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6 November 2014

Ms. Carmen D. Santos
PCB Coordinator
RCRA Corrective Action Office
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94105

Subject: **DRAFT** - Work Scope to Support Risk-based Closure Application
Sanitary District No. 1 of Marin County
Former Wastewater Treatment Plant, 2000 Larkspur Circle, Larkspur, CA
K/J 1365028*00

Dear Ms. Santos:

Per the request made by Region 9 of the United States Environmental Protection Agency (USEPA), the Ross Valley Sanitary District No. 1 (District) submitted a risk-based cleanup application to the USEPA on 26 July 2014, in accordance with Toxic Substances Control Act (TSCA) regulations for polychlorinated biphenyls (PCBs) under 40 Code of Federal Regulations (CFR) 761.61(c). The application proposed the interim use of approximately 5 acres of the 2000 Larkspur Landing Circle, Larkspur, California property (Site) as a commuter parking lot (Figure 1). The USEPA provided preliminary approval of the application on 21 October 2014, pending submittal of additional site characterization and construction information for the various site improvements needed to support the interim parking use. The following work scope is submitted in response to the USEPA's draft preliminary conditions, as specified in a 21 October 2014 email from Carmen Santos (USEPA) to Greg Norby (District). This work scope addresses the request for additional site characterization for the interim parking uses only. Any additional site characterization work necessary to support the final site closure (phase 2 as described in the July 2014 application), will be developed in coordination with EPA as a future effort.

Work Scope

The following four tasks describe the activities that will be conducted to collect and prepare the additional information requested by USEPA.

Ms. Carmen D. Santos
United States Environmental Protection Agency
6 November 2014
Page 2

Task 1 – Surface Soil, Near-surface Soil and Sediment Characterization

The District understands that the purpose of the additional site characterization is to evaluate whether surface or near surface soils contain polychlorinated biphenyls (PCBs) at concentrations that would pose a potential risk to site workers, as well as nearby businesses and residents, as a result of the planned construction activities. Per USEPA's request, the District will collect approximately 18 surface (0 to 3 inches below ground surface [bgs]) and near-surface (12 to 18 inches bgs) soil samples to further evaluate the presence of PCBs in surface and near surface soils prior to construction. Approximately 13 surface soil and 5 near-surface soil samples will be collected from the locations identified on Figure 2. Nine sediment samples will be collected from the on-site catchment, and the drainage swale that exists along the eastern and southern property boundary (Figure 2). Additionally, samples will be collected from four small stockpiles of soil that currently exist on-site. The stockpiled soil will be used as grading material, if characterization results confirm the sediments do not contain significant concentrations of PCBs. Sample collection and laboratory analytical procedures are described below.

Surface soil samples - Surface soil samples will be collected using a pre-cleaned stainless-steel trowel. Prior to collecting the sample, existing vegetation and debris will be removed from the sample location. The sample will then be collected with a clean trowel and transferred to a laboratory-supplied container. The soil will be classified in the field in general accordance with the visual-manual procedure of the Unified Soil Classification System (ASTM D 2488-90). The sample container will be placed in a cooler containing crushed ice, pending delivery to the analytical laboratory. The sample name, date and time of collection will be recorded on the chain-of-custody form that will accompany the samples to the laboratory.

Near-surface and stockpile soil samples - Prior to collecting the near-surface and stockpile samples the upper 4 to 6 inches of soil, vegetation and debris will be removed using a shovel. The soil overburden will then be removed to the pre-determined sample depth using a clean hand auger. The soil sample will be collected using a clean slide hammer lined with a 6-inch long by 2.5-inch diameter stainless steel tube. The slide hammer will be used to drive the sample tube into the undisturbed soil. The sample tube will then be recovered from the boring and removed from the slide hammer. The ends of the sample tube will be covered with Teflon tape and capped with plastic caps. A label will be affixed to the sample tube that identifies the sample name, date and time of collection. The sample tube will be placed in a re-sealable plastic bag, the placed in a cooler containing crushed ice, pending delivery to the analytical laboratory. The sample name, date and time of collection will be recorded on the chain-of-custody form that will accompany the samples to the laboratory.

