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Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
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Arnold Schwarzenegger
Governor

November 8, 2007

Mr. Mike Sedell
City Manager
City of Simi Valley
2929 Tapo Canyon Road
Simi Valley, California 93063-2199

Dear Mr. Sedell:

Thank you for your October 18, 2007 letter to Ms. Maureen Gorsen regarding the potential presence of chemical contamination at the Runkle Canyon property. In your letter, you requested that the Department of Toxic Substances Control (DTSC) review two environmental reports and provide an opinion regarding several concerns pertaining to the Runkle Canyon property.

On July 2, 2007, the City of Simi Valley undertook the collection of one surface soil and two surface water samples from locations in Runkle Canyon. The reports you submitted with your letter document the results of that sampling event.

1. "Laboratory Analytical Results for Surface Water and Surface Soil Samples Collected from the Proposed Runkle Canyon Development July 2, 2007", August 14, 2007, Tetra Tech, Inc.
2. "Runkle Canyon; Water and Soil Sampling Report", July 16, 2007, Runkle Canyon, LLC and Geocon Consultants, Inc.

Along with providing the reports, you posed the following questions in your letter:

1. "Do the findings from the sampling event indicate that a hazardous condition exists that would need to be addressed before this approved housing development may proceed, and if so, how may this issue appropriately be addressed?"
2. "Do the test results indicate that contact with the water and/or soil presents a risk to the public?"
3. "Is there any action the City of Simi Valley is legally obligated to take (e.g., reporting to regulatory agencies) in view of these results?"

DTSC has not been involved with investigative activities at the Runkle Canyon development property to this point. However, DTSC is the lead agency for the investigation and cleanup of the adjacent Santa Susana Field Laboratory (SSFL). On August 16, 2007, DTSC and Respondents at the SSFL entered into a Consent Order for Corrective Action (Order) outlining specific requirements for the investigation and cleanup of the 2,850-acre site. Sections 3.4.9 and 3.4.10 of that Order require the Respondents to submit an offsite report by December 14, 2007 and perform additional offsite investigations if DTSC determines such studies are necessary. According to the Order:

"Section 3.4.9. Within 120 days of the effective date of this Order, the Respondents shall prepare and submit to DTSC a report summarizing all off-site media sampling and testing data for chemical and radiologic contaminants conducted by the Respondents around the SSFL. The summary report shall itemize all separate off-site sampling programs, specify the objectives, summarize the conclusions and summarize results. The report shall include maps and figures of SSFL and surrounding areas showing sample locations, sample results, and sample identification numbers referenced to tables of the analytical results and sample information. The map or maps shall have a key which identifies the sample as to sample media type (air, surface water, soils, groundwater, seeps, and springs). The data table summaries shall be referenced to the original reports. The Respondents shall review the data and make conclusions and recommendations as to the completeness of the sampling, and recommendations for additional sampling if needed. A bibliography of all original work plans, Health and Safety Plans, Quality Assurance Plans and final reports shall be compiled, and electronic versions of those original reports shall be included on a CD with the report.

3.4.10. If DTSC determines, based on its evaluation of the report specified in 3.4.9 of this Order, that additional work is required, Respondents shall submit and carry out, by dates to be specified by DTSC, the following workplans:

1. A Workplan to monitor potential presence of airborne chemical and radiologic releases from the SSFL in communities and residential areas surrounding SSFL.
2. A Workplan to sample all the surface drainages leading offsite from the SSFL property to evaluate potential chemical and radiologic releases into drainages leading away from the SSFL. The Workplan shall also identify and include a proposal for sampling seeps and springs in the vicinity of the SSFL.

3. A Workplan to collect surface soils and sediment samples in communities surrounding the SSFL for chemical and radiologic testing. The Workplan shall include the rationale for selecting the locations of these samples."

DTSC intends to use the forthcoming report and other information, e.g., historical records concerning operations at SSFL, to determine whether an investigation of potential contamination from the SSFL into Runkle Canyon and other areas surrounding of the SSFL is required.

