FINAL REMEDIAL ACTION PLAN AMENDMENT FOR SOIL GAS
Midway-Bayshore Village Redevelopment
Daly City, California

Prepared For:

MidPen Housing Corporation
303 Vintage Park Drive #250
Foster City, California

Prepared By:

Langan Engineering and Environmental Services, Inc.
135 Main Street, Suite 1500
San Francisco, California 94105

Kylie Cush
Staff Geologist

Dustyne Sutherland
Senior Project Scientist

Peter Cusack
Senior Associate/Vice President

PROFESSIONAL GEOLOGIST
DORINDA SHIPMAN
NO. 215
CERTIFIED HYDROGEOLOGIST
Exp. 12/31/2021
STATE OF CALIFORNIA

Dorinda Shipman, PG, CHG
Principal/Vice President

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FINAL REMEDIAL ACTION PLAN AMENDMENT FOR SOIL GAS APPROVAL RECORD
SIGN-OFF SHEET
Midway-Bayshore Village Redevelopment
Daly City, California

CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

DEPARTMENT OF TOXIC SUBSTANCES CONTROL
700 Heinz Avenue, Suite 200
Berkeley, California 94710

Kim Walsh, Project Manager — **Date** 6/29/21

Kim Walsh, Unit Chief — **Date** 6/29/21

Julie Pettijohn, Site Mitigation Branch Chief — **Date** 6/29/2021

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ACRONYM AND ABBREVIATION LIST

ARARs	Applicable or Relevant and Appropriate Requirements
bgs	below ground surface
BAAQMD	Bay Area Air Quality Management District
BaP	benzo(a)pyrene
BMPs	best management practices
Cal/OSHA	State of California Division of Occupational Safety and Health
CAMP	Community Air Monitoring Plan
CCR	California Code of Regulations
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CHSC	California Health and Safety Code
COCs	contaminants of concern
COPCs	chemicals of potential concern
cPAH	carcinogenic polycyclic aromatic hydrocarbons
CSM	Conceptual Site Model
DCB	dichlorobenzene
DEQ	Department of Environmental Quality
DTSC	California Department of Toxic Substances Control
DUP	duplicate
E&E	Ecology and Environment Inc.
ERRG	Engineering/Remediation Resources Group
ESD	Explanation of Significant Differences
ESLs	Environmental Screening Levels
FS	Feasibility Study
GC	General Contractor
HACSM	Housing Authority of the County of San Mateo
HASP	Health and Safety Plan
HERO	Human and Ecological Risk Office
HHRA	Human Health Risk Assessment
HI	Hazard Indices

ACRONYM AND ABBREVIATION LIST (Continued)

HQ	hazard quotient
ICs	institutional controls
ILCR	Incremental Lifetime Cancer Risk
LUC	Land Use Covenant
mg/kg	milligrams per kilogram
MGP	manufactured gas plant
MSL	mean sea level
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
OEHHA	California Office of Environmental Health Hazard Assessment
O&M	Operation and Maintenance
OM&M	Operation, Maintenance and Monitoring
OSHA	Occupational Safety and Health Administration
PAH	polycyclic aromatic hydrocarbons
PCE	tetrachloroethene
PG&E	Pacific Gas and Electric
PPE	personal protective equipment
PVC	polyvinyl chloride
RAO	remedial action objective
RAP	Remedial Action Plan
RAW	Remedial Action Work Plan
RCRA	Resource Conservation and Recovery Act
RDIP	Remedial Design and Implementation Plan
RI	Remedial Investigation
RI/FS	Remedial Investigation Feasibility Study
RPWP	Remediation Project Work Plan
RSL	Regional Screening Level
SCEA	Sustainable Communities Environmental Assessment
SGSLs	soil gas screening levels
SL	screening level
SVE	soil vapor extraction

ACRONYM AND ABBREVIATION LIST (Continued)

SVOC	semi-volatile organic compound
TAC	toxic air contaminant
TBC	to be considered
TMB	1,2,4-trimethylbenzene
TPH	total petroleum hydrocarbons
TSCA	Toxic Substances Control Act
U.S.C.	United States Code
USEPA	United States Environmental Protection Agency
VI	vapor intrusion
Virginia DEQ	Virginia Department of Environmental Quality
VMS	vapor mitigation systems
VOC	volatile organic compound

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EXECUTIVE SUMMARY

MidPen Housing Corporation (Midpen) and the Housing Authority of the County of San Mateo (HACSM, Owner) plan to redevelop the Midway Village housing complex and adjacent Bayshore Park located at 45 and 47 Midway Drive in Daly City (Master Plan Redevelopment Area) (Figures 1 and 3). The Midway Village residential complex was constructed in 1976 and the park was constructed in 1977. Today, Midway Village consists of 35 buildings comprised of townhome-style apartments, a childcare facility, a resident-serving community center and the Midway Village housing offices.

Redevelopment plans include replacing the existing 150 units of affordable rental housing with 555 new affordable rental apartments and below market rate ownership townhomes and relocating the park, childcare facility, resident-serving community center and the property management office to alternate locations. The redevelopment is expected to begin construction in June of 2021 and will be completed in five phases to limit the disruption to current residents (Section 1.1) (Figure 2). Midway Village and Bayshore Park are under the oversight of the California Department of Toxic Substances Control (DTSC) for environmental investigation and remediation activities related to historical contaminated fill material. Langan Engineering and Environmental Services, Inc. (Langan) has prepared this Final Remedial Action Plan Amendment (RAP Amendment) to address soil gas (the air in between unsaturated soil particles) contamination in the portion of Midway Village located north of Midway Drive (Midway Village North) and the adjacent Bayshore Park (collectively the Site). The activities described in this RAP Amendment will provide long-term protection of the health of future residents, the public and the environment, and allow for the construction of the future development.

The Master Plan Redevelopment Area is approximately 15.8 acres and is bordered by the PG&E Martin Service Center to the north and northeast, Martin Street to the south and Schwerin Street to the west (Figure 3). From around 1908 to 1913, a manufactured gas plant (MGP) operated on the PG&E Martin Service Center property. In 1944, during construction of Navy housing, approximately 20,000 cubic yards of soils contaminated with MGP waste was moved from the PG&E property and used as fill material to raise the grade in low lying areas of Navy housing development. In 1976, the Navy housing was demolished, and Midway Village and Bayshore Park were constructed in 1976 and 1977, respectively.

In the 1990s and early 2000s, the HACSM and City of Daly City (Daly City) removed between two to five feet of soil contaminated with polycyclic aromatic hydrocarbons (PAHs) associated with former gas manufacturing activities in accordance with DTSC-approved 1993 RAP and 2001 Explanation of Significant Differences (ESD) for Midway Village North and the 1998 Removal Action Workplan and 2001 ESD for Bayshore Park (Ecology and Environment, 1993c; City of Daly City, 1998; DTSC, 2001a; and DTSC, 2001b). These areas were backfilled with two to five feet of clean soil or covered with hardscape such as patios and walkways to prevent human contact with any remaining impacted soil. The areas that were excavated and backfilled are presented in Appendix A. Land use covenants (LUCs) were established by DTSC for some parcels in Midway Village in 1998 and 2010 and for Bayshore Park in 2002. The 1998 and 2010 LUCs prevents use of the land for anything other than multi-family residential. The 2002 Bayshore Park LUC prevents use of the land for residences, hospitals, public or private schools for persons under 21 years of age, or daycare centers for children. A summary of the LUCs is provided in Table 1. The 1995 Operations and Maintenance Agreement and 2005 Settlement Agreement for Midway Village ensure ongoing monitoring and maintenance of the clean soil cap and hardscape cap in Midway Village. The 2008 Settlement Agreement for Bayshore Park ensures ongoing monitoring and maintenance of the clean soil cap and hardscape cap in Bayshore Park.

Since completing remediation activities, DTSC has evaluated the Site every five years to confirm that the soil remedy presented in the RAPs/ESDs remains effective in protecting human health. The most recent Five-Year Review, conducted in June 2019, confirmed that the soil remedy was still effective. Because the redevelopment plan includes changing the land use of Bayshore Park to residential housing, DTSC required a soil gas investigation to evaluate potential risk to future residents. Concurrently, DTSC performed a Five Year Review in 2019 to evaluate the protectiveness of the existing soil remedy. Based on this review, DTSC required the HACSM to perform an updated evaluation of the vapor intrusion pathway to confirm that soil gas concentrations did not pose a significant risk to current Midway Village residents. DTSC required this evaluation because standard practice for vapor intrusion assessment has progressed since the 2002 indoor air evaluation at Midway Village. The updated evaluation confirmed that the current Midway Village buildings and soil remedy continue to be an effective barrier to vapor intrusion. During the updated evaluation of the vapor intrusion pathway at Midway Village, groundwater was observed at 2 feet below ground surface in areas impacted by MGP waste. As further explained below, DTSC required HACSM to evaluate the potential for offsite transport of contamination in groundwater.

In 2018 and 2019, Langan completed soil gas sampling that found that soil gas is impacted by benzene, ethylbenzene, and naphthalene. Based on the sampling results, Langan prepared a Human Health Risk Assessment (HHRA) to evaluate cancer risk and non-cancer health hazards to future residents after the proposed redevelopment assuming no engineering controls. The HHRA specifically did not address risks and hazards for current residents (Langan, 2020b). Langan also performed indoor air sampling in February and October of 2019 to evaluate the human health risks and hazards to the current residents of Midway Village. Langan subsequently prepared the Indoor Air and Sub Slab Results letter report (Langan, 2020c) which concluded that the current residents of Midway Village are not exposed to MGP contaminants in soil gas. DTSC concurred with the findings of the HHRA and Indoor Air and Sub Slab Results reports. During the soil gas investigations, groundwater was observed as shallow as 2.0 feet below ground surface (bgs). As a result, DTSC required HACSM to evaluate the 1) potential for offsite transport of contaminated groundwater and 2) potential for ecological risk. The results of Groundwater Investigation will be provided in the forthcoming Final Groundwater Investigation report that addresses both of these requirements.

The RAP Amendment for soil gas presents a detailed analysis of four alternatives. The four alternatives were evaluated using Federal and State criteria. The four alternatives evaluated in this RAP Amendment include:

- Alternative 1: No Action.
- Alternative 2: Soil Vapor Extraction with Vapor Mitigation Systems, Institutional Controls and Monitoring.
- Alternative 3: Vapor Mitigation Systems with Institutional Controls and Monitoring.
- Alternative 4: Soil Gas Hot Spot Excavation and Vapor Mitigation Systems with Institutional Controls and Monitoring.

Based on the evaluation and comparison of these alternatives, Alternative 3: Vapor Mitigation Systems with Institutional Controls and Monitoring is the preferred remedial alternative identified to address soil gas at the Site. This alternative includes:

- Installing vapor mitigation systems underneath the building pads within the future Midway Village North construction areas (except for at the open-air parking garage) that will prevent soil gas from entering the indoor air of future buildings;

- Amending or replacing, as appropriate, the existing LUCs for the Site to 1) require vapor mitigation on the Bayshore Park and Midway Village North, and 2) allow for housing on the current Bayshore Park property once vapor mitigation systems have been installed;

- Ongoing monitoring and maintenance of the existing caps and any vapor mitigation systems to ensure they remain effective; and

- In addition to the ongoing five-year reviews of the soil remedy (cap and LUCs), there will be reviews of the implemented soil gas remedy every five years to confirm that the measures put in place to address soil gas impacts continue to be protective of the health and safety of Site users, the public and the environment.

A detailed analysis of each alternative is included in Section 4.0.

After consideration of and response to public comments and approval of the RAP Amendment, MidPen and HACSM will develop Remedial Design and Implementation Plans (RDIPs) for each phase of construction that include detailed designs of the future vapor mitigation systems. The RDIPs will also outline how to replace the clean soil and hardscape caps that will be demolished or disturbed during future building construction. The RDIP is discussed in Section 5.0.

Because the proposed redevelopment plan includes land uses not currently approved in the existing LUCs, a variance process addressing the LUCs is required. Assuming the variance is approved, the existing LUCs will be amended or replaced after the soil gas remedy has been successfully implemented and approved by DTSC.

1.0 INTRODUCTION

Langan Engineering and Environmental Services, Inc. (Langan), on behalf of MidPen Housing Corporation (MidPen) and the Housing Authority of the County of San Mateo (HACSM-Owner), has prepared this Final Remedial Action Plan Amendment (RAP Amendment) for the Midway Village housing complex (Midway Village Envirostor site #41650007) and the adjacent Bayshore Park (Bayshore Park Envirostor site #41990001) (Figure 1). For the purposes of this RAP Amendment the Site consists of the portion of Midway Village north of Midway Drive and the adjacent Bayshore Park located in Daly City, California (Figure 4).

The proposed redevelopment of the entire Midway Village housing complex and Bayshore Park (Master Plan Redevelopment Area) will encompass an area larger than the Site, as shown on Figure 3. As part of the redevelopment, the existing buildings will be demolished in phases and replaced with new housing and associated structures over five phases of development. Redevelopment of the Master Plan Redevelopment Area includes construction of slab-on-grade, high-density residential housing units, including walk up flats, townhomes, and apartments; parking lots; a slab-on-grade, open ventilated garage; redevelopment and relocation of the manager's office; redevelopment and relocation of an existing childcare facility; redevelopment and relocation of the existing Bayshore Park; and the provision of streets, walkways and green space. In Midway Village North (the portion of Midway Village located north of Midway Drive), no subsurface development (i.e., swimming pools, basements, below grade parking) is proposed; however, new subsurface utilities will be installed, and existing subsurface utilities will be abandoned, removed, or relocated during development. The proposed redevelopment of the portion of Midway Village located south of Midway Drive (Midway Village South), is not the subject of this RAP Amendment. However, it will include construction of slab-on-grade, high-density residential housing units, including walk up flats, townhomes, and apartments; construction of attached low-density townhomes; construction of a podium style parking garage; and the provision of streets, walkways and green space.

Recent environmental investigations indicate that soil gas at Midway Village and Bayshore Park is impacted by chemicals including benzene, chloroform, ethylbenzene, naphthalene, tetrachloroethene (PCE), 1,2,4-trimethylbenzene (TMB), vinyl chloride, and total xylenes. These compounds were identified as chemicals of potential concern (COPCs) for the vapor intrusion pathway. Soil gas at Midway Village South contains low concentrations of some COPCs that were determined not to be a significant risk to human health. The risk evaluation is presented in Langan's *Human Health Risk Assessment, Midway-Bayshore Village Redevelopment, Daly City,*

California (HHRA) dated 24 September 2020, as discussed below in Section 2.8.2 (Langan, 2020b). This RAP Amendment amends the following decision documents:

1. Midway Village including the Ecology and Environment Inc. (E&E) August 1993 *Final Remedial Action Plan for Midway Village (RAP)* and the State of California Department of Toxic Substance Control (DTSC) July 2001 *Explanation of Significant Differences (ESD) Extent of PAH Soil Contamination Midway Village, Daly City (*Midway Village ESD); and

2. Bayshore Park including the City of Daly City July 1998 *Removal Action Work Plan (RAW), Bayshore Park, City of Daly City, California,* and DTSC July 2001 *ESD Extent of PAH Soil Contamination, Bayshore Park Site, Daly City* (Bayshore Park ESD).

The chosen remedy and historical remedial actions for each of these four documents are summarized in Table 1 and discussed in Sections 1.2 and 2.2. This RAP Amendment evaluates remedial action alternatives for soil gas and recommends the alternative for mitigating the risk to human health and the environment posed by the COPCs in soil gas.

1.1 Planned Redevelopment

MidPen was selected to carry out redevelopment and anticipates redeveloping the Master Plan Redevelopment Area in phases under ground leases with the HACSM. The proposed Master Plan Redevelopment Area is shown on Figures 2 and 3 and includes:

- Phased demolition of the 35 existing buildings including townhome-style apartments, the childcare facility, resident-serving community center, and Midway Village management office;

- Construction, over four phases of development, of 555 residential units including two- to three-story townhomes, two- to three-story walk up flats, and three- to four-story apartment buildings;

- Replacement of the resident-serving community center, childcare facility, and Midway Village property management facilities in different locations within the Master Plan Redevelopment Area;

- Construction of a revised street system;

- Development of 407 off-street parking spaces in a four-story podium parking structure (Garage A) and development of on-street parking with approximately 1.2 parking spots per residential unit to be provided for residents;

- Relocation, during the fifth phase of development, of the Bayshore Park to a new location within the Master Plan Redevelopment Area and completion of a clean soil cap with a

minimum thickness of two feet that will also serve as site preparation for the new Park facility to be developed by Daly City; and

- Ancillary improvements including landscaping, pedestrian walkways, and water and wastewater line improvements.

While some townhomes in Midway Village South will have small backyards, and one partially below grade parking garage is planned, in Midway Village North no subsurface development (e.g., swimming pools, basements, below grade parking) is proposed, and there will be no private backyards. New subsurface utilities will be installed, and existing subsurface utilities will be properly abandoned, or removed, or relocated during redevelopment in Midway Village North and Bayshore Park. The existing cap in Midway Village North and Bayshore Park will either be disturbed and/or demolished and replaced as detailed in Section 4.3, as part of the redevelopment process, to prevent direct contact with soil contamination. The Master Plan Redevelopment project is expected to begin construction in June of 2021 and will be completed in five phases to limit the disruption to current residents. The phased construction plan is presented in Figure 2. The development phases will include the following:

- Phase 1 – Demolition of the existing Bayshore Park, property management office, and the eastern portion of Midway Drive. Construction of 147 residential units including Building A, slab on grade open ventilated parking garage wrapped within Building A, Building A2, and associated pedestrian walkways (Midway Village North and Bayshore Park).

- Phase 2 – Demolition of 10 residential buildings and Midway Court. Construction of 128 units including Building B, Building B2 (includes childcare center), Building C, and the western portion of Partridge Street (Midway Village North and one building on Midway Village South).

- Phase 3 – Demolition of the childcare center and the western portion of Midway Drive. Construction of 140 units, the community center (Midway Village North), pedestrian walkways, and the eastern portion of Partridge Street, Building D and Parking Garage D (Midway Village South).

- Phase 4 – Demolition of residential buildings in Village South. Construction of 140 units in several types of residential buildings (Midway Village South).

- Phase 5 – Demolition of eight residential buildings, the community center, Cypress Lane, and Cypress Court. Construction of a minimum two-foot-thick clean soil cap, rough grading and utility stub-out of the new Bayshore Park, which will be returned to the City of Daly City for Park development. Daly City must receive DTSC approval of protectiveness measures related to such Park development activities, further remedy implementation if

necessary, and remedy monitoring and maintenance for the Park.

Phases 3 and 4 are anticipated to be completed concurrently. It should be noted, and as supported by the HHRA and remedy evaluation outlined below, that the remedial action recommended in this RAP Amendment only applies to Midway Village North and Bayshore Park and includes construction Phases 1 and 5 and portions of Phases 2 and 3.

1.2 Purpose of the Remedial Action Plan Amendment

The 1993 RAP evaluated remedial action alternatives for soil at Midway Village and did not evaluate remedial actions for Bayshore Park (E&E, 1993c). In the RAP, groundwater and soil gas were not identified as media of concern that could pose a human health risk. The 1993 RAP soil remedy for Midway Village included soil removal and capping with institutional controls (ICs) and monitoring. In August 1993, DTSC approved the RAP for Midway Village. The 2001 Midway Village ESD for Midway Village modified the 1993 RAP to require increasing the thickness of the soil cap from two to five feet in areas where COPCs have been found at depth (DTSC, 2001a).

The 1998 RAW evaluated remedial action alternatives for soil at Bayshore Park. The RAW remedy included 1) excavation and disposal of PAH impacted soil associated with the construction of a 96-inch storm drain through Bayshore Park, and 2) excavation of four 10 by 10 foot excavations where PAHs exceeded the remedial action criteria of 10 milligrams per kilogram (mg/kg), followed by capping with two of clean fill above the storm drain and 10 by 10 foot excavation of six areas capping with institutional controls (ICs) and monitoring (City of Daly City, 1998). The 2001 Bayshore Park ESD updated the total PAH clean up goal of 10 mg/kg to a more protective clean up level of 0.9 mg/kg as benzo(a)pyrene (B(a)P) equivalents (DTSC, 2001b). As a result, the remedy of the 2001 Bayshore Park ESD required excavation of the top two feet of soil across the entire Bayshore Park with capping, ICs and monitoring. A summary of these four documents is presented in Table 1.

In December 2018 and April 2019, soil gas samples were collected from Midway Village North and Bayshore Park in accordance with Langan's *Limited Soil Gas Sampling Work Plan Midway Village Redevelopment, Daly City, California (Work Plan)* dated 29 October 2018. The Work Plan was approved by DTSC in their email dated 9 November 2018.

In November 2019, soil gas samples were collected from Midway Village South in accordance with Langan's *Village South Soil Gas Sampling Work Plan Addendum* (Langan, 2019b).

Langan prepared the 24 September 2020 Human *Health Risk Assessment* (HHRA) to estimate potential human health risks for future residents and construction workers at Midway Village and Bayshore Park under a redevelopment scenario (Langan, 2020b). The HHRA for soil gas is summarized in Section 2.8. The HHRA identified areas with elevated COPC concentrations in soil gas associated with the vapor intrusion pathway that resulted in potentially unacceptable risks and hazards for future residents.

It should be noted that 1) the above-referenced soil remedies have been implemented, as discussed in Section 2.2 (Engineering/Remediation Resources Group [ERRG], 2002) and 2) exposure to groundwater was retained as a construction worker exposure scenario in the HHRA. The HHRA determined that health and safety measures implemented during construction will be protective of construction workers. Therefore, this RAP Amendment only evaluates soil gas remedial alternatives and does not evaluate remedial alternatives for soil or groundwater.

The purpose of this RAP Amendment is to 1) amend the previous 1993 Midway Village RAP, the 1998 Bayshore Park RAW, and both 2001 Midway Village and Bayshore Park ESDs and 2) evaluate and choose a soil gas remedy to mitigate human health risk at the Site. This RAP Amendment has been prepared in general accordance with Section 25356.1, Chapter 6.8 of the California Health and Safety Code (CHSC).

1.3 Lead and Support Agencies

DTSC is the lead agency overseeing environmental investigation and remediation activities at the Site, including implementation of this RAP Amendment, except for implementation of local regulations such as boring permits required by the City of Daly City. DTSC is also the beneficiary of the Land Use Covenants (LUCs).

2.0 SITE BACKGROUND

The following section describes the Site, previous investigations and remedial actions, subsurface conditions, recent sampling results for soil, soil gas and groundwater, and the HHRA methodology and conclusions.

2.1 Site Description

The Site includes two environmental remediation sites, Midway Village and Bayshore Park, and is located on the San Francisco Peninsula at an elevation of approximately 17 to 24 feet above mean sea level (MSL). Bayshore Park is approximately 3.8 acres and consists of a grassy field

used for sports, a playground and an asphalt-topped play yard. In contrast, the entire Midway Village housing complex (Midway Village North and Midway Village South) together with Bayshore Park comprises the Master Plan Redevelopment Area. It includes parcels addressed as 45 and 47 Midway Drive and comprises approximately 15 acres of land, including a parcel formerly owned by the Bayshore Elementary School District. Midway Village is composed of 37 parcels and 35 buildings comprised of townhome-style apartments, a childcare facility, a resident-serving community center, and the Midway Village housing management offices (Figure 4).

The Midway Village residential complex was constructed in 1976. A manufactured gas plant (MGP) operated from approximately 1908 to 1913 on the adjacent Martin Service Center site, currently owned by Pacific Gas and Electric Company (PG&E). Because crude oil was used as the MGP feedstock, the predominant residual waste material produced by the plant was lampblack, which contains polycyclic aromatic hydrocarbons (PAHs). In 1944, during construction of Navy housing, approximately 20,000 cubic yards of soils contaminated with MGP waste was moved from the PG&E property and used as fill material to raise the grade in low lying areas of Navy housing development. In 1976, the Navy housing was demolished, and Midway Village and Bayshore Park were constructed in 1976 and 1977, respectively.

On 6 December 1991, DTSC issued the Imminent and Substantial Endangerment Order and Remedial Action Order # I/SE-90/91-004 (Order) on the Site. The Order named the responsible parties the United States Navy, United States Department of Housing and Urban Development and PG&E as responsible parties. The Order required the preparation of the Remedial Investigation Feasibility Study (RI/FS) to evaluate the extent of MGP contaminants in soil at the Midway Village Public Housing Project. To comply with the Order, E&E completed a Remedial Investigation (RI) in 1992 to assess the nature and extent of hazardous substances in soil and groundwater at the Site and portions of Midway Village South (E&E, 1992). The RI found that PAHs were detected in soil throughout Midway Village North at concentrations that exceeded background levels. In groundwater, low concentrations of PAHs and other chemicals found in urban environments were detected in shallow groundwater samples from 15 to 20 feet below the ground surface (bgs) from one monitoring well, W-1. E&E prepared the subsequent 11 June 1993 Feasibility Study (FS) with data that was collected in accordance with the RI Work Plan (E&E, 1993a). The purpose of the FS was to evaluate the feasibility of remedial actions that would be protective of receptors at Midway Village. The chosen remedial action alternative presented in the 1993 RAP was a combination of soil removal and replacement, and capping with hardscapes or clean fill. Because shallow and deep groundwater was not used or likely to be

used as a domestic water supply, there was no route of exposure for Midway Village residents to be exposed to COPCs in groundwater; therefore, remedial action was not required. The RAP, as discussed below in Section 2.2, implemented the chosen remedial actions evaluated in the FS.

2.2 Previous Remedial Actions

Several focused environmental investigations and remedial actions have occurred at the Site (Table 1). Until 2018, investigative activities were concentrated on PAHs and metals in soil. Other parameters in soil were evaluated to a lesser extent, including volatile organic compounds (VOCs), cyanide, and phenols. Remedial actions have focused on PAHs in soil. Though groundwater has been investigated during previous remedial investigations, remedial action was not required (E&E, 1993c).

1998 Bayshore Park Remedial Action Work Plan

In July 1998, the City of Daly City prepared the RAW. The purpose of the RAW was to present remedial alternatives associated with the installation of a 96-inch diameter storm drain through Bayshore Park and investigation and remediation activities associated with three areas, including Bayshore Park (Figure A-1 in Appendix A). The remedial action objectives (RAOs) for the project were 1) removal of surface soil up to depths of two feet bgs with concentrations that exceeded 10 mg/kg of total PAHs and 2) capping of the remaining soils that exceeded 10 mg/kg of total PAHs with a minimum of two feet of clean fill material in conjunction with a LUC to ensure maintenance and restrict breaching of the cap. DTSC's 2001 Bayshore Park ESD updated the total PAH clean up goal of 10 mg/kg to a more protective clean up level of 0.9 mg/kg as B(a)P equivalents. As a result, the remedy of the 2001 ESD required excavation of the top two feet of soil across Bayshore Park with capping, ICs and monitoring. In accordance with ERRG's Remediation Work Plan (RWP) discussed below, approximately 13,000 cubic yards of material was excavated from Bayshore Park (ERRG, 2001).

Engineering/Remediation Resources Group's (ERRG's) Midway Village/Bayshore Park Remediation Workplan

To update the 1998 RAW, ERRG prepared the RWP dated 9 August 2001. This RWP was prepared because the total PAH clean up goal of 10 mg/kg was updated to a more protective clean up level of 0.9 mg/kg as B(a)P equivalents. This change in the PAH cleanup level was presented in DTSC's July 2001 Bayshore Park ESD. The change in clean up level subsequently increased excavation volumes and costs for off-site disposal compared to what was previously presented in the 1998 RAW. These changes did not fundamentally change the chosen remedy.

In accordance with ERRG's RWP, PAH-contaminated soil that exceeded 0.9 mg/kg B(a)P equivalent was removed from portions of Midway Village North up to five feet bgs and up to two feet bgs in the Park, as shown on Figure A-1 in Appendix A. A cap consisting of two to five feet of clean soil, landscaping with a minimum of two feet of clean soil, or hardscape including concrete building pads, concrete or asphalt walkways, patios, and roadways was placed over areas of remaining contamination. Because of the increase in cap thickness, approximately 3,000 cubic yards of PAH impacted soil from Midway Village was excavated and disposed off-site. The capped areas consist of the entire Bayshore Park and locations in the vicinity of Buildings 22 through 24, 28, 29, and 31 through 35 (ERRG, 2002). Analytical data for five sources of backfill were provided to DTSC for approval prior to cap placement (ERRG, 2002). Multiple Midway Village North parcels and the Bayshore Park are subject to the existing 1998, 2002, and 2010 DTSC LUCs to ensure cap maintenance and prevent human direct contact with soil (Figure 5). The LUC restrictions are described in Table 1.

Midway Village South and some parcels on Midway Village North are not subject to existing LUCs (Figure 5). The parcels on Midway Village North that are covered by the LUCs are subject to requirements of the 6 November 1995 Operations and Maintenance (O&M) Agreement with DTSC, which was signed on 9 November (DTSC, 1995a). The 1995 O&M Agreement and the O&M obligation under the 2005 Settlement Agreement applies to Midway Village and does not include the Bayshore Park parcels. The 2008 Settlement Agreement for Bayshore Park obligates the City of Daly City to maintain a minimum of two feet of clean soil covering contamination by maintaining vegetation or existing hardscape.

The current soil remedy outlined in the 1995 O&M Agreement with HACSM includes the following conditions for the capped areas in Midway Village:

- Inspections of the of hardscapes every six months,
- Sealing of concrete, every three years,
- Sealing of asphalt cracks with slurry coating every two years, and
- Monitoring landscaping areas for deep holes, missing plants or dried areas.

DTSC has published four Five Year Review reports for Midway Village and three Five Year Review reports for Bayshore Park to evaluate the performance of the current soil remedy and to determine if the remedy remains protective of human health and the environment. In each Five-Year Review report for Midway Village and Bayshore Park since 2000 and 2007, respectively, including the most recent Five Year Review reports for both Midway Village and Bayshore Park

published in June 2019, DTSC has stated that the current soil remedy is protective of human health.