Catchment basin sediment samples - The four on-site stormwater catchment basins will be inspected prior to conducting the sampling event. If a catchment basin contains a sufficient amount of sediment, a sample will be collected. Sediment samples will be collected using a clean stainless steel trowel, as described above. The sample will be collected from within the drain pipe, if possible, to minimize the collection of non-stormwater related debris that may have collected in the bottom of the catchment basin. The sample will then be transferred to a laboratory-supplied container and placed in a cooler containing crushed ice, pending delivery to

Ms. Carmen D. Santos
United States Environmental Protection Agency
6 November 2014
Page 3

the analytical laboratory. The sample name, date and time of collection will be recorded on the chain-of-custody form that will accompany the samples to the laboratory.

Sediment samples - Three surface sediment samples will be collected from the stormwater swale that exists along the eastern/southern property boundary. Samples will be collected at the approximate locations identified on Figure 2. Samples will be collected using a pre-cleaned stainless-steel trowel. Prior to collecting the sample, existing vegetation and debris will be removed from the sample location. The sample will then be collected with a clean trowel and transferred to a laboratory-supplied container. The soil will be classified in the field in general accordance with the visual-manual procedure of the Unified Soil Classification System. The sample container will be placed in a cooler containing crushed ice, pending delivery to the analytical laboratory. The sample name, date and time of collection will be recorded on the chain-of-custody forms that will accompany the samples to the laboratory.

Equipment decontamination - Prior to collecting each sample, the sampling equipment will be decontaminated by scrubbing with a brush and a solution of potable (bottled) water and phosphate-free soap, then double-rinse it with clean deionized water.

Sample locating - Following completion of the sampling event, the District will contract a California-licensed surveyor to determine the location (longitude and latitude) and elevation of each sample location.

Investigation-derived waste - Wash water will be stored in an appropriate container at the end of the field investigation and disposed in accordance with applicable California laws and regulations.

Laboratory analysis - Samples will be submitted to a California-certified laboratory for analysis of PCBs using USEPA Method 8082A (or latest revision). Prior to analysis, the samples will be extracted and prepared using USEPA Method 3540C. Sample results will be reported on a dry-weight basis. Laboratory analysis will be conducted on a standard 10-day turn-around time.

Task 2 – Construction Specifications

The USEPA has requested that construction means and methods for the parking lot, and ancillary areas, be provided within 30 days of receiving final approval of the Application from the USEPA. Prior to preparing construction specifications, the District is required to request and receive solicitations for the work, select the contractor, and execute the construction contract. The District anticipates the bidding process will require a minimum of 60 days to complete, once it receives formal District Board approval. Therefore, the District proposes to provide the USEPA with the requested construction means and methods at least 60 days prior to the start of construction. The construction means and methods will include a description of any clearing and grubbing activities (including location and depth), grading and parking lot surface preparation, sidewalk construction, stormwater control feature installation, as well as the construction materials to be used. The District understands that the USEPA will review the means and methods to evaluate whether disturbance of any potential PCB-laden soils will result in an adverse risk to site workers, the public, nearby residents, or the environment. The District also understands that the USEPA will not opine on the engineering design or specification for the work. The District presumes that the USEPA will review and provide comments on the

Ms. Carmen D. Santos
United States Environmental Protection Agency
6 November 2014
Page 4

construction means and methods within 30 days of receipt. Any additional time required to review the documents could result in construction delays and impact the construction schedule and costs.

Task 3 – Site Management Plan

The USEPA has requested that the District provide a Construction Site Management Plan (CSMP), and a second Post-construction Monitoring and Maintenance Plan (PMMP) within 30 days of receiving final approval of the Application from the USEPA. As described above, prior to preparing the CSMP and PMMP, the District is required to request and receive solicitations for the work, select the contractor, and execute the construction contract. Therefore, the District proposes to provide the USEPA with the requested CSMP at least 30 days prior to the start of construction, and the PMMP at least 60 days prior to completing construction. The CSMP will:

- Describe activities that will take place on-site during construction.
- Identify any use constraints and site control features.
- Describe applicable dust control and monitoring activities for PCB-impacted soils that may be disturbed during construction.
- Provide contingency measures that the District will undertake in the event elevated PCBs concentrations are identified in soils or sediments (as part of Task 1).
- Decontamination procedures for construction equipment.
- Disposal procedures for PCB-impacted waste.

