Department of Toxic Substances Control

Matthew Rodriquez
Secretary for
Environmental Protection

Deborah O. Raphael, Director
700 Heinz Avenue
Berkeley, California 94710-2721

Edmund G. Brown Jr.
Governor

January 9, 2014

Ms. Eileen Fanelli
Environmental Remediation Program Manager
The Presidio Trust
103 Montgomery Street
P.O. Box 29052
San Francisco, California 94129-0052

Dear Ms. Fanelli:

Lendrum Court (Site) is a residential area located in the northwest corner of Area B at the Presidio of San Francisco. In 2010, The Presidio Trust (Trust) excavated 3 trenches at the Site to investigate broken glass that was observed at the ground surface throughout the Site. At one trench, the Trust encountered a debris and ash layer. Dioxins, furans, and polycyclic aromatic hydrocarbons were detected in a composite sample taken from the debris and ash layer. This information was submitted to the Department of Toxic Substances Control (DTSC) in December 2012, and in February 2013, DTSC directed the Trust to prepare a Preliminary Endangerment Assessment Workplan (PEA Workplan). The PEA Workplan was approved by DTSC in June 2013.

On December 2, 2013, the Trust submitted to DTSC the draft *Lendrum Court Investigation Summary Report and Screening Risk Evaluation, Presidio of San Francisco, California,* dated November 2013 (Report). The Report summarizes the results of soil sampling that was outlined in the DTSC-approved PEA Workplan, dated May 2013. DTSC uses a risk-based lead soil screening level of 80 milligrams per kilogram (mg/kg) for residential land use. Lead was detected in Lendrum Court surface soils at concentrations as high as 1,000 mg/kg. Of the 17 surficial soil samples that were collected from a depth of 0.5 to 1 foot below ground surface, the lead concentration in 12 samples exceeded the 80 mg/kg lead screening level. Finally, the Report states that the calculated exposure point concentration (95 percent confidence limit of the arithmetic mean) of lead in shallow soils is 615 mg/kg.

Based on the reported lead levels and the complete exposure pathway, it appears that surface soils at Lendrum Court present a potential human health risk to Lendrum Court residents. Therefore, DTSC requests that the Trust submits a technical memorandum proposing an action to minimize exposure while a final remedial action is developed.

DTSC's comments on the Draft *Lendrum Court Investigation Summary Report and Screening Risk Evaluation*, dated November 2013, will be transmitted under separate cover.

If you have any questions or comments, please contact me at (510) 540-3879 or at George.Chow@dtsc.ca.gov.

Sincerely,

George Chow
Project Manager
Brownfields and Environmental Restoration Program
Berkeley Office

cc: Mr. Brian Ullensvang
Brian_Ullensvang@nps.gov

Ms. Agnes Farres
Agnes.Farres@waterboards.ca.gov

Mr. Doug Kern
dougkern@sbcglobal.net

Mr. Mark Youngkin
rabmark@sbcglobal.net

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Dear Ms. Fanelli:

On December 2, 2013, the Trust submitted to The Department of Toxic Substances Control (DTSC) the draft *Lendrum Court Investigation Summary Report and Screening Risk Evaluation, Presidio of San Francisco, California,* dated November 2013 (Report). The Report summarizes the results of soil sampling that was outlined in the DTSC-approved Preliminary Endangerment Asesssment Workplan, dated May 2013. DTSC's comments on the Report are provided below.

1. Please add a section that summarizes the assessment of community concerns and the public participations activities that have occurred and are planned.
2. Please add a section that identifies deviations from the May 2013 Work Plan, and the related reasoning or justifications.
3. Footnote 6 – List the reference for the EPA recommendation provided in this footnote.
4. The playground near Lendrum Court was sampled in December 2013. Please include the methods and results of the play area sampling in the Report for DTSC's review.
5. Polycyclic aromatic hydrocarbon (PAH) discussion in Sections 7-8 (Summary of Analytical Results, Potential Chemicals of Concern, Screening Risk Evaluation)
    a. Please use the toxicity equivalence factors from Section 2.3.5 of the November 2013 User's Guide for EPA Region 9 Regional Screening Levels (http://www.epa.gov/reg3hwmd/risk/human/rb-concentration_table/usersguide.htm) to calculate benzo(a)pyrene (BAP) equivalents for carcinogenic PAHs for each sample and report in Table 3.
    b. Please also include BAP equivalents in the discussion and table when comparing sample results with BAP screening and background levels.

Comparison of BAP equivalence values to screening levels will influence the determination of whether PAHs are Contaminants of Concern (COCs).

c. Please present the range of background BAP, as opposed to listing only the upper tolerance limit.

6. Dioxins and Furans. At this time, there is insufficient information to determine whether dioxins and furans are COCs. Please add a section identifying data gaps to be addressed in further investigations.
7. Limits of the debris area. The approved PEA Work Plan says that trenches 205-215 will be used to define the edges of the debris area.
    a. From looking at trench logs, it appears that trees may have obstructed the extension of some of these trenches. Please explain in the text where trees or other factors prevented the extension of trenches to reach 1-10% debris, as prescribed in the approved Work Plan.
    b. In the report, please add a section identifying which trenches, if any, appear to have determined the limits of the debris and identify on a figure.
8. The final PEA Work Plan said, "The Trust plans to collect discrete soil samples of the material from the trench at approximately 10% and 1% debris levels of each trench using a backhoe bucket or manually, if the excavation is safe to enter. Soil samples will generally be collected in the center of the horizons to be tested, at least one foot below ground surface. Soil samples from the approximate 1% debris zone will be collected and extracted (to allow preservation to meet analytical holding times), but will only be analyzed if samples from the approximate 10% debris zone exceed site-specific cleanup levels." Please clarify in the report whether this was achieved during field activities, and clarify whether the debris samples in Tables 2-4 represent a 10% debris zone or a 1% debris zone. It seems that most debris samples do exceed site-specific cleanup levels.

If you have any questions or comments, please contact me at (510) 540-3879 or at George.Chow@dtsc.ca.gov.

Sincerely,

George Chow
Project Manager
Brownfields and Environmental Restoration Program
Berkeley Office

cc: See next page.

cc: Mr. Bruce Handel
Bruce.Handel@usace.army.mil

Mr. Brian Ullensvang
Brian_Ullensvang@nps.gov

Ms. Agnes Farres
Agnes.Farres@waterboards.ca.gov

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