2.3 Geology and Hydrogeology

In the 1800s, the shoreline of the San Francisco Bay was located at Bayshore Boulevard, approximately 0.2 miles east of the Site (CH2M Hill, 1991). The land west of Bayshore Boulevard, including portions of the PG&E property adjacent to the Site was a saltwater marsh, which was filled between the 1940s and 1970s to accommodate for the expansion of the Martin Substation (currently Martin Service Center). Since the 1970s, a freshwater marsh developed in the topographic low (referred to as the Levinson Property) between Bayshore Boulevard and the PG&E property; this freshwater marsh is located approximately 0.12 miles east of the Site (CH2M Hill, 1991) (Figure 1).

Per the November 2019 San Francisco Basin (Region 2) Water Quality Control Plan (Basin Plan), groundwater at Visitacion Valley and the Site is designated for existing PRO (industrial process supply) and IND (industrial service supply) beneficial uses and potentially municipal (MUN) and agricultural (AGR) beneficial uses. Drinking water at the Site is supplied by the San Francisco Public Utilities Commission (PUC). Because of existing LUCs and future LUCs, groundwater at the Site is not permitted for drinking, agricultural, or industrial use.

At the Site, groundwater flow is presumed to be eastward towards the San Francisco Bay located approximately 1.2 miles east of the Site. Shallow groundwater at the Site may discharge into the unlined drainage ditch (Figure 4) located on the adjacent PG&E property referred to as the Brisbane Yard Annex immediately east of Bayshore Park (CH2M Hill, 1991, and Figure 1). The drainage ditch directs water to the east, where the ditch runs through the freshwater marsh. Water drains from the freshwater marsh through a floodgate and ultimately discharges to the San Francisco Bay (Figure 1). The floodgate at the end of the freshwater marsh prevents sediments from entering the sewer that connects to the bay (CH2M Hill, 1991).

Based on recent and previous field investigations, soil at the Site can be classified into three units. Fill consisting of silt, sand, clay, and general construction debris, underlies Midway Village North and the Park (E&E, 1993c). The fill is approximately 10 feet thick beneath the Park in the vicinity of the former marsh, and the fill layer thins towards the west with a thickness of less than one foot at the western end of Cypress Lane (E&E, 1993c). The fill layer consists of medium dense to dense sand, silty sand and clayey sand and stiff to very stiff clay. The fill layer thickness decreases on Midway Village South. During Langan's November 2019 soil gas investigation in

Midway Village South, the fill layer was not observed in any of the five foot soil gas probes borings, and during Rockridge Geotechnical's investigation, the observed fill layer thickness was less than two feet where explored (Rockridge, 2020). Underlying the fill layer are former-marsh sediments. The horizon between the fill and underlying former-marsh sediments is observed to be gradational in some locations. Based on Rockridge Geotechnical's 2020 investigation, this marsh deposit consists of soft to medium stiff clay with varying amounts of organics and ranges in thickness between two and four feet and 7.5 and 10 feet (Rockridge, 2020). Below the marsh deposits are heterogeneous alluvium deposits consisting of interbedded medium dense to very dense sand with varying silt and clay content and stiff to hard clay that extended to maximum depth explored of 50.5 feet.

The 1993 RAP concluded that there was no single, well-defined water-bearing unit in the top 20 feet bgs (E&E, 1993c). However, based on pore dissipation tests completed by Rockridge, depth to groundwater ranged between 13.9 feet bgs in Midway Village South, and two feet bgs in the southern portion of the Bayshore Park. Rockridge stated that these water levels are likely representative of shallow and deep groundwater zones and may not be representative of groundwater levels in the fill (Rockridge, 2020). During Langan's December 2018 soil gas investigation, groundwater in the fill was observed as shallow as two feet bgs, and during the March 2020 groundwater investigation, groundwater was observed at approximate depths of 12 feet bgs at GW-1 in Midway Court, two feet bgs in GW-3 near soil gas sample location SG-9, and nine feet bgs at GW-5 in Bayshore Park (Langan, 2020c).

Based on information from former monitoring wells located at the adjacent PG&E Martin Service Center property just north of the Site, the unconfined groundwater within the artificial fill is encountered at approximately seven feet bgs. The saturated thickness of this zone is up to seven feet. The surface water may infiltrate from the drainage ditch to groundwater during and after rainfall events (Hayley and Aldrich, 2015). Shallow groundwater generally flows to the east towards the San Francisco Bay (Innovative Technical Solutions Inc., 2009).

2.4 Previous Soil Results

Soil results can be found in the following documents and are discussed in detail in Langan's HHRA (Langan, 2020b).

1. *Remedial Investigation Report for the Remedial Investigation/Feasibility Study and the Remedial Action Plan for Midway-Bayshore Site*, E&E, May 1993;

2. *Data Summary Report, Midway Village Soil Investigation*, URS, January 2001a;

3. *Midway Village Data Summary Report Addendum: Additional Sampling*, URS, August 2001b; and,

4. *Final Report, Midway Village/Bayshore Park Removal Action Completion Report*, ERRG, September 2002.

Because there is an existing DTSC-approved soil remedy that has been evaluated in four Five Year Review reports and DTSC has stated that this soil remedy is effective in protecting human health, soil is not evaluated in this RAP Amendment. The soil remedy and previous Five Year Review reports predated evaluation of the soil gas sampling results completed in 2018 and 2019, which identified a potential vapor intrusion pathway. The most recent June 2019 Five Year report states that vapor intrusion assessments have progressed and an updated vapor intrusion assessment for the planned redevelopment is appropriate. Additionally, because the redevelopment plan includes land uses that are not approved in the current LUCs, a variance application must be approved by DTSC prior to start of construction. The variance process is discussed in Section 5.0.

In addition, a DTSC-approved Remedial Design Implementation Plan (RDIP) will be prepared for each redevelopment phase prior to construction as discussed in Section 5.0.

2.5 Soil Gas Results

Midway Village North

In December 2018, Langan advanced 16 borings to facilitate the collection of soil gas samples. Soil gas samples were collected in accordance with the Work Plan (Langan, 2018a). DTSC required the soil gas investigation to evaluate potential human health risk associated with the proposed change in land use from recreational to residential on Bayshore Park, and to update the previous 2002 vapor intrusion assessment for Midway Village as recommended in the Five-Year Review. The Work Plan was approved by DTSC in their email dated 9 November 2018.

Temporary soil gas sample wells (SG-1 through SG-16) were installed in Midway Village North and Bayshore Park, as shown on Figure 6. Fifteen soil gas samples (including duplicate samples DUP-1 and DUP-2) were collected from temporary soil gas wells. Due to the presence of shallow groundwater or infiltrated rainwater in three of the borings (SG-6, SG-10 and SG-11), soil gas samples were not able to be collected (Figure 6), and the remaining soil gas probes were installed at varying depths ranging between 2.5 to 5.0 feet bgs. In addition, two ambient air samples (Ambient 1 and Ambient 2) were collected to provide a comparison to what was detected in the soil gas samples (Langan, 2020c).

In April 2019, Langan advanced two additional temporary soil gas probes (SG-17 and SG-18) as shown in Figure 6. Soil gas probe SG-17 was advanced adjacent to a residence in Cypress Court to investigate a PCE detection in a sub slab soil gas sample. Soil gas probe SG-18 was advanced adjacent to Bayshore Child Care facility to confirm there was no subsurface source contributing to a PCE detection in indoor air (Langan 2020c). Indoor air sampling and results for the current residents of Midway Village North are discussed in Langan's *Indoor Air and Sub Slab Results, Midway-Bayshore Village Redevelopment, Daly City, California* dated 8 July 2020.

Due to the presence of shallow groundwater or infiltrated rainwater in the borehole, in the field on 29 April 2019 and as discussed with DTSC, the temporary soil gas probe for SG-17 was installed to a depth of 1.5 feet bgs. In addition, ambient air sample AA-5 was collected to provide a comparison of what was detected in the soil gas samples (Langan 2020c).

MPG-related VOCs detected during soil gas sampling events at Midway Village North included benzene, ethylbenzene, 1,4-DCB, naphthalene, xylenes, 1,2,4-trimethylbenzene (1,2,4-TMB), and 1,3,5-TMB. These VOCs detected in soil gas are attributed to the presence of MGP-impacted fill that was placed in Midway Village North and Bayshore Park in 1944. Other detected VOCs that are not considered MGP-related COPCs included bromomethane, carbon tetrachloride, chloroethane, chloroform, chloromethane dichlorodifluoromethane, PCE, styrene, trichlorofluoromethane, trichlorotrifluoroethane, and vinyl chloride. The sample locations with VOC exceedances above their respective residential human health soil gas screening levels (SGSLs)[1] include SG-1, SG-9, SG-14, and SG-17, as shown on Figure 7. Naphthalene was detected in these four samples at 7,950 micrograms per cubic meter (µg/m^3) (SG-1), 116,000 µg/m^3 (SG-9), 6,750 µg/m^3 (SG-14), and 145 µg/m^3 (SG-17), and exceeded the SGSL of 83 µg/m^3. Benzene was detected in three samples at 46,600 µg/m^3 (SG-9), 709 µg/m^3 (SG-14), and 381 µg/m^3 (SG-17), and exceeded the SGSL of 97 µg/m^3. Ethylbenzene was detected in SG-9 at 8,270 µg/m^3, and exceeded the SGSL of 1,100 µg/m^3 (Table 2; Figure 7; Langan 2020c).

Midway Village South

Per the request of DTSC, in October 2019, Langan advanced temporary soil gas probes SG-19 though SG-29 at Midway Village South as shown on Figure 6 (Langan, 2020b).

[1] SGSLs were derived using DTSC's 2011 default attention factor of 0.001. The SGSLs were calculated using the 2011 attenuation factor and the indoor and ambient air screening levels from either DTSC's HERO HHRA Note 3 (June 2020) or the USEPA RSLs for resident air published in November 2019. The rationale to use DTSC's 2011 attenuation factor is included in Section 2.8.1.

At Midway Village South, only samples SG-19 and SG-25 contained VOCs detected at concentrations exceeding their respective SGSLs (Langan, 2020e). Vinyl chloride was detected at SG-19 at 14.7 µg/m^3, exceeding the SGSL of 9.50 µg/m^3. Ethylbenzene was detected at SG-25 and DUP-1 at 2,520 and 2,600 µg/m^3 respectively, exceeding the SGSL of 1,100 µg/m^3. Several other VOCs were detected above laboratory reporting limits but below their respective SGSLs (Table 2). Several VOCs were also present above laboratory detection limits in the ambient air samples collected. Benzene, carbon tetrachloride, and naphthalene exceeded their respective ambient air screening levels (SLs). Soil gas data and SGSL exceedances are summarized in Table 2 and Figure 7 (Langan, 2020b).

2.6 Groundwater Results

In April 2020, Langan performed groundwater sampling, in part to confirm the shallow depth to groundwater observed during the soil gas investigations. The primary purpose of the investigation was to evaluate potential offsite transport of MGP-related contaminants and the potential risk to offsite ecological receptors. Results of the groundwater investigation will be provided in a forthcoming Final Groundwater Investigation Report. Groundwater flow is presumed to be east towards San Francisco Bay, and the off-Site drainage ditch is shown on Figure 8 (Hayley and Aldrich, 2015). Previous groundwater data collected by Haley and Aldrich in 2015 and E&E in 1993 were used in Langan's HHRA to evaluate potential risk to future residents and construction workers, as discussed in Section 2.8.

Langan collected groundwater samples from five locations (GW-1 through GW-5) at Midway Village North in April 2020 per our *Groundwater Investigation Work Plan, Midway-Bayshore Village Redevelopment* (Figure 8; Langan, 2020a). Although the purpose of the recent groundwater sampling was to evaluate ecological risk, the results were compared to Regional Water Quality Control Board (Water Board) Residential Groundwater Vapor Intrusion (VI) Environmental Screening Levels (ESLs), as shown in Table 3, to inform health and safety procedures such as the use of appropriate personal protective equipment (PPE) that will be required during redevelopment activities. Because groundwater is not a source of drinking water, results were not compared to drinking water quality standards.

Total cyanide was detected in four of the six groundwater samples analyzed at concentrations ranging from 5.8 micrograms per liter (µg/L) in GW-4 to 770 µg/L and 940 µg/L in GW-3 and the duplicate sample (DUP) DUP-1-2020, respectively. The VI ESL for cyanide of 200 µg/L was only exceeded in the GW-3 and the DUP-1-2020 samples.

Naphthalene was detected in all six groundwater samples analyzed at concentrations ranging from 0.15 µg/L in GW-5 to 1,000 µg/L and 1,100 µg/L in GW-3 and the DUP respectively. The VI ESL of 4.6 µg/L was exceeded in samples GW-2, GW-3 and the DUP-1-2020.

Twenty-two SVOCs were detected above laboratory reporting limits at concentrations ranging from 0.011 µg/L to 9.4 µg/L; however, concentrations did not exceed established VI ESLs (Table 3).

In addition, the highest concentration of naphthalene and cyanide were detected adjacent to SG-9, where the highest concentrations of naphthalene in soil gas was also detected. The depth to groundwater at SG-9 was observed at approximately 3.5 feet bgs. Though total cyanide exceed the VI ESL in GW-3 and naphthalene exceeded the VI ESL in GW-2 and GW-3, these sample locations are currently located in outdoor parking areas and will be below the future Bayshore Park (Phase 5). Additionally, buildings in Midway Village North will have vapor mitigation system (VMS) as a protective mitigation measure for future residents.

The results of the groundwater investigation at Midway Village North will not impact the chosen remedial action for soil gas because evaluating human health risk using soil gas results most accurately represents concentrations available for potential exposure via the vapor inhalation pathway.

At Midway Village South, groundwater contamination is not expected because the MGP impacted fill material is not present and groundwater typically flows east towards the San Francisco Bay. In addition, MGP related COCs were not detected above ESLs in GW-1, the groundwater sample location closest to Midway Village South.

2.7 Conceptual Site Model

The Conceptual Site Model (CSM) presented in the HHRA identified potential sources and types of constituents, affected media, potential receptors, and potential exposure pathways. The CSM was used as the foundation on which risk assessment exposure assumptions were based. The CSM is presented in Figure 9A. Given the continued use of Midway Village as residential apartment units following completion of improvements, two potential receptor populations were identified for quantitative evaluation in the HHRA:

- Residents (children and adults), and
- Construction workers.

Park recreators and day care use were not evaluated in the HHRA because the evaluation of the resident receptor is health-protective for recreators and day care uses. Currently, there are no complete direct-contact exposure pathways to the Site users, including residents, from impacted soil by maintenance of a cap at Midway Village North. The Bayshore Park portion is underlain by at least two feet of clean fill material. Several PAH-impacted areas at Midway Village North were remediated and backfilled with clean fill as discussed in Section 2.2. Figure 9B presents a remediation CSM indicating that the current and future cap eliminates the soil exposure route and that future VMS will mitigate the potential soil vapor exposure route to residents. Though future residents will not experience direct exposure to soil, for the purpose of the HHRA and as a highly conservative measure, residents were assumed to be exposed to soil up to 10 feet bgs.

Soil gas samples were collected from Midway Village North in December 2018 and April 2019 to assess the potential human health risks associated with the vapor intrusion pathway. Based on the soil gas data comparison to SGSLs, vapor intrusion into indoor air was retained as an exposure pathway for further evaluation in the HHRA. Potentially complete exposure pathways for the residents included incidental ingestion of soil, dermal contact with soil, inhalation of fugitive dust and ambient air, and inhalation of indoor air.

Construction workers will be required to adhere to protective measures to limit or control exposure as prescribed in a Health and Safety Plan (HASP) and DTSC approved RDIP; however, the construction worker was conservatively assumed to be exposed to both surface and subsurface soils to a maximum depth of 10 feet bgs. Potentially complete exposure pathways for the construction worker included incidental ingestion of soil, dermal contact with soil, inhalation of fugitive dust and ambient air, incidental ingestion of groundwater, dermal contact with groundwater, and inhalation of trench air.

The City of Daly City supplies potable water to the Site (SCS Engineers, 2017). The LUCs for Midway Village North and the Bayshore Park prohibit drilling for drinking water or irrigation water; consequently, Langan believes there is no direct contact exposure pathway to groundwater by adult and child residents. Midway Village South will be provided potable water from the same municipal supply as Midway Village North. Though previous environmental reports have indicated groundwater is present at depths of 20 to 25 feet bgs (ERRG, 2002), the recent geotechnical investigations and soil gas investigations suggest that groundwater may be shallower at depths ranging between two feet to 12 feet bgs. At these depths, it is plausible that construction workers may encounter groundwater during the course of their work. If any groundwater is encountered during redevelopment, the groundwater will be managed in accordance with a

DTSC-approved RDIP. In addition, construction workers will wear PPE and follow appropriate health and safety procedures as outlined in a HASP, and as required under the State of California Division of Occupational Safety and Health (Cal/OSHA) Title 8 regulations. Based on the recent depth to groundwater observed during Langan and Rockridge's 2020 investigations, exposure to groundwater was retained for the construction worker exposure scenario for further evaluation in the HHRA.

2.8 Human Health Risk Assessment

The objectives of the HHRA were to determine whether 1) concentrations of constituents below the cap in soil (data collected by others in Midway Village North and Midway Village South) and in soil gas (2018 and 2019 data) (Midway Village North) may pose unacceptable risks to human health for future residents and construction workers and 2) constituents in groundwater (collected by others) may pose unacceptable risk to construction workers unless the use of PPE is implemented. In addition, to mitigate risk to exposure to groundwater, groundwater management procedures will be submitted with the RDIP. As presented in the 24 September 2020 HHRA, a soil gas risk evaluation was conducted using a conservative attenuation factor of 0.03 to calculate soil gas screening levels. An attenuation factor is defined as the ratio of the indoor air concentrations to sub surface concentrations and is used as a measure of the decrease in concentration that occurs during vapor migration. The potential vapor intrusion risk was subsequently re-evaluated using a refined, Tier 2 attenuation factor of 0.001, as discussed below.

2.8.1 Evaluation of the Vapor Intrusion Attenuation Factor

The DTSC recommends evaluating multiple lines of evidence at vapor intrusion sites to provide a comprehensive understanding of the vapor intrusion pathway and to increase the confidence in risk management decisions. The following sections describe the lines of evidence that were evaluated for determining the appropriate soil gas to indoor air attenuation factor.

The generic soil gas attenuation factor, 0.03, developed empirically by the United States Environmental Protection Agency (USEPA) (USEPA, 2012) represents the 95th percentile value in the USEPA's vapor intrusion database and was initially applied to conservatively screen vapor intrusion potential at the Site. This empirical attenuation factor was developed using paired indoor air and sub-slab soil gas measurements from vapor intrusion sites throughout the United States, including primarily sites in the northeast and colder climates. The climate in Daly City is distinct from other regions in terms of heating and cooling. The Daly City area's moderate temperature results in high indoor air exchange rates (i.e., fresh air entering the building) caused primarily by

an increased use of windows and doors for ventilation and minimal heating requirements during the winter. Low subsurface vapor entry rates are also expected because 1) passive ventilation results in a low pressure differential between indoor and outdoor air, and 2) the use of air conditioning pressurizes a building, which reduces or negates advection of subsurface vapor across the building slab.

In addition, more than 75% of the indoor air samples included in the USEPA vapor intrusion database were collected from residential basements. The Midway-Bayshore Village Redevelopment consists of residential buildings constructed on a concrete slab without basements. The housing stock in the database was on average built before World War II, whereas the housing at issue here will be newly constructed and built to modern standards.

The USEPA notes that differences in site conditions should be considered when evaluating the vapor intrusion database because they may "impart significant bias" (USEPA, 2012). Based on the climate zone of coastal California, a generic sub-slab attenuation factor applicable to the Daly City region is 0.0008 (Brewer, et al., 2014), indicating that risk and hazard estimates derived using screening levels that incorporate the generic attenuation factor are overestimated by one or more orders of magnitude.

DTSC's May 2019 Human Health Risk Assessment (HHRA) Human and Ecological Risk Office (HERO) Note 4 provides that in addition to the empirical USEPA attenuation factor the "DTSC recommended default attenuation factors for preliminary screening evaluations can be found in Table 2 of DTSC's 2011 Vapor Intrusion Guidance." This reference table establishes that the appropriate attenuation factor for calculating SGSLs is 0.001 for residential use. The following sections describe Site conditions that support the application of 0.001 as the appropriate Tier 2 soil gas to indoor air attenuation factor for the project.

Biodegradation

For all source types, soil vapor concentrations decrease as the distance from the source increases. In the subsurface, the dominant process for vapor transport is diffusion through the air-filled pores of the soil matrix. The potential for aerobic degradation during vapor migration will influence the vapor distribution of a chemical in the subsurface during diffusion. A defining feature of petroleum vapor intrusion is the relatively rapid rate of attenuation due to biodegradation in vadose zone soils, as is noted in the DTSC Vapor Intrusion Guidance (DTSC, 2011). MGP-related VOCs like xylenes degrade more readily with the presence of oxygen in the subsurface and concentrations will decrease with time compared to recalcitrant compounds such as halogenated

VOCs. Sub-slab gas samples, described below, provide empirical evidence of bioattenuation of MGP-related VOCs detected in deeper soil vapor. Oxygen was analyzed at each of the soil gas sample locations, and concentrations were reported to range between 9.57% and 22.7%, indicating that there is sufficient subsurface oxygen to enable biodegradation processes for petroleum-related VOCs. As described below, sub-slab gas samples, provide empirical evidence of bioattenuation of MGP-related VOCs detected in deeper soil vapor.

Building Conditions

The vapor intrusion pathway is partly predicated on vapor entry through adventitious openings such as cracks and seams in walls or slab foundations. The ability of concrete to hinder the transport of soil gas depends on the physical integrity of the concrete; intact concrete is virtually impermeable to air flow (USEPA, 2012). Therefore, the concentration of MGP-related VOCs in indoor air is heavily influenced by the integrity of the foundation. New foundations, like those that will be poured at the Site, are unlikely to develop significant foundation cracks compared to the concrete slabs of older structures. However, contaminant concentrations are expected to degrade over time.

Indoor Air and Sub-slab Soil Gas Data

Paired indoor air and sub-slab soil gas samples were collected in February and October 2019 to evaluate the vapor intrusion pathway at Midway Village North. Sampling procedures, results and the indoor air risk evaluation are presented in Langan's *Indoor Air and Sub-slab Sampling Results* letter report dated 5 November 2020 (Langan, 2020c). An evaluation of the Site-specific attenuation factor based on empirical data is presented below:

- In February 2019, PCE was detected in sub-slab soil gas sample SS-8 at a concentration of 326 µg/m^3. PCE was not detected in the collocated indoor air sample (IA-8) with a reporting limit of 0.0678 µg/m^3, indicating PCE is not migrating across the existing building slab. The resulting attenuation factor is 0.0002.

- In October 2019, PCE was again detected in sub-slab soil gas sample SS-8 at a concentration of 116 µg/m^3. PCE was not detected above laboratory reporting limit in collocated indoor air sample (IA-8). The resulting attenuation factor is 0.0006 for the existing building slab.

- In February 2019, naphthalene was detected in sub-slab soil gas sample SS-4 at a concentration of 1.03 µg/m^3. Naphthalene was not detected in the collocated indoor air sample (IA-4) with a reporting limit of 0.0786 µg/m^3, indicating that naphthalene is not migrating across the building slab. Naphthalene was detected in soil gas at elevated concentrations (maximum 116,000 µg/m^3 at SG-9) at 2.5 feet bgs; a depth greater than

the sub-slab soil gas sample depth of approximately six inches below the building slab (Langan, 2020b). Though the soil gas and sub-slab soil gas samples were not collocated, the markedly lower sub-slab and substantially higher soil gas concentrations indicate that naphthalene vapor concentrations reduce significantly as they move toward the surface.

- Benzene was detected in soil gas at elevated concentrations (maximum 46,600 µg/m^3 at SG-9) at 2.5 feet bgs, or two feet below the sub-slab soil gas sample depth of approximately six inches below the building slab (Langan, 2020b). Though the soil gas and sub-slab soil gas samples were not collocated, the markedly lower sub-slab soil gas concentrations indicate that benzene vapor concentrations reduce considerably as they move toward the surface. The vertical migration of hydrocarbons is frequently mitigated by biodegradation that takes place in the subsurface; therefore, benzene concentrations in soil gas samples collected from the 2.5 to 5-foot soil interval are higher than those from samples collected from just underneath the building slab. Benzene was only detected in three sub-slab soil gas samples (SS-7, SS-8, and SS-10) at concentrations of 2.71µg/m^3, 2.47 µg/m^3, and 1.85 µg/m^3, respectively. The associated indoor air sample results were consistent with ambient benzene concentrations in outdoor air (Langan, 2020c).

Based on the slab-on-grade, new construction, Daly City climate, biodegradation potential of petroleum VOCs, building conditions, and the indoor air, sub-slab soil gas, and soil gas sample results, an attenuation factor of 0.001 is sufficiently conservative to derive soil gas screening levels in this RAP Amendment to support health-protective risk management decisions.

2.8.2 HHRA Results

The HHRA provides information to support decisions concerning the need for further evaluation or action based upon anticipated future land use. Two receptor populations were identified: (1) Master Plan Redevelopment Area residents, and (2) construction workers. The risk assessment evaluation includes the following:

Soil

Carcinogenic PAHs (cPAH) concentrations in soil at Midway Village South are consistent with ambient background concentrations or below the associated risk-based concentrations (DTSC, 2009 and Langan, 2020b). As presented in the DTSC's Ambient PAH Study (DTSC, 2009), the 95th percent upper confidence limit (95UCL) of the mean benzo(a)pyrene equivalents (BaPeq) concentration is 0.4 mg/kg and the 95th percentile BaP_{eq} is 0.9 mg/kg for Northern California soils. Because the cPAH concentrations in soil at Midway Village South were either consistent with regional background or below the associated risk-based concentrations, additional remedial action for soil is not required.

Incremental Lifetime Cancer Risk (ILCR) estimates for the future Midway Village North site resident potentially exposed to cPAHs and naphthalene in soil is greater than DTSC's point-of-departure for risk management decision-making (i.e., 1E-06) but fall within the USEPA's risk management range (1E-06 to 1E-04). The Hazard Quotient (HQ) for the future Site resident potentially exposed to soil at Midway Village North are below the regulatory target level of one. Soil risk in Midway Village North is currently mitigated with the implementation of the existing approved remedy, which includes capping with ICs and monitoring.

The ILCR estimate for the construction worker is greater than DTSC's point-of-departure for risk management decision-making, but within the USEPA's risk management range at 5E-05. The non-cancer HQ is greater than 1 at 110, primarily due to exposure to groundwater in a construction trench. Potential human health risk to groundwater must be mitigated for the construction worker receptor using appropriate health and safety procedures (i.e. PPE) that will be outlined in a HASP.

Groundwater

The groundwater sample results reported in the 1993 RI (E&E, 1993b) were used to assess construction worker exposure to contaminants that infiltrate a trench or excavation. PAHs were detected in samples from W-1 and W-2 at 1.3 µg/L and 33.5 µg/L, respectively. Total cyanide was detected in samples from W-1 and W-2 at 16 µg/L and 140 µg/L, respectively. Benzene was detected in the sample from W-2 at 2.1 µg/L. TPH as diesel was detected in the samples from W-1 and W-2 at 100 and 130 µg/L. Since PAHs and TPH were reported as total values, toxicity values for B(a)P and the aromatic TPH diesel range fraction were utilized to characterize risk. Subchronic toxicity values obtained from the USEPA Regional Screening Level (RSL) metadata were applied for benzene, TPH, and cyanide.

Incidental ingestion of groundwater, dermal contact with groundwater, and inhalation of trench air were evaluated for the construction worker scenario. The Virginia Department of Environmental Quality (Virginia DEQ) construction worker trench model was used to estimate the migration of volatiles from groundwater into a construction trench. The depth of groundwater was assumed to be less than 15 feet bgs and groundwater was assumed to be pooling in the trench.

Exposure to historical PAH groundwater concentrations (evaluated as B(a)P), benzene, cyanide, and TPH (evaluated as the medium aromatic fraction) results in a non-cancer HI of 110. The

primary risk driving chemicals are BaP with a HQ of 11, and cyanide with a HQ of 98. The ILCR was within the USEPA's risk management range at 5E-05 (Langan 2020b).Soil Gas

Soil gas data collected throughout Midway Village North and Bayshore Park indicated discrete areas of elevated COPC concentrations that result in potentially unacceptable risks and hazards for future residents associated with the vapor intrusion pathway at locations with elevated soil gas (Table 4a). The vapor intrusion pathway requires remedial alternative evaluation for Midway Village North parcels that are included in Phases 1 and 5 (future Bayshore Park) and portions of Phases 2 and 3.

In Midway Village North, the results of the risk evaluation for soil gas demonstrate wide-ranging variability between sample locations with cumulative ILCR results spanning from 5E-08 at SG-16 located at Cypress Lane and Schwerin Street to 2E-03 at SG-9 in the northwest portion of Midway Village (Figure 7). The calculated HQ varied from 0.002 at SG-16 to 53 at SG-9. The primary contributors to the total HQ at SG-9 are benzene and naphthalene with HQs of 15 and 37, respectively (Table 4a).

In Midway Village South, the results of the risk evaluation indicate that the cumulative ILCR results range from 8E-08 at SG-22, located between buildings B7 and B12 on Brandon Court, to 2E-06 at SG-19 and SG-25, located just south of Midway Drive. The calculated HQs varied from 0.001 at SG-22 to 0.2 at SG-25. The primary contributors to the total HQ at SG-25 are xylenes (Table 4b). The following multiple lines of evidence were evaluated to determine that the VI pathway did not represent an exposure concern to future residents at Midway Village South:

- Biodegradation potential at both SG-19 and SG-25 where compounds contributing to ILCR will readily biodegrade with the presence of oxygen.
- Spatial analysis and building conditions; sample SG-25 with the highest ILCR will underlie a paved walkway, and SG-19 will be below a new building foundation which is unlikely to develop significant foundation cracks compared to the concrete slabs of older structures.
- Low permeability soil types such as clay are present at Midway Village South.
- Impacted fill material is present at Midway Village North only.