The PMMP will:

- Describe site inspection activities and schedules.
- Identify potential operation and maintenance procedures to be implemented during the interim use.
- Propose notification and management procedures to be following prior to and immediately after conducting non-routine repairs (e.g., emergency repair of a subsurface utility)
- Provide a template and recommended content for the annual maintenance and monitoring report.

The District presumes that the USEPA will review and provide comments on the CSMP within 30 days of receipt. Any additional time required to review the document could result in construction delays and impact the construction schedule and costs.

Ms. Carmen D. Santos
United States Environmental Protection Agency
6 November 2014
Page 5

Task 4 – Land Use Covenant

The District will provide the USEPA with a draft of the proposed land use covenants (LUCs) within 30 days of approval of this work plan. The District will work with USEPA, the City of Larkspur, the tenant, and the County of Marin (County) to finalize the LUCs and ensure they are recorded with the County prior to the completion of the construction activities.

If you have any questions regarding the above information, please contact me at (415) 243-2448, or Mr. Greg Norby, General Manager of Sanitary District No. 1 of Marin County.

Your prompt attention to this matter is appreciated.

Very truly yours,

KENNEDY/JENKS CONSULTANTS

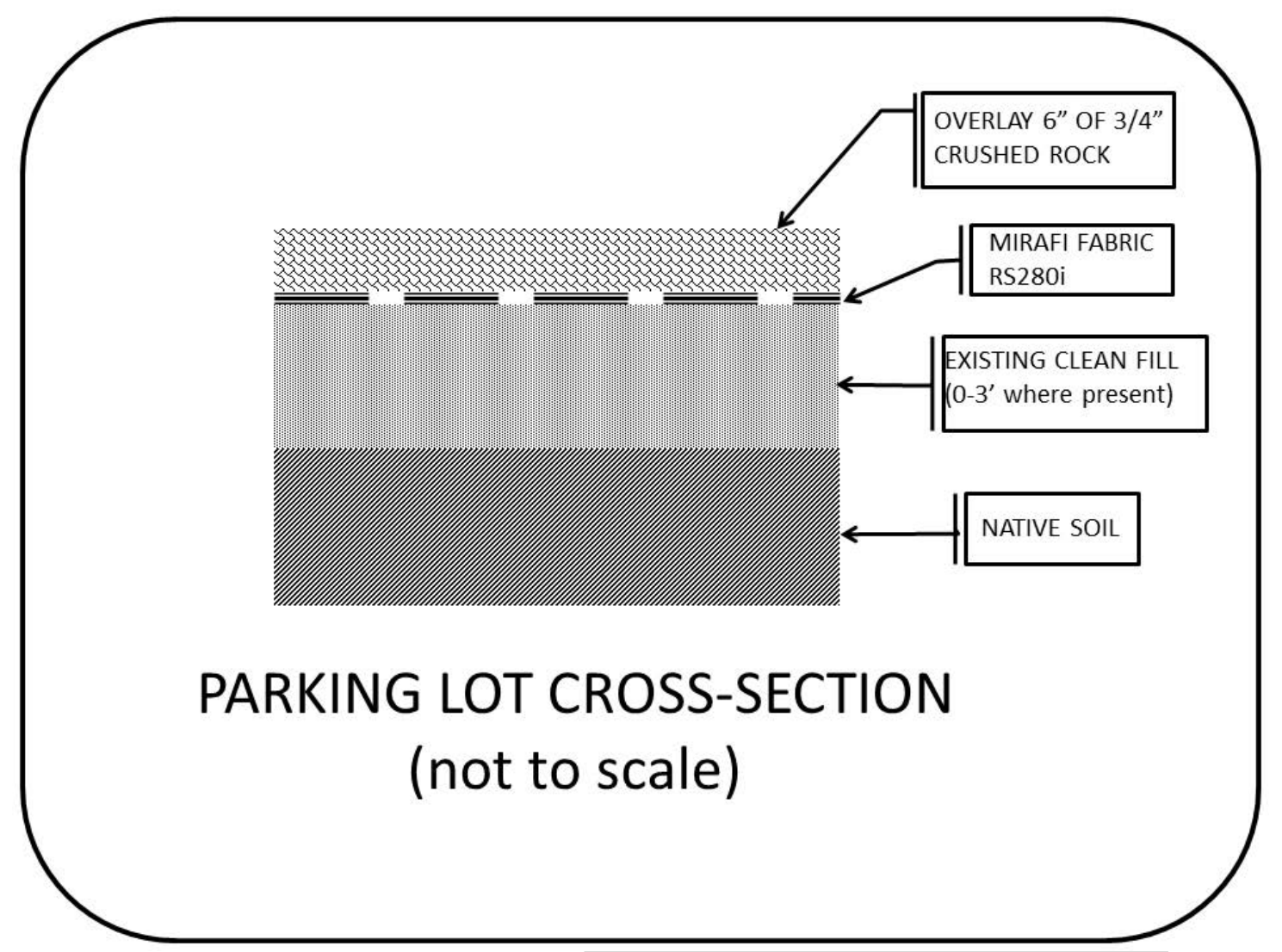
A handwritten signature in blue ink that reads "Todd Miller". The signature is written in a cursive, flowing style.

