

Roe, Dilan, Env. Health

From: Roussos, Gregory <Greg.Roussos@WestonSolutions.com>
Sent: Wednesday, April 18, 2018 10:59 AM
To: Nuchims, Eric; Roe, Dilan, Env. Health
Cc: Mike Bowes; rmcanamy@eqm.com; Gary Wofford; Peter Morris
Subject: RE: 1708 Wood Street (Oakland)_Staging Area for EPA Clean-up of Bercovich Lead Smelter Site
Attachments: sample locations.pdf; FINAL Bercovich SAP.pdf

Attached is the Sampling and Analysis Plan along with a figure depicting the sample locations. We are requesting the lab analyze for TPH-g,d,mo and PAHs along with the analyses listed in the sampling plan.

Surface soil was collected from three locations around the staging area at the breaks in the concrete berm along the perimeter of the parking lot. Another was collected from near the fire hydrant on the corner of Campbell and 17th St.

Greg Roussos

Project Scientist
office: 480.477.4918
cell: 513.604.4797

Weston Solutions

2300 Clayton Road, Suite 900
Concord, CA 94520

 Please consider the environment before printing this material.

From: Nuchims, Eric [mailto:nuchims.eric@epa.gov]
Sent: Tuesday, April 17, 2018 6:52 PM
To: Roe, Dilan, Env. Health <Dilan.Roe@acgov.org>
Cc: Mike Bowes <Mike.Bowes@TRIPointeHomes.com>; Roussos, Gregory <Greg.Roussos@WestonSolutions.com>; rmcanamy@eqm.com; Gary Wofford <g.wofford@yahoo.com>; Peter Morris <peterm@westenvironmental.com>
Subject: Re: 1708 Wood Street (Oakland)_Staging Area for EPA Clean-up of Bercovich Lead Smelter Site

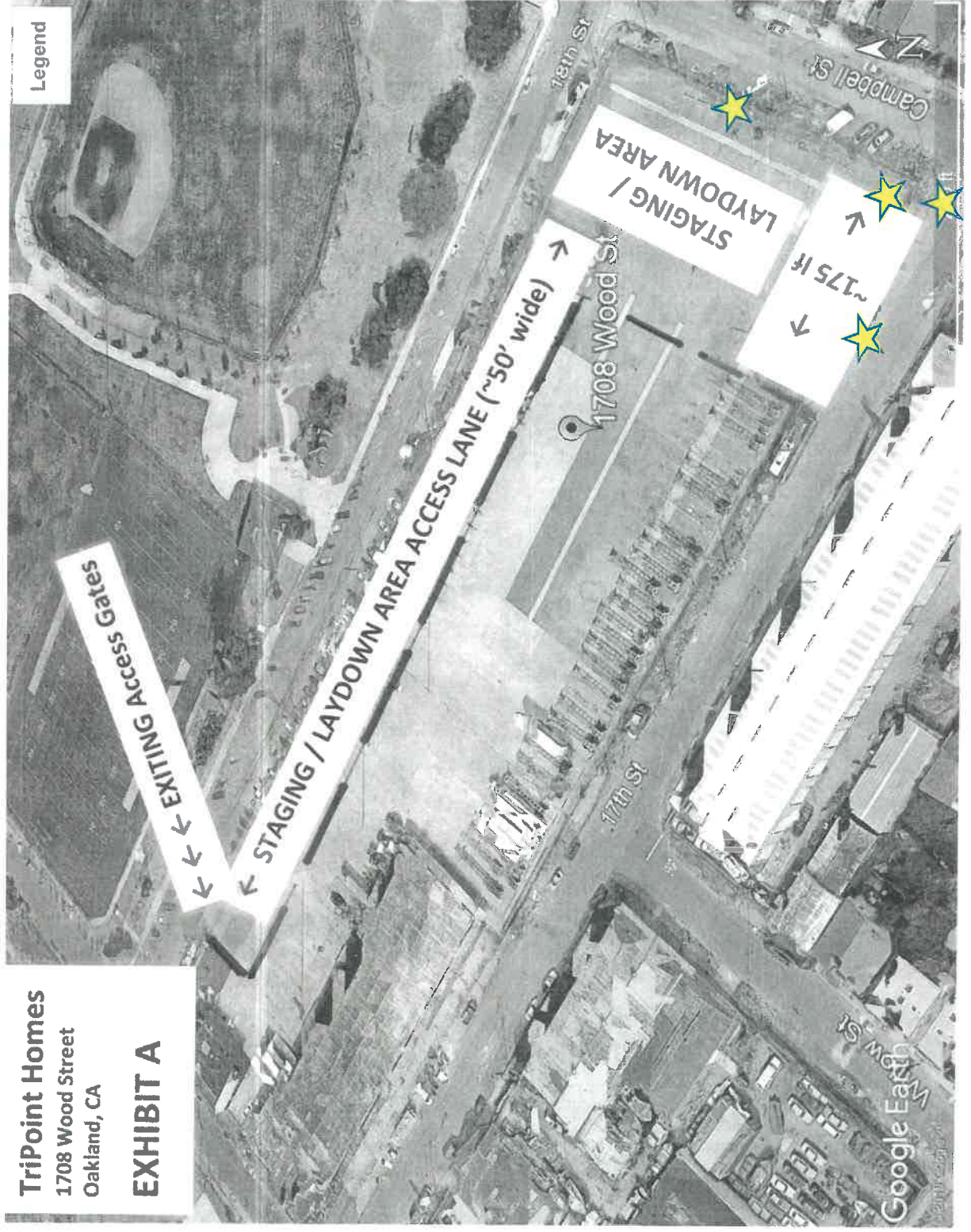
Dilan

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Additionally, Greg as the project manager for this project under the Superfund Technical Assistance and Response Team (START) contract with the United States Environmental Protection Agency will be responsible for documenting the the whole operation including TriPointe's property (staging area).