In consideration of the above multiple lines of evidence, that the default Tier 2 attenuation factor of 0.001 attenuation factor for VI risk evaluation is likely an overestimate. Therefore, soil gas remedial actions will not be required for Midway Village South.

The risk evaluation for Midway Village South and lines of evidence are presented in Langan's HHRA dated 24 September 2020 (Langan, 2020b).

2.8.3 Contaminants of Potential Concern

Based on the existing soil remedy, results of the HHRA, and a comparison of the 2018 and 2019 soil gas sampling data comparison to SGSLs, the following COPCs for the vapor intrusion pathway were identified: benzene, ethylbenzene, naphthalene, and vinyl chloride.

3.0 REMEDIAL ACTION OBJECTIVES AND GOALS

This section summarizes the remedial action objectives (RAOs), goals, and applicable and appropriate requirements for soil gas. Because the approved soil remedy is protective of human health, only soil vapor was evaluated throughout Sections 3.0 through 5.0.

3.1 Remedial Action Objectives

RAOs for soil gas will be protective of human health and the environment consistent with future land uses proposed for the redevelopment which includes Residential, Commercial, and Recreational land use. For the remedies to be evaluated, the RAOs are:

- Prevent or minimize exposure to VOCs in soil vapor at concentrations that would pose and unacceptable risk to residents and commercial users through exposure to indoor air inhalation of soil gas vapors.
- Prevent or minimize exposure of the public or construction workers to residual COPCs in soil, soil vapor, and groundwater during remedial action implementation.
- Ensure the selected remedial alternative(s) is protective for the planned use.
- Compliance with "Applicable and Relevant or Appropriate Requirements" (ARARs) and "to be considered" criteria (TBCs). ARARs are defined as either "applicable" or "relevant and appropriate" regulations, standards, criteria, or limitations promulgated under federal, state, and local regulations (see Section 3.3).

3.2 Soil Gas Remedial Goals

Based on the lines of evidences discussed above, soil gas remedial goals (SGRGs) are the SGSLs, derived using the DTSC's 2011 default attenuation factor of 0.001, also adopted as the project-specific Tier 2 attenuation factor. The SGSLs were calculated using the 2011 default attenuation factor and the indoor and ambient air screening levels from either DTSC's HHRA

HERO Note 3 published in June 2020 or the USEPA RSLs for resident air published in November 2019. SGRGs are presented in Table 5.

3.3 Identification of Potential ARARs and TBCs

This section presents federal and state ARARs that may apply to development of potential remedial alternatives to address COPCs in soil gas.

3.3.1 ARARs Definitions

The RAOs described in this section are developed in part by considering ARARs, and the ARARs presented in this section apply to the COPCs identified for soil gas. ARARs are defined as either "applicable" or "relevant and appropriate" regulations, standards, criteria, or limitations promulgated under federal, state, and local regulations. Midway Village is not a site listed on the USEPA Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) National Priorities List; however, the guidance established by the USEPA for evaluating ARARs on CERCLA sites is employed as guidance for identifying ARARs at the Site. In addition, under the National Contingency Plan (NCP), Title 40 Code of Federal Regulations (CFR) Part 300, the applicable, relevant, and appropriate requirements are defined as follows:

- ***Applicable*** requirements are those cleanup standards; standards of control; and other substantive requirements, criteria, or limitations promulgated under federal environmental or state environmental agencies citing laws that specifically include a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance found at a site. A requirement is applicable if it specifically addresses or regulates the hazardous substance, pollutant, contaminant, action being taken, or other circumstance at the Site. It is necessary to evaluate whether the specific conditions that trigger applicability of a statute, regulation, or requirement exist for the Site or activity in question in order to assess whether a particular requirement would be applicable. Such conditions include:
  - Who, as specified by the regulation, is subject to its authority;
  - The types of substances and activities regulated;
  - The period during which the regulation is in effect; and
  - The types of activities the regulation requires, limits, or prohibits.

If these conditions are met, the requirement is applicable. If not, the next step is to consider whether the requirement is relevant and appropriate.

- ***Relevant and appropriate*** requirements are those cleanup standards; standards of control; and other substantive requirements, criteria, or limitations promulgated under

federal environmental or state environmental agencies citing laws that, while not applicable to a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance at a site, address problems or situations sufficiently similar to those encountered at the Site (relevant) that their use is well suited (and appropriate) to the particular site. Evaluating whether a requirement is relevant and appropriate must be Site-specific and based on best professional judgment. A requirement may be relevant but not appropriate for a specific site. Only the requirements that are determined to be both relevant and appropriate are ARARs. Portions of a requirement may be relevant and appropriate even if a requirement in its entirety is not. The criteria for evaluating whether a requirement is relevant and appropriate are listed in Section 300.400(g)(2) of the NCP and include the following:

- The purpose of the requirement with respect to the proposed action at the Site;
- The medium regulated or affected by the requirement and the medium contaminated or affected at the Site;
- The substances regulated by the requirement and the substances detected at the Site;
- The actions or activities regulated by the requirement and the remedial action contemplated at the Site;
- Any variances, waivers, or exemptions of the requirement and their availability for the circumstances at the Site;
- The type of place regulated and the type of place affected by the release or action;
- The type and size of structure or facility regulated and the type and size of structure or facility affected by the release or contemplated by the action; and
- Any considerations of use or potential use of affected resources in the requirement and the use or potential use of the affected resource at the Site.

A state requirement is considered an ARAR when it meets the following criteria:

- A standard, requirement, criterion, or limitation specified by state environmental agency law;
- Promulgated (of general applicability and legally enforceable) requirement;
- Substantive (not procedural or administrative) requirement;
- Requirement that is more stringent than the federal requirement;
- Identified by the state regulator in a timely manner relative to the potential site action; and
- Requirement that is consistently applied.

In general, on-Site actions need only comply with the substantive aspects of ARARs, but not with the corresponding administrative procedures, such as administrative reviews and recording and record-keeping requirements. Off-Site actions must comply with all legally applicable requirements, both substantive and administrative. A summary of the ARARs is presented in Table 6.

In addition to ARARs, under the NCP, regulatory agencies' advisories, criteria, or guidance may be appropriate and useful "to be considered" (TBC) in developing remediation remedies. Such criteria, or TBCs, are not automatically required as cleanup standards because they are by definition neither promulgated nor enforceable. However, they may be useful in identifying what is protective at a site or how to carry out an action. Criteria stemming from regulatory agency advisories or guidance are considered either when ARARs do not exist (for example, as with remediation goals for soil and sediment) or when attaining ARARs is not protective. These criteria may be used to develop remediation goals or to guide how a remedy is implemented.

ARARs are usually divided into three categories, chemical-specific, location specific, and action-specific, as follows:

- Chemical-specific ARARs are generally considered as health- or risk-based numerical values applied to Site-specific conditions that result in the establishment of remediation goals to reduce the risk of human and environmental exposure to the levels that will be acceptable for its current and future Site uses (e.g., use of USEPA RSLs and DTSC SLs to calculate SGSLs and evaluate human health risk in the HHRA).

- Location-specific ARARs are restrictions on the concentrations of hazardous substances or the conduct of activities because of the characteristics of the Site or its immediate environment.

- Action-specific ARARs are technology- or activity-based and apply to specific remedial approaches rather than to a site (e.g., requirements to determine if generated waste is hazardous waste).

Details of the Federal and State ARARs and TBCs for the Site are described in Table 6.

4.0 REMEDIAL ACTION ALTERNATIVES AND EVALUATION

This section provides the evaluation criteria and a detailed analysis of each remedial alternative developed, followed by a comparative analysis. This information will be used to select a final remedy for the Site. The alternatives are evaluated using criteria based on statutory requirements of CERCLA (as amended), the NCP, the CHSC, and State and Federal guidance.

4.1 Federal and State Evaluation Criteria

The NCP specifies nine criteria to use in the detailed analysis as listed below. The first two criteria are threshold criteria that must be satisfied in order for a remedy to be eligible for selection; the next five criteria are "balancing criteria," which are used to evaluate the comparative advantages and disadvantages of the alternatives; and the last two criteria are "modifying criteria," which reflect regulatory agency and public input.

1. Overall Protection of Human Health and the Environment - This criterion addresses whether a proposed remedial alternative protects human health and the environment, considering long-term and short-term Site-specific characteristics. The remedy's long-term effectiveness and permanence, short-term effectiveness, and ability to reduce chemical toxicity, mobility, and volume affect the evaluation of the overall performance of each alternative under this criterion. Assessment of a remedial alternative with respect to this criterion is based largely on the degree of certainty that it can achieve progress toward meeting the Site-specific RAOs.

2. Compliance with ARARs - The selected remedy must comply with all ARARs and applicable regulatory advisories, criteria or guidance, as described in Section 3.3.

3. Long-Term Effectiveness and Permanence - This criterion addresses how well a remedy is projected to maintain protection of human health and the environment, including after RAOs have been initially met. Components to be addressed include the magnitude of anticipated residual risks and the adequacy and long-term reliability of management controls.

4. Reduction of Toxicity, Mobility, or Volume through Treatment - This criterion evaluates an alternative remedial action's ability to reduce toxicity, mobility, or volume of contaminants. Factors to be considered under this criterion include the following (USEPA, 1993):

    a) Treatment or recycling processes and the materials they would treat;

    b) Amount of hazardous substances, pollutants, or contaminants destroyed, recycled or treated;

    c) Degree of expected reduction in toxicity, mobility, or volume of waste due to treatment or recycling and specifications by which the reductions are occurring;

    d) Is the treatment irreversible;

    e) Type and quantity of residuals that remain following treatment, considering persistence, toxicity, mobility, and propensity of contaminants to bioaccumulate; and

    f) The degree to which the treatment reduces the hazards posed by the principal threats at the Site.

5. Short-Term Effectiveness - This criterion assesses protection of human health and the environment during implementation of the remedial action and shortly thereafter. To be considered are the length of time required to achieve protection, the short-term reliability of remedial technologies, protection of workers and the community during construction, and potential disruptions to exposed populations; that is, short-term environmental impacts.

6. Implementability - Implementability is assessed by considering the technical and administrative feasibility of each alternative as well as the availability of needed goods and services. Other considerations include the ability to construct and operate remedial facilities, ease of undertaking additional remedial actions, ability to monitor remedial effectiveness, and ability to obtain approvals and permits.

7. Cost - Capital costs include design and construction costs, costs for initial implementation of ICs, and O&M costs, such as annual outlays for monitoring and maintenance.

8. Community Acceptance - This criterion includes consideration of community comments on the proposed remedial alternatives.

9. State Acceptance - This criterion considers the State's position and key concerns related to the alternatives, including the State's comments on the ARARs or the proposed use of waivers.

In addition, the CHSC requires a "statement of reasons setting forth the basis for the removal and remedial actions selected." Further, State code requires the evaluation of remedial alternatives with respect to the following six factors:

1. Health and Safety Risks Posed by Site Conditions – This criterion considers the health and safety risks posed by Site conditions, which includes review of environmental data and reports related to the Site.

2. Effect of Contamination upon Beneficial Uses of Resources – This criterion evaluates the effect of contamination or pollutant levels upon present, future, and probable beneficial uses of contaminated, polluted, or threatened resources.

3. Effect on the Reasonable Availability of Groundwater Resources - This criterion evaluates the effect of the remedial action alternative upon present, future, and probable beneficial uses of groundwater resources for present, future, and probable future uses. This criterion prohibits remedial action measures that use off-Site transport and disposal of untreated hazardous substances or contaminated materials if practical and cost-effective treatment technologies are available.

4. Site Specific Characteristics – This criterion considers Site-specific characteristics such as the potential for off-Site migration of COCs, surface and subsurface soil, hydrogeologic conditions, and pre-existing background contamination levels.

5. Cost Effectiveness – This factor evaluates the cost-effectiveness of remedial action alternatives, including total short-term (capital) and long-term (O&M) costs.

6. Potential Environmental Impacts of Remedial Action – This criterion evaluates potential environmental impacts of the remedial action.

4.2 Remedial Action Alternatives

The four remedial alternatives developed and evaluated for soil gas include:

- Alternative 1: No Action.
- Alternative 2: Soil Vapor Extraction with Vapor Mitigation Systems, Institutional Controls and Monitoring.
- Alternative 3: Vapor Mitigation Systems with Institutional Controls and Monitoring.
- Alternative 4: Soil Gas Hot Spot Excavation and Vapor Mitigation Systems with Institutional Controls and Monitoring.

An analysis of the soil gas remedial alternatives listed above against the nine federal and six state criteria is presented below. Table 7 presents a summary of the remedial alternatives evaluation. The alternatives are evaluated against each criteria and generally rated as fail, very poor, poor, acceptable, good, very good, or excellent; some criteria remain to be determined (e.g., community and state acceptance). The criteria ratings are practical (e.g. implementability) and/or comparative (cost) and are based on engineering principles, Site and schedule constraints and professional judgement. For example, cost criteria is rated based on relative dollar amount whereas cost effectiveness remedial benefit for the dollar spent. To be selected, the cleanup alternative must compare favorably to other alternatives based on the overall rating derived from the criteria ratings as provided in Table 7.

It should be noted that although Alternatives 2 and 4 remedial alternatives include SVE and soil vapor hot spot removal, as a conservative measure to protect the health of future residents and commercial users, these alternatives also include VMS installation at all buildings within future Midway Village North.

4.3 Cap Disturbance and Replacement

Though this RAP Amendment is to evaluate the remedy for soil vapor, the existing cap that is comprised of concrete, asphalt, and soil will either be disturbed or demolished. Cap disturbance and replacement applies to Alternatives 2 through 4 described below, and therefore does not affect the remedial action alternative comparison. The cap that is disturbed or demolished will be replaced with a cap consisting of either hardscape (e.g. building foundations, roadways, parking lots, sidewalks, etc.) or at least two feet of clean fill placed above a demarcation layer in landscaping areas and/or the future Bayshore Park (Phase 5). Figure B-1 in Appendix B illustrates the cap replacement plan for the existing LUCs on Midway Village North.

Required permits will be obtained prior to the start of remedial activities, and a list of potential required permits will be outlined in each phased RDIP. Permits will be kept on the Site and will be made available for inspection during working hours. The following permits may be required prior to the start of demolition, grading, and excavation:

- If dewatering is needed prior to issuance of a grading permit, dewatering plans will be submitted to City of Daly City for approval prior to approval of grading permits;
- Grading permit;
- Building permits;
- Bay Area Air Quality Management District (BAAQMD) air quality permit and certification of off-road equipment greater than 25 horsepower that would be operated for more than 20 hours. This permit would be completed by the General Contractor (GC);
- Other BAAQMD authorizations as needed to implement the RDIP and maintain the remedy;
- If required, City of Daly City encroachment permits for activities requiring traffic control, trenching in the street, and installation of sanitary sewer and water service laterals;
- City of Daly City Site Improvement Permit for streets and utilities;
- If needed for groundwater disposal, Waste Discharge Permit from the Water Board or National Pollutant Discharge Elimination System (NPDES) Permit; and
- If the VMS were to be converted to an active extraction system in the future, a Permit to Construct and a Permit to Operate would need to be obtained from the BAAQMD.

- SWPPP must conform to the current legal requirements including the California State Water Resource Control Board (SWRCB) NPDES General Permit No. CAS00002, Waste Discharge Requirements (WDRs) for Discharges of Stormwater Runoff Associated with Construction and Land Disturbance Activities.

In the Phase 1 construction area of the existing Bayshore Park and the Phase 2 and Phase 3 construction areas of the existing Midway Village north, the existing cap will be disturbed from activities including the installation of utilities, building foundations, elevator pits, and bio-retention basins (required to address stormwater runoff for the proposed redevelopment).

Table B-1 presents the volume of contaminated soil export; the volume of assumed non-contaminated fill export; the volume of import fill; and approximate depths of elevator pits, utilities, and bio-retention basins for each phase of redevelopment. It is also assumed that excavated fill from Midway Village South will be used for import fill once material has been sampled in accordance with the RDIP and approved for reuse by the DTSC. For landscaping areas that require clean import fill, it is assumed that the contaminated fill layer will remain undisturbed and that two feet of clean import soil will be placed above a demarcation layer. For soils excavated outside of the existing capped areas on Midway Village North, it is understood that they may contain contaminants of concern. These soils will be chemically tested, and should the analytical results indicate that the soils are contaminated, they will be disposed off-Site. Soil management and cap disturbance mitigation procedures are discussed below in Section 4.3.1 to 4.3.8.

4.3.1 Soil Management

Soil handling, excavation, grading, and placement will be performed by a licensed engineering contractor with a Class A License and Hazardous Substance Removal Certification. If necessary, excavated soil will be temporarily stockpiled and covered with plastic sheeting pending relocation, segregation, or off-haul. The temporary stockpiled material will be placed within temporary fencing and/or barricades. If excess materials are off-hauled, waste profiling of the material will be completed and documented.

Excess soil generated during construction activities will be sampled and analyzed to evaluate the appropriate waste disposal facility. The sampling frequency, analytes, and required quality control procedures will be described in a Sampling and Analysis Plan in each phased RDIP. Soil profiling criteria will ultimately depend on the acceptance criteria of the licensed landfill facilities receiving the soil. If soil is proposed for reuse on-site, samples will be collected and analyzed in accordance with the guidelines established by the 2001 DTSC *Information Advisory Clean Imported Fill*

Material (DTSC, 2001) (Clean Fill Advisory). Soil imported onto the Site will be also be tested in accordance with the Clean Fill Advisory.

4.3.2 Site Security

The potential for trespassers or visitors to gain access to the Site and come into direct contact with potentially contaminated soil will be controlled through the implementation of the following access and perimeter security measures:

- Existing access control measures will be maintained, especially those areas with exposed soil, while still allowing tenant, public, and others' access to specific portions of the Site as warranted.

- Exclusion zone security fencing will be placed as-needed to prevent pedestrian/vehicular access to unpaved areas and soil stockpiles. Gates will be closed and locked during non-business hours. Fencing will consist of a 6-foot chain link or equivalent fence.

- Access to any exposed soil and soil stockpiles will be restricted with fencing and warning signs at approximately 200-foot intervals, where appropriate.

- Warning signs should read as follows with 2-inch lettering height in black capital letters on a yellow background:

CAUTION - NO TRESPASSING
HOUSING AUTHORITY OF THE COUNTY OF SAN MATEO
POTENTIAL ENVIRONMENTAL POLLUTION
CONTACT: (415) 467-4240 ext 12

Compliance with and maintenance of the specific access control measures is the responsibility of the Owner, the Operator, and their Agents.

In addition, a community hotline will be posted on security fencing for any complaints regarding noise, dust control, or general community concerns.

4.3.3 On-Site Movement of Soils

Cap material from Midway Village North or fill material from Midway Village South may be moved within or between various portions of the Site if required sampling and analytical results confirm the cap material and fill material is suitable for reuse. Reused soils must meet current standards for fill material. Fill material must also be screened for naturally occurring asbestos. The sampling frequency and required analytical testing will be outlined in the RDIPs.

4.3.4 Odor Control Procedures

Odor suppression measures will be implemented by the GC whenever contaminated soil is encountered and handled during construction activities.

These means include, but are not limited to: (a) limiting the area of open excavations; (b) wetting down of surfaces; (c) shrouding open excavations with tarps and other covers; (d) use of foams to cover exposed odorous soils; and (e) if warranted, use of chemical odorants in spray or misting systems (i.e. Simple Green, ODEX Zap TPH Mitigation Agent, Biosolve, and Gorilla-Snot). Safety Data Sheets (SDS) for any odor suppressors will be submitted with the RDIP to the DTSC prior to use. Odor suppressants will be applied by either perimeter high pressure misting lines or as a point source from spray guns. Odor control procedures will be presented in the RDIP.

4.3.5 General Dust Control Methods

Dust control will be accomplished through implementation of BAAQMD regulations, best management practices (BMPs), and engineering controls. In addition, dust control mitigation measures will meet requirements outlined in Stantec's *Midway Village Sustainable Communities Environmental Assessment* (SCEA) dated 6 April 2020.

Detailed dust control mitigation measures will be presented in the RDIPs and Community Action Air Monitoring Plan (CAMP).

4.3.6 Contingency Procedures

If unanticipated conditions such as contaminated soil and or underground structures are discovered, initial response, notification protocols, and a path forward including collection and analysis of samples will be completed. Detailed soil management contingency procedures will be included in the RDIP. These procedures will ensure that that development activities can continue safely.

4.3.7 Stormwater Pollution Prevention Plan

Per the requirements of the SCEA, a Stormwater Pollution Prevention Plan (SWPPP) will be prepared by the GC per state and federal regulations, and kept on site. The construction SWPPP must conform to the current legal requirements including the California State Water Resource Control Board (SWRCB) NPDES General Permit No. CAS00002, Waste Discharge Requirements (WDRs) for Discharges of Stormwater Runoff Associated with Construction and Land Disturbance Activities. The SWPPP will be submitted with the RDIP. The GC and its subcontractors will implement BMPs for erosion and sediment control. BMPs may include

diversion of drainage from the stockpiles, installation of silt fencing/straw bale filter barriers on the down gradient toe of the stockpile slope and dust control. Stockpiles will be inspected at least weekly to ensure dust control and runoff control measures are functioning adequately and as specified in the appropriate plans. If during an inspection, it is determined that BMPs are not in place, the GC will be responsible for implementing the BMPs, in accordance with the project-specific SWPPP.

4.3.8 Community Air Monitoring Plan

A CAMP will be prepared under separate cover by Langan in accordance with DTSC CAMP Guidance dated January 2020 and will outline dust monitoring procedures to be implemented during potential dust generating activities. The air monitoring objectives of a CAMP, per the CAMP Guidance, are as follows (DTSC, 2020a):

- Establish air monitoring Site-specific action levels for airborne COPC concentrations at including PAHs in soil particulates and VOCs in ambient air;
- Determine if and when COPCs in fugitive dust or VOCs exceed these action levels;
- Identify how direct-reading particulate measurements will be used as a surrogate for PAH COPCs in dust;
- Identify how direct-reading total VOC measurements will be used as a surrogate VOC concentrations; and
- Ensure that engineering controls and work practices are effective to minimize potential community impacts.

In addition, the CAMP will, at a minimum, specify:

- Sensitive receptors.
- Conditions when real-time dust monitoring and direct reading total VOC measurement is required.
- Baseline dust monitoring requirements.
- Community hotlines for any complaints regarding fugitive dust.
- The dust monitoring equipment and direct reading total VOC measurement to be used, as well as the minimum detection limit and equipment calibration requirements.
- Weather station equipment.

- Wind monitoring and shut down requirements.
- Air monitoring frequency and locations.
- Sampling and analysis plans for air monitoring.
- Dust threshold and calculated action levels and proposed corrective action responses.
- Reporting requirements.

The CAMP will be submitted as an Appendix to the RDIP to the DTSC for review and approval.

4.3.9 Groundwater Management

Phase 1 development plans include excavation of soil or installation of trench box shoring to depths that may encounter groundwater to support the construction of underground utilities. Because excavation for building foundations is shallow it is assumed that trench shoring will be needed for utility corridors only. Water removed during utility installation will be temporary placed into drums and/or storage tanks. The water will be sampled and analyzed for typical waste profile parameters and disposed of in accordance with applicable permits and regulations. Also, depending on groundwater analytical results and if approved by DTSC, the water may be reused for dust control purposes. Groundwater will be managed in accordance with the SCEA.

Disposal options may include pre-treatment and discharge into the City of Daly City's sanitary sewer system under an approved batch wastewater discharge permit. The Owner, Operator, or its Agents including, but not limited to, the GC may also apply for an NPDES permit through the Water Board for discharge to the San Francisco Bay. Compliance with provisions of any discharge permit is the responsibility of the Owner, Operator, or its Agents.

The results of the analysis and disposition of accumulated groundwater will be submitted to DTSC in the Remedial Action Completion Report (RACR).

4.4 Alternative 1 - No Action

Under Alternative 1, no remedial actions or mitigative measures would be taken to prevent exposure to soil vapor COPCs in indoor air through the vapor intrusion pathway. This alternative is retained throughout the evaluation process, as required by the NCP, to provide a baseline against which the other alternatives can be compared.

4.4.1 Federal Criteria Evaluation for Alternative 1

Overall Protection of Human Health and the Environment

At the Site, COPCs are present at levels in soil gas that pose an unacceptable risk to human health under the planned residential and commercial use for the Site. Alternative 1 does not address these risks; therefore this alternative fails this criterion.

Compliance with ARARs

ARARs apply to "any removal action or remedial action conducted entirely on Site," but "no action" is not a removal or remedial action; therefore, an evaluation of this alternative against ARARs in not required.

Long-Term Effectiveness and Permanence

Under this alternative, soil gas COPCs with concentrations above SGRGs would have the potential to migrate into newly constructed buildings and would not prevent exposure. On this basis, Alternative 1 fails this criterion.

Reduction of Toxicity, Mobility, or Volume through Treatment

By definition, the no-action alternative does not include any treatment. Therefore, this alternative fails this criterion.

Short-Term Effectiveness

Since no response actions would occur under this alternative, the on-Site community would not be exposed to additional risks from response actions, and the unmitigated risks would be as presented in the HHRA. The off-Site community and Site workers would not be exposed because no ground-disturbing activities would be conducted for the purpose of installation of SVE wells or excavation, and no adverse environmental risks would result from implementation of the alternative. The overall rating for Alternative 1 for this criterion is excellent.

Implementability

No action, including implementation of ICs or construction of the remedy would be required to implement this remedy; the overall rating for Alternative 1 for this criterion is excellent.

Cost

There are no capital or O&M costs associated with this alternative; therefore, the overall rating for Alternative 1 under this criterion is excellent.

4.4.2 State Criteria Evaluation for Alternative 1

Health and Safety Risks Posed by Site Conditions

This alternative provides no reduction of health and safety risks because no additional steps would be taken to mitigate risks associated with soil gas COPCs. The overall rating for Alternative 1 under this criterion is poor.

Effect of Contamination upon Beneficial Uses of Resources

Soil gas with contaminant concentrations above COPCs would remain in place, and there would be no new measures implemented to prevent human exposure to or migration of contaminants. The overall rating for Alternative 1 is not applicable.

Effect of Contamination upon Groundwater Resources

Per the Basin Plan, groundwater at Visitacion Valley and the Site is designated for current PRO (industrial process supply) and IND (industrial service supply) and potentially municipal (MUN) and agricultural (AGR) beneficial uses. This alternative will not create a loss of beneficial groundwater use for the following reasons: 1) the LUCs currently and will in the future restrict use of groundwater for all uses, 2) the Site is developed and not currently used for agriculture or industrial purposes, and 3) drinking water is provided by the PUC, and LUCs will not allow the use of groundwater as a source of drinking water. Therefore, there is no loss of groundwater beneficial use. The overall rating for Alternative 1 is not applicable.

Site-Specific Characteristics

This alternative could result in the potential soil gas COPCs to migrate into indoor air, and no maintenance or monitoring would be performed. The overall rating for Alternative 1 under this criterion is poor.

Cost Effectiveness

There are no costs associated with Alternative 1; therefore, its overall rating under this criterion is excellent.

Potential Environmental Impacts of Remedial Action

Alternative 1 does not include any remedial action; therefore, there are no environmental impacts associated with implementation of a remedy. The overall rating of this alternative under this criterion is excellent.

4.5 Alternative 2 - Soil Vapor Extraction (SVE) with Vapor Mitigation Systems, Institutional Controls and Monitoring

Alternative 2 consists of SVE to reduce COPCs in soil gas, VMS, ICs, and monitoring to mitigate vapor intrusion into indoor air. SVE would be implemented in Phase 5 and a small portion of Phase 1 areas where COPCs exceed SGRGs by 100 times. One hundred times the SGRGs is equivalent to the upper end (1xE-4) of the human health risk management range and based on professional judgement is a practical level at which substantial COPC mass can be removed. The SVE target area is presented in Figure 10. The SVE system is assumed to consist of SVE wells, conveyance piping and a vapor-phase granular activated carbon (GAC) treatment system. Prior to implementing this alternative, a pilot study would be conducted to verify the effectiveness of this alternative and to refine the design of the full-scale SVE system. It should be noted that though the criteria for operation of SVE is 100 times the SGRGs, VMS will be installed below all future buildings within future Midway Village North, which will act as a protective engineering control for residual COPCs in soil gas.

It is anticipated that SVE may not be technically feasible or cost effective because 1) the system construction area is limited due to existing buildings in the vicinity of SG-9, and 2) a small portion of SVE is within the Phase 1 construction area as shown on Figure 10. Additionally, limitations for SVE exist due to historically and recently observed shallow groundwater in the northern portion of Midway Village North, where the SVE areas are proposed (Langan, 2020b; Rockridge, 2020; Figure 10). In April 2020, groundwater was observed at approximately two feet bgs at grab groundwater sample locations GW-2 and GW-3 shown on Figure 8, which are in the vicinity or directly within the proposed SVE area shown in Figure 10. Soil vapor extraction wells will not function if continuously saturated with water, and shallow groundwater and saturated soil are considered limiting factors for SVE design (DTSC, 2010a). The installation of SVE will also be difficult to implement in the Phase 1 construction area because of grading and construction activities and would delay construction in Phase 1, which is a critical path milestone for MidPen and HACSM to secure their federal funding. If there are delays from SVE implementation, MidPen and HACSM will incur contractor related construction delay fees stemming from any delay to the start of construction which is anticipated in June of 2021, of $170,000 per month. Given the uncertainties regarding feasibility of installing SVE, MidPen and HACSM will install VMS below Buildings A and A2 to protect against residual COPCs in soil gas.

