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PUBLIC Health
DEPARTMENT

Environmental Health Services

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July 24, 2019

Mr. Aaron Locke
Garden Palms, LLC
1999 Avenue of the Stars, Suite 2850
Los Angeles, CA 90067

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

Dear Mr. Locke,

The Santa Barbara County Public Health Department, Environmental Health Services (EHS), Site Mitigation Unit (SMU) has reviewed the site file and the June 11, 2019 *Work Plan for Additional Soil, Soil Vapor, and Groundwater Assessment (Work Plan)* prepared by GeoEnviro Services, Inc. (GESI). The subject site is a 4.5-acre parcel developed for commercial/industrial use and is partitioned into smaller areas for use by multiple tenants. Five framed, commercial office/warehouse buildings onsite and many temporary structures/storage areas exist on-site. According to the *Work Plan*, the site history includes a closed Leaking Underground Fuel Tank (LUFT) case associated with Channel City Lumber (LUFT Case #90043), a former railyard, a former asphalt batch plant, a lumber yard, agricultural use on the northern portion, a machine shop, a construction yard, an auto repair facility, a metal and wood working shop, painting operations, container storage, and fumigators. The *Work Plan* states that a commercial hotel property is planned at the site with subterranean parking.

A 2003 Phase I Environmental Site Assessment report prepared by Rincon Consultants, Inc. concluded that there were potential Recognized Environmental Conditions at the site due to the presence of earthquake debris and the former use of the property as a railyard. In 2012, Rincon collected soil and groundwater samples from eleven soil borings that were drilled to a maximum depth of eight feet below ground surface (bgs). Soil samples were analyzed for Total Petroleum Hydrocarbons (TPH) as gasoline, diesel, motor oil, Volatile Organic Compounds (VOCs) and CAM 17 metals. Groundwater samples were only analyzed for VOCs. Based on the soil analytical data, TPH as motor oil was detected in six of the twenty-two samples at levels greater than the Santa Barbara County Investigation Level (IL) of 100 mg/kg. Arsenic, copper and lead were detected in select

soil samples above their respective Environmental Screening Levels (ESLs) but below their respective Soluble Threshold Leaching Concentration (STLC). Select VOCs were detected at low levels in some soil samples at concentrations less than their respective ESLs. Select groundwater samples contained Methyl tert Butyl Ether (MtBE), Trichloroethene (TCE), and Methylene Chloride ($MeCl_2$) above their respective Maximum Contaminant Levels (MCLs). At the time it was noted that based on the ESLs, none of the VOCs presented a vapor intrusion risk. EHS notes that based on the 2019 San Francisco Regional Water Board ESLs, TCE exceeds the Groundwater Vapor Intrusion Human Health Risk Levels for a residential and commercial/industrial scenario in sample B9.

As identified by Citadel Environmental Services in their Phase I ESA dated July 1, 2016, the site was identified by the State of California – Envirostor Database as the location of "Bomb Storage. The bomb storage designation by Envirostor (DTSC) does not include any additional information regarding the period of storage, the specific location, the types of ordinance, or the likelihood for the presence of bomb related materials at the site. Based on EHS' research, this site may be associated with an Army Corps Formerly Used Defense Site (FUDS). The *Work Plan* states that based on the location of the site within a densely populated coastal portion of the Santa Barbara waterfront, commercial/industrial and business district, the designation for bomb storage is atypical for this area, is not related to any identifiable historical site use, and is not well documented. GESI conducted research and concludes that they do not believe any paper or verbal confirmation of the presence of ordinance will be feasibly obtained.

In 2016, GESI completed 24 soil borings identified as GP1 through GP24. Borings GP1-19 were advanced to a total depth of 10' below ground surface (bgs). Borings GP 20-24 were advanced to 8' bgs. Soil samples were analyzed for TPH as gas, TPH as diesel, TPH as motor oil, VOCs, and CAM 17 metals. Select samples were additionally analyzed for TPH as Creosote by EPA Method 8015, Pesticides, Polychlorinated Biphenyls (PCBs), and Polycyclic Aromatic Hydrocarbons (PAHs). Two samples contained detectible concentrations of TPH as gasoline in the vicinity of the closed LUFT case, one of which exceeded the IL of 100 mg/kg. TPH as diesel and motor oil were detected in several samples exceeding the IL of 100 mg/kg. Creosote, Pesticides and PCBs were not detected in any of the soil samples. Select PAHs were detected in only one sample at concentrations less than their respective ESLs. Naphthalene exceeded the ESL in one sample. Cadmium exceeded the STLC in two locations. Shallow groundwater was encountered onsite during site assessment activities completed in November 2016 at depths ranging from approximately 8.0 feet to 8.5 feet below grade, but was not collected or analyzed in 2016.

The *Work Plan* proposes the following:

1. A magnetometer survey by an Unexploded Ordinance (UXO) trained and experienced firm to be conducted following surface clearing/demolition and prior to breaking ground for over-excavation. EHS notes that the *Work Plan* does not propose performing a UXO survey prior to conducting intrusive assessment work.
2. Advance 20 direct push borings for the collection of soil samples. Fifteen are proposed to a maximum depth of approximately 15' bgs for soil sample collection

at depths of 3', 5', and 8' bgs and groundwater collection. Five will be advanced to a depth of approximately 8' bgs for soil sample collection at depths of 3', 5', and 8' bgs at each location.

