



County of San Diego

JACK MILLER
DIRECTOR

**DEPARTMENT OF ENVIRONMENTAL HEALTH
LAND AND WATER QUALITY DIVISION**

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ELIZABETH POZZEBON
ASSISTANT DIRECTOR

May 12, 2010

Ms. Shela Wosk
MSD Masada Company, LLC
P.O. Box 12-2336
San Diego, CA 92112

Dear Ms. Wosk:

VOLUNTARY ASSISTANCE PROGRAM – DEH CASE NO. H27452-001
RESPONSE LETTER
FORMER GOODYEAR TIRE
1045 BROADWAY, SAN DIEGO, CALIFORNIA 92101

Staff of the Department of Environmental Health, Site Assessment and Mitigation Program (SAM) reviewed the following documents prepared by Geocon Consultants, Inc.:

- *Additional Soil and Soil Vapor Investigation*, dated October 15, 2009
- *Workplan for Soil Removal and Site Rehabilitation*, dated March 30, 2010
- *Workplan Addendum*, dated May 7, 2010

The report documents the actions and subsequent findings of several environmental investigations at the site, including soil and soil vapor sampling activities conducted to determine the extent of contamination at the property. The workplans propose to excavate contaminants at the site.

SAM Staff spoke with the property owner, Ms. Shela Wosk of the MSD Masada Company, on May 10, 2010, to discuss the project in more depth than presented in the previously provided documents. Ms. Wosk indicated that the proposed property use was a paved parking lot and that the cleanup goals for the site should correlate accordingly. While future redevelopment was not out of the question, Ms. Wosk indicated that any discussion regarding future property use was highly premature and repeated that there were currently no plans for redevelopment at this time. The goal of the proposed cleanup, as stated by Ms. Wosk, is to transform the subject site into a paved parking lot in the most cost efficient manner that environmental responsibility allows. With this goal in mind, and at the request of Ms. Wosk, SAM evaluated the cleanup options for the site based on available information.

Site specific cleanup goals can vary greatly from one property to another depending on numerous factors, including the contaminants in question, the existing or proposed site use and that of neighboring properties, and a multitude of other site specific characteristics such as groundwater usage and depth, and nearby sensitive receptors. Rarely is any one cleanup goal (published or not) appropriate for all sites and implementation of this approach without a thorough understanding of all site characteristics, commonly referred to as a site conceptual model (SCM), can lead to an

inefficient or ineffective remediation plan. With this in mind, and with the proposed site use as a paved parking lot, SAM provides the following site management options, which address the property owner's goals, as identified and requested above, while protecting human health and the environment in the most efficient manner.

Option 1

SAM evaluated the provided data and site characteristics with the proposed use as a paved, grade level parking lot which would not contain any human occupied structures. As part of this evaluation, SAM reviewed surrounding property use, potential vapor risk issues, anticipated contaminant mobility, and potential for groundwater impact among other items. Based on this review, and considering that additional assessment and/or mitigation activities may be necessary in the future (as identified in Option 2), beyond those already conducted and proposed, **the property in its existing environmental condition appears to be acceptable for use as a grade level paved parking lot with no human occupied structures.** Should future property use change from a paved parking lot, the site must be reevaluated to ensure that any new proposed use continues to protect human health and the environment. Future redevelopment of the site would require additional assessment and remediation activities appropriate for the new proposed site use.

Option 2

The proposed cleanup action will act to remove the majority of identified contamination at the site, including total petroleum hydrocarbons (oils) greater than 1,000 milligrams per kilogram, and the majority of tetrachloroethene (PCE), a cleaning solvent. These activities would mitigate a significant amount of contamination at the site and development as a paved parking lot would of course be acceptable. However, **prior to site redevelopment with placement of a structure, slab on grade or underground development requiring excavation, additional assessment activities will be required to address the following items** in an effort to more completely develop the SCM:

1. Significant PCE vapor concentrations were identified in the northwestern portion of the site; however there does not appear to be any soil sampling data available to assess the source of the PCE vapors. While the consultant-provided theory, that vapors are likely attributed to the adjacent cleaners, is plausible, it remains untested and additional assessment must be conducted in an attempt to determine the source of PCE vapors in this area to ensure future structures are adequately protected. If additional PCE-impacted soil was identified, this material may have to be mitigated prior to placement of structures.
2. Potential lead-impacted soil has not been adequately assessed at the site. Based on boring logs and cross sections, a significant amount of undocumented fill exists across the site, which in this area of downtown San Diego may contain burn ash and associated heavy metals. The observation of concrete and brick fragments in backfill supports the potential existence of burn ash. While there were several soil samples collected and analyzed for metals at the site, the majority of them were associated with the clarifier and hoist 7 or were taken at excessive depths, outside the standard burn ash depths of near-surface to approximately five feet below grade. Typically burn ash assessments include collection of soil samples in a random grid type pattern across the site at several depths to assess the presence and depth of impacts. If lead-impacted soil was observed across the site, proper handling and disposal would be required prior to redevelopment.

Option 3

As identified in Option 2 above, additional assessment must be conducted at the site prior to future structural redevelopment. As a proactive approach, **assessment activities, as identified in Option 2, can be completed now in an effort to better understand if the proposed excavation activities will be successful in mitigating contaminants or if additional remediation activities will be necessary in the future**, should site redevelopment occur. One potential benefit of conducting assessment activities now, as opposed to the future, is that the current economic climate may allow assessment activities to be conducted more quickly and cheaply than in the future. In addition, the site is presently more accessible to conduct work, which could be more challenging if done at a later date following construction and usage as a paved parking lot.

Option 4

On occasion, environmental work is conducted prior to a determination of site usage. Typically these scenarios correspond with property transactions where the property buyer requires the site to be “clean” upon or immediately following delivery. While there is no plan to sell or develop the site at this time, the same principles can be employed proactively to ready the site for future redevelopment. In this scenario, a conservative land use is proposed for the site, typically residential with below grade parking. **Assessment and cleanup actions are conducted assuming residential with below grade parking land use, which would be appropriate for the majority of potential property uses including commercial, industrial, and land uses with less stringent requirements.** Following completion of assessment and mitigation activities, SAM would issue a concurrence letter approving the site for use as residential with below grade parking and other less sensitive uses as identified above.

SAM must be notified prior to implementation of the aforementioned options and is available for further discussion, elaboration, or questions should they be required. Your consultant must prepare the request to implement the selected option and include pertinent information in accordance with the option chosen (i.e. if your selection includes the implementation of additional assessment activities, a workplan should be prepared and presented to SAM in accordance with the SAM Manual). If Option 1 is chosen, no additional work is necessary with the exception of a notice of intent to implement. Regardless of which option is chosen, SAM will respond as appropriate.

Unless otherwise requested, this letter will conclude expedited review of this project. If you have any questions regarding this project, please do not hesitate to call me at (619) 338-2908.

Sincerely,

KEITH E. KEZER, Project Manager
Site Assessment and Mitigation Program

KEVIN M. HEATON, PG 4163, CHg 163
Senior Hydrogeologist
Site Assessment and Mitigation Program

cc: Jack Keener, Geocon Consultants, Inc.