Following Phase 1 demolition and grading activities, prior to SVE installation a pilot study will be conducted in order to obtain information needed to design the appropriate SVE system for the RDIP submittal to the DTSC. Following SVE, VMS will be installed below all buildings with future

Midway Village North (Phases 1, 2, and 3) with the exception of the slab-on-grade, open, mechanically ventilated garage (Garage A) planned for a portion of Building A (Figure 2), which is located in the current Bayshore Park. The design of the VMS will be submitted to DTSC in a RDIP for each development Phase and will include construction design drawings and proposed post construction monitoring requirements.

The conceptual VMS design, developed for order-of-magnitude cost estimating purposes, for each proposed building within construction Phase 1 and the portions of Phase 2 and 3 within future Midway Village North includes:

- A continuous, competent vapor barrier membrane immediately beneath the structural foundation slab to mitigate vapor migration into the building (membrane product selection and specifications will be provided along with VMS designs in the RDIP and will require DTSC approval.

- Horizontal collection and venting system consisting of 3-inch diameter perforated polyvinyl chloride (PVC) pipe embedded in a 4-inch gravel layer installed below the vapor barrier to allow soil vapors that may otherwise collect beneath the slab to migrate and vent to the atmosphere outside the building.

- Perimeter grade beam vents to facilitate convective airflow up the vertical riser pipes of the collection and venting systems by allowing fresh air to enter the space beneath the foundation slab.

- A series of risers fitted with wind-assisted turbines to vent vapors to the atmosphere at roof level.

- Electrical service at the roof level in the event that the VMS needs to be converted from a passive to active system, which may be achieved via the installation of a belt drive corrosion resistant duct fan. VMS design drawings included in RDIP will require that electrical service be provided at the roof level to operate this fan if necessary.

ICs are non-engineered remedy components based on the intended land use and would be designed to meet RAOs and ARARs. ICs will be necessary to ensure proper operation and monitoring of the required VMS and ensure the soil gas remedy is effective long term. Operation, maintenance, and post construction monitoring and IC monitoring would be outlined in a DTSC approved Operation, Maintenance and Monitoring (OM&M) Plan. The LUCs are components of ICs, enforceable by DTSC, and will reference the OM&M requirements. The redevelopment plan proposes changes in land use. For example, prohibited land uses for the existing 2002 Bayshore Park LUC is residences, hospitals, public or private schools and day care centers. The Midway Village 1998 and 2010 LUCs approved land use only includes multiple family residential.

The changes in the proposed land uses (Figure 2) for the property subject to the existing LUCs will be approved through a variance process described in Section 5.0.

4.5.1 Federal Criteria Evaluation for Alternative 2

Overall Protection of Human Health and the Environment

COPCs are present in soil gas at concentrations that pose an unacceptable risk to future Site users. The installation of an SVE system would reduce COPC concentrations in areas with COPC concentrations in soil gas 100 times SGRGs. The SVE would operate until monitoring results show that COPC concentrations have decreased to SGRGs or the COPC recovery has reached asymptotic conditions. A VMS is an effective engineering control that has been proven to mitigate the potential for vapor intrusion by eliminating the vapor intrusion pathway. Whether the SVE is chosen together with VMS, or the VMS alone is indicated, the implementation and enforcement of ICs such as the LUCs and OM&M would ensure the integrity of the soil gas remedy. The overall rating for this alternative against this criterion is very good (Table 7).

Compliance with ARARs

Action-specific ARARs associated with this alternative would be met. Soil cuttings generated during the installation of SVE wells should be managed as a hazardous waste (if needed) pursuant to the requirements of RCRA that have been identified as chemical specific ARARs. The overall rating for Alternative 2 for compliance with ARARs is acceptable.

Long-Term Effectiveness and Permanence

Under Alternative 2, soil gas will be removed from areas where COPC concentrations exceed SGRGs by 100 times using SVE, combined with the installation of VMS. Prior to implementation of this alternative, a pilot study would need to be conducted to verify the effectiveness of SVE and to refine the design of the full-scale SVE system. However, the effectiveness of the SVE would be negatively impacted by the shallow groundwater in Midway Village North and the heterogeneous, low-permeability nature of the fill material, and by the time constraints from the Phase 1 construction schedule. VMS has been successfully used as an engineering control to prevent migration of VOCs into building indoor air. Its effectiveness depends on the installation quality and results of long-term maintenance and monitoring. The VMS would be installed during building construction and will be present as long as the building remains. ICs in the form of LUC agreement will ensure proper implementation and long term O&M of this remedy. VMS repairs will be outlined in the DTSC approved OM&M Plan. Though VMS has good long term effectiveness, the SVE component is technically ineffective; therefore, the overall rating for Alternative 2 against this criterion is poor.

Reduction of Toxicity, Mobility, or Volume through Treatment

The SVE component of Alternative 2 would reduce the overall mass of VOCs in soil gas in the subsurface through extraction and treatment. Eliminating the vapor intrusion pathway via the VMS would mitigate COPC migration from the subsurface into the building, thus reducing the mass of VOCs. Because soil vapors would be removed with active SVE treatment for Alternative 2, the toxicity of chemicals will be reduced. The overall rating for Alternative 2 is good.

Short-Term Effectiveness

Risks to the community and current workers may occur during construction due to increased traffic. Risks to workers that are constructing the SVE and VMS may also occur, although these would be mitigated by implementation of a Site-specific HASP, which would include the use of appropriate PPE and measures to protect against exposure of COPCs. By implementing Best Management Practices (BMPs) and a CAMP, the community would be exposed to minimal risk during SVE and VMS installation. The effectiveness of the SVE is likely to be limited by the shallow groundwater in Midway Village North and the heterogeneous, low-permeability nature of the fill material. Due to these site-specific conditions, several months would be required to reduce COPC concentrations in soil gas. Therefore, the short-term effectiveness is low. If the Phase 1 construction schedule is delayed from the implementation of SVE, MidPen and HACSM will incur construction delay fees of $170,000 per month. In the cost estimate in Appendix C Table C-1 we have assumed that a six month delay could be incurred with the implementation of SVE. The overall rating for Alternative 2 for this criterion is very poor.

Implementability

Implementability includes technical and administrative feasibility and availability of required resources. SVE and VMS are easily implemented technologies. Services and materials for SVE and VMS installation are readily available. Contractors implement SVE and VMS systems using common construction practices, and several contractors that perform these types of services are available in the San Francisco Bay Area.

Under this alternative, significant portions of the cap (both the soil cover and the hardscape) on Midway Village North and Bayshore Park will be disturbed or removed during grading and demolition in preparation for the redevelopment. The construction will include a new equally protective cap and the VMS. In addition, the redevelopment plan proposes land use changes (Figure 2) that are not approved for the existing LUCs. Therefore, administrative feasibility is contingent on securing variances from the three existing LUCs that require maintenance of the existing cap and maintenance of the park for park purposes. Cap maintenance at Bayshore Park

is also required under the settlement agreement between the State and the Responsible Parties. LUC variances are required for compliance with action-specific State ARARs (see Section 3.3.2.). The variance process is discussed in Section 5.0.

Alternative 2 is rated good for implementability.

Cost

The total capital and O&M costs for Alternative 2 is presented in Table 8. The estimated total present value is $4,336,200 for Alternative 2. The detailed cost estimate is presented in Table C-1 in Appendix C. The overall rating for Alternative 2 is poor.

4.5.2 State Criteria Evaluation for Alternative 2

Health and Safety Risks Posed by Site Conditions

This alternative provides a discernible reduction of health and safety risks because active steps would be taken to mitigate risks associated with soil gas COPCs, i.e., removal through installation of a SVE system and installation of a VMS to mitigate vapor intrusion risk from residual COPCs in soil gas, and implementing ICs and annual monitoring to maintain the integrity and functionality of the VMS. The overall rating for Alternative 2 under this criterion is very good.

Effect of Contamination upon Beneficial Uses of Resources

Based on the current land use and the timing of the development project, SVE could impact residents because SVE wells and carbon treatment vessels would need to be installed around the existing buildings. VMS installation does not impact the beneficial use of resources. ICs in the form of LUCs and the OM&M Plan would be implemented to maintain the operation and functionality of the VMS. The overall rating for Alternative 2 under this criterion is good.

Effect of Contamination upon Groundwater Resources

Per the Basin Plan, groundwater at Visitacion Valley and the Site is designated for current PRO (industrial process supply) and IND (industrial service supply) and potentially municipal (MUN) and agricultural (AGR) beneficial uses. This alternative will not create a loss of beneficial groundwater use for the following reasons: 1) the LUCs currently and will in the future restrict use of groundwater for all uses, 2) the Site is developed and not currently used for agriculture or industrial purposes, and 3) drinking water is provided by the PUC, and LUCs will not allow the use of groundwater as a source of drinking water. Therefore, there is no loss of groundwater beneficial use. The overall rating for Alternative 2 is not applicable.

Site-Specific Characteristics

Alternative 2 will remove COPCs in soil vapor over time, via SVE, with VMS to manage risks in the interim and over time; however, SVE will require mechanical equipment and pipelines to manage extracted vapors, which would be near existing buildings (future Bayshore Park Phase 5) and new buildings within the Phase 1 construction area (current Bayshore Park) as shown on Figure 10. Additionally, depth to groundwater is shallow in the proposed SVE area. While the SVE design will rely on the results of the pilot study, the proposed SVE well network would extend into the area beneath existing buildings in Midway Village North (Figure 10), which would be less technically effective because the presence of existing buildings would limit the spacing and installation of SVE wells and conveyance piping. In addition, if the pilot study identifies the need for higher density of soil vapor wells based on radius of influence, the existing building may limit the ability to install SVE wells. The design of the SVE system would be provided in a RDIP. VMS will be needed to mitigate residual soil gas COPCs from migrating into indoor air. Soil gas removal using SVE will require installing soil vapor monitoring wells and periodic sampling of the well and SVE system performance in a residential neighborhood and open space. The overall rating for Alternative 2 under this criterion is very poor.

Cost Effectiveness

Costs for SVE would include capital costs for the pilot study and full-scale system installation and operation and monitoring costs during the duration of operation, which may be one year to three years. VMS would be required because the extraction of COPCs in soil vapor via SVE would not be complete before the start of construction for the new buildings in Phase 1 (Figure 10) Additionally, VMS and ICs including OM&M, will be needed for all future Midway Village North buildings. Costs for VMS would include capital costs for the installation and OM&M costs for the duration of operation, assumed to be 50 years for cost estimation purposes. Considering the low technical effectiveness and capital and operations costs and monthly construction delay fees to implement SVE short term within the constraints of the Phase 1 construction schedule, Alternative 2 is rated very poor.

Potential Environmental Impacts of Remedial Action

The remedial action under Alternative 2 includes the import of materials needed to install, construct, and operate the SVE system and VMS. Associated environmental impacts would include VOC emissions from trucks bringing construction materials to/from the Site, from construction equipment during installation, and from the SVE system operation. VOC vapors would be treated via carbon vessels and operated under a BAAQMD permit. Grading prior to installation of a VMS could temporarily generate dust; however, implementing a Site-specific

CAMP will mitigate exposure of neighboring communities and Midway Village residents. The overall rating of Alternative 2 under this criterion is good.

4.6 Alternative 3 - Vapor Mitigation Systems with Institutional Controls and Monitoring

Alternative 3 consists of the installation of VMS with ICs and monitoring. VMS is proposed below all building pads within future Midway Village North Phases 1, 2, and 3 construction areas with the exception of the slab-on-grade, open air and mechanically-ventilated parking garage attached to Building A, which will be located in the current Bayshore Park (Figure 11). The design of the VMS will be submitted to DTSC in a RDIP for each development Phase. The conceptual VMS design, developed for order-of-magnitude cost estimating purposes, for each proposed building within construction Phase 1 and the portions of Phase 2 and 3 within future Midway Village North includes:

- A continuous, competent vapor barrier membrane immediately beneath the structural foundation slab to mitigate vapor migration into the building (membrane product selection and specifications will be provided along with VMS designs in the RDIP and will require DTSC approval);

- Horizontal collection and venting system consisting of 3-inch diameter PVC pipe embedded in a 4-inch gravel layer installed below the vapor barrier to allow soil vapors that may otherwise collect beneath the slab to instead migrate and vent to the atmosphere outside the building;

- Perimeter grade beam vents to facilitate convective airflow up the vertical riser pipes of the collection and venting systems by allowing fresh air to enter the space beneath the foundation slab;

- A series of risers fitted with wind-assisted turbines to vent vapors to the atmosphere at roof level; and

- Electrical service at the roof level in the event that the VMS needs to be converted from a passive to active system which may be achieved via the installation of a belt drive corrosion resistant duct fan. VMS design drawings included in RDIP will require that electrical service be provided at the roof level to operate this fan if necessary.

An RDIP will be prepared for each Phase of development and will include construction design drawings and proposed post-construction monitoring requirements. The decision to convert the VMS system from passive to active will be based on post construction monitoring results following the installation of the VMS. The criteria for converting from a passive to an active system will be included in the RDIP. In addition, the VMS construction drawings will include

design elements that require a power source on the roof level of each building to allow the conversion from a passive to active system. ICs will be necessary to ensure operation and monitoring of the VMS and to ensure the soil vapor remedy is effective long term. Operation, maintenance, and post construction monitoring and IC monitoring would be outlined in a DTSC approved OM&M Plan. The LUCs are components of ICs, enforceable by DTSC, and will reference the OM&M requirements. The changes in the proposed land uses (Figure 2) for the property subject to the existing LUCs will be approved through a variance process described in Section 5.0.

4.6.1 Federal Criteria Evaluation for Alternative 3

Overall Protection of Human Health and the Environment

COPCs are present in soil gas at concentrations that pose an unacceptable risk to future Site users. A VMS vapor barrier is an effective engineering control that has been proven to eliminate the vapor intrusion pathway. The implementation and enforcement of ICs such as the LUC and OM&M agreement would ensure the integrity of the soil vapor remedy. The overall rating for this alternative against this criterion is excellent (Table 7).

Compliance with ARARs

If active VMS is needed action-specific ARARs associated with this alternative would be met. The overall rating for Alternative 3 for compliance with ARARs is acceptable.

Long-Term Effectiveness and Permanence

VMS has been successfully used as an engineering control to prevent migration of VOCs into newly constructed buildings. Its effectiveness depends on the installation quality and long term maintenance and monitoring. The VMS would be installed during building construction and will be present as long as the building remains. ICs in the form of LUCs and OM&M agreements will ensure proper implementation and long term O&M of this remedy. If any future subsurface work is needed that would breach the VMS, repairs will be outlined in DTSC approved OM&M Plan. The overall rating for Alternative 3 against this criterion is very good.

Reduction of Toxicity, Mobility, or Volume through Treatment

Elimination of the vapor intrusion pathway through the installation of the VMS would eliminate COPC migration from the subsurface into the building. Although some bioattenuation of petroleum VOCs is likely occurring, because soil vapor containing elevated concentrations of COPCs would not be removed or treated, the volume and toxicity of chemicals would not be reduced, though the mobility would be decreased. The overall rating for Alternative 3 is poor.

Short-Term Effectiveness

Risks to the community and current workers may occur during construction due to increased traffic. Risks to construction workers that are constructing VMS may also occur, although this would be mitigated by implementation of a Site-specific HASP, which would include the assignment of appropriate personal protective equipment and measures to protect against exposure of COPCs. VMS will be installed by licensed contractors and observed by trained professionals. By implementing BMPs, the community would be exposed to minimal risk during VMS installation. BMPs would mitigate environmental effects by the implementation of construction practices designed to minimize dust control and air monitoring to compare to Site-specific ambient air action levels. The implementation time for this alternative would be months per phase of construction, coinciding with the new building construction for each of the separate phases of construction, so the short-term risk would be very minimal. The overall rating for Alternative 3 for this criterion is very good.

Implementability

Implementability includes technical and administrative feasibility and availability of required resources. This alternative is technically feasible and easily implemented, as contractors associated with installation VMS systems are common construction practices. Several contractors that perform these types of services are available in the San Francisco Bay Area. Materials for VMS installation are readily available and could be installed immediately during construction of new buildings.

Under this alternative, significant portions of the cap (both the soil cover and the hardscape) on Midway Village North and Bayshore Park will be disturbed or removed during grading and demolition in preparation for the redevelopment. The redevelopment activities will include the construction of a new equally protective cap and the VMS. In addition, the redevelopment plan (Figure 2) includes proposed land use changes that are not approved for the existing LUCs. Therefore, administrative feasibility is contingent on securing variances from the three existing LUCs that require maintenance of the existing cap and maintenance of the Bayshore Park for park purposes. Cap maintenance at Bayshore Park is also required under the settlement agreement between the State and the Responsible Parties. LUC variances are required for compliance with action-specific State ARARs (see Section 3.3 and Table 1). The variance process is discussed in Section 5.0.

For these reasons, Alternative 3 is rated very good for implementability.

Cost

The total capital and OM&M costs for Alternative 3 is presented in Table 8. The estimated total present value is $2,457,600 for Alternative 3. The detailed cost estimate is presented in Table C-2 in Appendix C. The overall rating for Alternative 3 is very good.

4.6.2 State Criteria Evaluation for Alternative 3

Health and Safety Risks Posed by Site Conditions

This alternative provides a significant reduction of health and safety risks because active steps would be taken to mitigate risks associated with soil gas COPCs, i.e., installation of a passive VMS (with option to go active) to mitigate vapor intrusion risk from residual COPCs in soil gas, and implementing ICs and OM&M to maintain the integrity and functionality of the VMS. The overall rating for Alternative 3 under this criterion is very good.

Effect of Contamination upon Beneficial Uses of Resources

The installation of a VMS does not impact the beneficial use of resources. ICs in the form of LUCs would be implemented to maintain the operation and functionality of the VMS. The overall rating for Alternative 3 under this criterion is not applicable.

Effect of Contamination upon Groundwater Resources

Per the Basin Plan, groundwater at Visitacion Valley and the Site is designated for current PRO (industrial process supply) and IND (industrial service supply) and potentially municipal (MUN) and agricultural (AGR) beneficial uses. This alternative will not create a loss of beneficial groundwater use for the following reasons: 1) the LUCs currently and will in the future restrict use of groundwater for all uses, 2) the Site is developed and not currently used for agriculture, and 3) drinking water is provided by the PUC and LUCs will not allow the use of groundwater as a source of drinking water. Therefore, there is no loss of groundwater beneficial use. The overall rating for Alternative 3 is not applicable.

Site-Specific Characteristics

This alternative will mitigate soil gas COPCs from migrating into indoor air and will not impact the use of surrounding and nearby open space. The overall rating for Alternative 3 under this criterion is excellent.

Cost Effectiveness

Costs for VMS would include capital costs for the installation and OM&M costs for the duration of operation, assumed to be 50 years for cost estimation purposes. Alternative 3 is rated is very good for cost effectiveness.

Potential Environmental Impacts of Remedial Action

The remedial action under Alternative 3 is limited to importation of a materials needed to install the VMS. Associated environmental impacts would include emissions from trucks bringing construction materials to/from the Site and from construction equipment during installation. Grading prior to installation of a VMS could temporarily generate dust. However, implementing a Site-specific CAMP will mitigate exposure of neighboring communities and Midway Village residents. The overall rating of this alternative under this criterion is very good.

4.7 Alternative 4 - Soil Gas Hot Spot Excavation (4A) and Soil Gas Hot Spot Targeted Excavation (4B) and Vapor Mitigation Systems with Institutional Controls and Monitoring

Alternative 4 consists of MGP-impacted fill excavation as a source removal for areas where soil gas analytical results exceed SGRGs in combination with VMS, where appropriate, with ICs and monitoring. Excavation uses earthmoving equipment (such as an excavator) to remove soil at locations where COPC concentrations in soil gas exceed SGRGs. Two versions of this alternative are evaluated; Alternative 4A includes locations with SGRG exceedances in Phase 1 and Phase 5 and Alternative 4B includes only SGRG exceedances in Phase 1, where enclosed residential structures Buildings A and A2 will be constructed. Overall, Alternative 4 is evaluated below with specific differences in criteria between Alternatives 4A and 4B noted where appropriate.

Alternative 4A includes SGRG exceedances in the vicinity of sample locations SG-1, SG-9, SG-14, and SG-17 (Figure 12). The limits of the excavation are estimated and additional delineation using soil gas sampling would be conducted following building demolition to confirm the excavation extent. Additional soil gas samples, which would be used for delineation, would be collected at locations where shallow groundwater was observed during the 2018 soil gas investigation (SG-6, SG-10, and SG-13) and between sample locations SG-14 and SG-16 (Figure 12). Sampling results will be compared to SGRGs and excavation limits will include locations where COPCs exceed SGRGs. For Alternative 4A, two excavations would be completed during the construction Phases 1 and 5 for soil vapor source removal. The vertical limit of excavation would be to the depth of the fill material which is the source contributing to MGP related VOCs in soil vapor. The detailed cost estimate in Table C-3A assumed the depth of fill layer in Midway Village North is approximately five feet bgs and extends to 10 feet bgs in Bayshore Park (with the top two feet including the clean cap material that was placed by ERRG as part of the 2002 remedial actions).

For Alternative 4B, soil vapor hot spots in the Phase 1 area where residential slab-on-grade Buildings A and A2 will be constructed would be excavated as shown on Figure 12. The limits of the excavation are estimated and additional soil gas samples would be collected between SG-1

and SG-5 and SG-1 and SG-6, and attempted at SG-6 (Figure 12) to delineate the extent of soil vapor excavation. Sampling results will be compared to SGRGs and excavation limits will include locations where COPCs exceed SGRGs.

For both Alternatives 4A and 4B, soil vapor hotspot excavation would delay construction in Phase 1 which is a critical path for MidPen and HACSM to secure their federal funding. Soil vapor hot excavation would delay the construction schedule because the sequencing of the development requires grading and foundation work before construction can proceed. If there are delays from excavation, MidPen and HACSM will incur construction delay fees from the start of construction which is anticipated in June of 2021 of $170,000 per month.

Excavated soil will be hauled off-Site for disposal at a licensed disposal facility, and excavations will be backfilled with clean fill. Though excavation would remove soil vapor hot spots, for purpose of the cost estimate and as intended by MidPen and HACSM (Table C-3A), it is assumed that VMS will be installed below all new buildings in future Midway Village North Phases 1, 2, and 3. The VMS design will be submitted as separate RDIPs for each Phase 1, 2, 3, and 5 (if needed) and will include post construction monitoring requirements, and outline the criteria for converting a passive VMS to an active VMS, which may be achieved via the installation of a belt drive corrosion resistant duct fan. The VMS conceptual design components are discussed above in Sections 4.5 and 4.6. In addition, Phase 1, 2, 3, and 5 (if needed) construction areas will require ICs and long term OM&M. The decision to change the VMS system from active to passive will be based on post-construction monitoring.

4.7.1 Federal Criteria Evaluation for Alternative 4

Overall Protection of Human Health and the Environment

COPCs are present in soil gas at concentrations that pose an unacceptable risk to future Site residents. Excavation of soil from soil gas hot spot locations could be completed concurrent with construction in the Phase 1 area and following building demolition in the Phase 5 area Source removal of the soil gas containing COPCs above SGRGs would mitigate the future Site user exposure to soil gas COPCs via the indoor air inhalation pathway. Additionally, a VMS is an effective engineering control that has been proven to eliminate the vapor intrusion pathway and would be an additional protective engineering control when installed in conjunction with soil gas hot spot excavation in Phase 1 Buildings A and A2. The implementation and enforcement of ICs, such as the LUCs and OM&M Plan, would ensure the integrity of the soil vapor remedy. The overall rating for Alternatives 4A and 4B against this criterion is excellent (Table 7).

Compliance with ARARs

Soil gas hot spot excavation in Phase 1 in combination with VMS, and VMS only in the remaining Phases 2 and 3, meets action-specific ARARs associated with this alternative. The overall rating for Alternatives 4A and 4B for compliance with ARARs is acceptable.

Long-Term Effectiveness and Permanence

The factors evaluated under long-term effectiveness and permanence include the magnitude of residual risks and adequacy and reliability of controls. Excavation would remove most of the soil gas containing COPCs exceeding SGRGs, which would reduce residual risks to exposure of COPCs in soil gas via the indoor air inhalation pathway in Buildings A and A2. Additionally, VMS has been successfully used as an engineering control to prevent migration of VOCs into newly constructed buildings. The effectiveness of the VMS depends on the installation quality and long term maintenance and monitoring. The VMS would be installed during building construction and will be present as long as the building remains. ICs in the form of a LUC and OM&M agreements will ensure proper implementation and long term OM&M of this remedy. If any future subsurface work is needed that would breach the VMS, repairs will be outlined in a DTSC approved OM&M Plan. The overall rating for Alternatives 4A and 4B against this criterion is excellent.

Reduction of Toxicity, Mobility, or Volume through Treatment

Elimination of the vapor intrusion pathway through the source removal of soil gas exceeding SGRGs and the installation of the VMS would eliminate any residual COPC migration from the subsurface into the buildings. Because soil gas containing elevated concentrations of COPCs would be removed, the volume and toxicity of chemicals would be reduced and with the implementation of VMS, the mobility would be decreased. The overall rating for Alternatives 4A and 4B is very good.

Short-Term Effectiveness

The total excavation volume for Alternative 4A is 19,180 cubic yards, which equals approximately 959 truckloads (assuming 20 cubic yards per truck). The total excavation volume for Alternative 4B is 10,600 cubic yards, which equals approximately 530 truckloads (assuming 20 cubic yards per truck).

Alternative 4 would pose added risks to the community and current occupants due to increased construction traffic and generation of dust that contains residual COPCs. However, these risks would be mitigated by BMPs for dust control, a CAMP to compare to Site-calculated ambient air action levels, limited hours of active construction, restrictions on idling of trucks, and tarping of loads on trucks carrying sediments off-Site for disposal. Risks to construction workers that are

completing the excavation or that are constructing VMS may also occur, although this would be mitigated by implementation of a Site-specific HASP. In addition, exposure to groundwater would be mitigated by groundwater management plan that will be included with the Phase 1 RDIP. The HASP would include the assignment of appropriate PPE and measures to protect against exposure of COPCs. Excavation work will be completed and VMS will be installed by licensed contractors and observed by trained professionals. The implementation time for this alternative would be months, coinciding with old building demolition (Alternative 4A) and the new building construction (Alternatives 4A and 4B), so the short-term risk would be minimal. The overall rating for Alternatives 4A and 4B for this criterion is good.

Implementability

Implementability includes technical and administrative feasibility and availability of required resources. Excavation would involve the use of long reach excavators, wheel loader dump trucks, low ground-pressure dozers, and other earth moving equipment. Excavation and VMS installation are common construction practices and are technically feasible, and several contractors that perform these types of services are available in the San Francisco Bay Area. VMS installation is easily implemented; materials for VMS installation are readily available and could be installed during construction of new buildings.

Additionally, certain portions of the excavations would require shoring, dewatering, wastewater sampling and potentially treatment, and procurement of discharge permits due to depth to water and depth of fill across the Site, particularly in current Midway Village North. Associated with these activities, a dewatering plan and shoring plan will be needed prior to excavation and included in the RDIP for Phase 1. The excavation within the Phase 1 construction phase may delay the construction schedule because of shoring installation, dewatering, length of time to off-haul 1,500 truckloads of soil, and potential dewatering treatment system installation. The 96-inch storm drain that was installed in 1992 as part of the Bayshore Park RAW is within the Phase 1 and Phase 5 excavation areas. HACSM funded the installation of this storm drain and the integrity cannot be compromised making nearby excavation slower, requiring the need for manual digging in certain areas and complicating shoring design around the storm drain. The soil vapor excavation in the future Bayshore Park (Phase 5) would not be completed until close to the start of that construction phase.

Under this alternative, significant portions of the cap (both the soil cover and the hardscape) on Midway Village and Bayshore Park will be disturbed or removed during grading and demolition in preparation for the redevelopment. The construction activities will include construction of a new

equally protective cap and the VMS. In addition the redevelopment plan includes proposed land use changes (Figure 3) that are not approved for the existing LUCs. Therefore, administrative feasibility is contingent on securing variances from the three existing LUCs that require maintenance of the existing cap and maintenance of the park for park purposes. Cap maintenance at Bayshore Park is also required under the settlement agreement between the State and the Responsible Parties. LUC variances are required for compliance with action-specific State ARARs (see Section 3.3.2.). The variance process is discussed in Section 5.0.

For these reasons, Alternatives 4A and 4B are rated poor for implementability.

Cost

With the anticipated start of construction in June 2021, Alternatives 4A and 4B would delay the schedule because the sequencing of the development requires grading and foundation work before further construction can proceed. These delays of up to four months would result in associated construction delay fees of $170,000 per month.

The total capital and O&M costs for Alternatives 4A and 4B are presented in Table 8. The estimated total present values for Alternatives 4A and 4B are $6,566,900 and $5,065,200, respectively. The detailed cost estimate is presented in Tables C-3A and C-3B in Appendix C. The overall ratings for Alternatives 4A and 4B are very poor.

4.7.2 State Criteria Evaluation for Alternative 4

Health and Safety Risks Posed by Site Conditions

This alternative provides a significant reduction of health and safety risks because active steps would be taken to mitigate risks associated with soil gas COPCs, i.e., excavation of soil containing soil gas above SGRGs, installation of a VMS to mitigate vapor intrusion risk from residual COPCs in soil gas, and implementing ICs and OM&M to maintain the integrity and functionality of the VMS. The overall rating for Alternative 4A is good because excavation of soil vapor hotspots is not required.

The overall rating for Alternative 4B, where soil vapor hot spots would be removed prior to new Building A2 construction, under this criterion is very good.

Effect of Contamination upon Beneficial Uses of Resources

Excavation and the installation of a VMS does not impact the beneficial use of resources. ICs in the form of OM&M Agreements and a LUC would be implemented to maintain the operation and functionality of the VMS. The overall rating for Alternative 4A and 4B under this criterion is good.