The sampling data presented in the Tetra Tech, Inc. and Geocon Consultants, Inc. reports are very limited. Split surface water samples were collected from two different locations, and one split surface soil sample was collected from a third location. In addition, Geocon collected soil sediment samples and unpreserved surface water samples (subsequently lab filtered and preserved) from the same location where the split surface water samples were collected. All samples were analyzed for metals. It is not possible to make meaningful conclusions regarding risk to human health and the environment at the Runkle Canyon property based on the limited data and the uncertainties associated with the way the samples were collected, the nature of the water sampled, and the lack of site-specific soil background concentrations. One uncertainty pertains to the turbidity of the water samples. The concentrations of metals in water can be greatly affected by the turbidity of a sample. Turbid water samples that are collected in acidified sample containers may result in elevated metals concentrations during analysis because the acid preservative will leach metals from the solid particles into the water. The lab-filtered water samples collected by Geocon generally show lower concentrations compared to the unfiltered samples. There is general agreement in the analytical results between the City of Simi Valley (Tetra Tech/Pat Chem) samples, however, the Geocon analytical results are generally lower (both split unfiltered and lab-filtered) in concentration. The surface water results were compared to various regulatory criteria (U.S. EPA Preliminary Remediation Goals, Drinking Water Maximum Contaminant Levels, Drinking Water Notification Levels and Public Health Goals). Metals concentrations for some of the surface water samples are above the comparison screening levels (arsenic, cadmium, chromium, lead, nickel, vanadium). It should be noted that these comparison levels are drinking water quality standards, while they are useful for initial screening purposes to determine if additional investigation should be considered, they should not be utilized to draw conclusions regarding risk to receptors when compared to surface water samples. A risk assessment utilizing appropriate characterization data should be performed to arrive at conclusions regarding risk to human health and the environment.

The surface soil results from the sampling were compared to regulatory screening values (U.S. EPA Preliminary Remediation Goals and California Human Health Screening Levels) and regional background levels. There is general agreement in the

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analytical results between the City of Simi Valley (Tetra Tech/Pat Chem) and Geocon samples. Arsenic appeared elevated compared to the screening values, however, the lack of site-specific background data makes it difficult to ascertain if the arsenic values are representative of the natural environment at Runkle Canyon or indicative of a release. Again, while these comparison criteria are useful for initial screening purposes to determine if additional investigation should be considered, they should not be utilized to draw conclusions regarding risks to receptors. A risk assessment utilizing appropriate characterization data should be performed to arrive at conclusions regarding risk to human health and the environment.

In summary, DTSC intends to utilize the forthcoming report from SSFL Respondents to inform conclusions about the potential for contamination in areas outside the boundaries of the SSFL, the adequacy of investigative work already completed, and the need for additional work in areas surrounding the SSFL. In response to your questions 1 and 2, based on the limited nature of and the uncertainties associated with the data collected during the sampling event, DTSC is unable to draw definitive conclusions regarding risk to human health and the environment at the Runkle Canyon property at this time. The data provided are not sufficient to conclude that a hazardous condition does not exist. Your question number 3 relies on the response to the first two questions: therefore DTSC is not able to comment on what legal obligations the City may have. DTSC's emphasis on the SSFL offsite report does not preclude the owner or developer of the Runkle Canyon property from entering into a Voluntary Cleanup Agreement with DTSC to properly evaluate the potential onsite human health and ecological risks at the Runkle Canyon property under the regulatory oversight of DTSC. We are sending a separate letter to the developers of the Runkle Canyon and Woolsey Canyon projects recommending that they consider working with us to address questions and concerns about environmental conditions in the areas where developments are planned.

If you have any questions concerning this matter, please contact me at (916) 327-8642 or Mr. Gerard Abrams, Senior Engineering Geologist at (916) 255-3600.

Sincerely,



Norman E. Riley
SSFL Project Director

cc: see next page

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