

Appendix A State of California, Department of Toxic Substances Control,
Jessy Fierro, Senior Environmental Scientist, Comment Letter in
Response to the Draft Environmental Impact Report For 2800 Casitas
Avenue Project, April 16, 2020.

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Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D.
Director
9211 Oakdale Avenue
Chatsworth, California 91311



Gavin Newsom
Governor

April 16, 2020

Ms. Erin Strelch
Los Angeles Department of City Planning
221 North Figueroa Street, Suite 1350
Los Angeles, California 90012

DRAFT ENVIRONMENTAL IMPACT REPORT FOR 2800 CASITAS AVENUE PROJECT

Dear Ms. Strelch,

The Department of Toxic Substances Control (DTSC) reviewed the Draft Environmental Impact Report (DEIR) for 2800 Casitas Avenue Project (Project). The DEIR describes the Project proposal as a mixed-use development consisting of residential and commercial units, a parking structure, and open space/recreational areas. Based on the review of the DEIR, DTSC's comments are as follows:

1. The project area is located within the historical boundary of the former Taylor Yard, a railroad maintenance facility and has been recently occupied by a metals manufacturing facility. The DEIR references the 2016 Phase I Environmental Site Assessment (Phase 1) and the 2016 Human Health Risk Assessment (HHRA). An investigation report is not included. Previous investigations identified a drum storage area, former fueling station with two former underground storage tanks. The chemicals of concern include volatile organic compounds and petroleum. The Phase I states the combined cancer risk for exposure to chemicals in soil gas is 4×10^{-6} .
2. Vapor intrusion (VI) risks were evaluated using soil gas concentrations at 3, 5 and 15 feet below ground surface (ft bgs). For current risk assessments, DTSC would also recommend the use of the 0.03 attenuation factor for VI. Using the highest tetrachloroethylene (PCE) concentration in soil gas (2,900 micrograms/cubic meter ($\mu\text{g}/\text{m}^3$) at 5 ft bgs) would result in a cancer risk of two in ten thousand. Multiple spatially collocated samples at LB2,15,16,17,18, 19, and 20 are within the maximum value, so there appears to be a defined area of contamination. Lower concentrations of trichloroethylene (TCE) were also found in a few samples. Risk management may need to be reevaluated based upon

Ms. Erin Strelch

April 16, 2020

Page 2

the new soil vapor assessment. Based on the available data, mitigation and/or operation and maintenance activities may be needed.

3. The DEIR should identify how any further investigation or remediation activities will be conducted, and which government agency will provide appropriate regulatory oversight.
4. Due to the amount of excavation planned for this project, and understanding the contamination present at the site and the potential for identifying additional impacted soil, a detailed soil management plan, air monitoring plan, and health and safety plan should be developed with regulatory oversight.
5. If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate health and safety procedures should be implemented.

DTSC provides guidance on remediation and soil management and oversight of cleanup activities through the Standard Voluntary Agreement (SVA). For additional information on the SVA, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to discuss this matter further, please contact me at JFierro@dtsc.ca.gov.

Sincerely,



Jessy Fierro

Senior Environmental Scientist

Site Mitigation and Restoration Program - Chatsworth Office