Effect of Contamination upon Groundwater Resources

Per the Basin Plan, groundwater at Visitacion Valley and the Site is designated for current PRO (industrial process supply) and IND (industrial service supply) and potentially municipal (MUN) and agricultural (AGR) beneficial uses. This alternative will not create a loss of beneficial groundwater use for the following reasons: 1) the LUCs currently and will in the future restrict use of groundwater for all uses, 2) the Site is developed and not currently used for agriculture, and 3) drinking water is provided by the PUC and LUCs will not allow the use of groundwater as a source of drinking water. Therefore, there is no loss of groundwater beneficial use. The overall rating for Alternative 4A and 4B is not applicable.

Site-Specific Characteristics

This alternative will remove and mitigate soil gas COPCs from migrating into indoor air for Phase 1 Buildings A and A2. This alternative would also mitigate vapor migration into indoor air in all buildings on Midway Village North including the current Bayshore Park through the installation of a vapor mitigation system (VMS). The overall rating for Alternative 4A and 4B under this criterion is very good.

Cost Effectiveness

Costs associated with this alternative are high relative to other alternatives. Additionally, the excavation of soil gas hot spots at SG-9, SG-14, and SG-17 is proposed in the future Bayshore Park area, which is proposed for recreational use rather than residential use. Therefore, the additional costs associated with excavation in the future Bayshore Park area, where groundwater is typically shallow, make this alternative unreasonably expensive. As discussed above, the Phases 1 and 5 construction delay fees from excavations are also very high. Costs for VMS would include capital costs for the installation and OM&M costs for the duration of operation, assumed to be 50 years for cost estimation purposes. For these reasons, Alternatives 4A and 4B are rated very poor for cost effectiveness.

Potential Environmental Impacts of Remedial Action

This remedial alternative would consume considerable amounts of fuel and generate diesel exhaust during excavation, backfilling, and off-Site and on-Site transportation activities for both excavation and VMS installation. However, the fuel impacts could be at least partially mitigated by using "clean diesel" equipment. The need for clean import fill would mean that quarried resources would be heavily utilized. The quantity of landfilled material will require significant landfill capacity. Excavation and grading prior to installation of a VMS could temporarily generate dust; however, implementing a Site-specific CAMP will mitigate exposure of neighboring

communities and Midway Village residents. The overall rating for Alternatives 4A and 4B under this criterion is poor.

5.0 PROPOSED REMEDY

Based on the evaluation of the proposed soil gas remedial alternatives using the NCP criteria and the State of California criteria from the CHSC, Alternative 3 overall rating is very good and is the recommended remedial alternative for soil gas (Figure 11). Under Alternative 3, VMS will be designed and installed below all future building pads in Midway Village North buildings during Phases 1, 2 and 3. The design will be submitted to DTSC in RDIPs for each construction Phase, will include the criteria to convert from a passive to active VMS, and will recommend post construction monitoring requirements. Alternative 3 is protective of future receptors of Midway Village North, and while it does add additional costs, it does not add unnecessary increased costs for the redevelopment or cause any delays to implementing the construction schedule. The VMS design is phase-specific, and thus drawings for each VMS will be submitted at the time construction drawings have been completed for each phase.

Institutional Controls

The IC objectives will also continue to monitor the soil remedy (cap) to ensure long-term protectiveness of human health and environment and will outline requirements for VMS. VMS operation and maintenance, cap maintenance, annual inspections and post construction monitoring, and IC monitoring would be outlined in a DTSC-approved OM&M Plan. The OM&M Plan will provide specific procedures to properly maintain and operate the major components of the VMS and will also include monitoring of the soil remedy.

The existing caps and current LUCs eliminate the exposure pathways and mitigate the risks from cPAHs in soil to both residential and recreational park users. Per MidPen's proposed development plan (Figure 2), land use for the existing Bayshore Park would change to multi-unit residential, and the existing land use of some parcels of Midway Village North would change to landscaped areas, residential and community facility use, childcare, and a public park. Under Section 4.01 of the 2002 Bayshore Park LUC, prohibited land uses include residences, hospitals, public or private schools, or a childcare center. Under Section 4.01 of the Midway Village North 1998 and 2010 LUCs, approved land use only includes multiple family residential use in conformance with the local zoning code of R3 Multiple Family Residential. The redevelopment plan for a portion of the existing 2010 LUC includes a childcare center (Figure 13). The Daly City Municipal Code R3 designation includes a variety of uses including multiple family residential, day care, townhouse, and parks. The proposed changes in land use will be approved through a

variance process discussed below. Further, prior to occupancy of the new construction, written approval from DTSC will be required to indicate that such occupancy does not exceed the then-current risk standards.

Under this Alternative 3, significant portions of the cap (both the soil cover and the hardscape) on Midway Village North and Bayshore Park will be disturbed or removed during grading and demolition in preparation for the redevelopment. The redevelopment will include construction of a new equally protective cap and the VMS under buildings when necessary based on risk. Therefore, administrative feasibility is contingent on securing variances from the three existing LUCs that require maintenance of the existing cap and maintenance of Bayshore Park. Cap maintenance at Bayshore Park is also required under the settlement agreement between the State and the Responsible Parties. LUC variances are required for compliance with action-specific State ARARs (see Section 3.3 and Table 6).

The variance process includes a public hearing. A DTSC hearing officer will decide on the variance application as required by law (e.g., under California Health and Safety Code [HSC § 25223]). At the hearing, the applicant must prove that the variance will not create significant public health hazards, diminish controls for health hazards, or increase the number of people exposed to significant hazards. The hearing officer may consider interim measures proposed by the applicant that will be implemented to protect public health during the redevelopment and remedy enhancement process. If the variance is granted and this alternative is approved, the remedy could be enhanced through implementation of the VMS and the replacement of significant portions of the existing cap with a new cap in several locations. The hearing officer may also consider other factors if they are made part of the record during the hearing process such as public benefits to be derived from redevelopment if variance approval is granted (e.g., additional affordable housing and improved public access to the park). The hearing officer will consider applicable evidence presented during the hearing process, then issue a decision and findings of fact to support that decision.

The LUCs are a component of ICs, and following completion of the soil gas remedy, which will be outlined in each RDIP, the LUCs will be amended or replaced. The LUCs will also be re-mapped to include the areas with existing LUCs that require the cap (soil remedy) and expanded in Midway Village North to include all newly constructed buildings with VMS. Additionally, the LUCs will include a restriction on the future Bayshore Park that prevents building any enclosed structures without VMS. The LUCs will require non-interference with the remedy components including the cap (soil remedy), VMS, or a combination of both. The LUCs will also require access

for continuing maintenance of the remedy and reporting on LUC compliance. Overall, the LUC or LUCs covering the redeveloped residential parcels of Midway Village North will allow for residential and associated uses such as green open spaces, recreational spaces, and childcare facilities. The LUC covering the redeveloped Bayshore Park will permit recreational uses or other uses determined to be appropriate based on risk assessment.

It should be noted that requirements for long term monitoring of the cap will include maintenance and monitoring for both the hardscape portions (building foundations, walkways, driveways, and streets) and areas covered by landscaping. The new childcare center will be constructed within Building B2 in Phase 2 (Figure 13), which will offer protection from soil gas intrusion due to the LUC requirement for VMS beneath the building. Engineering controls selected as part of the remedy to make the Site safe for intended use must have an OM&M Plan and an O&M Agreement to ensure its continued effectiveness. The effectiveness will be reviewed every five years during the five-year review.

Remedial Design Implementation Plan

To implement Alternative 3, an RDIP will be prepared and approved by the DTSC prior to each construction phase. The purpose of the RDIP will be to present measures to protect the construction workers, commercial employees, residents, recreators, children, pedestrians, and any nearby community sensitive receptors from potential environmental and health and safety risks that otherwise may arise from the presence of COPCs in the soil, soil vapor, and groundwater. The RDIP will include the following:

- Permits, utility clearance and site preparation;
- Site security measures;
- Health and Safety requirements;
- Procedures for the discovery of unknown subsurface conditions such as contaminated soil or underground structures;
- Cap replacement protocols to be followed during redevelopment, including restoring the two feet of clean cover over a demarcation layer in landscaping areas or green space (future Bayshore Park Phase 5), and under hardscapes;
- Soil management and groundwater management procedures;
- Sampling and Analysis Plan for testing on-site soils for reuse and import fill material for the softscape cap and utility trenches;

- CAMP;
- Dust and vapor mitigation measures;
- Odor control procedures;
- Stormwater Pollution Prevention Plan (SWPPP);
- Traffic control plans;
- Record keeping;
- Emergency Response Plan for responding to emergencies and non-emergency changes in field conditions;
- Required approvals and documentation for deviations from the RAP Amendment; and
- Schedules.

Five-Year Reviews

DTSC will review and approve a Five-Year Review performed by HACSM for the soil gas remedy. These Five-Year Reviews will assess whether the soil gas remedy continues to be protective of human health and the environment and evaluate whether modifications to the remedy are necessary. The Five Year reviews will also continue to monitor effectiveness of the existing soil remedy. A component of the Five-Year Reviews is reviewing the status and performance of the IC monitoring systems. Any new information or data from the Site that may impact the effectiveness of the remedy will be considered in the Five-Year Reviews.

6.0 CEQA DOCUMENTATION

As the lead agency under CEQA for the redevelopment, the City of Daly City prepared the SCEA for the proposed Midway-Bayshore Village Redevelopment Project that evaluated and summarized its potential environmental effects. The SCEA also recommended mitigation measures that would substantially reduce or avoid potentially significant environmental impacts. DTSC has reviewed and concurs with the findings in the City's SCEA.

In accordance with the California Environmental Quality Act, DTSC has prepared the Statement of Findings and Notice of Determination in support of DTSC's discretionary decision on this Final RAP Amendment. The Statement of Findings and Notice of Determination is included in Appendix D.

7.0 STATEMENT OF REASONS AND NON-BINDING ALLOCATION OF RESPONSIBILITY

Appendix E provides the Statement of Reasons and the Non-Binding Preliminary Allocation of Responsibility.

8.0 PUBLIC PARTICIPATION PLAN

In accordance with the DTSC's Public Participation Manual (DTSC, 2001), and DTSC's RAP Policy (DTSC, 1995), the DTSC will seek public participation in selection and implementation of this RAP Amendment for the Site as described below.

8.1 Public Participation Program Objectives

The following public information objectives have been identified for the Site:

- *Keep the community informed about the project* - Provide community members (i.e., existing residents and neighbors within 1,000 feet of the Site), with accurate, timely, concise, and easy-to-understand information about the remedial action and mitigation activities and how these activities fit in with overall redevelopment plans.

- *Provide opportunities for informed public input* - Provide opportunities for members of the public to ask questions, voice their concerns, or express their opinions about the chosen soil gas remedy.

- *Respond to community concerns* - Respond in a timely fashion to community concerns, questions, and information requests.

The following sections present how these objectives will be met.

8.2 Information Repositories

Key technical documents will be available online at the DTSC's Envirostor website https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=41650007.
Historical documents related to Bayshore Park are available online at https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=41990001. Hard copy copies of the document will be made available to the community in the MidPen Housing Office.
The Administrative Record List is included in this RAP Amendment as Appendix F.

8.3 Community Update

In March 2021, the DTSC mailed a Community Update to those entities on a mailing list generated by MidPen, HACSM and the DTSC to inform them of the opportunity to attend a virtual Public Meeting and/or comment on the Draft RAP Amendment. DTSC will continue to provide Community Updates as appropriate to notify the public of meetings, comment opportunities, public hearings, and important Site activities. Contact information is included in all fact sheets for MidPen, HACSM, and DTSC staff that the public can contact for additional information, as well as the location of the information repositories. Copies of issued Community Updates are kept in the MidPen Housing office on-Site.

8.4 Public Notice, Meeting, and Comment Period for RAP Amendment

The DTSC held a public meeting regarding the Draft RAP Amendment on April 14, 2021, and there was a minimum of 45-day comment period during which the DTSC received written and oral comments on the Draft RAP Amendment. During a public meeting, the Draft RAP Amendment was presented to community members and the community members had an opportunity to ask questions and provide comments. Documents related to the Final RAP Amendment are available to the public as part of the Administrative Record. The Administrative Record List is included in this RAP Amendment as Appendix F.

The DTSC prepared the Responsiveness Summary which includes a summary of oral and written public comments received during the comment period, as well as the responses to those comments. The Responsiveness Summary is included in Appendix G.

8.5 LUC Variance Application and Hearing Process

As noted in Section 5.0, the feasibility of the implementation of this RAP Amendment is contingent upon approvals of the LUC variances to allow MidPen, as agent for HACSM as the current owner under the three LUCs, to implement the selected remedy. If the variance to destroy the existing remedy in order to build a newer and better remedy is not granted for any reason, implementation of the anticipated RAP Amendment will not be able to proceed. All of the proposed alternatives, other than the no-action alternative, require destruction of the existing cap remedies that are required to be maintained under the terms of the LUCs and required to be maintained pursuant to the 2005 and 2008 Settlement Agreements. Destruction of the existing cap would be implemented following procedures in the RDIP, HASP, and CAMP (Section 4.3) to ensure that these activities do not present a risk for residential or other receptors in proximity of the Site, or to construction workers. It is anticipated that allowing the construction of the selected

alternative under this RAP Amendment, that will build a newer and better remedy for the Site, should be agreeable to the Responsible Parties under those Settlement Agreements. Acting on behalf of HACSM and Daly City as the parties obligated to maintain the protectiveness of the remedy in place for Midway Village and Bayshore Park under those Settlement Agreements, MidPen would then move forward under the anticipated approval of this RAP Amendment together with the anticipated approval of the variances, to accomplish this Midway Village revitalization with a better protectiveness, better housing, and better park amenities.

9.0 REFERENCES

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TABLES

Table 1
Environmental Decision Document Summary for Midway Village and Bayshore Park
(Collectively Midway-Bayshore Village Redevelopment)
City of Daly City, California

1/A	B	C	D	E	F	G	H	I
2	**Site**	**Decision Documents and Selected Remedy**	**Additional Remedial Investigations**	**Subsequent Decision Documents**	**LUCs and Restrictions**	**Current Site Use**	**Future Site Use**	**Construction Phase***
	Midway Village	1993 RAP (Ecology and Environment, Inc., 1993b): The 1993 Remedial Action Plan (RAP) followed the 1993 Remedial Investigation Report for the Remedial Investigation/Feasibility Study and the Remedial Action Plan for Midway-Bayshore Site (Ecology and Environment, Inc., 1993a) and established the Response Action Objectives (RAO) to eliminate or reduce potential for exposure to PAHs in surface soils where total polycyclic aromatic hydrocarbons (PAH) concentrations exceed 10 mg/kg. The RAP proposed excavation and capping of surface soils exceeding total PAH concentrations of 10 mg/kg using the following techniques: **Excavation and Capping** • Excavation of up to two feet of surface soil, backfilling with clean fill, and covering the clean fill with softscape (i.e. sod or ornamental landscaping). • Excavation of up to one foot of soil and installing asphalt paving with appropriate subgrade (not to exceed 2,400 square feet). • Excavation of up to six-inches of soil and installation of concrete paving (not to exceed 19,100 square feet) • Construction of planter beds to cap the surface soil with two feet of clean fill (not to exceed 3,500 square feet). **Restrictions** • Deed restriction to be recorded with Department of Toxics Substance Control (DTSC), which will include land use restrictions.	2001 Data Summary Report, Midway Village Soil Investigation (URS, 2001a): URS conducted additional soil sampling, primarily in Midway Village North and along the perimeter of Bayshore Park in June 2000 across the site. PAHs in soil were identified in 21 shallow soil samples. 2001 Midway Village Data Summary Report Addendum: Additional Sampling (URS, 2001b): To confirm the results of the June 2000 sampling event, URS collected confirmation soil samples (from 0.5 to five feet below ground surface) in May 2001. PAH exceedances were reported in soil ranging in depth from 0.5 to 4.5 feet below ground surface. Based on June 2000 and May 2001 sampling, DTSC modified both the 1993 Midway Village RAP and the 1998 Bayshore Park Remedial Action Work Plan) RAW with Explanation of Significant Differences (ESDs) for each site.	2001 ESD Extent of PAH Soil Contamination (DTSC, 2001a): This ESD updated the 1993 RAP remedial goal to 0.9 mg/kg benzo(a)pyrene equivalents. The ESD also modified the RAP to require the thickness of the soil cap to increase from two feet to five feet in areas where PAHs were found in soil exceeding 0.9 mg/kg at depth. Based on the additional depth of the clean soil buffer and the revised cleanup goals, approximately 3,000 cubic yards of soil containing PAH contamination required excavation and off-site disposal. 2002 RACR for Midway Village/Bayshore Park (ERRG, 2002): This report summarizes the site-specific remediation activities in Midway Village and Bayshore Park. The remediation of soil on-site was completed in 1994. The DTSC concurred with the remedial action completion in November 2002 (DTSC, 2002b). Remedial Action Certification Form (DTSC, 2003a): This work was completed in September 2001, and the Midway Village certification of remedial action for soil was issued in 2003.	1995 O&M Agreement within Third Amendment to Imminent and Substantial Endangerment Order and Remedial Action Order (DSTC, 1995): **Concrete Areas** Concrete within remediated areas will be monitored on an on-going basis and inspected at least: (a) Every six months for cracks or missing concrete by the Midway Village Manager and Midway Village Maintenance Supervisor; (b) Annually for seal coating on the concrete for peeling, cracking or deterioration; and (c) Monthly during the dry seasons or after each storm during the wet seasons, Housing Authority maintenance personnel will flush the culvert behind all units bordering the Pacific Gas & Electric (PG&E) facility and chain link fence. The Operation & Maintenance (O&M) Agreement outlines appropriate actions for concrete and asphalt areas. **Landscaped Areas** All landscaped areas within the remediation will be monitored on an on-going basis. If any Housing Authority employee or resident notices any deep holes, missing plants, or dried areas it will be reported to the Midway Village Manager. The Manager will visit the site to decide on the appropriate action. At least once every six (6) months the Midway Village Manager and either the Midway Village Maintenance Supervisor or a designated Maintenance Person will review all areas covered with landscape or clean fill. They will review the areas for deep holes, missing plants, or dried areas. All areas listed in the CAP DESCRIPTION will be viewed. Appropriate action will be taken if any problems are found. **Cap Maintenance Fund** Housing Authority has pledged to maintain the remediation cap for a period of 30 years (effective November 6, 1995). 1998 Land Use Covenant (LUC) for Midway Village Capped Area (DTSC, 1998): **Prohibited Uses** (a) Development other than multiple family residential use in conformance with the local zoning code of R3 Multiple Family Residential. **Soil Management** (a) No activities that will disturb the soil (e.g., excavation, grading, removal, trenching, filling, substantial earth movement or mining) shall be allowed without a Soil Management Plan and a Health and Safety Plan approved by the DTSC. (b) Any contaminated soils brought to the surface by grading, excavation, trenching or backfilling shall be managed in accordance with all applicable provisions of state and federal law. (c) A sign shall be posted in the Midway Village office in English and Spanish stating that no grading, excavation or construction activities, excluding routine operation and maintenance, can occur on the Property without written permission from the DTSC. **Prohibited Activities** (a) Raising of food (cattle, food crops) other than in above-ground planter boxes. (b) Drilling for drinking or irrigation water, oil, or gas. **Non-Interference with Cap** (a) Activities that may disturb the Cap (e.g. excavation, grading, removal, trenching, filling, earth movement, or mining) shall not be permitted without prior review and approval by the DTSC. (b) All uses and development of the Property shall preserve the integrity of the Cap. (c) The Cap shall not be altered without written approval by the DTSC. (d) Covenantor shall notify the DTSC of each of the following: (I) the type, cause, location and date of any damage to the Cap and (ii) the type and date of repair of such damage. Notification to the DTSC shall be made as provided below within ten (10) working days of both the discovery of any such disturbance and the completion of any repairs. Timely and accurate notification by any Owner or Occupant shall satisfy this requirement on behalf of all other Owners and Occupants.	Residential	Recreational, Residential, and Childcare Center	Phases 1, 2, 3, and 5 (Return Park to City of Daly City)
3								

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4	**Midway Village (Continued)**	See Cell 3C.	See Cell 3D.	See Cell 3E.	1998 LUC for Midway Village Capped Area continued (DTSC, 1998): **Access for DTSC** (a) DTSC shall have reasonable right of entry and access for inspection, monitoring, and other activities consistent with the purposes of the LUC as deemed necessary in order to protect the public health or safety, or the environment. **Notice in Agreements** (a) Owner shall give all purchasers, lessees, and tenants a written notice containing the following statement: "The land described herein contains hazardous substances. Such condition renders the land and the owner, lessee, or other possessor of the land subject to requirements, restrictions, provisions and liabilities contained in Chapters 6.5 and 6.8 of Division 20 of the California Health and Safety Code. This statement is not a declaration that a hazard exists." 2010 LUC (DTSC, 2010): **Prohibited Uses** (a) Development other than multiple family residential use in conformance with the local zoning code of R3 Multiple Family Residential. **Soil Management** (a) No activities that will disturb the soil (e.g., excavation, grading, removal, trenching, filling, substantial earth movement or mining) shall be allowed without a Soil Management Plan and a Health and Safety Plan approved by the DTSC in advance. (b) Any contaminated soils brought to the surface by grading, excavation, trenching or backfilling shall be managed in accordance with all applicable provisions of state and federal law. (c) A sign shall be posted in the Midway Village office in English and Spanish stating that no grading, excavation or construction activities, excluding routine operation and maintenance, can occur on the Property without written permission from DTSC. **Prohibited Activities** (a) Raising of food (cattle, food crops) other than in above-ground planter boxes. (b) Drilling for water, oil, or gas without prior written approval by the DTSC. **Non-Interference with Cap** (a) Activities that may disturb the Cap (e.g. excavation, grading, removal, trenching, filling, earth movement, or mining) shall not be permitted without prior written approval by the DTSC. (b) All uses and development of the Capped Property shall preserve the integrity or effectiveness of the Cap. (c) The Cap shall not be altered without prior written approval by the DTSC. (d) Covenantor shall notify the DTSC of each of the following: (i) The type, cause, location and date of any other disturbance to the cap that could affect the ability of the cap to contain subsurface hazardous wastes or hazardous materials underneath the Property, and (ii) the type and date of repair of such disturbance. Notification to the DTSC shall be made as provided below within ten (10) working days of both the discovery of any such disturbance and the completion of any repairs. Timely and accurate notification by any Owner or Occupant shall satisfy this requirement on behalf of all other Owners and Occupants. **Access for DTSC** DTSC shall have reasonable right of entry and access to the Property for inspection, monitoring, and other activities consistent with the purposes of the LUC as deemed necessary by the DTSC in order to protect the public health or safety, or the environment.	See Cell 3G.	See Cell 3H.	See Cell 3I.

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2	**Site**	**Decision Documents and Selected Remedy**	**Additional Remedial Investigations**	**Subsequent Decision Documents**	**LUCs and Restrictions**	**Current Site Use**	**Future Site Use**	**Construction Phase***
5	**Bayshore Park**	1998 RAW (City of Daly City, 1998): The 1998 RAW established the RAO of remediating and capping all surface soil found to have greater than 10 mg/kg total PAHs. The RAW proposed excavation and capping of surface soils exceeding total PAH concentrations of 10 mg/kg using the following techniques: **Excavation and Capping** • Excavation and off-site disposal of PAH-impacted soil, including PAH-impacted soil associated with the installation of 96-inch storm drain. • Excavation and off-site disposal of four (4) four by ten foot areas where PAHs exceeded the remedial action criteria 10 milligrams per kilogram (mg/kg). • Capping above the storm drain and excavation areas with two feet of clean fill. **Restrictions** • ICs • O&M Plan • Site-specific health and safety plan required prior to construction activities on-site	1999 Soil Quality Evaluation, Bayshore Basin Storm Drain Improvement (Lowney Associates, 1999): In December 1998, 29 soil borings were advanced northern portion of Bayshore Park to define the extent of contamination to comply with the RAW. PAHs were detected in 38 out of 44 shallow soil samples between 0.5 and two feet below ground surface. 2001 Data Summary Report, Midway Village Soil Investigation (URS, 2001a): URS conducted additional soil sampling, primarily in Midway Village North and along the perimeter of Bayshore Park in June 2000 across the site. PAHs in soil were identified in 21 shallow soil samples. 2001 Midway Village Data Summary Report Addendum: Additional Sampling (URS, 2001b): To confirm the results of the June 2000 sampling event, URS collected confirmation soil samples (from 0.5 to five feet below ground surface) in May 2001. PAH exceedances were reported in soil ranging in depth from 0.5 to 4.5 feet below ground surface. Based on December 1998, June 2000 and May 2001 sampling, DTSC modified both the 1993 Midway Village RAP and the 1998 Bayshore Park RAW with ESDs for each site.	2001 ESD Extent of PAH Soil Contamination (DTSC, 2001b): This ESD was produced following additional sampling in 1998, 2000, and 2001. The ESD updated the 1998 RAW remedial goal to 0.9 mg/kg benzo(a)pyrene equivalents. DTSC also required excavation of the top two feet of soil across the entire park due to this updated remedial goal and considered this a conservative approach. Approximately 13,000 cubic yards of soil was required to be excavated and disposed off-site. 2002 RACR for Midway Village/Bayshore Park (ERRG, 2002): This report summarizes the site-specific remediation activities in Midway Village and Bayshore Park. The remediation of soil on-site was completed in 1994. The DTSC concurred with the remedial action completion in November 2002 (DTSC, 2002b). Remedial Action Certification Form (DTSC, 2003b): This work was completed in July 2002, and the Bayshore Park certification of remedial action for soil was issued in 2003.	2002 LUC (DTSC, 2002a): **Prohibited Uses** (a) A residence, including any mobile home or factory built housing, constructed or installed for use as residential human habitation. (b) A hospital for humans. (c) A public or private school for persons under 21 years of age. (d) A day care center for children. **Soil Management** (a) The Owner shall provide the DTSC written notice at least fourteen (14) days prior to any activities that will disturb the soil below the Cap (e.g., excavation, grading, removal, trenching, filling, earth movement or mining). Any such activities must comply with a Soil Management Plan and a Health and Safety Plan approved by the DTSC. (b) No notice shall be required for activities that temporarily disturb only the top two feet of soil. However, at the conclusion of such activities, the Owner is required to maintain at least two feet of clean soil above the contaminated layer. (c) Any contaminated soils brought to the surface by grading, excavation, trenching or backfilling shall be managed in accordance with all applicable provisions of state and federal law. **Non-Interference with Cap** (a) All uses and development of the Capped Property shall preserve the integrity of the Cap. (b) The Cap shall not be altered without written approval by the DTSC, except as allowed in section 4.02 of the LUC. (c) Covenantor shall notify the DTSC of each of the following: (i) the type, cause, location and date of any damage to the Cap and (ii) the type and date of repair of such damage. Notification to the DTSC shall be made as provided below within ten (10) working days of the discovery of any such disturbance and within twenty (20) working days after the completion of any repairs. Timely and accurate notifications by any Owner or Occupant shall satisfy this requirement on behalf of all other Owners and Occupants. **Access for DTSC** (a) DTSC shall have reasonable right of entry and access for inspection, monitoring, and other activities as deemed necessary in order to protect the public health or safety, or the environment.	Recreational	Residential	Phases 1, 2, 3, and 5 (Return Park to City of Daly City)

Table 1
Environmental Decision Document Summary for Midway Village and Bayshore Park
(Collectively Midway-Bayshore Village Redevelopment)
City of Daly City, California

Notes:

* Construction phases are illustrated on Figure 3. The RAP Amendment covers Phases 1 and 5 and portions of Phases 2 and 3 in Midway Village North and the current Bayshore Park.

DTSC – California Department of Toxic Substances Control
ESD – Explanation of significant differences
IC – Institutional control
LUC – Land use covenant
mg/kg – milligrams per kilogram
No. – Number
O&M – Operations and Maintenance
PAH – Polycyclic aromatic hydrocarbon
PG&E – Pacific Gas and Electric Company
RACR – Remedial Action Completion Report
RAO – Remedial Action Objective
RAP – Remedial Action Plan
RAW – Removal Action Work Plan

References:

- City of Daly City, 1998. Removal Action Work Plan, Bayshore Park, City of Daly City, California. July.
- DTSC, 1995. Third Amendment to Imminent and Substantial Endangerment Order and Remedial Action Order, Health and Safety Code Section 25358.3 (a) (1) and 25355.5 (a) (1) (B). 9 November.
- DTSC, 1998. Covenant to Restrict Use of Property Environmental Restriction, Re: Midway Village Capped Area, Daly City, California Assessor's Parcel Numbers (APN) 005-330-250, 005-330-270, 005-330-270, 005-330-340, 005-330-350, 005-330-360, 005-330-370, and 005-330-380. 24 September.
- DTSC, 2001a. Explanation of Significant Differences, Extent of PAH Soil Contamination, Midway Village, Daly City. 13 July.
- DTSC, 2001b. Explanation of Significant Differences, Extent of PAH Soil Contamination, Bayshore Park Site, Daly City. 13 July.
- DSTC, 2002a. Covenant to Restrict Use of Property Environmental Restriction, (Re: San Mateo County Assessor's Parcel Numbers 005-330-330 and 005-330-390 a.k.a David R. Rowe Park). 17 October.
- DTSC, 2002b. Report of Completion of Remedial Action. 22 November.
- DTSC, 2003a. Remedial Action Certification Form. Midway Village. 13 May.
- DTSC, 2003b. Remedial Action Certification Form. Bayshore Park. 13 May.
- DTSC, 2010. Covenant to Restrict Use of Property Environmental Restriction, (Re: County of San Mateo APN(s) 005-330-280, 005-330-290, 005-330-300, and 005-330-310, Midway Village, Daly City, California – Site Code 200212). 23 November.
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- Ecology and Environment, Inc., 1993b. Final Remedial Action Plan for Midway Village. 13 August.
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- Lowney Associates, 1999. Soil Quality Evaluation, Bayshore Basin Storm Drain Improvement, Daly City and Brisbane, California. 24 February.
- URS, 2001a. Data Summary Report, Midway Village Soil Investigation, Daly City, California, Volume I. January.
- URS, 2001b. Midway Village Data Summary Report Addendum: Additional Sampling, Daly City, California. August.