3. According to the *Work Plan*, the purpose of the borings will be to screen and collect vadose zone soil samples for TPH as gasoline, TPH as diesel, TPH as motor oil, VOCs, Title 22 metals, and Creosote and Pentachlorophenol by EPA Method 8270. Grab groundwater samples will be obtained from 15 borings using Hydropunch or temporary casing installation collection methods. The *Work Plan* proposes to analyze groundwater samples for TPH as gasoline and VOCs.
4. In addition, twelve locations will be evaluated for soil vapor in shallow soils using direct push installation to a depth of 5' bgs. Soil vapor samples will be analyzed using a mobile laboratory for TPH as gasoline and VOCs using EPA Method 8260.

After a careful review of the *Work Plan* and site file, EHS approves the *Work Plan* with the following comments and directives:

1. EHS requires, that at a minimum borehole locations are cleared by a trained UXO professional prior to initiating any site work. EHS concurs that a complete UXO survey should be conducted by a trained individual prior to demolition, corrective actions or construction activities.
2. For soil vapor samples, a two hour equilibration time is required by the DTSC Active Soil Gas Advisory dated July 2015 for direct push methods. The *Work Plan* states that soil vapor samples will be analyzed on-site using EPA method 8260B rather than TO-15. Ensure results are reported in ug/m3 and that reporting limits are less than their respective ESLs.
    a. The *Work Plan* stated that no potential VOC source in groundwater was identified at the site with the exception of the closed LUFT site. However, EHS notes that two of the groundwater samples from 2012 (B-9 and B-8) exceed the Short Term Action Level for TCE for a residential scenario (5.0 ug/L) but are less than the commercial Short Term Action Level for TCE (20 ug/L).
    b. Additional soil vapor samples shall be collected to the east of groundwater sample B-9 and to the west of B-8 respectively, near the edges of the property.
3. The *Work Plan* identifies Buildings #2, 4, and 5 as being associated with lumber storage and/or historic Channel City Lumber Company operations. In 2016 soil samples were analyzed for Creosote by EPA Method 8015 with results being non-detect.
    a. To capture the specific compounds that are found in Creosote, EHS requires that all soil samples be analyzed for Semi-Volatile Organic Compounds (including m/p-Cresol, O-Cresol, pentachlorophenol) and PAHs. Samples that have detections for pentachlorophenol shall be additionally analyzed for Dioxins and Furans as these are know contaminants associated with creosote containing pentachlorophenol.
4. In addition to the proposed groundwater analyses (TPH as gasoline, VOCs), EHS requires groundwater samples be analyzed for CAM 17 metals and PAHs. Ensure

VOC analyses include oxygenates and lead scavengers. Field filter samples for metals analysis prior to acidification.

5. Based on the results of hydropunch groundwater samples, the need for permanent groundwater monitoring wells will be evaluated.
6. EHS generally requires delineation of all contaminants of concern to the Tier 1 ESLs prior to development of a corrective action plan.
7. EHS generally considers commercial/industrial ESLs applicable to a hotel development. Remediation to levels above unrestricted (residential) land use may require a Land Use Covenant.
8. Based on the results of the soil vapor survey, vapor intrusion mitigation measures may be required as part of site re-development if the source of the vapors cannot be remediated to prevent vapor intrusion.
9. It is EHS' understanding that the footprint of the subterranean parking structure is essentially the same as that of the hotel, with approximately two acres of open space on the site. Regardless of remediation, a large amount of soil which may be characterized as hazardous waste will ultimately need to be removed to accommodate subterranean parking. Therefore, subsequent to any required remediation that removes areas of known contamination, the remaining soil will need to be managed in accordance with a soils management plan. This soils management plan shall be developed once the corrective action, if required, has been completed.
10. The *Work Plan* states that the Assessor's Parcel Number (APN) for the subject site is 6206-003-012 (formerly 017-630-008; -009, -018, -021, -024, -027). The reported APN does not appear to be valid based on the format and research on the County Assessor's website. APNs 017-630-008; -009, -018, -021, -024, -027 appear to be correct based on the County Assessor's website. Please confirm and include correct APN(s) on future reports.
11. EHS notes that this project appears to be within the Coastal Zone. Permitting through the City of Santa Barbara is required. The City may have additional requirements that EHS will take into consideration when it comes to development of a corrective action plan.
12. Soil boring destruction permits are required for all soil borings, temporary soil vapor probes, and groundwater grab samples that are within 10 vertical ft. of groundwater. Permits applications are found at the following link: https://www.countyofsb.org/phd/ehs/smu.sbc.
13. It is your responsibility to obtain all permits and appropriate clearances prior to beginning fieldwork. All required permits shall be in hand prior to initiating fieldwork.
14. A historical water production well was located on the property from 1888 to 1892. If the well is encountered during grading operations, it shall be evaluated to determine if it needs to be properly abandoned. If it has been abandoned, then care shall be taken not to disturb the integrity of the abandonment seal.
15. Notify EHS a minimum of **48 Hours** in advance of all fieldwork. Fieldwork shall begin by **September 13, 2019**.
16. The report documenting the site activities shall be submitted within **60 days** of completing fieldwork. In an effort to conserve resources, upload the following to GeoTracker Site #T100000012868 and email confirmation to EHS:

a. Geo_Report: A copy of the site assessment report;
b. EDF: Laboratory Data;
c. Geo_Bore: Boring logs completed during site assessment activities; and
d. Geo_Map: map showing site assessment locations/borings and remediation activities.

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

Ec:
Mr. Joseph Schaaf, GeoEnviro Services, Inc. (jschaaf@geoenviroservices.com)
Wright Family H Limited Partnership (jeanne@wrightcosb.com)
Ms. Kathleen Kennedy, Santa Barbara City Planning Department (kkennedy@santabarbaraca.gov)
GeoTracker Database

Mlc/tmr : 749_20190705