Todd Miller, CHG
Principal Geologist

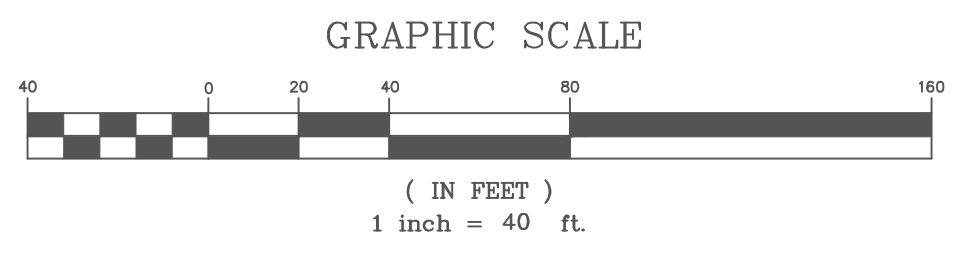
Encs: Figure 1 – Site Plan with Parking Lot Layout (from Application)
Figure 2 – Figure 1 with Sample Locations Identified

cc: Steven Arman, United States Environmental Protection Agency
Alvin Greenberg, Risk Science Associates
Jolie Houston, Berliner•Cohen
Randell Ishii, Sanitary District No. 1 of Marin County
Ivan Lieben, United States Environmental Protection Agency
Greg Norby, Sanitary District No. 1 of Marin County
Christian Picone, Berliner•Cohen
Patrick Wilson, United States Environmental Protection Agency

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- SURVEY NOTES:**
- VERTICAL DATUM IS BASED ON FOUND STREET MONUMENT AT CENTERLINE OF SIR FRANCIS DRAKE BLVD EAST AND LINCOLN CIRCLE. BRASS DISK ELEV.=24.95. PER ROSS VALLEY SANITARY DISTRICT MAP.
 - HORIZONTAL DATUM IS BASED UPON FIELD SURVEY AND RECORD DATA, (17 R.M.5 & 24 O.S. 100)
 - CONTOUR INTERVAL IS 2'.
 - TOPOGRAPHIC SURVEY PERFORMED ON OCTOBER 29, 2012 THROUGH NOVEMBER 1, 2012.



SOURCE:
ORIGINAL DRAWING FROM ILS ASSOCIATES.