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Table 2
Soil Gas Analytical Results
Midway-Bayshore Village Redevelopment
Daly City, California

Analyte			Benzene	Bromo-methane	Carbon Tetra-chloride	Chloro-ethane	Chloro-form	Chloro-methane	Dichloro-difluoro-methane	Dichloro-tetrafluoro-ethane	1,4-DCB	1,1-DCA	1,2-DCA	Ethyl-benzene	Naphth-alene	PCE	Styrene	Toluene	1,2,4-TCB	1,1,1-TCA	TCE	Trichloro-fluoro-methane	Trichloro-trifluoro-ethane	1,2,4-TMB	1,3,5-TMB	Vinyl Chloride	Xylenes			All Other VOCs	Isopropa nol	Helium	Oxygen	Carbon Dioxide	Helium Measured in the Shroud
																											M+P	O	Total						
Residential Indoor Air RSL (2019)[1]			0.097 [3]	5.2 [1]	0.47 [1]	10,000 [1]	0.12 [1]	94 [1]	100 [1]	NE	0.26 [1]	1.8 [1]	0.11 [1]	1.1 [1]	0.083 [1]	0.46 [3]	940 [3]	310 [3]	2.1 [1]	5,200	0.48 [1]	1,300 [3]	5,200 [1]	63 [1]	63 [1]	0.0095 [3]	100 [1]	100 [1]	100 [1]	*	NE	NE	NE	NE	
Residential Soil Gas Screening Level[2]			97.0	5,200.0	470	10,000,000	120	94,000	100,000	NE	260	1,800	110	1,100	83	460	940,000	310,000	2,100	5,200,000	480	1,300,000	5,200,000	63,000	63,000	10	100,000	100,000	100,000	*	NA	NA	NA	NA	
Sample ID	Date	Depth (feet bgs)	µg/m³																												%v				
MIDWAY VILLAGE NORTH SOIL GAS SAMPLES																																			
SG-1	12/13/18	4.0	33.4	< 38.8	< 62.9	< 26.4	< 48.8	< 20.7	< 49.5	< 69.9	< 60.1	< 40.5	< 40.5	< 43.4	**7,950**	< 67.8	129	68.4	< 74.2	< 54.6	< 53.7	< 56.2	< 76.6	654	565	< 25.6	126	106	232	ND	–	< 0.100	10.3	9.11	20
SG-2	12/13/18	4.0	8.18	< 3.88	< 6.29	< 2.64	< 4.88	< 2.07	< 4.95	< 6.99	< 6.01	< 4.05	< 4.05	5.17	< 5.24	< 6.78	< 4.26	23.7	< 7.42	< 5.46	< 5.37	5.90	< 7.66	5.26	< 4.92	< 2.56	18.6	6.69	25.29	ND	–	< 0.100	–	–	20
SG-3	12/12/18	4.5	17.0	< 7.77	< 12.6	< 5.28	< 9.77	< 4.13	< 9.89	< 14.0	< 12.0	< 8.10	< 8.09	< 8.68	< 10.5	< 13.6	< 8.52	15.5	< 14.8	< 10.9	< 10.7	< 11.2	< 15.3	< 9.83	< 9.83	< 5.11	< 17.4	< 8.68	< 26.08	ND	–	< 0.200	–	–	20
SG-4	12/13/18	5.0	14.9	< 7.77	< 12.6	< 5.28	< 9.77	< 4.13	< 9.89	< 14.0	< 12.0	< 8.10	< 8.09	17.1	< 10.5	< 13.6	< 8.52	35.2	< 14.8	< 10.9	< 10.7	< 11.2	< 15.3	< 9.83	< 9.83	< 5.11	47.4	10.2	57.6	ND	–	< 0.200	–	–	20
DUP-1	12/12/18	5.0	7.57	< 3.88	< 6.29	< 2.64	< 4.88	< 2.07	< 4.95	< 6.99	< 6.01	< 4.05	< 4.05	< 4.34	< 5.24	< 6.78	< 4.26	17.4	< 7.42	< 5.46	< 5.37	< 5.62	< 7.66	5.65	< 4.92	< 2.56	11.3	< 4.34	11.3	ND	–	< 0.100	–	–	20
SG-5	12/13/18	4.0	29.2	< 5.83	< 9.44	< 3.96	11.6	< 3.10	< 7.42	< 10.5	< 9.02	< 6.07	< 6.07	< 6.51	< 7.86	< 10.2	< 6.39	7.80	< 11.1	< 8.19	< 8.06	< 8.43	< 11.5	< 7.37	< 7.37	< 3.83	< 13.0	< 6.51	< 19.51	ND	–	< 0.150	–	–	20
SG-7	12/13/18	4.0	3.77	< 3.88	< 6.29	< 2.64	< 4.88	< 2.07	< 4.95	< 6.99	< 6.01	< 4.05	< 4.05	< 4.34	8.81	< 6.78	< 4.26	6.93	< 7.42	< 5.46	< 5.37	< 5.62	< 7.66	< 4.92	< 4.92	< 2.56	< 8.68	< 4.34	< 13.02	ND	–	< 0.100	17.9	2.30	20
SG-8	12/13/18	3.0	< 4.79	< 5.83	< 9.44	< 3.96	< 7.32	< 3.10	< 7.42	< 10.5	< 9.02	< 6.07	< 6.07	< 6.51	< 7.86	< 10.2	< 6.39	< 5.65	< 11.1	< 8.19	< 8.06	< 8.43	< 11.5	< 7.37	< 7.37	< 3.83	< 13.0	< 6.51	< 19.51	ND	–	< 0.150	–	–	20
SG-9	12/13/18	2.5	**46,600**	< 699	< 1,130	< 475	< 879	< 372	< 890	< 1260	< 1080	< 729	< 729	**8,270**	**116,000**	< 1,220	< 767	1,000	< 1,340	< 982	< 967	< 1,010	< 1380	2,140	1,620	< 460	13,100	5,800	18,900	ND	–	< 0.450	–	–	20
SG-11	12/12/18	4.0	< 3.19	< 3.88	< 6.29	< 2.64	< 4.88	< 2.07	< 4.95	< 6.99	< 6.01	< 4.05	< 4.05	< 4.34	< 5.24	< 6.78	< 4.26	< 3.77	< 7.42	< 5.46	< 5.37	< 5.62	< 7.66	< 4.92	< 4.92	< 2.56	< 8.68	< 4.34	< 13.02	ND	–	< 0.100	–	–	20
SG-12	12/13/18	3.5	6.71	< 3.88	< 6.29	< 2.64	80.5	< 2.07	< 4.95	< 6.99	< 6.01	< 4.05	< 4.05	29.5	47.9	< 6.78	< 4.26	22.2	< 7.42	< 5.46	< 5.37	< 5.62	< 7.66	< 4.92	< 4.92	< 2.56	175	63.6	238.6	ND	–	< 0.100	9.87	4.84	20
DUP-2	12/13/18	3.5	< 12.8	< 15.5	< 25.2	< 10.6	86.6	< 8.26	< 19.8	< 28.0	< 24.1	< 16.2	< 16.2	28.4	41.6	< 27.1	< 17.0	22.1	< 29.7	< 21.8	< 21.5	< 22.5	< 30.7	< 19.7	< 19.7	< 10.2	164	59.0	223.0	ND	–	< 0.100	9.57	4.52	20
SG-14	12/12/18	2.5	**709**	< 311	< 503	< 211	< 391	< 165	< 396	< 559	< 481	< 324	< 324	939	**6,750**	< 543	< 341	< 301	< 594	< 437	< 430	< 450	< 613	< 393	< 393	< 204	< 695	< 347	< 1042	ND	–	< 0.100	20.2	0.218	20
SG-15	12/13/18	2.5	38.8	< 5.83	< 9.44	< 3.96	< 7.32	< 3.10	< 7.42	< 10.5	< 9.02	< 6.07	< 6.07	6.69	12.5	< 10.2	< 6.39	8.18	< 11.1	< 8.19	< 8.06	< 8.43	< 11.5	< 7.37	< 7.37	< 3.83	< 13.0	< 6.51	< 19.51	ND	–	< 0.150	20.6	0.717	20
SG-16	12/12/18	3.5	5.08	< 3.88	< 6.29	< 2.64	< 4.88	< 2.07	< 4.95	< 6.99	< 6.01	< 4.05	< 4.05	< 4.34	< 5.24	< 6.78	< 4.26	< 3.77	< 7.42	< 5.46	< 5.37	< 5.62	< 7.66	< 4.92	< 4.92	< 2.56	< 8.68	< 4.34	< 11.2	ND	–	< 0.100	15	0.727	20
SG-17	04/29/19	1.5	**381**	0.864	< 1.26	< 0.528	< 0.977	2.36	2.81	< 1.40	< 1.20	< 0.810	< 0.809	392	**145**	< 1.36	7.95	85.3	< 1.48	< 1.09	< 1.07	1.33	< 7.66	24.7	20.0	< 0.179	116	164	280	ND	–	< 0.100	19.3	0.178	20 to 21
SG-18	04/29/19	3.0	6.16	< 0.388	0.758	8.06	0.842	3.61	2.39	< 0.699	0.797	< 0.405	< 0.405	5.15	2.01	1.5	< 0.426	32.2	< 0.742	< 0.546	< 0.537	1.67	< 3.83	2.27	1.4	0.528	11.9	4.08	15.98	ND	–	2.52	21.5	< 0.100	18 to 20
DUP-1	4/29/2019	3	7.59	< 0.388	0.970	9.77	0.940	4.26	2.79	< 0.699	< 0.601	< 0.405	< 0.405	5.73	2.00	1.33	< 0.426	37.0	< 0.742	< 0.546	< 0.537	2.02	< 3.83	1.91	1.27	0.601	13.20	4.61	17.81	ND	–	2.66	21.2	< 0.100	18 to 20
Ambient-1	12/12/18	–	< 3.19	< 3.88	< 6.29	< 2.64	< 4.88	< 2.07	< 4.95	< 6.99	< 6.01	< 4.05	< 4.05	< 4.34	< 5.24	< 6.78	< 4.26	< 3.77	< 7.42	< 5.46	< 5.37	< 5.62	< 7.66	< 4.92	< 4.92	< 2.56	< 8.68	< 4.34	< 11.2	ND	–	–	–	–	–
Ambient-2	12/12/18	–	< 3.19	< 3.88	< 6.29	< 2.64	< 4.88	< 2.07	< 4.95	< 6.99	< 6.01	< 4.05	< 4.05	< 4.34	< 5.24	< 6.78	< 4.26	< 3.77	< 7.42	< 5.46	< 5.37	< 5.62	< 7.66	< 4.92	< 4.92	< 2.56	< 8.68	< 4.34	< 11.2	ND	–	–	–	–	–
AA-5	04/29/19	–	0.177	0.194	0.472	0.061	0.130	1.01	2.85	0.149	< 0.0601	< 0.0405	0.0909	0.0485	< 0.786	< 0.0678	< 0.0426	0.193	< 0.0742	< 0.0546	< 0.0537	1.35	0.633	< 0.0492	< 0.0492	< 0.00895	0.132	0.0577	0.1897	ND	–	–	–	–	–
MIDWAY VILLAGE SOUTH SOIL GAS SAMPLES																																			
SG-19	11/20/19	5.0	8.23	< 1.55	< 2.52	1.30	14.1	5.11	2.31	< 2.80	< 2.41	7.13	< 1.62	30.9	< 3.15	< 2.71	< 1.70	67.2	< 2.97	< 2.18	< 2.15	< 15.3	< 15.3	3.61	< 1.97	**14.7**	123	42.1	165.1	ND	–	0.108	20.9	0.679	10 to 15
SG-20	11/21/19	5.0	8.39	< 1.55	< 2.52	1.50	8.74	< 0.826	2.71	< 2.80	< 2.41	< 1.62	< 1.62	34.7	< 3.15	< 2.71	< 1.70	92.5	< 2.98	< 2.18	< 2.15	< 4.50	< 15.3	3.19	< 1.97	0.678	129	64.8	193.8	ND	< 1.00	–	20.5	0.334	–
SG-21	11/21/19	5.0	3.70	0.545	< 0.629	0.486	7.97	1.38	1.23	< 0.699	< 0.601	< 0.405	< 0.405	1.23	< 0.786	36.3	< 0.426	5.96	< 0.742	< 0.546	0.698	< 1.12	< 3.83	1.65	0.774	0.246	3.61	1.45	5.06	ND	< 2.00	–	22.2	0.493	–
SG-22	11/21/19	5.0	2.96	< 0.388	< 0.629	< 0.264	1.87	0.235	1.12	< 0.699	< 0.601	< 0.405	< 0.405	1.48	< 0.786	14.1	< 0.426	5.43	< 0.742	1.04	< 0.537	< 1.12	< 3.83	2.79	1.07	< 0.0895	4.18	1.57	5.75	ND	< 1.00	–	18.7	2.81	–
SG-23	11/21/19	5.0	< 12.8	< 3.11	< 5.03	< 2.11	84.7	2.06	< 3.96	< 5.59	< 4.81	< 3.24	< 3.24	334	8.58	41.5	3.46	791	< 5.94	< 4.37	< 4.30	< 8.99	< 30.7	7.30	< 3.93	< 0.716	1740	549	2289	ND	–	< 0.200	21.1	0.499	10 to 15
SG-24	11/21/19	5.0	31.1	< 0.583	< 0.944	0.448	17.5	1.97	2.82	< 1.05	< 0.902	< 0.607	< 0.607	17.5	21.6	11.7	< 0.639	144	< 1.11	< 0.819	< 0.806	1.69	< 5.75	32.2	13.2	0.355	98	33.5	131.5	ND	–	< 0.150	19.8	0.359	10 to 15
DUP-2	11/21/2019	5	28.8	< 2.33	< 3.78	< 1.58	19.4	2.10	3.05	< 4.19	< 3.61	< 2.43	< 2.43	425	10.3	11.9	< 2.56	151	< 4.45	< 3.27	< 3.22	< 6.74	< 23.0	24.1	11.0	< 0.537	2340	663	3003	ND	–	< 0.100	16.5	0.318	10 to 15
SG-25	11/21/19	5.0	< 63.9	< 15.5	< 25.2	< 10.6	34.9	< 8.26	< 19.6	< 28.0	< 24.1	< 16.2	< 16.2	**2,520**	< 31.5	< 27.1	< 17.0	192	< 29.7	< 21.8	< 21.5	< 45.0	< 153	< 19.7	< 19.7	< 3.58	13,200	3,720	16,920	ND	–	< 0.100	20.2	1.21	10 to 15
DUP-1	11/21/2019	5	< 63.9	< 15.5	< 25.2	< 10.6	35.7	< 8.26	< 19.8	< 28.0	< 24.1	< 16.2	< 16.2	**2,600**	< 31.5	< 27.1	< 17.0	205	< 29.7	< 21.8	< 21.5	< 45.0	< 153	< 19.7	< 19.7	< 3.58	13,600	3,830	17,430	ND	–	< 0.100	22.7	1.12	10 to 15
SG-26	11/21/19	5.0	20.6	< 0.583	< 0.944	0.822	10.4	1.64	2.66	< 1.05	< 0.902	< 0.607	< 0.607	16.6	< 1.18	5.78	3.02	801	< 1.11	< 0.819	< 0.806	1.82	< 5.75	3.00	1.22	0.244	94.1	31.2	125.3	ND	–	< 0.150	22.2	0.235	10 to 15
SG-27	11/21/19	5.0	37.2	5.80	< 0.944	1.36	27.3	3.79	3.31	< 1.05	< 0.902	< 0.595	< 0.607	23.4	< 1.18	13.9	0.723	405	< 1.11	< 0.819	< 0.806	2.56	< 5.75	4.08	5.31	0.251	145	37.1	182.1	ND	< 1.50	–	18.9	1.97	–
SG-28	11/21/19	5.0	28.6	< 0.777	< 1.26	< 0.526	25.0	2.01	2.58	< 1.40	< 1.20	< 0.810	< 0.809	22.3	< 1.57	12.6	1.64	175	< 1.48	< 1.09	< 1.07	< 2.25	< 7.68	7.66	3.35	< 0.179	160	53.9	213.9	ND	< 2.00	–	18.4	0.405	–
SG-29	11/21/19	5.0	31.6	< 0.777	< 1.26	0.991	19.0	2.55	2.38	< 1.40	< 1.20	< 0.810	< 0.809	16.3	< 1.57	5.39	1.38	203	< 1.48	< 1.09	< 1.07	< 2.25	< 7.66	8.78	5.49	0.277	114	35.4	149.4	ND	< 2.00	–	20.9	0.333	–
AA-1 DOWNWIND	11/20/19	–	0.245	0.0854	0.405	< 0.0264	0.0844	0.741	1.99	0.119	< 0.0601	< 0.0405	0.0574	0.138	< 0.0786	< 0.0678	< 0.0426	0.541	< 0.0742	< 0.0546	< 0.0537	1.06	0.451	0.177	0.0571	< 0.00895	0.429	0.184	0.613	ND	–	–	–	–	–
AA-2 UPWIND	11/20/19	–	0.313	< 0.0388	0.376	< 0.0264	0.0973	0.674	2.11	0.114	0.0660	< 0.0405	0.0535	0.160	0.212	< 0.0678	< 0.0426	0.649	0.165	< 0.0546	< 0.0537	1.02	0.399	0.191	0.0638	< 0.00895	0.457	0.197	0.654	ND	–	–	–	–	–
AA-1 DOWNWIND	11/21/19	–	0.221	< 0.0388	0.387	< 0.0264	0.0853	0.677	1.90	0.114	< 0.0601	< 0.0405	0.0508	0.0684	< 0.0786	< 0.0678	< 0.0426	0.311	< 0.0742	< 0.0546	< 0.0537	1.02	0.432	0.0747	< 0.0492	< 0.00895	0.194	0.0970	0.291	ND	–	–	–	–	–
AA-2 UPWIND	11/21/19	–	0.264	0.0522	0.386	< 0.0264	0.108	0.705	1.94	0.117	< 0.0601	< 0.0405	0.0520	0.0939	0.0855	< 0.0678	< 0.0426	0.425	< 0.0742	< 0.0546	< 0.0537	1.04	0.423	0.0892	< 0.0492	< 0.00895	0.249	0.113	0.362	ND	–	–	–	–	–

Notes:

Bold - Concentration detected at or above Residential Soil Gas Screening Level

Red - Concentration detected at or above the Indoor Air Residential RSL

[1] Residential Indoor Air Screening Levels taken from USEPA, RSL Summary Table, April 2019

[2] Screening levels have been adjusted using an assumed attenuation factor of 0.001.

[3] Residential Ambient Air Screening Levels taken from DTSC, Office of HERO HHRA Note Number: 3, Table 3, April 2019

< 38.8 Not detected above laboratory reporting limit (38.8 µg/m³)

– - Not applicable

%v - Percent by volume

***** Varies by compound

µg/m³ - micrograms per cubic meter

1,1,1-TCA - 1,1,1-trichloroethane

RSL - Regional Screening Level

USEPA - US Environmental Protection Agency

VOCs - Volatile organic compounds

bgs - below ground surface

NE - Not Established

NA - Not Applicable

ND - Not Detected above laboratory reporting limits

1,4-DCB - 1,2-Dichlorobenzene

1,1-DCA - 1,1-dichloroethane

1,2-DCA - 1,2-dichloroethane

PCE - Tetrachloroethylene

1,2,4-TMB - 1,2,4-trimethylbenzene

1,1,1-TCA - 1,1,1-Trichloroethane

TCE - Trichloroethylene

1,2,4-TMB - 1,2,4-trimethylbenzene

1,3,5-TMB - 1,3,5-trimethylbenzene

VOCs - Volatile organic compounds

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Table 3
Summary of Groundwater Analytical Results
Midway-Bayshore VIllage
Daly City, California

Sample ID	Sample Date	Cyanide	Naphthalene	All other VOCs	SVOCs																				
					Acenaph-thene	Acenaph-thylene	Anthracene	Benzo (a) anthracene	Benzo (a) pyrene	Benzo (b) fluoranthene	Benzo (g,h,i) perylene	Benzo (k) fluoranthene	1,1-Biphenyl	Chrysene	Dibenzo (a,h) anthracene	Di-n-butyl Phthalate	Diethyl Phthalate	Fluoranthene	Fluorene	Indeno (1,2,3-cd) pyrene	1-Methylnapthalene	2-Methylnapthalene	Phenanthrene	Phenol	Pyrene	All other SVOCs
		(µg/L)																							
GW-1	04/08/20	< 1	0.15	ND	< 0.011	< 0.011	< 0.011	< 0.021	< 0.011	< 0.027	< 0.021	< 0.011	< 0.054	< 0.011	< 0.011	0.072	0.049	0.014	< 0.011	< 0.021	< 0.011	< 0.011	0.027	0.48	< 0.021	ND
GW-2	04/08/20	**53**	**280**	ND	10	0.32	0.75	0.24	< 0.011	0.26	0.27	0.11	1.7	0.31	0.032	0.042	0.036	2.6	4.1	0.17	7.2	6.6	**7.5**	< 0.022	2.2	ND
GW-3	04/08/20	**770**	**1,000**	ND	2.5	2.7	1	0.18	0.26	0.27	0.38	0.092	5.1	0.26	0.037	0.19	0.043	2	4.8	0.23	12	9.1	**8.6**	0.2	1.5	ND
DUP-1-2020	04/08/20	**940**	**1,100**	ND	< 5.5	< 5.5	< 5.5	< 11	< 5.5	< 14	< 11	< 5.5	< 27	< 5.5	< 5.5	< 11	< 11	< 5.5	< 5.5	< 11	8.2	6.1	< 11	< 11	< 11	ND
GW-4	04/09/20	**5.8**	0.29	ND	0.086	0.013	0.011	< 0.021	0.011	< 0.026	< 0.021	< 0.010	< 0.052	< 0.01	< 0.01	0.053	< 0.021	0.028	0.012	< 0.021	< 0.01	< 0.01	0.048	< 0.021	0.025	ND
GW-5	04/09/20	< 5	0.15	ND	< 0.1	0.37	0.19	1.9	4.8	4.7	7.4	1.5	< 0.50	3.1	0.53	< 0.2	< 0.2	**9.4**	< 0.1	4.7	< 0.1	< 0.1	0.47	< 0.2	6.7	ND
FB1-2020-04-08	04/08/20	< 1	< 0.10	ND	< 0.01	< 0.01	< 0.01	< 0.021	< 0.01	< 0.026	< 0.021	< 0.01	< 0.052	< 0.01	< 0.01	0.053	< 0.021	< 0.01	< 0.01	< 0.021	< 0.01	< 0.01	< 0.021	< 0.021	< 0.021	ND
Saltwater Ecotox Aquatic Habitat ESL[1]		1	15	Various	15	15	15	15	15	15	15	15	14[2]	15	15	NE	2	8	15	15	NE	30	5	580	15	Various
Residential Groundwater VI HHR ESL[3]		200[4]	4.6	Various	NE	NE	NE	19	NE	NE	NE	NE	32[4]	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	Various

Notes:
µg/L - micrograms per liter
ESL - environmental screening level
HHR - human health risk
SVOC - Semi-volatile Organics Compounds, EPA Method 8270C
VI - Vapor Intrusion
VOC - Volatile Organics Compounds, EPA 8260B
Bold - Analyte concentration exceeds Aquatic Habitat ESL
Red - Analyte concentration exceeds Residential Groundwater VI HHR ESL
[1] Aquatic Habitat Environmental Screening Levels (ESLs), San Francisco Bay Regional Water Quality Control Board (RWQCB), Groundwater Summary, Saltwater Ecotox Aquatic Habitat Goal Levels, (Table GW-2). January 2019, Revision 2.
[2] Aquatic Habitat ESLs, RWQCB, Groundwater Summary,Freshwater Ecotox Aquatic Habitat Goal Level, (Table GW-2). January 2019, Revision 2.
[3] Groundwater Vapor Intrusion (VI) Human Health Risk (HHR) ESLs, RWQCB, Groundwater Summary, Groundwater VI Screening Levels, Residential Cancer Risk, (Table GW-3). January 2019, Revision 2.
[4] Groundwater VI HHR ESLs, RWQCB, Groundwater Summary, Groundwater VI Screening Levels, Residential Noncancer Risk, (Table GW-3). January 2019, Revision 2.
< 1 - Analyte was not detected above the laboratry reporting limit
ND - Analyte was not detected above the laboratory reporting limit
NE - Not Established
Various - various ESLs apply

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Table 4a
Soil Gas and Ambient Air Screening Level Risk Calculations –Midway Village North
Midway-Bayshore Village Redevelopment
Daly City, California

		Sample ID	SG-1			SG-2			SG-3			SG-4			SG-5			SG-7			SG-9		
		Date	12/13/18	SG-1 ILCR	SG-1 Hazard Quotient	12/13/18	SG-2 ILCR	SG-2 Hazard Quotient	12/12/18	SG-3 ILCR	SG-3 Hazard Quotient	12/13/18	SG-4 ILCR	SG-4 Hazard Quotient	12/13/18	SG-5 ILCR	SG-5 Hazard Quotient	12/13/18	SG-7 ILCR	SG-7 Hazard Quotient	12/13/18	SG-9 ILCR	SG-9 Hazard Quotient
		Depth (feet bgs)	4.0			4.0			4.5			5.0			4.0			4.0			3.0		
Compound	Cancer SL[1]	Non-Cancer SL[2]	µg/m³			µg/m³			µg/m³			µg/m³			µg/m³			µg/m³			µg/m³		
Benzene	97	3,100	33.4	3.4E-07	0.01	8.18	8.4E-08	0.003	17.0	1.8E-07	0.005	14.9	1.5E-07	0.005	29.2	3.0E-07	0.01	3.77	3.9E-08	0.001	46,600	4.8E-04	15
Bromomethane	NE	5,200	< 38.8	--	--	< 3.88	--	--	< 7.77	--	--	< 7.77	--	--	< 5.83	--	--	< 3.88	--	--	< 699	--	--
Carbon Tetrachloride	470	42,000	< 62.9	--	--	< 6.29	--	--	< 12.6	--	--	< 12.6	--	--	< 9.44	--	--	< 6.29	--	--	< 1,130	--	--
Chloroethane	NE	10,000,000	< 26.4	--	--	< 2.64	--	--	< 5.28	--	--	< 5.28	--	--	< 3.96	--	--	< 2.64	--	--	< 475	--	--
Chloroform	120	100,000	< 48.8	--	--	< 4.88	--	--	< 9.77	--	--	< 9.77	--	--	11.6	9.7E-08	0.0001	< 4.88	--	--	< 879	--	--
Chloromethane	NE	94,000	< 20.7	--	--	< 2.07	--	--	< 4.13	--	--	< 4.13	--	--	< 3.10	--	--	< 2.07	--	--	< 372	--	--
Dichlorodifluoromethane	NE	100,000	< 49.5	--	--	< 4.95	--	--	< 9.89	--	--	< 9.89	--	--	< 7.42	--	--	< 4.95	--	--	< 890	--	--
Dichlorotetrafluoroethane	NE	NE	< 69.9	--	--	< 6.99	--	--	< 14.0	--	--	< 14.0	--	--	< 10.5	--	--	< 6.99	--	--	< 1260	--	--
1,4-Dichlorobenzene	260	830,000	< 60.1	--	--	< 6.01	--	--	< 12.0	--	--	< 12.0	--	--	< 9.02	--	--	< 6.01	--	--	< 1080	--	--
1,2-Dichloroethane	110	7,300	< 40.5	--	--	< 4.05	--	--	< 8.09	--	--	< 8.09	--	--	< 6.07	--	--	< 4.05	--	--	< 729	--	--
Ethylbenzene	1100	999,990	< 43.4	--	--	5.17	4.7E-09	0.000004	< 8.68	--	--	17.1	1.6E-08	0.00001	< 6.51	--	--	< 4.34	--	--	8,270	7.5E-06	0.0007
Naphthalene	83	3,100	7,950	9.6E-05	3	< 5.24	--	--	< 10.5	--	--	< 10.5	--	--	< 7.86	--	--	8.81	1.1E-07	0.003	116,000	1.4E-03	37
Tetrachloroethene	460	420,000	< 67.8	--	--	< 6.78	--	--	< 13.6	--	--	< 13.6	--	--	< 10.2	--	--	< 6.78	--	--	< 1,220	--	--
Styrene	NE	940,000	129	--	0.0001	< 4.26	--	--	< 8.52	--	--	< 8.52	--	--	< 6.39	--	--	< 4.26	--	--	< 767	--	--
Toluene	NE	310,000	68.4	--	0.0002	23.7	--	0.0001	15.5	--	0.0001	35.2	--	0.0001	7.8	--	0.00003	6.93	--	0.00002	1,000	--	0.003
Trichlorofluoromethane	NE	1,300,000	< 56.2	--	--	5.90	--	0.000005	< 11.2	--	--	< 11.2	--	--	< 8.43	--	--	< 5.62	--	--	< 1,010	--	--
Trichlorotrifluoroethane	NE	NE	< 76.6	--	--	< 7.66	--	--	< 15.3	--	--	< 15.3	--	--	< 11.5	--	--	< 7.66	--	--	< 1380	--	--
1,2,4-Trimethylbenzene	NE	63,000	654	--	0.01	5.26	--	0.0001	< 9.83	--	--	< 9.83	--	--	< 7.37	--	--	< 4.92	--	--	2,140	--	0.03
1,3,5-Trimethylbenzene	NE	63,000	565	--	0.009	< 4.92	--	--	< 9.83	--	--	< 9.83	--	--	< 7.37	--	--	< 4.92	--	--	1,620	--	0.03
Vinyl Chloride	9.5	100,000	< 25.6	--	--	< 2.56	--	--	< 5.11	--	--	< 5.11	--	--	< 3.83	--	--	< 2.56	--	--	< 460	--	--
m&p-Xylenes	NE	100,000	126	--	0.001	18.6	--	0.0002	< 17.4	--	--	47.4	--	0.0005	< 13.0	--	--	< 8.68	--	--	13,100	--	0.131
o-Xylene	NE	100,000	106	--	0.001	6.69	--	0.0001	< 8.68	--	--	10.2	--	0.0001	< 6.51	--	--	< 4.34	--	--	5,800	--	0.058
Total Xylenes	NE	100,000	232	--	0.002	25.29	--	0.0003	< 26.08	--	--	57.6	--	0.001	< 19.51	--	--	< 13.02	--	--	18,900	--	0.189
			Total	1E-04	3	***Total***	9E-08	0.003	***Total***	2E-07	0.01	***Total***	2E-07	0.01	***Total***	4E-07	0.01	***Total***	1E-07	0.004	***Total***	2E-03	53