Sincerely

Legend



TriPoint Homes
1708 Wood Street
Oakland, CA

EXHIBIT A

FINAL SAMPLING AND ANALYSIS PLAN

Bercovich Lead Smelter Site
Oakland, Alameda County, California



Prepared for:
U.S. Environmental Protection Agency
Region 9

EPA Contract Number: EP-S5-13-02
Document Control Number: 0163-08-ABLP
TDD No. 0002/1302-T2-R9-17-08-0002

April 2018

Prepared by:



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(925) 945-2600

**FINAL
SAMPLING AND ANALYSIS PLAN**

**Bercovich Lead Smelter Site
Oakland, Alameda County, California**

**EPA Contract Number: EP-S5-13-02
Document Control Number: 0163-08-ABLP
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Prepared by: _____ Date: _____
Greg Roussos, Project Manager
Weston Solutions, Inc.

Reviewed by: _____ Date: _____
Anne Busher, Quality Assurance Coordinator
Weston Solutions, Inc.

Approved by: _____ Date: _____
Eric Nuchims, Federal On-Scene Coordinator
U.S. Environmental Protection Agency, Region 9

TABLE OF CONTENTS

1.	INTRODUCTION.....	1
1.1	PROJECT ORGANIZATION	1
1.3	DISTRIBUTION LIST	3
1.4	STATEMENT OF THE SPECIFIC PROBLEM.....	3
2.	BACKGROUND	4
2.1	SITE LOCATION AND DESCRIPTION	4
2.2	SITE GEOLOGY	4
2.3	SITE HISTORY	4
2.4	PREVIOUS INVESTIGATIONS AND REGULATORY INVOLVEMENT	5
3.	PROJECT AND DATA QUALITY OBJECTIVES (DQO).....	6
3.1	PROJECT TASKS AND SAMPLING OBJECTIVES	6
3.2	BACKFILL MATERIAL AND SOIL SCREENING LEVELS	6
3.3	PARTICULATE MONITORING SCREENING LEVELS	6
3.4	PARTICULATE SAMPLING ACTION LEVELS.....	7
3.5	DATA QUALITY INDICATORS (DQIs)	7
3.6	DATA QUALITY OBJECTIVES (DQOs)	7
3.7	SCHEDULE OF SAMPLING ACTIVITIES	10
3.8	SPECIAL TRAINING REQUIREMENTS/CERTIFICATIONS.....	10
4.	SAMPLING DESIGN AND RATIONALE.....	11
4.1	BACKFILL MATERIAL SAMPLING.....	11
4.2	CONFIRMATION SOIL SAMPLING.....	11
4.3	AIR SAMPLING	12
4.3.1	Background Air Sampling	12
4.3.2	Removal Action Air Sampling.....	12
4.4	CONTAMINANTS OF CONCERN	12
5.	REQUEST FOR ANALYSIS.....	13
5.1	FIELD ANALYSIS	13
5.2	LABORATORY ANALYSIS	13
5.2.1	Soil Samples.....	13
5.2.2	Air Samples.....	13
6.	FIELD METHODS AND PROCEDURES.....	15
6.1	FIELD PROCEDURES	15
6.1.1	List of Equipment Needed	15
6.1.2	Equipment Maintenance	15

TABLE OF CONTENTS (CONTINUED)

6.1.3	Inspections/Acceptance Requirements for Supplies and Consumables.....	15
6.1.4	Logbooks.....	16
6.1.5	Photographs.....	16
6.1.6	Mapping Equipment.....	17
6.2	BACKFILL MATERIAL SAMPLING PROCEDURES.....	17
6.3	SOIL SAMPLING PROCEDURES.....	17
6.3.1	Composite Soil Sampling.....	18
6.3.2	Discrete Point Soil Sampling.....	18
6.4	FIELD XRF ANALYTICAL PROCEDURES.....	18
6.5	PARTICULATE MONITORING PROCEDURES.....	19
6.6	AIR SAMPLING PROCEDURES.....	19
6.7	FIELD DECONTAMINATION PROCEDURES.....	19
7.	DISPOSAL OF RESIDUAL MATERIALS.....	21
8.	SAMPLE IDENTIFICATION, DOCUMENTATION, AND SHIPMENT.....	22
8.1	SAMPLE NOMENCLATURE.....	22
8.2	CONTAINER, PRESERVATION, AND HOLDING TIME REQUIREMENTS.....	22
8.3	SAMPLE LABELING, PACKAGING, AND SHIPPING.....	22
8.4	SAMPLE CHAIN-OF-CUSTODY FORMS AND CUSTODY SEALS.....	23
9.	QUALITY ASSURANCE AND CONTROL.....	24
9.1	FIELD QUALITY CONTROL SAMPLES.....	24
9.1.1	Assessment of Field Contaminants (Blanks).....	24
9.1.1.1	Temperature Blanks.....	24
9.1.2	Assessment of Sample Variability.....	24
9.1.3	Field Analytical QC Samples.....	24
9.1.4	Laboratory QC Samples.....	24
9.1.5	Laboratory Confirmation Samples.....	24
9.2	ANALYTICAL AND DATA PACKAGE REQUIREMENTS.....	25
9.3	DATA MANAGEMENT.....	25
9.4	DATA VALIDATION.....	26
9.5	FIELD VARIANCES.....	27
9.6	ASSESSMENT OF PROJECT ACTIVITIES.....	27
9.6.1	Assessment Activities.....	27
9.6.2	Project Status Reports to Management.....	27
9.6.3	Reconciliation of Data with DQOs.....	27
10.	REFERENCES.....	29

LIST OF TABLES

Table 1-1	Key Project Personnel Contact Information
Table 3-1	Screening Levels and Data Quality Indicator Goals for Soil
Table 3-2	Screening Levels and DQI Goals for Particulate Monitoring in Ambient Air
Table 3-3	DQI Goals for Particulate Sampling in Ambient Air by SW-846 Method 6010B
Table 5-1	Sample Analysis and Information - Soil and Air

LIST OF FIGURES

Figure 1	Site Location Map
Figure 2	Site Layout Map and Sampled Parcels
Figure 3	Removal Assessment Sampling Results

