



County of Santa Cruz

HEALTH SERVICES AGENCY

701 OCEAN STREET, ROOM 312, SANTA CRUZ, CA 95060-4073

(831) 454-2022 FAX: (831) 454-3128

<http://www.co.santa-cruz.ca.us/>

ENVIRONMENTAL HEALTH

August 29, 2018

Phil and Martha Oneto
c/o: Mr. Robert E. Bosso
Bosso Williams, A Professional Corporation
rbosso@bossowilliams.com

SUBJECT: *Response to Remedial Action Completion Report and First Quarter 2018 Grab Groundwater and Soil Vapor Monitoring Report and Associated Documents, E. 5th Street Warehouse Property (GeoTracker Global ID T10000008129), 25 E. 5th Street, Watsonville, CA*

Dear Mr. and Mrs. Oneto:

The County of Santa Cruz Environmental Health Division (CSCEHD) has reviewed the following documents for the subject site: (1) *Remedial Action Completion Report (RACP*, dated January 5, 2018, by Weber, Hayes & Associates [WHA]); (2) *Semi-Annual Grab Groundwater and Soil Vapor Monitoring – First Quarter 2018 (Monitoring Report*, dated April 30, 2018, by WHA); and (3) waste disposal documentation for the semi-annual monitoring (received by email on June 29, 2018 by WHA). Thank you for the submittals. This letter presents our response.

Please note that our agency also received a draft *Covenant and Environmental Restriction on Property* (dated January 11, 2018, by WHA) and a draft *Site Environmental Management Plan* (dated January 9, 2018, by WHA). We are deferring review of these documents until at least the results of the next semi-annual monitoring event are reported to our agency, WHA recommends case closure, and new current drafts of these documents are submitted.

Both the *RACP* and the *Monitoring Report* are acceptable to our agency. We are providing the following comments to assist with the path forward:

- Our agency concurs with the recommendations in the *Monitoring Report* to collect and analyze one additional round of grab groundwater and soil vapor samples. We understand that your consultant will be performing that fieldwork in September 2018. Depending on the results of that monitoring event, additional groundwater and/or soil vapor monitoring may or may not be warranted.
- We concur with the recommendation in the *Monitoring Report*, that because SV-1 at 5 feet appears to be compromised, to install a new 5-foot soil vapor sample probe near the existing soil vapor well for collection of a soil vapor sample. Care should be taken to not install the new vapor probe so close to the existing SV-1 that breakthrough could occur by short circuiting through SV-1.

- We concur with the comment in the *Monitoring Report* that once the conditions at the site are confirmed to be appropriate for issuance of a “no-further-action” determination, that the issuance will be conditional on recording and implementing an appropriate environmental deed restriction and a site environmental management plan.
- If, and when, your consultant believes it is appropriate and recommends case closure from our agency based on the monitoring results and site conditions, they should summarize and discuss the site conditions relative to all land-use scenarios and exposure pathways so that we have a full understanding of these parameters and so we can be certain that the planned deed restriction is protective.
- WHA comments in the two reports that elevated groundwater monitoring results for GW-1 and GW-3 correlate with similar order of magnitude groundwater concentrations at the Jalisco Restaurant property monitoring well network, indicating a relatively small, low-concentration groundwater plume. In future monitoring reports, please provide and contrast the results from 618 Main Street relative to elevated chemicals concentrations at 25 E. 5th Street and indicate the distribution of the elevated plume(s)
- During the review of semi-annual soil vapor monitoring in the *RACR*, WHA comments, “All detected concentrations were several orders of magnitude below the Risk Based Soil Gas Screening Levels (RBSLs) developed for the adjacent Jalisco Restaurant property”. If you would like to use the RBSLs for decision making for 25 E. 5th Street going forward, please provide a review of how the RBSLs were calculated for the adjacent site and an assessment of their applicability for the site at 25 E. 5th Street.
- Our agency has named this case “E. 5th Street Warehouse Property” in GeoTracker and in county records. To avoid confusion, we recommend that all parties use this same name going forward on applicable reports and correspondence.

General Comments

- In accordance with Title 23 of the California Code of Regulations, you are required to complete Electronic Submittal of Information (ESI) reporting for all applicable documents and data, including data in Electronic Deliverable Format (EDF), to the SWRCB GeoTracker database. Refer to the GeoTracker web page for electronic reporting requirements at http://www.waterboards.ca.gov/ust/electronic_submittal/index.shtml.
- Our agency requires notification of all field dates, estimated start and end times, field contact person, and contact-person phone number at least 5 business days in advance of all field activities.

You are responsible for continuing the proposed semi-annual groundwater and soil vapor monitoring in accordance with our previous letter to you dated March 8, 2017 (Revised). Your next monitoring report is due to our agency, DTSC, and GeoTracker by **October 30, 2018**. If your consultant recommends case closure at that time based on site conditions, you are also responsible for submitting a draft *Site Environmental Management Plan* and a draft *Covenant and Environmental Restriction on Property* **by October 30, 2018**. The copies for our agency should be submitted electronically directly to my email (Scott.Carson@santacruzcounty.us). If you have any comments or questions regarding this letter, you may contact me at the above email address or at (831) 454-2758, 8:00 a.m. to 9:30 a.m., Monday through Friday.

Sincerely,



Scott E. Carson, P.G., C.E.G.
Professional Geologist
County of Santa Cruz Health Services Agency
Environmental Health Division
Site Mitigation Program
701 Ocean Street, Suite 312
Santa Cruz, CA 95060

Cc: Mr. Jered Chaney, Weber, Hayes & Associates (jered@weber-hayes.com)
Mr. Henry Chui, DTSC (HChui@dtsc.ca.gov)
Mr. Pat Hoban, Weber, Hayes & Associates (pat@weber-hayes.com)
Phil and Martha Oneto, 102 Carl Avenue, Santa Cruz, CA 95062-1322