (1.1/1.9)
- SS-21 (6.4/1.6)
- SS-20 (47/17)
- SS-20 (38/2.2)
- SS-19 (20.0/1.5)
- SS-18 (13.0/2.5)
- SS-17 (6.8/1.9)
- SS-16 (45.0/8.5)
- SS-15 (36/2.1)
- SS-14 (1.5/1.2)
- SS-13 (1.3/1.4)
- SS-12 (1.2/1.1)
- SS-11 (13.0/1.0)
- SS-10 (18.0/0.9)
- SS-9 (18.0/0.9)
- SS-8 (7.3/1.8)
- SS-7 (1.1/0.6)
- SS-6 (12.0/1.2)
- SS-5 (3.8/1.0)
- SS-4 (3.0/3.0)
- SS-3 (1.4/1.8)
- SS-2 (7.2/1.3)
- SS-1 (1.1/1.9)
- SS-21 (6.4/1.6)
- SS-20 (47/17)



LEGEND

- | | | | |
|-----------|---|-----|---|
| ⊠ | Background sample location | ○ | Soil sample location |
| ⊙ | Soil sample location | ⊕ | Water sample location |
| ● | Soil sample location | × | Debris pile sample location |
| ⊠ | Sediment sample location | — | 16.0 mg/kg arsenic isoconcentration contour line |
| (1.8/1.9) | Previous Arsenic Concentration (0-0.5'/1'-1.5' DS or 0-0.5'/2-2.5' SS depth interval) | --- | Approximate 16.0 mg/kg arsenic isoconcentration con |
| NC | Not Collected | ⊠ | 25' (MA-1 and MA-2) and 50' grid (MA-3) of potentia |
| NA | Not Analyzed | ⊠ | Site boundary |
| | | ⊠ | Proposed organic pesticide and lead sample location |

APPENDIX A
DTSC PROJECT APPROVAL LETTER





Department of Toxic Substances Control

Linda S. Adams
Secretary for
Environmental Protection

Maureen F. Gorsen, Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Arnold Schwarzenegger
Governor

December 26, 2007

Mr. Mike Mahoney
Penryn Development, LLC
3990 Ruffin Road, Suite 100
San Diego, California 92123

RECEIVED			
WALLACE • KUHL & ASSOCIATES INC.			
DEC 27			
ASW	DJK	KKW	TGK
BAR	DRB	KKB	TSW
DCS	DVA	PWL	
DFS	JFB	SLF	
Rka	Sbn	W. Sac	

SUPPLEMENTAL SITE INVESTIGATION CONDITIONAL APPROVAL LETTER, PENRYN DEVELOPMENT, PENRYN, CALIFORNIA

Dear Mr. Mahoney:

The California Department of Toxic Substances Control (DTSC) received a draft Supplemental Site Investigation II Report (Report) in October, 2007. The Report was submitted by your consultant, Wallace Kuhl and Associates, Inc. for the 15 acre Penryn Development site located approximately one and one-half miles northeast of the central business district of the incorporated town of Loomis, California. The site previously supported an orchard until the 1970s. The site has remained fallow since the 1970s. The Report documents the sampling activities to characterize the extent of contamination in the soil and surface water. The report included a screening level human health risk assessment and an ecological screening risk assessment. An ecological screening risk assessment was conducted because a wetland is on the property, and the wetlands support a variety of species. The human health risk assessment documented that the contamination on site presents a risk to future residents. The report states that remediation is needed prior to development to protect human exposure. The ecological screening risk assessment documented that the contamination on-site could pose a risk to the white-tailed kite and Cooper hawk. However, the wetlands will be developed for residential land use in the near future. Placer County is drafting an Environmental Assessment Report (EIR) which will evaluate the environmental impacts of the development on the wetlands. Remediation along the wetlands will be coordinated with Placer County's final EIR. DTSC does have a comment on the Report which is discussed below. Once the comment has been addressed, then the Report is approved.