LIST OF APPENDICES

Appendix A	Site Specific Health and Safety Plan
Appendix B	Standard Operating Procedures
Appendix C	EPA Method 6200: Field Portable X-Ray Fluorescence Spectrometry for the Determination of Elemental Concentrations in Soil and Sediment

Roe, Dilan, Env. Health

From: Ronald McManamy Jr <rmcmanamy@eqm.com>
Sent: Tuesday, April 17, 2018 7:51 PM
To: Roe, Dilan, Env. Health
Cc: Nuchims, Eric; Mike Bowes; Greg.Roussos@WestonSolutions.com; Gary Wofford; Peter Morris
Subject: Re: 1708 Wood Street (Oakland)_Staging Area for EPA Clean-up of Bercovich Lead Smelter Site

Thanks for the guidance. Please let me inject that we appreciate Tri Pointe Holmes effort supporting the removal of impacted soils from these residents properties, reducing the duration of the site and burden to the community. Their generous offer of time and use of the property is charitable to this community and we hope to provide for these requirements to reduce their financial burden. Most importantly, we do not want to complicate the relationship of the County and Tri Pointe Holmes having them support this good work. Please be patient with with this process.

Respectfully,

Ron

Sent from my iPhone

On Apr 17, 2018, at 7:09 PM, Roe, Dilan, Env. Health <Dilan.Roe@acgov.org> wrote:

Good Evening Eric - I trust that the EPA has well documented plans and protocols for managing and conducting the lead removal project. Please understand the County's need for the same plans and protocols at the "staging area" site that we are providing regulatory oversight for Corrective Action to facilitate redevelopment. Please be sure to provide complete plans and protocols specific to the "staging area" site.

Dilan

Sent from my iPhone

On Apr 17, 2018, at 6:51 PM, Nuchims, Eric <nuchims.eric@epa.gov> wrote:

Dilan

I will have Greg provide you with a copy of our site specific sampling plan for the site (Greg please redact any PII if necessary from the plan). It will most likely have an addendum given the additional analyses and our project timeframe and we'll share that with you when it is ready. As far as locations at the staging area these are/ will be sample locations of opportunity that will also be used to illustrate the pre and post site conditions.

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Sincerely

Roe, Dilan, Env. Health

From: Roe, Dilan, Env. Health
Sent: Tuesday, April 17, 2018 5:56 PM
To: Mike Bowes
Cc: Greg.Roussos@WestonSolutions.com; Eric Nuchims; rmcmanamy@eqm.com; Gary Wofford; Peter Morris
Subject: Re: 1708 Wood Street (Oakland)_Staging Area for EPA Clean-up of Bercovich Lead Smelter Site

Hi Mike: It appears that the majority of my comments have been addressed with the exception of details on pre and post sample locations and sampling and analysis protocols. The document needs to provide a figure with pre/post staging area sampling locations, and specify sample types (e.g., discrete versus composite), collection protocols (e.g., decontamination procedures, laboratory supplied containers, storage in ice, etc), analytical laboratory methods, etc. This information is standard practice to provide. I advise that you have your consultant Engeo review the documents and my comments to help ensure that the requisite information has been included. Additionally, I request that Engeo provide oversight of the operations to ensure that the staging operations do not impact the site.

Dilan

Sent from my iPhone

On Apr 17, 2018, at 3:53 PM, Mike Bowes <Mike.Bowes@TRIPointeHomes.com> wrote:

Hi Dilan,

Please see the attached updated Work Plan. The "...Tracked Changes" version shows the changes that were made in blue text. Let us know if you have any further questions or comments.

Thank you.

Mike Bowes

Senior Project Manager

p. 925.804.2258

c. 925.383.2945

From: Mike Bowes

Sent: Monday, April 16, 2018 8:48 AM

To: 'Roe, Dilan, Env. Health' <Dilan.Roe@acgov.org>

Cc: Greg.Roussos@WestonSolutions.com; Eric Nuchims <nuchims.eric@epa.gov>; rmcmanamy@eqm.com; Gary Wofford <g.wofford@yahoo.com>; Peter Morris <peterm@westenvironmental.com>

Subject: RE: 1708 Wood Street (Oakland)_Staging Area for EPA Clean-up of Bercovich Lead Smelter Site

Hi Dilan,

Thank you for reviewing the work plan over the weekend. We will respond with the required information shortly.

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Attachments: Bercovich_Staging Area Work Plan_04-17-2018.pdf; Bercovich_Staging Area Work Plan_04-17-2018.docx; Bercovich_Staging Area Work Plan_04-17-2018_Tracked Changes.docx

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Thank you.

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From: Roe, Dilan, Env. Health [<mailto:Dilan.Roe@acgov.org>]
Sent: Sunday, April 15, 2018 7:38 PM
To: Mike Bowes <Mike.Bowes@TRIPointeHomes.com>
Cc: Greg.Roussos@WestonSolutions.com; Eric Nuchims <nuchims.eric@epa.gov>; rmcmnamy@eqm.com; Gary Wofford <g.wofford@yahoo.com>; Peter Morris <peterm@westenvironmental.com>
Subject: Re: 1708 Wood Street (Oakland)_Staging Area for EPA Clean-up of Bercovich Lead Smelter Site

Hi Mike - I have reviewed the documents sent over and do not see any issues with the proposed use of your property. However additional information needs to be provided to address the following items:

Bercovich Lead Smelter Site
Staging Area Operations SUMMARY
Page 1 of 2

The physical address for the property containing the staging area and associated access lane for the upcoming Bercovich Lead Smelter Site is 1708 Wood Street in Oakland, CA. The staging area and access lane occupy only a portion of said property. The staging area is located immediately adjacent to Campbell Street; measuring ~175' deep across the entire ~230' width of the property, and the access lane is located along the north side of the property adjacent to 18th Street; measuring ~50' wide, connecting the staging area to the existing facility access gates located near in the northwest corner of the property.

Reference Exhibit A, a plot plan generated from an aerial photo of the property depicting the proposed staging area and access lane.