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Table 4a
Soil Gas and Ambient Air Screening Level Risk Calculations –Midway Village North
Midway-Bayshore Village Redevelopment
Daly City, California

		Sample ID	SG-12			SG-14			SG-15			SG-16			SG-17			SG-18			AA-5		
		Date	12/13/18	SG-12 ILCR	SG-12 Hazard Quotient	12/12/18	SG-14 ILCR	SG-14 Hazard Quotient	12/13/18	SG-15 ILCR	SG-15 Hazard Quotient	12/12/18	SG-16 ILCR	SG-16 Hazard Quotient	04/29/19	SG-17 ILCR	SG-17 Hazard Quotient	04/29/19	SG-18 ILCR	SG-18 Hazard Quotient	04/29/19	AA-5 ILCR	AA-5 Hazard Quotient
		Depth (feet bgs)	3.5			2.5			2.5			3.5			1.5			3.0			--		
Compound	**Cancer SL[1]**	**Non-Cancer SL[2]**	**µg/m³**			**µg/m³**			**µg/m³**			**µg/m³**			**µg/m³**			**µg/m³**			**µg/m³**		
Benzene	97	3,100	6.71	6.9E-08	0.002	709	7.3E-06	0.2	38.8	4.0E-07	0.01	5.08	5.2E-08	0.002	381	3.9E-06	0.12	6.16	6.4E-08	0.002	0.177	1.8E-09	0.0001
Bromomethane	NE	5,200	< 3.88	--	--	< 311	--	--	< 5.83	--	--	< 3.88	--	--	0.864	--	0.0002	< 0.388	--	--	0.194	--	0.00004
Carbon Tetrachloride	470	42,000	< 6.29	--	--	< 503	--	--	< 9.44	--	--	< 6.29	--	--	< 1.26	--	--	0.758	1.6E-09	0.00002	0.472	1.0E-09	0.00001
Chloroethane	NE	10,000,000	< 2.64	--	--	< 211	--	--	< 3.96	--	--	< 2.64	--	--	< 0.528	--	--	8.06	--	0.000001	0.0610	--	0.00000001
Chloroform	120	100,000	80.5	6.7E-07	0.001	< 391	--	--	< 7.32	--	--	< 4.88	--	--	< 0.977	--	--	0.842	7.0E-09	0.00001	0.130	1.1E-09	0.000001
Chloromethane	NE	94,000	< 2.07	--	--	< 165	--	--	< 3.10	--	--	< 2.07	--	--	2.36	--	0.00003	3.61	--	0.00004	1.01	--	0.00001
Dichlorodifluoromethane	NE	100,000	< 4.95	--	--	< 396	--	--	< 7.42	--	--	< 4.95	--	--	2.81	--	0.00003	2.39	--	0.00002	2.85	--	0.00003
Dichlorotetrafluoroethane	NE	NE	< 6.99	--	--	< 559	--	--	< 10.5	--	--	< 6.99	--	--	< 1.40	--	--	< 0.699	--	--	0.149	--	--
1,4-Dichlorobenzene	260	830,000	< 6.01	--	--	< 481	--	--	< 9.02	--	--	< 6.01	--	--	< 1.20	--	--	0.797	3.1E-09	0.000001	< 0.0601	--	--
1,2-Dichloroethane	110	7,300	< 4.05	--	--	< 324	--	--	< 6.07	--	--	< 4.05	--	--	< 0.809	--	--	< 0.405	--	--	0.0909	8.3E-10	0.00001
Ethylbenzene	1100	999,990	29.5	2.7E-08	0.000004	939	8.5E-07	0.0003	6.69	6.1E-09	0.000006	< 4.34	--	--	392	3.6E-07	0.0000008	5.15	4.7E-09	0.0000004	0.0485	4.4E-11	0.00000005
Naphthalene	83	3,100	47.9	5.8E-07	0.02	6750	8.1E-05	2	12.5	1.5E-07	0.004	< 5.24	--	--	145	1.7E-06	0.05	2.01	2.4E-08	0.001	< 0.786	--	--
Tetrachloroethene	460	420,000	< 6.78	--	--	< 543	--	--	< 10.2	--	--	< 6.78	--	--	< 1.36	--	--	1.45	3.2E-09	0.000003	< 0.0678	--	--
Styrene	NE	940,000	< 4.26	--	--	< 341	--	--	< 6.39	--	--	< 4.26	--	--	7.95	--	0.00001	< 0.426	--	--	< 0.0426	--	--
Toluene	NE	310,000	22.2	--	0.0001	< 301	--	--	8.18	--	0.00003	< 3.77	--	--	85.3	--	0.0003	32.2	--	0.0001	0.193	--	0.000001
Trichlorofluoromethane	NE	1,300,000	< 5.62	--	--	< 450	--	--	< 8.43	--	--	< 5.62	--	--	1.33	--	0.000001	1.67	--	0.000001	1.35	--	0.000001
Trichlorotrifluoroethane	NE	NE	< 7.66	--	--	< 613	--	--	< 11.5	--	--	< 7.66	--	--	< 7.66	--	--	< 3.83	--	--	0.633	--	--
1,2,4-Trimethylbenzene	NE	63,000	< 4.92	--	--	< 393	--	--	< 7.37	--	--	< 4.92	--	--	24.7	--	0.0004	2.27	--	0.00004	< 0.0492	--	--
1,3,5-Trimethylbenzene	NE	63,000	< 4.92	--	--	< 393	--	--	< 7.37	--	--	< 4.92	--	--	20.0	--	0.0003	1.42	--	0.00002	< 0.0492	--	--
Vinyl Chloride	9.5	100,000	< 2.56	--	--	< 204	--	--	< 3.83	--	--	< 2.56	--	--	< 0.179	--	--	0.528	5.6E-08	0.000005	< 0.00895	--	--
m&p-Xylenes	NE	100,000	175	--	0.002	< 695	--	--	< 13.0	--	--	< 8.68	--	--	116	--	0.001	11.9	--	0.0001	0.132	--	0.000001
o-Xylene	NE	100,000	63.6	--	0.001	< 347	--	--	< 6.51	--	--	< 4.34	--	--	164	--	0.002	4.08	--	0.00004	0.0577	--	0.000001
Total Xylenes	NE	100,000	238.6	--	0.002	< 1042	--	--	< 19.51	--	--	< 11.2	--	--	280	--	0.003	15.98	--	0.0002	0.1897	--	0.000002
			Total	1E-06	0.02	***Total***	9E-05	2	***Total***	6E-07	0.02	***Total***	5E-08	0.002	***Total***	6E-06	0.2	***Total***	2E-07	0.003	***Total***	5E-09	0.0002

Notes:
[1] Residential Cancer Soil Gas Screening Levels (SLs) have been derived using the USEPA Residential Indoor Air RSLsor the DTSC Hero Note 3 Ambient Air Screening Levels and an assumed attenuation factor of 0.001
[2] Residential Non-Cancer SLs have been derived using the USEPA Residential Indoor Air RSLs or the DTSC HeroNote 3 Ambient Air Screening Levels and an assumed attenuation factor of 0.001
ILCR - Inherent Lifetime Cancer Risk
NE - not established
< 38.8 Not detected above laboratory reporting limit (38.8 µg/m^3)
µg/m^3 - microgram per cubic meter
bgs - below ground surface
USEPA - US Environmental Protection Agency
RSL - Regional Screening Level
DTSC - California Department of Toxic Substances Control
VOCs - Volatile organic compounds
HERO - Human and Ecological Risk Office
HHRA - Human Health Risk Assessment
ILCR - Incremental Lifetime Cancer Risk

Table 4b
Soil Gas and Ambient Air Screening Level Risk Calculations -Midway Village South
Midway-Bayshore Village Redevelopment
Daly City, California

		Sample ID	SG-19			SG-20			SG-21			SG-22			SG-23			SG-23(Dup-2)		
		Date	11/20/2019	SG-19 ILCR	SG-19 Hazard Quotient	11/21/2019	SG-20 ILCR	SG-20 Hazard Quotient	11/21/2019	SG-21 ILCR	SG-21 Hazard Quotient	11/21/2019	SG-22 ILCR	SG-22 Hazard Quotient	11/21/2019	SG-23 ILCR	SG-23 Hazard Quotient	11/21/2019	SG-23 (Dup-2) ILCR	SG-23 (Dup-2) Hazard Quotient
		Depth (feet bgs)	5			5			5			5			5			5		
Compound	Cancer SL[1]	Non-Cancer SL[2]	µg/m³			µg/m³			µg/m³			µg/m³			µg/m3			µg/m3		
Benzene	97	3,100	8.23	8.5E-08	0.003	8.39	8.6E-08	0.003	3.7	3.8E-08	0.001	2.96	3.1E-08	0.001	< 12.8	–	–	28.8	3.0E-07	0.009
Bromomethane	NE	5,200	< 1.55	–	–	< 1.55	–	–	0.545	–	0.0001	< 0.388	–	–	< 3.11	–	–	< 2.33	–	–
Carbon Tetrachloride	470	42,000	< 2.52	–	–	< 2.52	–	–	< 0.629	–	–	< 0.629	–	–	< 5.03	–	–	< 3.78	–	–
Chloroform	120	99,990	14.1	1.2E-07	0.0001	8.74	7.3E-08	0.00009	7.97	6.6E-08	0.00008	1.87	1.6E-08	0.00002	84.7	7.1E-07	0.0008	19.4	1.6E-07	0.0002
Chloroethane	NE	10,000,000	1.3	–	0.0000001	1.5	–	0.0000002	0.486	–	0.00000005	< 0.264	–	–	< 2.11	–	–	< 1.58	–	–
Chloromethane	NE	94,000	5.11	–	0.00005	< 0.826	–	–	1.38	–	0.00001	0.235	–	0.000003	2.06	–	0.00002	2.1	–	0.00002
1,1,1-Trichloroethane	NE	1,000,000	< 2.18	–	–	< 2.18	–	–	< 0.546	–	–	1.04	–	0.000001	< 4.37	–	–	< 3.27	–	–
1,2-Dichloroethane	110	7,300	< 1.62	–	–	< 1.62	–	–	< 0.405	–	–	< 0.405	–	–	< 3.24	–	–	< 2.43	–	–
1,4-Dichlorobenzene	260	830,000	< 2.41	–	–	< 2.41	–	–	< 0.601	–	–	< 0.601	–	–	< 4.81	–	–	< 3.61	–	–
Dichlorodifluoromethane	NE	100,000	2.31	–	0.00002	2.71	–	0.00003	1.23	–	0.00001	1.12	–	0.00001	< 3.96	–	–	3.05	–	0.00003
Dichlorotetrafluoroethane	NE	NE	< 2.8	–	–	< 2.8	–	–	< 0.699	–	–	< 0.699	–	–	< 5.59	–	–	< 4.19	–	–
Ethylbenzene	1,100	1,000,000	30.9	2.8E-08	0.00003	34.7	3.2E-08	0.00003	1.23	1.1E-09	0.000001	1.48	1.3E-09	0.000001	334	3.0E-07	0.0003	425	3.9E-07	0.0004
Methylene Chloride	1,000	420,000	< 41.7	–	–	< 41.7	–	–	< 10.4	–	–	< 10.4	–	–	< 83.4	–	–	< 62.5	–	–
Naphthalene	83	3,100	< 3.15	–	–	< 3.15	–	–	< 0.786	–	–	< 0.786	–	–	8.58	1.0E-07	0.003	10.3	1.2E-07	0.003
Tetrachloroethene	460	42,000	< 2.71	–	–	< 2.71	–	–	36.3	7.9E-08	0.0009	14.1	3.1E-08	0.0003	41.5	9.0E-08	0.001	11.9	2.6E-08	0.0003
Styrene	NE	940,000	< 1.7	–	–	< 1.7	–	–	< 0.426	–	–	< 0.426	–	–	3.46	–	0.000004	< 2.56	–	–
Toluene	NE	310,000	67.2	–	0.0002	92.5	–	0.0003	5.96	–	0.00002	5.43	–	0.00002	791	–	0.003	151	–	0.0005
Trichloroethene	480	2,100	< 2.15	–	–	< 2.15	–	–	0.698	1.5E-09	0.0003	< 0.537	–	–	< 4.3	–	–	< 3.22	–	–
Trichlorofluoromethane	NE	1,300,000	< 4.5	–	–	< 4.5	–	–	< 1.12	–	–	< 1.12	–	–	< 8.99	–	–	< 6.74	–	–
Trichlorotrifluoroethane	NE	NE	< 15.3	–	–	< 15.3	–	–	< 3.83	–	–	< 3.83	–	–	< 30.7	–	–	< 23	–	–
1,2,4-Trimethylbenzene	NE	63,000	3.61	–	0.00006	3.19	–	0.00005	1.65	–	0.00003	2.79	–	0.00004	7.3	–	0.0001	24.1	–	0.0004
1,3,5-Trimethylbenzene	NE	63,000	< 1.97	–	–	< 1.97	–	–	0.774	–	0.00001	1.07	–	0.00002	< 3.93	–	–	11	–	0.0002
m&p-Xylenes	NE	100,000	123	–	0.001	129	–	0.001	3.61	–	0.00004	4.18	–	0.00004	1740	–	0.02	2340	–	0.02
o-Xylene	NE	100,000	42.1	–	0.0004	64.8	–	0.0006	1.45	–	0.00001	1.57	–	0.00002	549	–	0.005	663	–	0.007
1,1,2,2-Tetrachloroethane	48	83,000	< 2.75	–	–	< 2.75	–	–	< 0.687	–	–	< 0.687	–	–	< 5.49	–	–	< 4.12	–	–
1,1,2-Trichloroethane	180	210	< 2.18	–	–	< 2.18	–	–	< 0.546	–	–	< 0.546	–	–	< 4.37	–	–	< 3.27	–	–
1,1-Dichloroethane	1,800	830,000	7.13	4.0E-09	0.000009	< 1.62	–	–	< 0.405	–	–	< 0.405	–	–	< 3.24	–	–	< 2.43	–	–
1,1-Dichloroethene	NE	73,000	< 1.59	–	–	< 1.59	–	–	< 0.397	–	–	< 0.397	–	–	< 3.17	–	–	< 2.38	–	–
1,2,4-Trichlorobenzene	380	2,100	< 2.97	–	–	< 2.97	–	–	< 0.742	–	–	< 0.742	–	–	< 5.94	–	–	< 4.45	–	–
1,2-Dibromoethane (Ethylene Dibromide)	4.7	830	< 3.07	–	–	< 3.07	–	–	< 0.768	–	–	< 0.768	–	–	< 6.15	–	–	< 4.61	–	–
1,2-Dichlorobenzene	NE	210,000	< 2.41	–	–	< 2.41	–	–	< 0.601	–	–	< 0.601	–	–	< 4.81	–	–	< 3.61	–	–
1,2-Dichloropropane	760	4,200	< 1.85	–	–	< 1.85	–	–	< 0.462	–	–	< 0.462	–	–	< 3.7	–	–	< 2.77	–	–
1,3-Dichlorobenzene	NE	NE	< 2.41	–	–	< 2.41	–	–	< 0.601	–	–	< 0.601	–	–	< 4.81	–	–	< 3.61	–	–
Chlorobenzene	NE	52,000	< 1.84	–	–	< 1.84	–	–	< 0.46	–	–	< 0.46	–	–	< 3.68	–	–	< 2.76	–	–
Cis-1,2-Dichloroethene	NE	8,300	< 1.59	–	–	< 1.59	–	–	< 0.397	–	–	< 0.397	–	–	< 3.17	–	–	< 2.38	–	–
Cis-1,3-Dichloropropene	700	21,000	< 1.82	–	–	< 1.82	–	–	< 0.454	–	–	< 0.454	–	–	< 3.63	–	–	< 2.72	–	–
Hexachlorobutadiene	130	4,200	< 4.27	–	–	< 4.27	–	–	< 1.07	–	–	< 1.07	–	–	< 8.53	–	–	< 6.4	–	–
Trans-1,2-Dichloroethene	NE	83,000	< 1.59	–	–	< 1.59	–	–	< 0.396	–	–	< 0.396	–	–	< 3.17	–	–	< 2.38	–	–
Trans-1,3-Dichloropropene	700	21,000	< 1.82	–	–	< 1.82	–	–	< 0.454	–	–	< 0.454	–	–	< 3.63	–	–	< 2.72	–	–
Vinyl Chloride	9.5	100,000	14.7	1.5E-06	0.0001	0.678	7.1E-08	0.000007	0.246	2.6E-08	0.000002	< 0.0895	–	–	< 0.716	–	–	< 0.537	–	–
			Total	2E-06	0.005	***Total***	3E-07	0.01	***Total***	2E-07	0.003	***Total***	8E-08	0.001	***Total***	1E-06	0.03	***Total***	1E-06	0.04

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Table 4b
Soil Gas and Ambient Air Screening Level Risk Calculations -Midway Village South
Midway-Bayshore Village Redevelopment
Daly City, California

		Sample ID	SG-24			SG-25			SG-25 (Dup-1)			SG-26			SG-27			SG-28		
		Date	11/21/2019			11/21/2019			11/21/2019			11/21/2019			11/21/2019			11/21/2019		
		Depth (feet bgs)	5	SG-24 ILCR	SG-24 Hazard Quotient	5	SG-25 ILCR	SG-25 Hazard Quotient	5	SG-25 (Dup-1) ILCR	SG-25 (Dup-1) Hazard Quotient	5	SG-26 ILCR	SG-26 Hazard Quotient	5	SG-27 ILCR	SG-27 Hazard Quotient	5	SG-28 ILCR	SG-28 Hazard Quotient
Compound	**Cancer SL[1]**	**Non-Cancer SL[2]**	**µg/m3**			**µg/m3**			**µg/m3**			**µg/m3**			**µg/m3**			**µg/m3**		
Benzene	97	3,100	31.1	3.2E-07	0.01	< 63.9	–	–	< 63.9	–	–	20.6	2.1E-07	0.007	37.2	3.8E-07	0.01	28.6	2.9E-07	0.009
Bromomethane	NE	5,200	< 0.583	–	–	< 15.5	–	–	< 15.5	–	–	< 0.583	–	–	5.8	–	0.001	< 0.777	–	–
Carbon Tetrachloride	470	42,000	< 0.944	–	–	< 25.2	–	–	< 25.2	–	–	< 0.944	–	–	< 0.944	–	–	< 1.26	–	–
Chloroform	120	99,990	17.5	1.5E-07	0.0002	34.9	–	–	35.7	3.0E-07	0.0004	10.4	8.7E-08	0.0001	27.3	2.3E-07	0.0003	25	2.1E-07	0.0003
Chloroethane	NE	10,000,000	0.448	–	0.00000004	< 10.6	–	–	< 10.6	–	–	0.822	–	0.00000008	1.36	–	0.0000001	< 0.528	–	–
Chloromethane	NE	94,000	1.97	–	0.00002	< 8.26	–	–	< 8.26	–	–	1.64	–	0.00002	3.79	–	0.00004	2.01	–	0.00002
1,1,1-Trichloroethane	NE	1,000,000	< 0.819	–	–	< 21.8	–	–	< 21.8	–	–	< 0.819	–	–	< 0.819	–	–	< 1.09	–	–
1,2-Dichloroethane	110	7,300	< 0.607	–	–	< 16.2	–	–	< 16.2	–	–	< 0.607	–	–	< 0.607	–	–	< 0.809	–	–
1,4-Dichlorobenzene	260	830,000	< 0.902	–	–	< 24.1	–	–	< 24.1	–	–	< 0.902	–	–	< 0.902	–	–	< 1.2	–	–
Dichlorodifluoromethane	NE	100,000	2.82	–	0.00003	< 19.8	–	–	< 19.8	–	–	2.66	–	0.00003	3.31	–	0.00003	2.58	–	0.00003
Dichlorotetrafluoroethane	NE	NE	< 1.05	–	–	< 28	–	–	< 28	–	–	< 1.05	–	–	< 1.05	–	–	< 1.4	–	–
Ethylbenzene	1,100	1,000,000	17.5	1.6E-08	0.00002	2520	2.3E-06	0.003	2600	2.4E-06	0.003	16.6	1.5E-08	0.00002	23.4	2.1E-08	0.00002	22.3	2.0E-08	0.00002
Methylene Chloride	1,000	420,000	< 15.6	–	–	< 417	–	–	< 417	–	–	< 15.6	–	–	< 15.6	–	–	< 20.8	–	–
Naphthalene	83	3,100	21.6	2.6E-07	0.007	< 31.5	–	–	< 31.5	–	–	< 1.18	–	–	< 1.18	–	–	< 1.57	–	–
Tetrachloroethene	460	42,000	11.7	2.5E-08	0.0003	< 27.1	–	–	< 27.1	–	–	5.78	1.3E-08	0.0001	13.9	3.0E-08	0.0003	12.6	2.7E-08	0.0003
Styrene	NE	940,000	< 0.639	–	–	< 17	–	–	< 17	–	–	3.02	–	0.000003	0.723	–	0.0000008	1.64	–	0.000002
Toluene	NE	310,000	144	–	0.0005	192	–	0.0006	205	–	0.0007	801	–	0.003	405	–	0.001	175	–	0.0006
Trichloroethene	480	2,100	< 0.806	–	–	< 21.5	–	–	< 21.5	–	–	< 0.806	–	–	< 0.806	–	–	< 1.07	–	–
Trichlorofluoromethane	NE	1,300,000	< 1.69	–	–	< 45	–	–	< 45	–	–	1.82	–	0.000001	2.56	–	0.000002	< 2.25	–	–
Trichlorotrifluoroethane	NE	NE	< 5.75	–	–	< 153	–	–	< 153	–	–	< 5.75	–	–	< 5.75	–	–	< 7.66	–	–
1,2,4-Trimethylbenzene	NE	63,000	32.2	–	0.0005	< 19.7	–	–	< 19.7	–	–	3	–	0.00005	4.08	–	0.00006	7.66	–	0.0001
1,3,5-Trimethylbenzene	NE	63,000	13.2	–	0.0002	< 19.7	–	–	< 19.7	–	–	1.22	–	0.00002	5.31	–	0.00008	3.35	–	0.00005
m&p-Xylenes	NE	100,000	98	–	0.001	13200	–	0.1	13600	–	0.1	94.1	–	0.0009	145	–	0.0015	160	–	0.002
o-Xylene	NE	100,000	33.5	–	0.0003	3720	–	0.04	3830	–	0.04	31.2	–	0.0003	37.1	–	0.0004	53.9	–	0.0005
1,1,2,2-Tetrachloroethane	48	83,000	< 1.03	–	–	< 27.5	–	–	< 27.5	–	–	< 1.03	–	–	< 1.03	–	–	< 1.37	–	–
1,1,2-Trichloroethane	180	210	< 0.819	–	–	< 21.8	–	–	< 21.8	–	–	< 0.819	–	–	< 0.819	–	–	< 1.09	–	–
1,1-Dichloroethane	1,800	830,000	< 0.607	–	–	< 16.2	–	–	< 16.2	–	–	< 0.607	–	–	< 0.607	–	–	< 0.81	–	–
1,1-Dichloroethene	NE	73,000	< 0.595	–	–	< 15.9	–	–	< 15.9	–	–	< 0.595	–	–	< 0.595	–	–	< 0.793	–	–
1,2,4-Trichlorobenzene	380	2,100	< 1.11	–	–	< 29.7	–	–	< 29.7	–	–	1.13	3.0E-09	0.0005	< 1.11	–	–	< 1.48	–	–
1,2-Dibromoethane (Ethylene Dibromide)	4.7	830	< 1.15	–	–	< 30.7	–	–	< 30.7	–	–	< 1.15	–	–	< 1.15	–	–	< 1.54	–	–
1,2-Dichlorobenzene	NE	210,000	< 0.902	–	–	< 24.1	–	–	< 24.1	–	–	< 0.902	–	–	< 0.902	–	–	< 1.2	–	–
1,2-Dichloropropane	760	4,200	< 0.693	–	–	< 18.5	–	–	< 18.5	–	–	< 0.693	–	–	< 0.693	–	–	< 0.924	–	–
1,3-Dichlorobenzene	NE	NE	< 0.902	–	–	< 24.1	–	–	< 24.1	–	–	< 0.902	–	–	< 0.902	–	–	< 1.2	–	–
Chlorobenzene	NE	52,000	< 0.691	–	–	< 18.4	–	–	< 18.4	–	–	< 0.691	–	–	< 0.691	–	–	< 0.921	–	–
Cis-1,2-Dichloroethene	NE	8,300	< 0.595	–	–	< 15.9	–	–	< 15.9	–	–	< 0.595	–	–	< 0.595	–	–	< 0.793	–	–
Cis-1,3-Dichloropropene	700	21,000	< 0.681	–	–	< 18.2	–	–	< 18.2	–	–	< 0.681	–	–	< 0.681	–	–	< 0.908	–	–
Hexachlorobutadiene	130	4,200	< 1.6	–	–	< 42.7	–	–	< 42.7	–	–	< 1.6	–	–	< 1.6	–	–	< 2.13	–	–
Trans-1,2-Dichloroethene	NE	83,000	< 0.595	–	–	< 15.9	–	–	< 15.9	–	–	< 0.595	–	–	< 0.595	–	–	< 0.793	–	–
Trans-1,3-Dichloropropene	700	21,000	< 0.681	–	–	< 18.2	–	–	< 18.2	–	–	< 0.681	–	–	< 0.681	–	–	< 0.908	–	–
Vinyl Chloride	9.5	100,000	0.355	3.7E-08	0.000004	< 3.58	–	–	< 3.58	–	–	0.244	2.6E-08	0.000002	0.251	2.6E-08	0.000003	< 0.179	–	–
			Total	8E-07	0.02	***Total***	2E-06	0.2	***Total***	3E-06	0.2	***Total***	4E-07	0.01	***Total***	7E-07	0.02	***Total***	6E-07	0.01

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Table 4b
Soil Gas and Ambient Air Screening Level Risk Calculations -Midway Village South
Midway-Bayshore Village Redevelopment
Daly City, California

