



October 30, 2020

Ms. Trudi G. Carey
The Carey Group
5325 Calle Real
Santa Barbara, CA 93111
(trudi@careygroupinc.com)

Subject: Galileo Pisa LLC Project
5317 Calle Real, Goleta, California 93111
SMU# 765
APNs 069-525-022 and 069-160-051
GeoTracker Global ID# T10000016252

Dear Ms. Carey:

The Santa Barbara County Public Health Department, Environmental Health Services (EHS) Site Mitigation Unit has reviewed the August 13, 2020 document prepared by your consultant, Padre Associates, Inc., titled *Remedial Action Plan, Galileo Pisa, LLC Project, 5317 Calle Real, Santa Barbara, Santa Barbara County, California (RAP)*.

A Phase I report prepared for this site indicated that it was used as an avocado orchard and may have had an electrical transformer on it. A residential development is planned for the site. Based upon this information, EHS recommended soil sampling across the site for the following Constituents of Potential Concern (COPCs): metals, organochlorine pesticides, chlorinated herbicides, and, if a transformer was identified, polychlorinated biphenyls (PCBs). The July 16, 2020 Report documented the collection of ten initial near surface samples in the orchard area for metals, organochlorine pesticides, and chlorinated herbicides. Based upon these initial results, three vertical samples were collected at the sample location with the highest pesticides. No transformer was identified, so no sampling for PCBs was conducted.

The sample results indicated the presence of the organochlorine pesticides alpha-chlordane, gamma-chlordane, 4,4-DDD, 4,4-DDE, and 4,4-DDT and elevated levels of select metals. Of these COPCs, chlordane, 4,4-DDT, lead, arsenic and vanadium were above their respective Tier 1 Environmental Screening Levels (ESLs). EHS noted several technical errors with the July 16, 2020 Report, including incorrect unit transcription, lack

of units in the tables, and a lack of data interpretation. EHS concurred that the vanadium concentrations were indicative of background levels but disagreed that one location with elevated arsenic was related to background levels. EHS also determined that the total lead sitewide 95% Upper Confidence Limit (UCL) was below the Tier 1 Screening Level, thus remediation for lead is not warranted. The July 16, 2020 Report recommended that the soil with elevated chlordane could be used as fill material under the building or driveway/parking area and suggested preparing a soils management plan to accomplish this task. EHS did not oppose this remedial option, but noted that a Remedial Action Plan was required instead of a soil management plan.

The *RAP* reviewed the existing data and proposes remediation via excavation and offsite disposal. The site will be excavated to a depth of about 1 foot below ground surface in areas where elevated arsenic and chlordane was found. An estimated 800 to 1,500 cubic yards of non-hazardous soil will be excavated and disposed of off-site at an approved disposal facility. Verification soil samples will be collected and the Exposure Point Concentration will be calculated per the U. S. Environmental Protection Agency's ProUCL Program. ProUCL will be used to calculate the sitewide 95% UCL for chlordane and arsenic. The cleanup goals are 12 mg/kg for arsenic (DTSC's California background level) and 8.5 ug/kg for Chlordane (Tier 1 ESL). Backfill material, if necessary, will be tested per DTSC's Oct 2001 document titled *Information Advisory, Clean Imported Fill Material*.

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

1. As the site design has not yet been finalized, the soil in any area that is proposed to be an infiltration basin shall be tested for pesticides and metals. Remediation of these areas will be required to concentrations that are protective of groundwater.
2. Based upon the nature of the remedial action, the public notification shall consist of notices mailed to owners and occupants of parcels within 200 feet of the site, a notice in a local newspaper ad, and a Fact Sheet uploaded to GeoTracker. Please submit draft copies of the Public Notice, newspaper ad, and Fact Sheet to EHS for approval by **November 13, 2020**. A 30-Day Public Comment Period is required prior to final approval.
3. As required by State and County requirements under the California Environmental Quality Act (CEQA), EHS reviewed the work as proposed in the *RAP* and intends to issue a Notice of Exemption (NOE) for the *RAP*. EHS will post the NOE on GeoTracker. The public will have 180 days to file a legal challenge to this NOE (and not just present a public comment). Corrective action can commence prior to conclusion of the 180-day statute of limitations period on legal challenges. In the past, EHS has filed NOEs with the Clerk of the Board of Supervisors, which reduces the legal challenge period to 35 days. However, the County Clerk now charges \$50 to post this notice so EHS does not currently post NOEs at the Clerk of the Board's office. Alternately, if you wish to make arrangements to file the NOE with the Clerk of the Board of Supervisors, then the legal challenge period would be reduced to 35 days. If CEQA is in process or has been completed for related work at this site, please provide

documentation to verify the work as proposed in the *RAP* is included in that project. Upon review of any provided documentation and in consultation with the lead agency, EHS will determine if further CEQA review is appropriate.

4. It is your responsibility to obtain all permits and appropriate clearances from other agencies. All required permits shall be in hand prior to initiating fieldwork.
5. Please notify EHS at least **48-hours prior to beginning field work** and any sampling event.
6. This approval is valid for 1 year from the date of this letter.
7. Within six weeks of completion of the field work, upload the following to GeoTracker, with an email confirmation to me:
 - a. EDF: Lab Data;
 - b. Geo_Map: Map depicting soil boring locations;
 - c. Geo_Bore: Boring Logs; and
 - d. Geo_Report; Report documenting fieldwork.

If you have any questions regarding the aforementioned, please do not hesitate to call me at (805) 346-8216. Written correspondence regarding this matter should be sent to EHS at 2125 S. Centerpointe Parkway, Room 333, Santa Maria, CA 93455, via facsimile to (805) 346-8485, or via email at tom.rejzek@sbcphd.org).

Sincerely,



Thomas M. Rejzek
Professional Geologist #6461
Certified Hydrogeologist #601
LUFT/SMU Programs

ec: Mr. Sean Stewart, Santa Barbara County Planning Department (sestewart@co.santa-barbara.ca.us)
Mr. Louis Cappel, Padre Associates, Inc. (lcappel@padreinc.com)

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