



**Matthew Rodriguez**  
Secretary for  
Environmental Protection



## Department of Toxic Substances Control

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:

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 Assessment 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](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](mailto:George.Chow@dtsc.ca.gov).

Sincerely,



George Chow  
Project Manager  
Brownfields and Environmental Restoration Program  
Berkeley Office

cc: See next page.

Ms. Eileen Fanelli  
January 9, 2014  
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cc: Mr. Bruce Handel  
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