



Department of Toxic Substances Control

Matthew Rodriguez
Secretary for
Environmental Protection

Barbara A. Lee, Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Edmund G. Brown Jr.
Governor

December 18, 2014

Mr. Randy Potter (Historic Arsenal Park, LLC)
c/o The Arnold Law Practice, East Bay Office
3685 Mt. Diablo Boulevard, Suite 331
Lafayette, California 94549

COMMENTS ON AIR SAMPLING WORKPLAN (WORKPLAN) FOR THE HISTORIC ARSENAL PARK AT THE FORMER BENICIA ARMY ARSENAL, BENICIA, CALIFORNIA, FEDERAL FACILITY ID J09CA0756

Dear Mr. Potter:

DTSC has received and reviewed the Workplan submitted by AEI Consultants on behalf of the Historic Arsenal Park (Site) dated November 25, 2014. The purpose of this third round of indoor air sampling for the 50 Series Complex is to assure that the interim remedy remains effective with the change of the seasons and to address the concerns of the tenants.

DTSC's Human and Ecological Risk Office (HERO) comments are presented in the attached memorandum. HERO has requested to add sampling indoor air at building 70 and to avoid sampling during or within several days after a major storm.

DTSC has the following additional comments:

Comment 1: Figure 2 shows the planned sampling locations. Some of the annex buildings are mislabeled. The annex east of building 57 is mislabeled 56A instead of 57A. The annex east of building 56 is mislabeled 56A instead of 56B. The building south of building 56 is correctly labeled 56A.

Comment 2: Figure 2 shows 6 sample locations in building 56A. DTSC recalls that there is an office in that building that employs several young women of child bearing age: please assure that one of those samples is in that office. Preferentially, office/studio areas should be sampled rather than the hallways.

Comment 3: During DTSC's site visit on August 27, 2014 a tenant expressed concern that the potable water supply may have been contaminated by infiltration from groundwater into the old piping system at the site. A tap water sample would address this concern. Please add a tap water sample for analysis of the Site's contaminants of concern with reporting limits below appropriate screening levels (i.e. for comparison to Maximum Contaminant Levels for drinking water).

Mr. Randy Potter (Historic Arsenal Park, LLC)
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Please submit a revised Workplan for approval (email is acceptable).

If you have any questions, please contact me at (916) 255-3592 or via email at martin.herrmann@dtsc.ca.gov.

Sincerely,



Martin G. Herrmann, P.E.
Hazardous Substances Engineer
Brownfields and Environmental Restoration Program
Department of Toxic Substances Control

Attachment: Indoor Air Sampling Work Plan (3rd Round) at Former Benicia Arsenal,
Benicia, CA, Eric Sciuлло, PhD., HERO, December 16, 2014

cc: (by email)
Mr. James Arnold
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MEMORANDUM

TO: Martin Herrmann, Project Manager
Military Sites and Corrective Action Unit
Brownsfield and Environmental Restoration Program
8800 Cal Center Drive
Sacramento, CA 95826

FROM: Eric Sciuolo, Ph.D. *ES*
Staff Toxicologist, Human and Ecological Risk Office (HERO)

DATE: December 16, 2014

SUBJECT: Indoor Air Sampling Work Plan (3rd Round) at Former Benicia Arsenal,
Benicia, CA

PCA: 11018 Site: 201993-00

DOCUMENT REVIEWED: Indoor Air Sampling Work plan (3rd Round) at Former Benicia Arsenal Site. June 30, 2014 (Workplan). Prepared by AEI Consultants November 25, 2014.

GENERAL COMMENTS

1. Indoor Air Sampling Locations:

HERO recommends that the 3rd round of indoor air sampling at the Benicia Arsenal include Suzie's Dance Studio. HERO understands that the previous detection was below comparable screening levels protective of human health. However because trichloroethylene exhibits developmental toxicity and women of child bearing age frequently attend classes at the yoga studio, we recommend confirming the result.

2. Timing of Sampling Event:

HERO recommends exercising caution when scheduling the indoor air sampling event. The upcoming event takes place during what is typically the rainy season for that area. Recent rain event could impact indoor air detections and the

M. Herrmann
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quality of the data. HERO strongly suggests that the sampling event be planned to avoid interference with rainfall in the area.

CONCLUSION

HERO has reviewed the Indoor Air Work Plan (3rd Round) at the Former Benicia Arsenal as it pertains to human health risk assessment. HERO finds the Work Plan acceptable with Comments summarized here: HERO recommends that Suzie's Dance Studio be included in the upcoming air sampling event to account for potential exposure to sensitive receptors. Caution should be exercised when planning the sampling event to avoid possible interference with rainfall or very wet conditions at the Site.

Reviewed by: Michael J. Wade, Ph.D., D.A.B.T. 
Senior Toxicologist, HERO