LEGEND

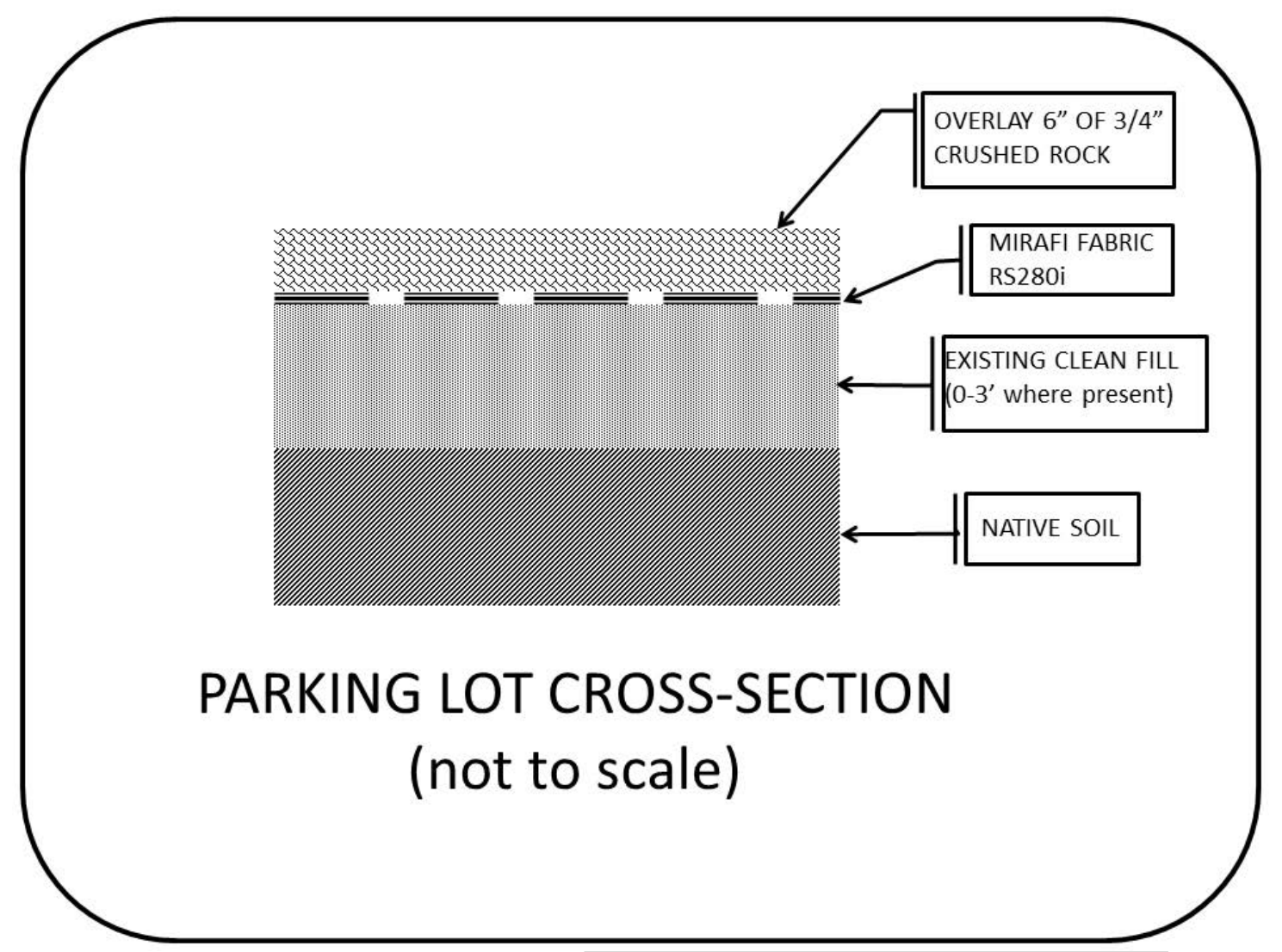
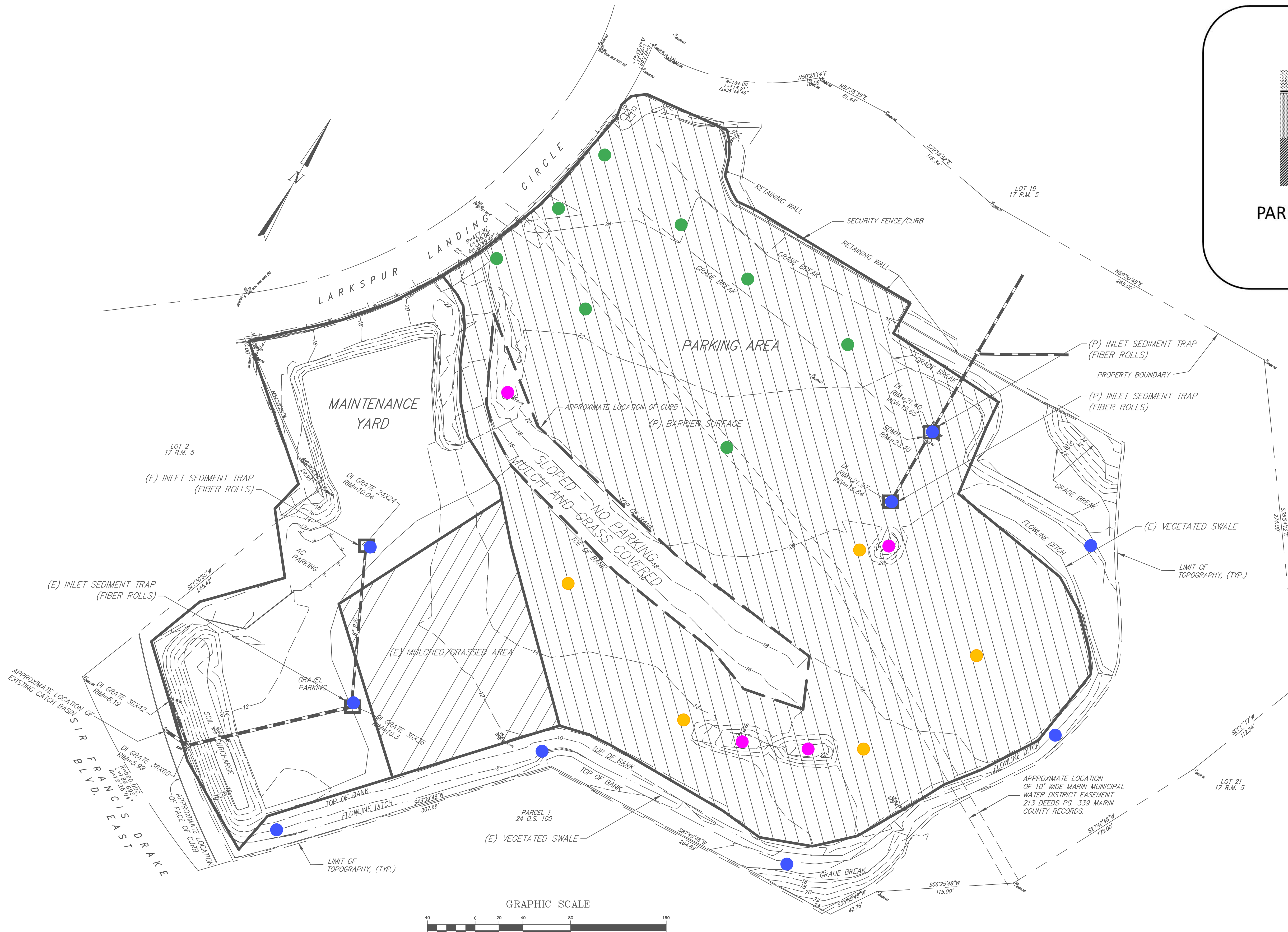
	RANDOM CONTROL FOR SURVEY
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	FLOWLINE
	EASEMENT LINE
	DROP INLET