Reference Exhibit B, a plot plan depicting the proposed staging area "footprint".

The staging area shall be used for staging an office trailer, with generator, Conex storage container, portable sanitary facilities, trash bin, import materials, empty roll-off bins, and in the event of a scheduling crisis, filled roll-off bins properly tarped and prepared for transport via the public right-of-way. In addition, it may be necessary to temporarily relocate tractor trailers; trailers, ONLY, from the Issa Transport Services facility, located nearby at 1639 18th Street, to allow space needed for a temporary access lane along the east boundary of their property. Ingress and egress to the staging area shall be marked with signage stating "EPA Staging Area" at the existing main access gates to the facility, located near the northwest corner of the facility. Additionally, EQM will have a banner on the trailer with an operated 24 hour telephone number presented on the outside for questions and emergency contact. Site sign in sheets and information will be gathered as appropriate during business hours. Onsite security will be able to reach site personnel as appropriate after standard working hours. Temporary chain link fence panels shall installed to delineate the inside boundaries of the access lane and staging area, limiting staging area operations to the pre-determined "footprint". There will be 24-hour Security for the staging area, beginning on Tuesday, 17 April 2018 and continuing until project completion. Upon completion of clean-up operations associated with the adjacent Bercovich Lead Smelter Site, the staging area and access lane shall be broom swept and the temporary fence panels shall be removed, returning the property to pre-staging area conditions.

Bercovich Lead Smelter Site
Staging Area Operations SUMMARY
Page 2 of 2

Examples of anticipated trucking operations associated with the staging area are as follows;

- Importing clean backfill materials directly from the supplier to stockpile [Please reference the Analytical Report provided by the supplier],
- Exporting clean backfill materials, as needed, to each of the respective properties being cleaned-up,
- Importing and temporarily staging empty 20-cy capacity bins directly from the T&D subcontractor,
- Transporting empty bins, as needed, to each of the respective properties being clean-up, and
- Importing and temporarily staging filled, *secured* bins to await transport to the disposal facility by the T&D subcontractor.

In addition to trucking operations, clean imported backfill materials shall be moisture conditioned, as needed, before being exported to the respective properties. A 500-gallon water wagon and 2k-gallon capacity water truck shall be utilized for moisture conditioning and dust suppression to meet the EPA “Zero Fugitive Dust” standard.

Surface water control related to the stockpiled materials will include Best Management Practices (BMP) to forestall sediment migration during daily operations or weather events. Engineering controls may include covering stock piles with 4 or 6 mil poly sheeting with appropriate anchors or sand bags to secure the cover preventing wind and rain driven migration. All storm water runoff areas shall pass through an appropriate sediment removal BMP before leaving the construction site or prior to being discharged to storm drains. The specific BMPs to be used for controlling sediment on this project include:

- Straw Waddles or Bale Barriers
- Silt Fence from off capped areas
- Storm Drain filter fabric Inlet Protection as appropriate

All pollutants including waste materials that occurs onsite shall be handled and disposed of in a manner that does not cause contamination of the site surface, impact media off the site surface or impact storm water. Good housekeeping and preventative measures will be taken to ensure that the site will be kept clean, well-organized, and free of debris.

Vehicles, construction equipment, and/or petroleum product storage/dispensing:

- All vehicles, equipment, and petroleum product storage/dispensing areas will be inspected regularly to detect any leaks or spills, and to identify maintenance needs to prevent leaks or spills.
- On-site fueling tanks and petroleum product storage containers shall include secondary containment.
- Spill prevention measures, such as drip pans, will be used when conducting maintenance and repair of vehicles or equipment.
- In order to perform emergency repairs on site, temporary plastic will be placed beneath and, if raining, over the vehicle.
- Contaminated surfaces shall be cleaned immediately following any discharge or spill incident.
- Any soils spilled from the 20 yard roll off containers shall be reported to EPA immediately for required reporting.

Pre and post site activities will provide for Soil samples to be collected from areas adjacent to the staging area to show the potential runoff from the staging area. Sampling locations will be determined based on field recognizance of the existing topography and field conditions. Samples will be collected at/near the surface (0-2 inches in depth) at each location (On site investigation and observations have found no soil/surface sediment were found below two inches). The composite soil samples will be analyzed for volatile organic compounds (VOCs), semi volatile organic compounds (SVOCs), metals, total petroleum hydrocarbons (TPH) -d, -g, and -mo, polycyclic aromatic hydrocarbons (PAHs) and polychlorinated biphenyls (PCBs).

After the removal action is complete and the heavy equipment has been demobilized from the Site, composite soil samples will be collected in the same locations and analyzed for the same analyses. The results from the samples will be compared to see if any residual contamination remains from the removal action activities. If sample results for the post sampling event are elevated above the pre-sampling results, the EPA will implement a plan, in consultation with TRI Pointe and Alameda County, to address the relevant areas that may include, if warranted, the disposal of impacted soil. At completion of the use of the property the EPA will prepare a final report that will include summary tables of analytical data and environmental screening levels and figures showing sample locations. Any confidential business information (CBI) and personally identifiable information (PII) will be redacted from the report.

