

1. **Cleanup Goals.**

a. **Clarify our approach to our consistent method to calculate the clean-up goals that are protective of the students that will be at the site.**

1. Why not use DTSC approved goals. Better for public perception, already in use across the State & thus is consistent with other schools built on former contaminated sites. *Will use DTSC goals.*

b. **Clarify that goal for As is 7 ppm (1.6 – lowest of ESL/DTSC/Student)**

1. *ok*

c. **Confirm that no groundwater cleanup goals have been established for this project.**

1. Why not have GW cleanup goals proposed? If exceeded, then default to vapor goals. The cleanup would appear "complete" IF all three media (soil, GW, and vapor) are adequately assessed. Still must demonstrate GW contaminant plume stability for closure, including demonstrating that plume isn't migrating through utility corridors etc.
2. How could you demonstrate that residual gw contamination would reach water quality objectives in a reasonable time frame? *LFR will address this in the Final CAP.*

2. **Confirmation soil samples. Clarify that we were not anticipating collecting any bottom samples.**

- a. How will you be able to define the vertical extent of soil contamination? Need bottom samples. Especially if no GW cleanup goals are proposed, how will you assess soil cleanup without the samples? *Agreed that no bottom samples for PAHs and metals excavation will be collected because exposure pathway is direct contact and soils below 2 feet would not complete the exposure pathway.*

3. **Institutional Controls. Concluding statement in letter is that institutional controls should not hinder site remediation. We agree. Did County reject proposal to have site occupied prior to meeting cleanup goals?**

- a. ACEH wishes to stress that the site must be cleanup fund and institutional controls must not be the default method to obtain /maintain site occupancy. *Explained last paragraph of the letter that institutional controls are not a substitute for site cleanup.*

IF DTSC MAINTAINED OVERSIGHT, SITE CLEANUP GOALS WOULD HAVE BEEN TO DTSC SCHOOL CALCULATED CLEANUP GOALS. WHY SHOULD THAT BE COMPROMISED NOW THAT ACEH IS THE OVERSIGHT AGENCY.