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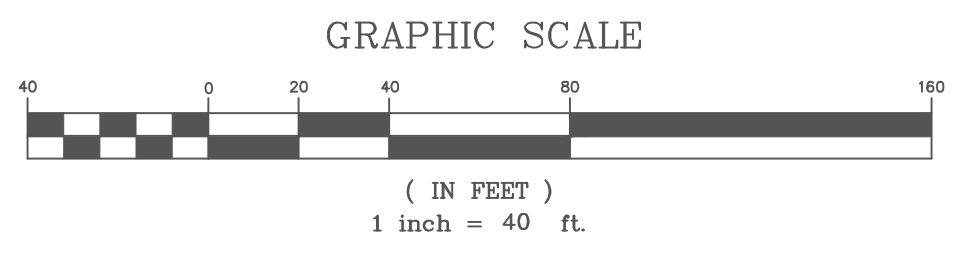
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ROSS VALLEY SANITARY DISTRICT 2000 LARKSPUR LANDING CIRCLE LARKSPUR CALIFORNIA	DRAWN: M.M./SJM DATE: 11/16/2012 JOB NO.: 8706 SHEET NO.: 1 OF 1
TOPOGRAPHIC MAP	

Irving L. Schwartz, C.E.
R.C.E. 18221

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SOURCE:
ORIGINAL DRAWING FROM ILS ASSOCIATES.

- Proposed Surface Soil Sample Location
- Proposed Surface/Near-surface Soil Sample Location
- Proposed Sediment Sample Location
- Proposed Stockpile Sample Location

LEGEND

	RANDOM CONTROL FOR SURVEY
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