Exhibit A

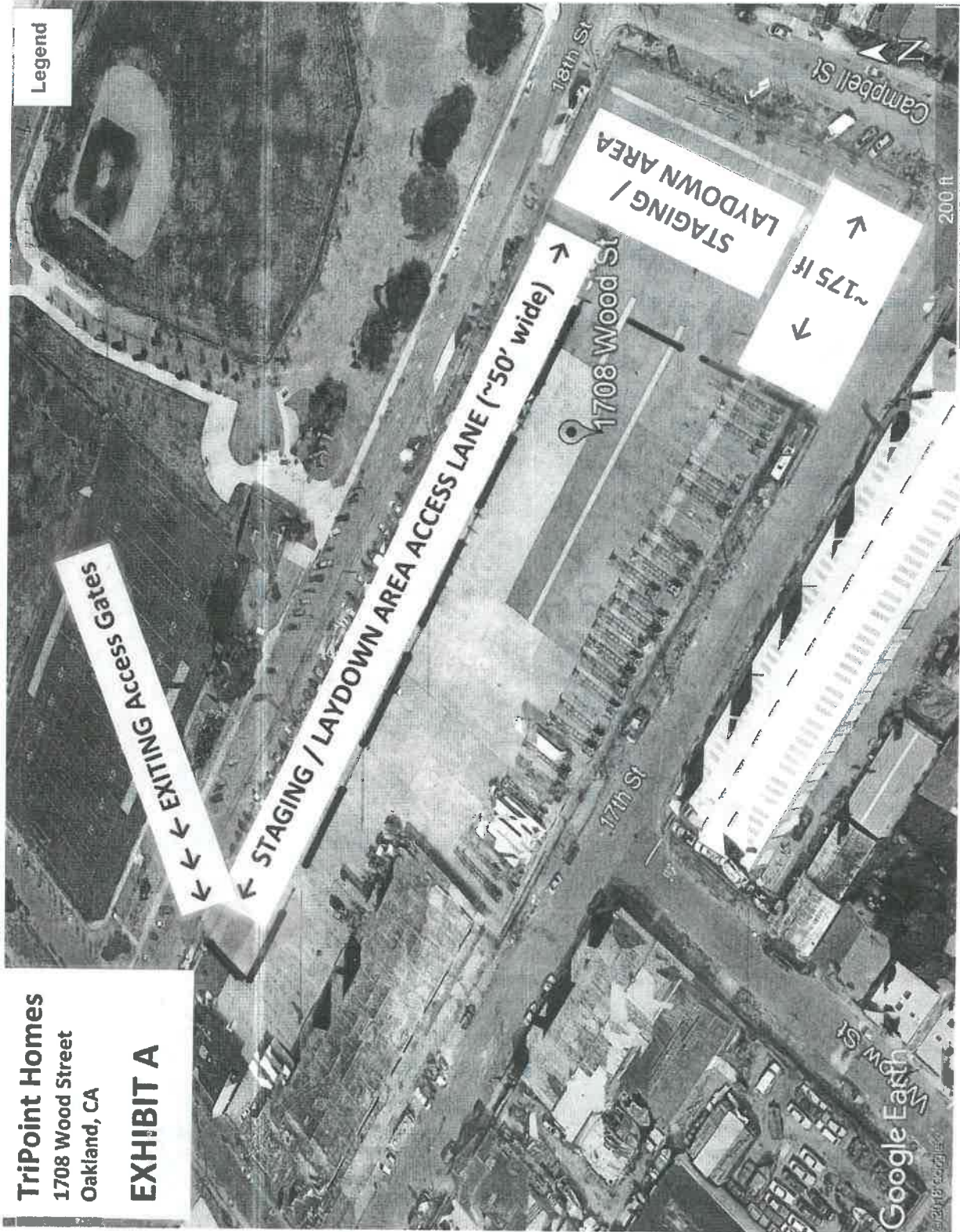
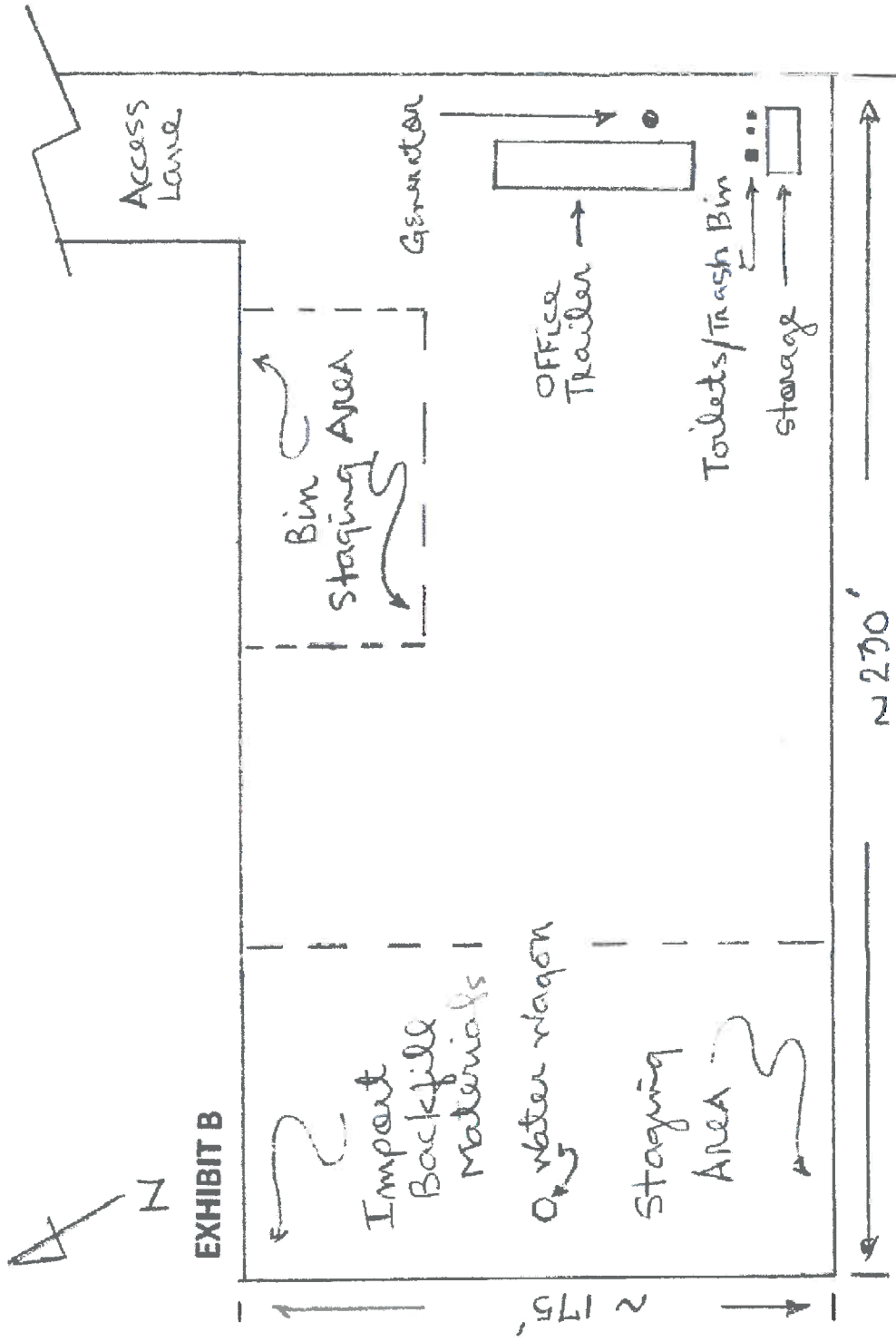


