



December 20, 2022

Ms. Amanda Mauceri  
Dauntless Development  
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([amauceri@dauntlesscp.com](mailto:amauceri@dauntlesscp.com))

Subject: Work Plan 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 *Work Plan for Additional Environmental Site Assessment (Work Plan)* dated November 23, 2022. A hotel development is proposed for the site with grading to consist of 25,500 cubic yards of cut with no fill. The primary constituents of concern (COCs) in soil are Total Petroleum Hydrocarbons as gasoline (TPHg), TPH as diesel (TPHd), and TPH as oil (TPHo), and metals including arsenic, cadmium, copper, lead, molybdenum, selenium, thallium, vanadium, and zinc. In soil vapor, COCs include benzene, ethylbenzene, and tetrachloroethene (PCE). Volatile Organic Compounds (VOCs) including Methyl tert-Butyl Ether (MTBE), trichloroethene (TCE), and cis-1,2-Dichloroethene (cis-1,2-DCE) and metals arsenic, barium, beryllium, lead, and selenium are COCs in shallow groundwater. The *Work Plan* proposes the following in accordance with EHS's previous directives:

1. Advance seven soil borings in the vicinity of SB-15 via Geoprobe (SB21-SB27) to delineate TPHd laterally. Soil probes will be advanced to depths of up to 8' with soil samples collected at depths of 5' and 8' below ground surface (bgs);
2. Advance three soil borings within the Garden Street drainage area on the northern portion of the site using hand auger and/or Geoprobe methods with samples collected at 5' and 8' bgs with analyses for TPH and VOCs (SB28-SB30);
3. Install four temporary soil vapor probes (SV16, 20, 18, 19) within borings SB-21, SB-23, SB-22, and SB-27 at depths of 5' bgs. In addition, advance borings SV-15

and SV-17 to depths of 5' to install temporary soil vapor probes and collect and analyze soil vapor samples for VOCs. SV15 -17 will have soil samples collected at 5' bgs. Soil vapor probes will be constructed per the guidelines outlined in the Department of Toxic Substances Control's Advisory Active Soil Gas Investigations, July 2015;

4. Install up to seven permanent groundwater monitoring wells (MW-1 through MW-6 and contingency location MW-7), with well screens set 5' above static groundwater elevation and extending 15' into groundwater. Additionally, soil samples will be collected at 5' intervals. Proposed well depths are 25-30' bgs with screened intervals from 10-30' for MW-1 and MW-2 and 5-25' for MW-3 through MW-7. MW-7 will potentially be located off-site near 120 Santa Barbara Street and will be contingent upon necessity and approval of site access. Approximately 1 week following well development, the wells will be gauged and sampled. Each of the wells will be purged of three casing volumes of groundwater, allowed to recharge to at least 80% of pre-purge levels, and sampled using a dedicated disposable bailer. The samples will be analyzed for TPHg and VOCs, including fuel oxygenates;
5. One soil sample will be additionally analyzed for title 22 metals for waste profiling purposes.

After a careful review of the *Work Plan* and site file, EHS has the following comments and conditions:

1. A closed LUFT site exists on the site with a 1000-gallon gasoline tank removed and 65 cubic yards of impacted soil removed. The site was closed in 1994 under oversight of the Central Coast Regional Water Quality Control Board. Several soil borings were advanced in this area during previous assessment activities. One sample, GP23-8, contained TPHg in excess of 100 mg/kg with a result of 156 mg/kg. No deeper sample was collected. Select other samples in this area contained TPHd and TPHo in excess of 100 mg/kg at depths ranging from 3-8' bgs. The *Assessment Report* concludes that localized TPHg is likely from a former UST, whereas the TPHd and TPHo were attributed to commercial/industrial land uses.
  - a. Compare the location of the former UST excavation and its sampling results with the current data from this area. If the data indicate that this TPHg is related to residual impacts from the tank removal, then additional sampling is not required in this area. If the data suggest that the TPHg cannot be attributed to the former tank, then EHS requires one additional soil boring in this area to a depth of greater than 8' bgs to vertically delineate the TPH. Submit this information, including cross sections and figures, to EHS by **January 6, 2023**.
  - b. Soil vapor sample SV-6 near this location contained low levels of benzene at 13 ug/m<sup>3</sup>. Although this value is below LUFT Low Threat Closure Policy criteria, it is unclear if this is related to the former tank. Additional soil vapor sampling is required in this area.
2. EHS notes that several samples from the March 2022 assessment exceeded 10X and 20X their respective Soluble Threshold Limit Concentration (STLC)/Toxicity

Characteristic Leaching Potential (TCLP) threshold values for lead and cadmium but were not analyzed for STLC/TCLP. EHS requires these locations be re-sampled and future soil samples additionally analyzed for CAM 17 metals and their soluble fractions, as applicable. Submit a map for EHS approval, by **January 10, 2023**, depicting the sample locations and depths of the areas to be resampled

3. Report future soil vapor results in ug/m<sup>3</sup>.
4. Soil vapor locations SV-5 and SV-9 exceed the residential Environmental Screening Level (ESL) for PCE and commercial/industrial ESL for benzene. SV-14 contains chloroform at 0.014 ug/L, which exceeds its commercial/industrial ESL. Additionally, TPHg in SV-8 at 2,669 ug/L exceeds its Residential ESL. EHS requires these constituents to be laterally delineated. Submit a brief workplan addendum, by **January 10, 2023**, for additional soil vapor sampling.
5. EHS concurs with the locations of proposed monitoring wells including off-site location to determine source area for TCE and Benzene. Additionally, EHS requires several on-site monitoring wells. Submit a map, by **January 10, 2023**, depicting the additional groundwater well locations.
6. EHS Geotech Environmental Boring and Monitoring Well Construction permit applications are required. The latest applications can be found at: <https://www.countyofsb.org/2007/Leaking-Underground-Fuel-Tank-LUFT>.
7. As select metals have been identified as chemicals of concern, include CAM 17 metals analysis on all soil samples. Additionally, analyze groundwater samples for metals and field filter the samples prior to acidification.
8. Past soil samples have been collected from 3, 5, and 8' bgs and artificial fill has been noted in portions of the site. Collect and analyze surface and 3-foot bgs samples in each of the proposed soil borings. Ensure that any fill material that is encountered in the borings is sampled and analyzed. 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 ESLs, EHS Investigation Levels and/or background levels to be vertically and laterally delineated. This will be required such that post excavation the 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.
9. The HASP references potential unexploded ordinances (UXO) at the site. All boring locations shall be cleared by an UXO trained technician.
10. Future groundwater monitoring and/or remediation may be required based on multiple rounds of groundwater monitoring and consultation with the Central Coast Regional Water Quality Control Board. Vapor Mitigation will likely be required unless a post-remediation soil vapor survey can demonstrate that levels have been remediated to less than Tier 1 ESLs.
11. Notify EHS **48 Hours** in advance of field work.

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](mailto:Marissa.censullo@sbcphd.org).

Sincerely,



Marissa Censullo  
Hazardous Materials Specialist  
SMU Program

Ec:

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GeoTracker Database

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