



Jared Blumenfeld  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

Meredith Williams, Ph.D.  
Acting Director  
700 Heinz Avenue  
Berkeley, California 94710-2721



Gavin Newsom  
Governor

October 25, 2019

Ms. Jenifer Beatty  
ARCADIS US, Inc.  
101 Creekside Ridge Ct, Suite 200  
Roseville, CA 95661  
[Jenifer.Beatty@arcadis-us.com](mailto:Jenifer.Beatty@arcadis-us.com)

Dear Ms. Beatty:

As you know, the Department of Toxic Substances Control (DTSC) released the *draft Feasibility Study/Remedial Action Plan for Lot 1, Lot 2, and the Uplands Portion of Lot 3* (FS/RAP) for the Zeneca/Former Stauffer Chemical Site, located in Richmond, California, on July 8, 2018 for public comment. The FS/RAP was prepared and submitted by Terraphase Engineering Inc. on behalf of Zeneca Inc. Based upon DTSC review of all public comments, DTSC has determined that the FS/RAP with the Recommended Alternative 3a satisfactorily addresses all applicable state and federal statutes and regulations with following modifications:

- Include additional evaluation of soil off-haul transportation methods (i.e., trains);
- Include further discussion and clarification of the National Contingency Plan's cost effectiveness criterion;
- Revise the comparative analysis criterion describing how each of the alternatives was ranked;
- Include the attached revised nonbinding allocation of responsibility (NBAR);
- Add a discussion of the potential transient increase in toxicity during groundwater treatment activities;
- Revise Table 47 and text to clarify the comparative evaluation of the alternatives, and revision of the ranking of alternatives with regards to reduction of toxicity, mobility or volume through treatment;
- Revise the text to include the impacts of groundwater treatment, the volume of excavated material and the ability of landfills to handle that quantity of soil, and how additional work restrictions affect the implementation of Alternative 6;
- Add a discussion of potential disposal facilities and their distance to the Site;

- Add that all trucks hauling soil to the Chemical Waste Management Kettleman Hills Facility must comply with DTSC permit conditions;
- Revise the term “cost-effectiveness” to “cost” in Section 8.1, and add clarification regarding the evaluation of cost effectiveness;
- Revised Table 45 to add a qualitative score to the Green Remediation Evaluation Matrix (GREM), and clarify that the construction materials criterion includes asphalt and road base;
- Revise the implementability discussion of Alternative 6 to include treatment of groundwater prior to excavation and the implications of this requirement, and ranking of Alternative 6 to moderately difficult based on various comments received;
- Add a discussion regarding the number of haul trucks that could conceivably leave the Site each day under Alternative 6;
- Revise Appendix H, Site Management Plan (SMP) to further address soil vapor concerns and addition of risk-based concentrations for residential indoor air;
- Add clarification to the text of Appendix H to state that the Risk Management Plans are included as Appendix A and B of the SMP;
- Include a description of the findings of the updated survey of special status species;
- Revise Section 9 to include a pre-construction survey for potential overwinter monarch butterfly habitat and the presence of burrowing owl. Include procedures to be followed if monarch butterflies or burrowing owl nests are found;
- Include the requirement that no construction work will occur during the Ridgway’s Rail (*Rallus longirostris oboletus*) breeding season within 700 feet of a calling center unless approved in writing by the California Department of Fish and Wildlife;
- Add that no project activities will be allowed during the twice monthly spring high tide inundations if Ridgway’s Rail are documented near the project location; and
- Add that if special-status and natural communities are detected during the project surveys, the information will be submitted to the California Natural Diversity Database.
- Add the City of Richmond’s Resolution 91-19 and City Manager Steven Falk’s September 30, 2019 letter to Acting Director Meredith Williams (Enclosed) to the Administrative Record List.

In addition, a Notice of Determination will be filed with the State Clearinghouse of the Governor’s Office of Planning and Research to comply with the provisions of the California Environmental Quality Act (CEQA). Enclosed is a copy of the CEQA documents, Responsiveness Summary and revised NBAR. These documents, along with the revised text, tables, and Appendix H should be added to the FS/RAP and a copy of the final FS/RAP needs to be placed in the information repository located at the Richmond Main Library no later than five working days of the date of this letter. A printed and electronic copy also needs to be provided to DTSC in pdf format (no file should be larger than 100 megabytes) also within five working days.

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If you have any questions please contact Lynn Nakashima at (510) 540-3839 or [Lynn.Nakashima@dtsc.ca.gov](mailto:Lynn.Nakashima@dtsc.ca.gov).

Sincerely,



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Environmental Program Manager I  
Site Mitigation and Restoration Program – Berkeley Office

Enclosures

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