Exhibit B



**Bercovich Lead Smelter Site
Proposed Staging Area Footprint**

Roe, Dilan, Env. Health

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Hi Mike - I have reviewed the documents sent over and do not see any issues with the proposed use of your property. However additional information needs to be provided to address the following items:

1. Locations, depths and methodology for collecting soil samples to confirm that the activities has not impacted your property and step out sampling protocols to define impacts if detected;
2. BMPs for stockpile management and stormwater control;
3. Contingency measures to be implemented to address accidental releases of lead impacted soil from bins or from vehicles being staged at the site (fuel, oil, etc);
4. Signage at the site with contact information and a complaint log.
5. Submittal of a report at completion of use of the property with summary tables of analytical data and environmental screening levels and figures showing sample locations signed and stamped by a professional geologist or civil engineer.

Dilan

Sent from my iPhone


On Apr 13, 2018, at 4:54 PM, Mike Bowes <Mike.Bowes@TRIPointeHomes.com> wrote:

Hi Dilan,

Thank you again for joining us on the call this morning to discuss the use of TRI Pointe's property as a staging area for the above-referenced EPA clean-up project. As you requested, the EPA's team has prepared the attached Work Plan for the staging area for your review. We have also attached the analytical report for the clean import material for your reference. Please "reply-to-all" to this email with any questions or comments, and we look forward to your timely feedback.

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Visit us on: 

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Visit us on: 

