



January 20, 2023

Ms. Amanda Mauceri
Dauntless Development
2419 Michigan Ave., Suite E
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(amauceri@dauntlesscp.com)

Subject: Work Plan Addendum for Additional Environmental Site Assessment
Garden Palms
101 Garden Street, Santa Barbara, CA 93101
SMU Site #749
APNs 017-630-008; -009, -018, -021, -024, -027

Dear Ms. Mauceri,

The Santa Barbara County Public Health Department, Environmental Health Services (EHS), Site Mitigation Unit (SMU) has reviewed the document prepared by GeoEnviro Services Inc. (GESI) titled Addendum to *Work Plan for Additional Environmental Site Assessment (Addendum)* dated December 28, 2022. The *Addendum* provides additional information and sample locations in response to EHS's December 20, 2022 letter. The *Addendum* proposes the following, in addition to the scope presented in the November 2022 Work Plan:

1. Additional step-out soil vapor locations in vicinity of historic vapor probes SV-5, SV-8, SV-9, SV-14 in order to delineate previously identified impacts of Tetrachloroethene (PCE), Total Petroleum Hydrocarbons as gasoline (TPHg), benzene, and chloroform. Twelve additional probes are proposed to delineate soil vapor in these areas;
2. Three additional soil vapor probes proposed in the vicinity of previous vapor probe SV-6 (SV6A-C) in order to delineate benzene impacts;
3. Re-sample locations SB-6R, SB-9R, SB-13R, SB-15R, SB17R, SB-18R, SB-19R, and SB-20R at depths corresponding to previously elevated TTLC concentrations for metals. These soil samples will be analyzed for STLC/TCLP, as necessary;
4. Two additional groundwater monitoring well locations MW-7 and MW-8 in the center of the site to evaluate Trichlorethene (TCE) and benzene concentrations. The off-site well MW-9 will be completed with approval of an access agreement; and;

5. Soil samples will be collected at surface and 3' depths in addition to depths previously proposed in the November 2022 Work Plan.

The *Addendum* also provides a cross-section through the former Underground Storage Tank (UST) area. Based on a review of information on the closed LUFT case and the analytical result at GP-23 @ 8' (TPHg at 156 mg/kg), the *Addendum* concludes that this appears to be residual soil impact from the former UST. Based on review, the north/eastern portion of the UST area was only partially assessed prior to the soil remediation work completed in 1994. The 1994 remediation work included the removal of pooled gasoline hydrocarbons above the groundwater, which was generally around 8-10' below ground surface (bgs). Excavation of 65 cubic yards of TPH impacted soil was limited to the southern end of UST excavation. No additional soil assessment is proposed in vicinity of GP-23. The *Addendum* concurs that borings will continue to be screened for potential Unexploded Ordinances (UXO), however, it notes that historical uses dating back to 1880 would not support a site use as bomb storage. No supporting documentation or physical evidence of UXO use, storage, or presence has been identified other than the "bomb storage" designation in Envirostor.

After a careful review of the *Addendum* and site file, EHS approves the *Addendum* with the following comments and conditions:

1. As the TPHg reported from sample GP-23 @ 8' appears to be attributed to former UST, EHS does not require additional soil sampling in this area. EHS notes that after June 30, 2023 any LUFT related issues will have to be handled by the State Water Boards.
2. The three soil vapor step-out locations around SV-8 are not depicted on the figure but they are indicated in the text of the report. When submitting boring permit applications, correct the figure to include these locations.
3. EHS concurs with the locations of proposed monitoring wells including off-site location to determine source area for select Volatile Organic Compounds (VOCs).
4. EHS Geotech Environmental Boring and Monitoring Well Construction permit applications are required for the proposed work. The latest applications can be found at: <https://www.countyofsb.org/2007/Leaking-Underground-Fuel-Tank-LUFT>.
5. EHS approves step out borings based on field indications of contamination. EHS requires all Constituents of Concern (COCs) that are above their respective Tier 1 Environmental Screening Levels, EHS Investigation Levels, and/or background levels to be vertically and laterally delineated. This will be required such that the post excavation mass and volume of residual metals at the site can be calculated. This will assist EHS in determining if the proposed remediation is acceptable and if a Land Use Covenant is required as a condition of case closure.
6. The comments and conditions of the EHS's December 20, 2022 letter apply, including groundwater samples being field filtered for metals analysis prior to acidification, all soil samples being analyzed for TTLC metals with STLC/TCLP as needed, and surface and 3' samples being analyzed in addition to 5' and 8' depths in all proposed borings.

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If you have any questions regarding this letter, please contact me at (805) 346-8345. Written correspondence regarding this matter should be sent to EHS at 2125 S. Centerpointe Parkway, Room 333, Santa Maria, CA 93455 or via email to Marissa.censullo@sbcphd.org.

Sincerely,



Marissa Censullo
Hazardous Materials Specialist
SMU Program

Ec:

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GeoTracker Database

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