This report and previous site investigation reports found elevated arsenic, DDT, DDD and DDE contamination above background levels or the California Human Health Screening Levels (CHHSLs). CHHSLs are screening levels which are protective for human health exposure. Arsenic, DDT, and DDE concentrations found on the property ranged between 1 to 54 milligrams per kilogram of soil (mg/kg), 1 to 2.7 mg/kg, and 1 to 2.5 mg/kg, respectively. A few background soil samples were collected and analyzed for arsenic, which ranged between 1 to 4 mg/kg. The CHHSLs for DDT, DDD, and DDE are 1.6 mg/kg, 2.3 mg/kg, and 1.6 mg/kg, respectively. Since the contamination on-site exceeded background and/or the CHHSLs, remediation is needed to achieve cleanup for unrestricted land use. As stated in the report and discussed during a phone call with your consultant in November, 2007, the report proposes an

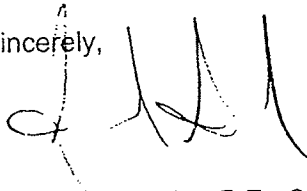
Mr. Mike Mahoney
December 26, 2007

Page 2

arsenic remediation level of 8.0 mg/kg using the 95% upper confidence level of the mean of the soil confirmation sampling data. An arsenic remediation cleanup level of 8.0 mg/kg is above the background level found onsite and is not consistent with DTSC policy regarding arsenic cleanup. Please provide the justification for cleanup of arsenic concentrations above background. Due to the cumulative effects for risk, the DDT, DDD, and DDE remediation levels should be below the CHHSLs. The DDT, DDD, and DDE remediation levels should be based on the total threshold limit concentration (TTL), which is 1.0 mg/kg when added together. Please address this comment in the draft Removal Action Work Plan, which will propose a remediation plan

If you have any questions, please contact Mr. Duane White at (916) 255-3585. DTSC looks forward to reviewing the draft Removal Action Work Plan.

Sincerely,

A handwritten signature in black ink, appearing to read 'F. Amador', written over a faint dotted line.

Fernando Amador, P.E., Chief
Sacramento Responsible Party Unit

cc: Mr. Bill Flores
Wallace Kuhl & Associates, Inc
500 Menlo Drive, Suite 100
Rocklin, California 95765

Comments/Response Table for the

Draft Removal Action Workplan

PENRYN PROPERTY

Penryn, California

WKA No. 5887.06

April 2, 2008

Comments by:

Duane White, DTSC Project Manager
Department of Toxic Substances Control

Response to comments by:

Bill Flores
Senior Environmental Geologist
Wallace-Kuhl & Associates

General Comments on the RAW

DTSC Comment #1:

The draft RAW proposes two remediation levels for arsenic – a soil screening level of 16 milligrams of arsenic per kilogram of soil (mg/kg) and an overall post-mitigation site soil arsenic concentration of 8 mg/kg. The term “soil screening level” in the draft RAW should be changed to “ceiling level”. The draft RAW should state that DTSC will review all confirmation sample results prior to excavation activities being completed to ensure no additional soil needs to be transported to a permitted facility.

In the December 26, 2007 DTSC letter, DTSC wanted the draft RAW to provide the justification to selecting an arsenic remediation level above background levels. The RAW proposes an arsenic post mitigation remediation level of 8 mg/kg while background concentrations have ranged between 1 to 4 mg/gk. The RAW justifies an arsenic level above background conditions by calculating the point of inflection between the background data and site data and identifying on page 15 that there will be incomplete pathways since the site will be developed into townhouses / apartment buildings.

WKA Response:

The term “soil screening level” has been changed to “ceiling level” in the Revised Draft RAW. Wording to the effect that, “the DTSC will review all confirmation sample results prior to completion of excavation activities to ensure no additional soil needs to be removed and transported to a permitted facility,” has been inserted into the text of page 3 of the Revised Draft RAW.