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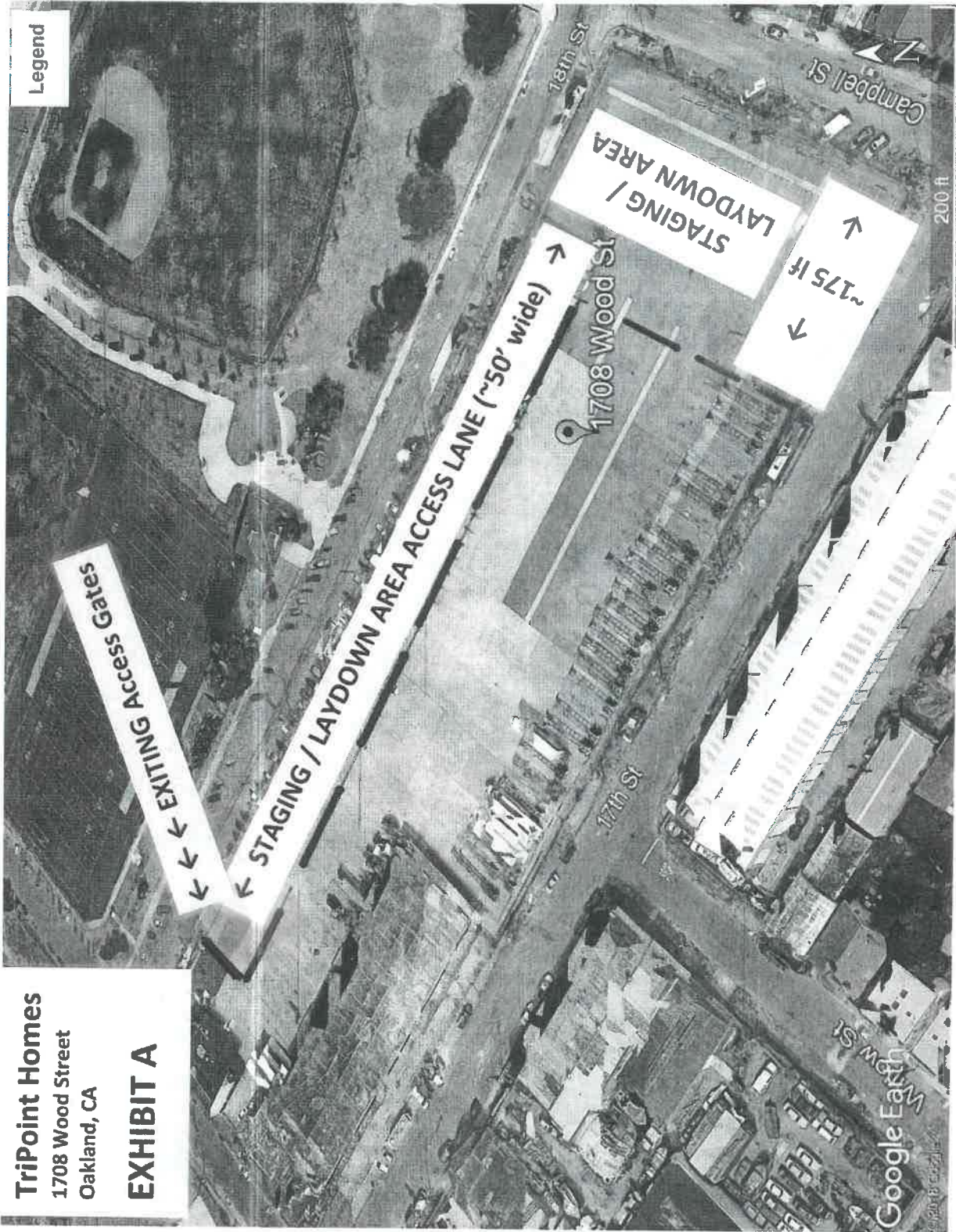
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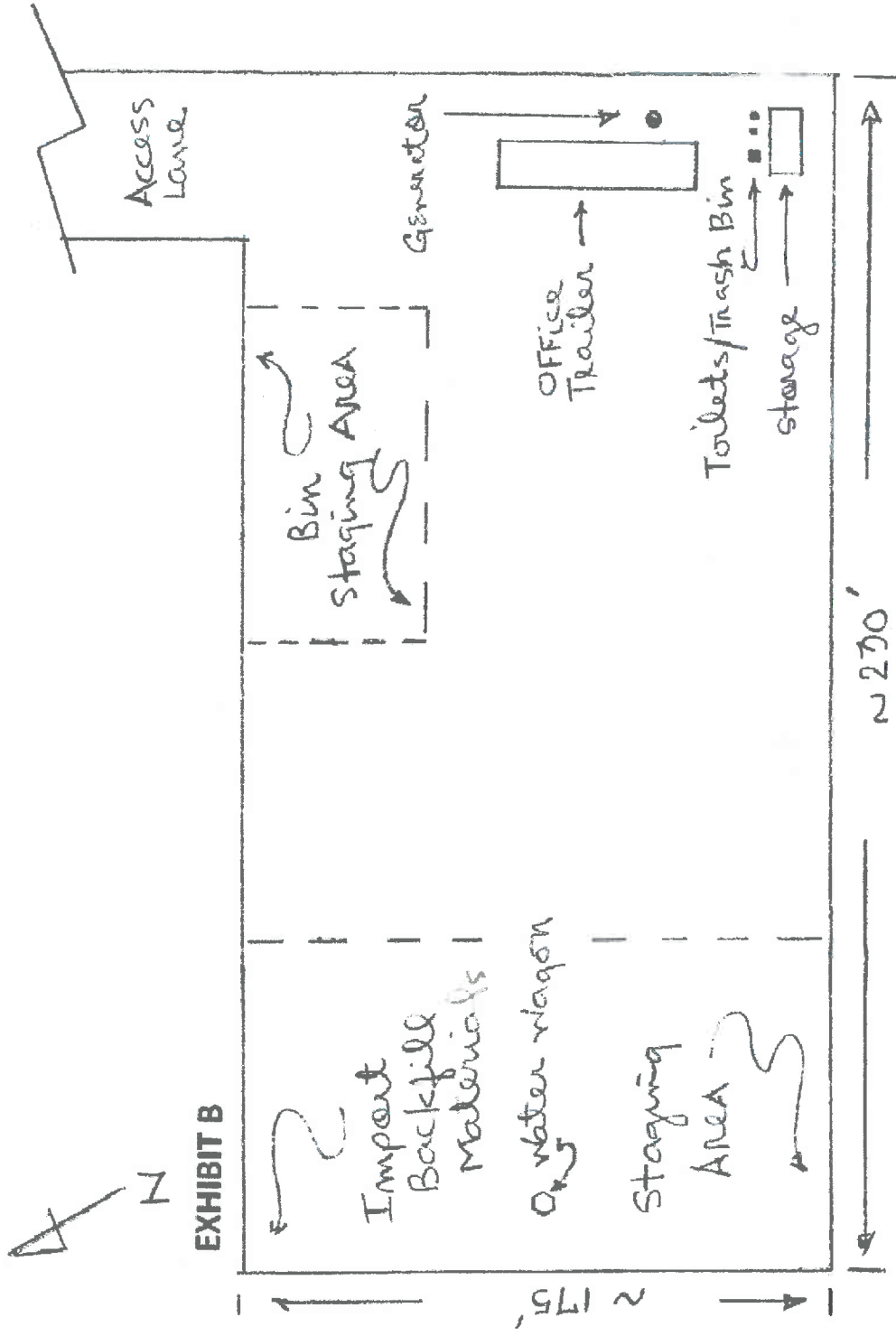
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Exhibit A



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Oakland, CA
EXHIBIT A



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From: Mike Bowes <Mike.Bowes@TRIPointeHomes.com>
Sent: Friday, April 13, 2018 8:57 AM
To: Roe, Dilan, Env. Health
Subject: RE: TRI Pointe_Wood/Campbell St (Oakland)_EPA Clean-up Project
Attachments: 1708 Wood Street_Aerial Photo.pdf

Dilan,

Attached is an Google Earth aerial image of our property and surrounding area that may help during our call.

Mike Bowes
Senior Project Manager
p. 925.804.2258
c. 925.383.2945

From: Mike Bowes
Sent: Friday, April 13, 2018 8:50 AM
To: Roe, Dilan, Env. Health <Dilan.Roe@acgov.org>
Subject: RE: TRI Pointe_Wood/Campbell St (Oakland)_EPA Clean-up Project

Dilan,

A representative from the EPA (Eric Nuchims) and their Contractor ("EQM") will be joining us on the call this morning. I have attached an email from Eric that includes a brief summary of their work plan, including pre and post sampling that they intend to complete. We will discuss their plan in more detail on the call.

<< File: 1708 Wood Street_EPA_Email to TPH_Work Plan_04-05-2018.pdf >>

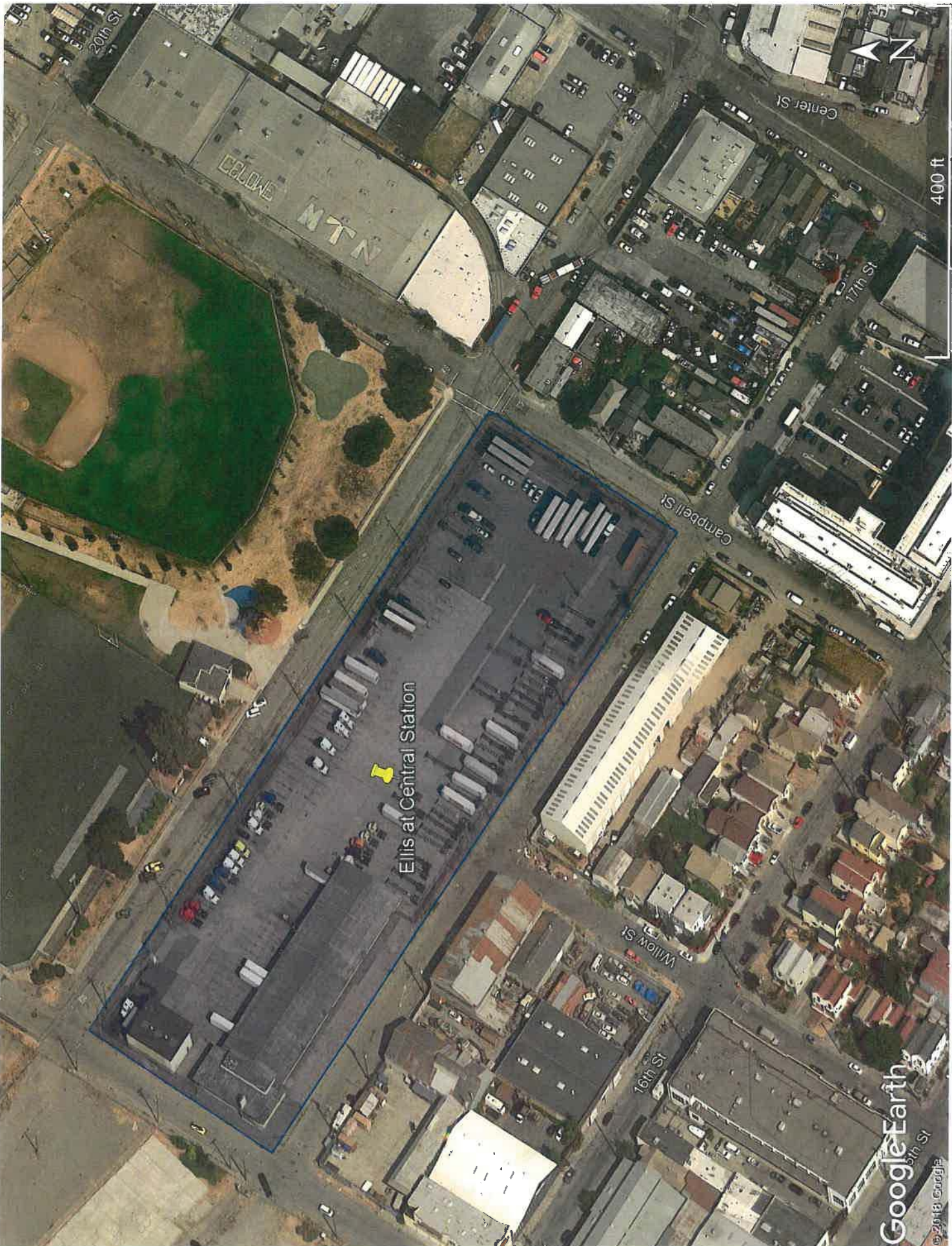
As a reminder, please use the following dial-in information for the call:

Dial-in Number: (917) 942-7963
Participant Code: 102 235 810 58

Mike Bowes
Senior Project Manager
p. 925.804.2258
c. 925.383.2945

-----Original Appointment-----

From: Mike Bowes
Sent: Thursday, April 12, 2018 5:46 PM
To: Mike Bowes; Roe, Dilan, Env. Health
Subject: TRI Pointe_Wood/Campbell St (Oakland)_EPA Clean-up Project
When: Friday, April 13, 2018 9:00 AM-9:30 AM (UTC-08:00) Pacific Time (US & Canada).
Where: Conference Call (Dial-in Information Below)



20th St

CALDWELL
MTN

Center St

400 ft

17th St

Campbell St

Ellis at Central Station

Willow St

16th St

Google Earth

© 2018 Google

Roe, Dilan, Env. Health

From: Mike Bowes <Mike.Bowes@TRIPointeHomes.com>
Sent: Friday, April 13, 2018 8:50 AM
To: Roe, Dilan, Env. Health
Subject: RE: TRI Pointe_Wood/Campbell St (Oakland)_EPA Clean-up Project
Attachments: 1708 Wood Street_EPA_Email to TPH_Work Plan_04-05-2018.pdf

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Mike Bowes

From: Nuchims, Eric <nuchims.eric@epa.gov>
Sent: Thursday, April 5, 2018 4:36 PM
To: Jim Idleman
Subject: Lease Agreement with EQM on behalf of the US EPA at 1708 Wood Street

Importance: High

Jim

It was good to talk to you this afternoon. Per our conversation, I am going to line out our plan to ensure that the US EPA and it's contractors are not going to add any contamination to the property we intend to lease at 1708 Wood Street, Oakland, CA 94607.

We will be taking pre and post occupancy samples from locations where runoff would drain to at the edges of the property. Those samples will be analyzed for Metals (Lead), Volatile Organic Compounds (VOC's), Semi-Volatile Compounds (SVOC's), and Polychlorinated biphenyls (PCB's). Those samples will be analyzed at USEPA's Region 9 Laboratory in Richmond, California.

As far as the soil that we will be removing from parcels right across Campbell Street, the soil will be placed in lined roll-off bins and will before they are moved to 1708 Wood Street they will be fully compliant with DOT regulations and ready for offsite transport. We will also have a street sweeper clean our area of operations after and if needed during our removal action in the neighborhood.

If you would like us to address any further concerns you might have that are within my authority and EQM's ability, please don't hesitate to ask.

On behalf of the EPA, EQM, and the owners and tenants of the homes across from Campbell St, I thank you Jim as well as TriPointe Homes for your willingness to assist our actions in making those homes environmentally safe for children, adults, and pets.

Sincerely

Eric Nuchims
Federal On-Scene Coordinator
U.S. Environmental Protection Agency - Region IX
Superfund - Emergency Response Section
75 Hawthorne Street
Mail Code: SFD-9-2
San Francisco, CA 94105
Desk Phone: 415 972-3252