		Sample ID	SG-29			AA-1-DownWind			AA-1-DownWind			AA-2-UpWind			AA-2-UpWind		
		Date	11/21/2019			11/20/2019			11/21/2019			11/20/2019			11/21/2019		
		Depth (feet bgs)	5	SG-29 ILCR	SG-29 Hazard Quotient	NA	AA-1-DownWind ILCR	AA-1-DownWind Hazard Quotient	NA	AA-1-DownWind ILCR	AA-1-DownWind Hazard Quotient	NA	AA-2-UpWind ILCR	AA-2-UpWind Hazard Quotient	NA	AA-2-UpWind ILCR	AA-2-UpWind Hazard Quotient
Compound	**Cancer SL[1]**	**Non-Cancer SL[2]**	**µg/m3**			**µg/m³**			**µg/m³**			**µg/m³**			**µg/m³**		
Benzene	97	3,100	31.6	3.3E-07	0.01	0.245	2.5E-09	0.00008	0.221	2.3E-09	0.00007	0.313	3.2E-09	0.0001	0.264	2.7E-09	0.00009
Bromomethane	NE	5,200	< 0.777	--	--	0.085	–	0.00002	< 0.0388	–	–	< 0.0388	–	–	0.052	–	0.00001
Carbon Tetrachloride	470	42,000	< 1.26	--	--	0.405	8.6E-10	0.00001	0.387	8.2E-10	0.000009	0.376	8.0E-10	0.000009	0.386	8.2E-10	0.000009
Chloroform	120	99,990	19	1.6E-07	0.0002	0.084	7.0E-10	0.0000008	0.085	7.1E-10	0.0000009	0.097	8.1E-10	0.000001	0.108	9.0E-10	0.000001
Chloroethane	NE	10,000,000	0.991	--	0.0000001	< 0.0264	–	–	< 0.0264	–	–	< 0.0264	–	–	< 0.0264	–	–
Chloromethane	NE	94,000	2.55	--	0.00003	0.741	–	0.000008	0.677	–	0.000007	0.674	–	0.000007	0.705	–	0.000008
1,1,1-Trichloroethane	NE	1,000,000	< 1.09	--	--	< 0.0546	–	–	< 0.0546	–	–	< 0.0546	–	–	< 0.0546	–	–
1,2-Dichloroethane	110	7,300	< 0.809	--	--	0.057	5.2E-10	0.000008	0.051	4.6E-10	0.000007	0.054	4.9E-10	0.000007	0.052	4.7E-10	0.000007
1,4-Dichlorobenzene	260	830,000	< 1.2	--	--	< 0.0601	–	–	< 0.0601	–	–	0.066	2.5E-10	0.00000008	< 0.0601	–	–
Dichlorodifluoromethane	NE	100,000	2.38	--	0.00002	1.99	–	0.00002	1.9	–	0.00002	2.11	–	0.00002	1.94	–	0.00002
Dichlorotetrafluoroethane	NE	NE	< 1.4	--	--	0.119	–	–	0.114	–	–	0.114	–	–	0.117	–	–
Ethylbenzene	1,100	1,000,000	16.3	1.5E-08	0.00002	0.138	1.3E-10	0.0000001	0.068	6.2E-11	0.00000007	0.16	1.5E-10	0.0000002	0.094	8.5E-11	0.00000009
Methylene Chloride	1,000	420,000	< 20.8	--	--	< 1.04	–	–	< 1.04	–	–	< 1.04	–	–	< 1.04	–	–
Naphthalene	83	3,100	< 1.57	--	--	< 0.0786	–	–	< 0.0786	–	–	0.212	2.6E-09	0.00007	0.086	1.0E-09	0.00003
Tetrachloroethene	460	42,000	5.39	1.2E-08	0.0001	< 0.0678	–	–	< 0.0678	–	–	< 0.0678	–	–	< 0.0678	–	–
Styrene	NE	940,000	1.38	--	0.000001	< 0.0426	–	–	< 0.0426	–	–	< 0.0426	–	–	< 0.0426	–	–
Toluene	NE	310,000	203	--	0.0007	0.541	–	0.000002	0.311	–	0.000001	0.649	–	0.000002	0.425	–	0.000001
Trichloroethene	480	2,100	< 1.07	--	--	< 0.0537	–	–	< 0.0537	–	–	< 0.0537	–	–	< 0.0537	–	–
Trichlorofluoromethane	NE	1,300,000	< 2.25	--	--	1.06	–	0.0000008	1.02	–	0.0000008	1.02	–	0.0000008	1.04	–	0.0000008
Trichlorotrifluoroethane	NE	NE	< 7.66	--	--	0.451	–	–	0.432	–	–	0.399	–	–	0.423	–	–
1,2,4-Trimethylbenzene	NE	63,000	8.78	--	0.0001	0.177	–	0.000003	0.075	–	0.000001	0.191	–	0.000003	0.089	–	0.000001
1,3,5-Trimethylbenzene	NE	63,000	5.49	--	0.00009	0.057	–	0.0000009	< 0.0492	–	–	0.064	–	0.000001	< 0.0492	–	–
m&p-Xylenes	NE	100,000	114	--	0.001	0.429	–	0.000004	0.194	–	0.000002	0.457	–	0.000005	0.249	–	0.000002
o-Xylene	NE	100,000	35.4	--	0.0004	0.184	–	0.000002	0.097	–	0.000001	0.197	–	0.000002	0.113	–	0.000001
1,1,2,2-Tetrachloroethane	48	83,000	< 1.37	--	--	< 0.0687	–	–	< 0.0687	–	–	< 0.0687	–	–	< 0.0687	–	–
1,1,2-Trichloroethane	180	210	< 1.09	--	--	< 0.0546	–	–	< 0.0546	–	–	< 0.0546	–	–	< 0.0546	–	–
1,1-Dichloroethane	1,800	830,000	< 0.81	--	--	< 0.0405	–	–	< 0.0405	–	–	< 0.0405	–	–	< 0.0405	–	–
1,1-Dichloroethene	NE	73,000	< 0.793	--	--	< 0.0397	–	–	< 0.0397	–	–	< 0.0397	–	–	< 0.0397	–	–
1,2,4-Trichlorobenzene	380	2,100	< 1.48	--	--	< 0.0742	–	–	< 0.0742	–	–	0.165	–	–	< 0.0742	–	–
1,2-Dibromoethane (Ethylene Dibromide)	4.7	830	< 1.54	--	--	< 0.0768	–	–	< 0.0768	–	–	< 0.0768	–	–	< 0.0768	–	–
1,2-Dichlorobenzene	NE	210,000	< 1.2	--	--	< 0.0601	–	–	< 0.0601	–	–	< 0.0601	–	–	< 0.0601	–	–
1,2-Dichloropropane	760	4,200	< 0.924	--	--	< 0.0462	–	–	< 0.0462	–	–	< 0.0462	–	–	< 0.0462	–	–
1,3-Dichlorobenzene	NE	NE	< 1.2	--	--	< 0.0601	–	–	< 0.0601	–	–	< 0.0601	–	–	< 0.0601	–	–
Chlorobenzene	NE	52,000	< 0.921	--	--	< 0.046	–	–	< 0.046	–	–	< 0.046	–	–	< 0.046	–	–
Cis-1,2-Dichloroethene	NE	8,300	< 0.793	--	--	< 0.0397	–	–	< 0.0397	–	–	< 0.0397	–	–	< 0.0397	–	–
Cis-1,3-Dichloropropene	700	21,000	< 0.908	--	--	< 0.0454	–	–	< 0.0454	–	–	< 0.0454	–	–	< 0.0454	–	–
Hexachlorobutadiene	130	4,200	< 2.13	--	--	< 0.107	–	–	< 0.107	–	–	< 0.107	–	–	< 0.107	–	–
Trans-1,2-Dichloroethene	NE	83,000	< 0.793	--	--	< 0.0396	–	–	< 0.0396	–	–	< 0.0396	–	–	< 0.0396	–	–
Trans-1,3-Dichloropropene	700	21,000	< 0.908	--	--	< 0.0454	–	–	< 0.0454	–	–	< 0.0454	–	–	< 0.0454	–	–
Vinyl Chloride	9.5	100,000	0.277	2.9E-08	0.000003	< 0.00895	–	–	< 0.00895	–	–	< 0.00895	–	–	< 0.00895	–	–
			Total	5E-07	0.01	***Total***	5E-09	0.0002	***Total***	4E-09	0.0001	***Total***	8E-09	0.0002	***Total***	6E-09	0.0002

Notes:
[1] Residential Cancer Soil Gas Screening Levels (SLs) have been derived using the USEPA Residential Indoor Air RSLs or the DTSC Hero Note 3 Ambient Air Screening Levels and an assumed attenuation factor of 0.001
[2] Residential Non-Cancer Soil Gas SLs have been derived using the USEPA Residential Indoor Air RSLs or the DTSC Hero Note 3 Ambient Air Screening Levels and an assumed attenuation factor of 0.001
µg/m³ - micrograms per cubic meter
< 1 Not detected at or above the laboratory reporting limit
SL - Screening Levels
USEPA - US Environmental Protection Agency
NE - Not Established
RSL - Regional Screening Level
DTSC - California Department of Toxic Substances Control
VOCs - Volatile organic compounds
HERO - Human and Ecological Risk Office
HHRA - Human Health Risk Assessment
ILCR - Incremental Lifetime Cancer Risk

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Table 5
Soil Gas Remedial Goals
Midway-Bayshore Village Redevelopment
Daly City, California

Analyte	Soil Gas Remedial Goals[1] ($\mu g/m^3$)
Benzene	97.0
Bromomethane	5,200.0
Carbon Tetrachloride	470
Chloroethane	10,000,000
Chloroform	120
Chloromethane	94,000
Dichlorodifluoromethane	100,000
Dichlorotetrafluoroethane	NE
1,4-DCB	260
1,1-DCA	1,800
1,2-DCA	110
Ethylbenzene	1,100
Naphthalene	83
PCE	460
Styrene	940,000
Toluene	310,000
1,2,4-TCB	2,100
1,1,1-TCA	1,000,000
TCE	480
Trichlorofluoromethane	1,300,000
Trichlorotrifluoroethane	5,200,000
1,2,4-TMB	63,000
1,3,5-TMB	63,000
Vinyl Chloride	9.5
Xylenes M+P	100,000
Xylenes O	100,000
Xylenes Total	100,000

Notes:

[1] Soil Gas Remedial Goals (SGRGs) were calculated using DTSC's 2011 default attenuation factor of 0.001 and the indoor and ambient air screening levels from either DTSC's HHRA HERO Note 3 published in June 2020 or the USEPA RSLs for resident air published in November 2019.

DTSC - California Department of Toxic Substances Control
HHRA - Human Health Risk Assessment
HERO - Human and Ecological Risk Office
USEPA - US Environmental Protection Agency
RSL - Regional Screening Level
$\mu g/m^3$ - micrograms per cubic meter
1,4-DCB - 1,4-dichlorobenzene
1,1-DCA - 1,1-dichloroethane
1,2-DCA - 1,2-dichloroethane
PCE - tetrachloroethylene
1,2,4-TCB - 1,2,4-trichlorobenzene
1,1,1-TCA - 1,1,1-trichloroethane
TCE - trichloroethylene
1,2,4-TMB - 1,2,4-trimethylbenzene
1,3,5-TMB - 1,3,5-trimethylbenzene

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Table 6
List of Applicable or Relevant and Appropriate Requirements and Advisories and Guidance To Be Considered
Midway-Bayshore Village Redevelopment
Daly City, CA

Potential Chemical-Specific ARARs and TBCs			
Requirement	Description	ARAR or TBC	Notes
Title 42 U.S.C. Chapter 82, Sections 6901-6991(i) - Solid Waste Disposal	These sections outline requirements for determining if a waste is considered USEPA RCRA hazardous waste.	ARAR	ARAR for solid waste generated during the installation of SVE wells and solid waste generated from soil gas excavations.
CCR Title 22 Sections 66261 and 66268 - Classifying California Hazardous Waste and Land Disposal Restrictions	This section defines a hazardous waste under state regulations and outlines the requirements for determining if a waste is a non-RCRA hazardous waste under California regulations. Relevant subsections include 66261.21; 66261.22(a)(1), (3) and (4); 66261.23; 66261.24(a)(1); 66261.24(a)(2)–(a)(8); 66261.3(a)(2)(C) and 66261.3(a)(2)(F); 66261.100; 66261.101; and 66268.1(f). TTLC and STLC values are listed for the classification of hazardous wastes. Section 66268.1(f) prohibits hazardous waste from land disposal unless wastes have been exempt or meet specified criteria.	ARAR	TTLC and STLC criteria for classifying California hazardous wastes are ARARs for off-site disposal of soil generated during installation of SVE wells and off-site disposal of soil generated from soil gas excavations.
CCR Title 27 Section 20210, 20220, and 20230 - Designated Waste, Nonhazardous Solid Waste, and Inert Waste	These sections contain state definitions of designated, non-hazardous, and inert waste.	ARAR	ARAR for discharges of waste generated during installation of SVE wells and waste generated from soil vapor excavations.
Proposition 65: The Safe Drinking Water and Toxics Enforcement Act (Health and Safety Code Section 25249.5)	This state proposition prohibits discharging any chemical known to the state to cause cancer or reproductive toxicity to a potential source of drinking water. "Clear and reasonable" warnings are required to be provided prior to exposure to any chemicals on the state list.	ARAR	ARAR for discharges of waste generated during installation of SVE wells or from soil gas excavations.
Clean Water Act 40 CFR Section 131.38 - Establishment of Numeric Criteria for Prioroty Toxic Pollutants for the State of California	List of water quality standards included in the table of criteria for Priority Toxic Pollutants in the State of California.	ARAR	ARAR for discharges to the surface water during remediation (i.e. during grading to install the vapor barrier membrane or other intrusive work).
Comprehensive Water Quality Control Plan (Basin Plan) for the San Francisco Bay Basin - Chapters 2 and 3	These chapters outline beneficial uses and water quality objectives. Chapter 2 lists and defines beneficial uses of the aquatic systems of California. The water quality objectives are outlined in Chapter 3 and are intended to protect the beneficial uses of the waters of the region and to prevent nuisance. Chapter 3 describes the narrative and numerical standards for water quality and includes Table 3-3.	ARAR	ARAR for surface water near the site with salinity greater than five parts per thousand, including the San Francisco Bay.
California SWRCB's Antidegradation Policy (Resolution No. 68-16)	This resolution establishes policies for water quality objectives for the State of California and restricts degradation of surface water and groundwater.	TBC	TBC for remedial action near the San Francisco Bay.
USEPA RSLs (November 2019)	These RSLs are outlined in tables using a target cancer risk of 1E-06 and target hazard quotients of 1.0 and 0.1. Screening levels are presented for resident soil, composite worker soil, resident air, composite worker air, resident tapwater, and resident soil to groundwater.	TBC	These risk-based concentrations were used to calculate the SGSLs for the site. USEPA RSLs have not been promulgated; therefore, RSLs are a TBC for soil gas remedial alternatives.
DTSC SLs (April 2019)	These SLs are outlined in Human and Ecological Risk Office Human Health Risk Assessment Note 3, DTSC-modified SLs. The DTSC-Recommended SLs for ambient air are included in Table 3.	TBC	These risk-based concentrations were used to calculate the SGSLs for the site. DTSC SLs have not been promulgated; therefore, SLs are a TBC for soil gas remedial alternatives.
Regional Water Board ESLs (January 2019, Revision 2)	These ESLs were developed by the Regional Water Board to protect the environment under the goals set forth in the Basin Plan. These goals include the protection of surface water, groundwater, soil, and soil vapor for human health, water resources, aquatic and terrestrial biota, and nuisance conditions. Tables SG-1 and SG-2 list ESLs for subslab/soil gas vapor intrusion human health risk levels and odor nuisance levels.	TBC	TBC for soil gas at the site.
Clean Water Act 40 CFR Part 264 - Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities	These regulations limit the treatment, storage, or disposal of hazardous waste at new facilities within 200 feet of a fault.	ARAR	ARAR for remedial action within 200 feet of a fault zone.

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Table 6
List of Applicable or Relevant and Appropriate Requirements and Advisories and Guidance To Be Considered
Midway-Bayshore Village Redevelopment
Daly City, CA

Potential Chemical-Specific and Location-Specific ARARs and TBCs			
Requirement	Description	ARAR or TBC	Notes
Clean Water Act 40 CFR Section 131.38 - Establishment of Numeric Criteria for Prioroty Toxic Pollutants for the State of California	List of water quality standards included in the table of criteria for Priority Toxic Pollutants in the State of California.	ARAR	ARAR for discharges to the surface water during remediation (i.e. during grading to install the vapor barrier membrane, excavation, or other intrusive work).
Comprehensive Water Quality Control Plan (Basin Plan) for the San Francisco Bay Basin - Chapters 2 and 3	These chapters outline beneficial uses and water quality objectives for the San Francisco Bay Basin. Chapter 2 lists and defines beneficial uses of the aquatic systems of California. Water quality objectives for selected toxic polluants are summarized in Chapter 3 and are intended to protect the beneficial uses of the waters of the region and to prevent nuisance. Chapter 3 describes the narrative and numerical standards for water quality and includes Table 3-3.	ARAR	ARAR for surface water near the site with salinity greater than five parts per thousand, including the San Francisco Bay.
California State Water Resources Control Board's Antidegradation Policy (Resolution No. 68-16)	This resolution establishes policies for water quality objectives for the State of California and restricts degradation of surface water and groundwater.	TBC	TBC for remedial action near the San Francisco Bay.

Table 6
List of Applicable or Relevant and Appropriate Requirements and Advisories and Guidance To Be Considered
Midway-Bayshore Village Redevelopment
Daly City, CA

Potential Action-Specific ARARs and TBCs				
Requirement	Description	Action	ARAR or TBC	Notes
Title 42 U.S.C. Chapter 82, Sections 6901-6991(i) - Solid Waste Disposal	These sections outline requirements for determining if a waste is considered USEPA RCRA hazardous waste.	SVE and Active VMS (if needed); Soil Gas Excavations	ARAR	ARAR for solid waste generated during the installation of SVE wells or soil gas excavation.
BAAQMD Clean Site Act State Implementation Plan - Regulation 2 Rule 1	This rule contains the requirement for an orderly reviewing procedure including the issuance of authorities to construct and permits to operate for new emission sources, the modification and operation of existing sources, and air pollution control devises. Section 301 requires use of the best available control technology for new emission sources.	SVE and Active VMS (if needed)	ARAR	ARAR for the operation of the SVE system or active VMS that may result in a new source of air pollution.
BAAQMD Clean Site Act State Implementation Plan - Regulation 2 Rule 2, Section 317	Requirement for review of a new a TAC emissions source. New and modified sources with Hazardous Air Pollutant emissions may be subject to Section 317, which requires the use of the MACT.	SVE and Active VMS (if needed)	ARAR	ARAR for the operation of the SVE system or active VMS that may result in a new source of air pollution.
BAAQMD Clean Site Act State Implementation Plan - Regulation 2 Rule 5	The requirement for the review of new and modified sources of TAC emissions in order to evaluate risk to human health.	SVE and Active VMS (if needed)	ARAR	ARAR for the operation of the SVE system or active VMS that may result in a new source of air pollution.
BAAQMD Clean Site Act State Implementation Plan - Regulation 2 Rule 1303	Requirement to comply with the air emissions requirements of the BAAQMD.	SVE and Active VMS (if needed)	ARAR	ARAR for potential emissions from remedial action alternatives.
BAAQMD Clean Site Act State Implementation Plan - Regulation 8 Rule 40	Requirement to limit the emission of organic compounds from soil with organic chemical or petroleum contamination.	SVE and Active VMS (if needed)	ARAR	ARAR for potential emissions from remedial action alternatives.
BAAQMD Clean Site Act State Implementation Plan - Regulation 8 Rule 47	Requirement to limit the emissions of organic compounds from contaminated groundwater and soil. Provisions of this Rule apply to new and modified air stipping and SVE.	SVE and Active VMS (if needed)	ARAR	ARAR for potential emissions from remedial action alternatives.
BAAQMD Clean Site Act State Implementation Plan - Regulation 8 Rule 40-405	Requirement to provide written notice to the Air Pollution Control Office of the intention to excavate.	SVE and Soil Gas Excavations	ARAR	ARAR for soil gas excavations implemented as part of remedial action alternatives.

Table 6
List of Applicable or Relevant and Appropriate Requirements and Advisories and Guidance To Be Considered
Midway-Bayshore Village Redevelopment
Daly City, CA

Potential Action-Specific ARARs and TBCs				
Requirement	Description	Action	ARAR or TBC	Notes
CCR Title 22 Section 66262	Portions of this section outline the regulations for requirements of a generator to determine if generated waste is hazardous. Section 66262.10(a) and Section 66262.11 establish standards for hazardous waste classification, manifesting, transportation keeping records, and reporting.	Off-Site Disposal of Soil	ARAR	ARAR for solid waste generated during the installation of SVE wells or during soil gas excavation.
CCR Title 22 Section 66264	Section 66264.13(a) and (b) requires analysis of waste to determine if it is classified as hazardous.	Off-Site Disposal of Soil	ARAR	ARAR for solid waste generated during the installation of SVE wells or during soil gas excavation.
Clean Water Act 40 CFR Part 264.554(d)(1)(i-ii) and (d)(2), (e), (f), (h), (i), (j), and (k)	Allows temporary staging of RCRA hazardous waste in piles with requirements for staging and designation. A stockpile may be designated for up to 2 years to ensure the timely completion of remedial actions.	Off-Site Disposal of Soil	ARAR	ARAR for solid waste generated during the installation of SVE wells or during soil gas excavation.
CCR Title 27 Section 20200(b), (c), and (d)	Section 20200(c) requires accurate characterization of waste. These portions of the section require the discharge of nonhazardous solid waste to classified units.	Off-Site Disposal of Soil	ARAR	ARAR for solid waste generated during the installation of SVE wells or during soil gas excavation.
CCR Title 27 Section 20210	Requires the discharge of designated waste to Class I or Class II waste management units.	Off-Site Disposal of Soil	ARAR	ARAR for solid waste generated during the installation of SVE wells or during soil gas excavation.
BAAQMD Clean Site Act State Implementation Plan Regulation 8 Rule 40	This rule outlines soil stockpiling requirements for soil with organic chemical or petroleum contamination	Off-Site Disposal of Soil	ARAR	ARAR for solid waste generated during the installation of SVE wells or during soil gas excavation.
Clean Water Act 40 CFR Section 122.44(k)(2) and (4)	This section lists requirements to use BMPs to prevent construction pollutants from contacting stormwater.	Off-Site Disposal of Soil	ARAR	ARAR for solid waste generated during the installation of SVE wells or during soil gas excavation..
CCR Title 22 Section 66261.10(a) and 66262.11	Requires the determination of whether a generated waste is hazardous waste.	SVE construction and grading activities during installation of VMS Soil Gas Excavations	ARAR	ARAR for determining whether waste generated from dredging and excavation during remedial construction is hazardous waste.
CCR Title 22 Section 66264.13(a) and (b)	Requires the testing of generated waste to determine whether the waste is hazardous.	SVE construction and grading activities during installation of VMS Soil Gas Excavations	ARAR	ARAR for determining whether waste generated from dredging and excavation during remedial construction is hazardous waste.
Clean Water Act 40 CFR Part 264.554(d)(1)(i-ii) and (d)(2), (e), (f), (h), (i), (j), and (k)	Allows temporary staging of RCRA hazardous waste in piles with requirements for staging and designation. A stockpile may be designated for up to 2 years to ensure the timely completion of remedial actions.	SVE construction and grading activities during installation of VMS Soil Gas Excavations	ARAR	ARAR for solid waste generated during remedial construction.
Clean Water Act 40 CFR Section 122.44(k)(2) and (4)	This section outlines storm water discharge requirements for construction that will disturb 1 or more acres.	SVE construction and grading activities during installation of VMS Soil Gas Excavations	ARAR	ARAR for solid waste generated during the installation of SVE wells or during soil gas excavation.
OSHA Standards 29 CFR Part 1910	Requirements for the health and safety of workers involved in hazardous waste operations. Includes emergency reponse workers during clean-up operations at sites recognized as hazardous waste sites.	SVE construction and grading activities during installation of VMS Soil Gas Excavations	ARAR	ARAR for remedial construction during the implementation of soil gas remedial alternatives.
OSHA Standards 29 CFR Part 1926	This Part includes general health and safety regulations for construction.	SVE construction and grading activities during installation of VMS Soil Gas Excavations	ARAR	ARAR for remedial construction during the implementation of soil gas remedial alternatives.
Cal/OSHA Title 8 CCR, Chapter 4	This Chapter outlines regulations for industrial safety. Relevant portions include but are not limited to Subchapter 4 (Construction Safety Orders), Subchapter 7 (General Safety Orders), and Section 1532.1	SVE construction and grading activities during installation of VMS Soil Gas Excavations	ARAR	ARAR for remedial construction during the implementation of soil gas remedial alternatives.
Cal/OSHA Title 8 CCR, Chapter 7	This Chapter outlines general industry safety orders, and relevant sections include but not limited to Section 5214.	SVE construction and grading activities during installation of VMS Soil Gas Excavations	ARAR	ARAR for remedial construction during the implementation of soil gas remedial alternatives.

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Table 6
List of Applicable or Relevant and Appropriate Requirements and Advisories and Guidance To Be Considered
Midway-Bayshore Village Redevelopment
Daly City, CA

Potential Action-Specific ARARs and TBCs				
Requirement	Description	Action	ARAR or TBC	Notes
Cal/OSHA Title 8 CCR, Section 3203	Section 3203 includes regulations for illness and injury prevention.	SVE construction and grading activities during installation of VMS Soil Gas Excavations	ARAR	ARAR for remedial construction during the implementation of soil gas remedial alternatives.
SWRCB Order No. 2009-009-DWQ	This order requires that BMPs will be used to prevent construction pollutants from contacting stormwater.	SVE construction and grading activities during installation of VMS and off-site disposal; Soil Gas Excavation activities	TBC	TBC for remedial construction (including excavation and stockpiling) during the implementation of soil gas remedial alternatives.
CCR Title 27, Section 20090(d)	This Section states that actions taken by public agencies to clean up unauthorized releases are exempt from CCR Titles 27 and 23, except that wastes removed from the immediate place of release and discharged to land must be managed in accordance with classification (CCR Title 27, Section 20200 and CCR Title. 23, Section 2520), and citing requirements of these two titles and wastes contained or left in place must comply with these two titles to the extent feasible.	SVE construction, grading activities during installation of VMS, soil gas excavation, and off-site disposal	ARAR	TBC for remedial construction (including excavation and stockpiling) during the implementation of soil gas remedial alternatives.
49 CFR Parts 171-180	United States Department of Transportation's regulations on transportation of hazardous waste.	Off-Site Disposal	ARAR	ARAR for solid waste generated during remedial construction during the implementation of soil gas remedial alternatives.
CHSC 25163	State law requiring registration of hazardous waste transportation.	Off-Site Disposal	ARAR	ARAR for solid waste generated during remedial construction during the implementation of soil gas remedial alternatives.
CCR Title 22 Section 66263	State regulation of hazardous waste transportation.	Off-Site Disposal	ARAR	ARAR for solid waste generated during remedial construction during the implementation of soil gas remedial alternatives.
California Civil Code Section 1471	The requirements that allow hazardous material covenants to run with the land.	Institutional Controls	ARAR	ARAR for institutional controls implemented for the soil gas remedial alternatives.
CHSC Section 25202.5	This Section descirbes the authority for the DTSC to enter into an agreement to restrict land uses.	Institutional Controls	ARAR	ARAR for institutional controls implemented for the soil gas remedial alternatives.
CHSC Section 25222.1	This Section provides a streamlined process to be used to enter into an agreement to restrict specific use of property in order to implement the substantive use restrictions of CHSC Section 25232(b)(1)(A)–(E).	Institutional Controls	ARAR	ARAR for institutional controls implemented for the soil gas remedial alternatives.
Cal/OSHA Title 8 CCR, Section 5182	Section 3203 includes regulations for illness and injury prevention. Title 5182 includes requirement that workers involved in hazardous substance operations associated with cleanup sites must comply with the health and safety requirements of the state and OSHA.	SVE construction and grading activities during installation of VMS and Soil Gas Excavations	ARAR	ARAR for remedial construction during the implementation of soil gas remedial alternatives.
CCR Title 14 Section 15000 - 15387 - California Environmental Quality Act (CEQA)	This act required environmental impact review by California govening agencies or regulated private parties.	Institutional Controls, SVE, VMS, and Soil Gas Excavations	ARAR	ARAR for all remedial alternatives.
CCR Title 22 Section 67391.1	The authority for the DTSC to enter into an agreement to restrict land uses. This Section includes requirements for LUCs.	Institutional Controls	ARAR	ARAR for institutional controls implemented for the soil gas remedial alternatives.

Table 6
List of Applicable or Relevant and Appropriate Requirements and Advisories and Guidance To Be Considered
Midway-Bayshore Village Redevelopment
Daly City, CA

Potential Action-Specific ARARs and TBCs				
Requirement	Description	Action	ARAR or TBC	Notes
SWRCB's Porter-Cologne Water Quality Control Act, California Water Code, Division 7, Section 13307.1(c)	This section outlines the policy for notification of property owners. If the Regional Water Board or SWRCB finds a property unsuitable for unrestricted use and requires a land use restriction to protect public health, safety, or the environment, a closure letter or NFA may not be issued unless a land use restriction is recorded under California Civil Code Section 1471.	Institutional Controls	ARAR	ARAR for institutional controls implemented at the site; requires proper recording of a land use restriction prior to the issuance of a Regional Water Board or SWRCB closure letter.
CHSC Section 25233(c)	The requirements for obtaining variances from land use restrictions.	Institutional Controls	ARAR	ARAR for institutional controls implemented for the soil gas remedial alternatives.
CHSC Section 25234	This Section outlines the requirements for removing land use restrictions.	Institutional Controls	ARAR	ARAR for institutional controls implemented for the soil gas remedial alternatives.
CHSC Section 25355.5(a)(1)(C)	Requirement to execute and record a written instrument that restricts land uses.	Institutional Controls	TBC	ARAR for institutional controls implemented for the soil gas remedial alternatives.
USEPA's Guide for Assessing and Mitigating the Vapor Intrusion Pathway from Subsurface Vapor Sources to Indoor Air (June 2015)	This vapor intrusion guidance defines and describes vapor intrusion and addresses vapor intrusion pathways, which may threaten human health. This guide is intended to help assess the subsurface vapor intrusion pathway with current technical recommendations.	SVE, VMS, and Soil Gas Excavations	TBC	TBC for soil gas remedial alternatives.
DTSC's Final Guidance for the Evaluation & Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance; October 2011)	The Vapor Intrusion Guidance provides steps and procedures for the investigation of vapor intrusion. The guidance describes the process of screening and site-specific assessments of potential risks from exposure pathways.	SVE, VMS, and Soil Gas Excavations	TBC	TBC for soil gas remedial alternatives.
DTSC's Draft Supplemental Guidance: Screening and Evaluating Vapor Intrusion (February 2020)	The DTSC, SWRCB, and Regional Water Board developed this draft supplemental guidance for conducting vapor intrusion evaluations.	SVE, VMS, and Soil Gas Excavations	TBC	TBC for soil gas remedial alternatives.

Notes:
ARAR - Applicable or Relevant and Appropriate Requirements
BAAQMD - Bay Area Air Quality Management District
Basin Plan - Comprehensive Water Quality Control Plan for the San Francisco Bay Basin
BMPs - Best Management Practices
Cal/OSHA - California Division of Occupational Safety and Health
CCR - California Code of Regulations
CFR - Code of Federal Regulations
CHSC - California Health and Safety Code
DTSC - Department of Toxic Substances Control
ESLs - Environmental Screening Levels
LUC - Land Use Covenant
MACT - Maximum Achievable Control Technology
No. - Number
NFA - No Further Action
OSHA - Occupational Safety and Health Administration
RCRA - Resource Conservation and Recovery Act
Regional Water Board - San Francisco Regional Water Quality Control Board
RSLs - Regional Screening Levels
SGSL - Soil Gas Screening Level
SL - Screening Level
STLC - Soluble Threshold Limit Concentrations
SVE - Soil Vapor Extraction
SWRCB - State Water Resources Control Board
TAC - Toxic Air Contaminants
TBC - To be considered
TTLC - Total Threshold Limit Concentration
U.S.C - United States Code
USEPA - United States Environmental Protection Agency
VMS - Vapor Mitigation System

Table 7
Evaluation of Remedial Action Alternatives Using NCP Criteria
Midway-Bayshore Village Redevelopment
Daly City, CA

	Alternative 1: No Action	**Alternative 2: SVE and VMS with ICs and Monitoring**	**Alternative 3: VMS with ICs and Monitoring**	**Alternative 4A[1]: Soil Gas Hot Spot Excavation and VMS with ICs and Monitoring**	**Alternative 4B[2]: Soil Gas Hot Spot Targeted Excavation (Below Planned Residential Structures) and VMS with ICs and Monitoring**
Federal Criteria Rating					
1. Overall Protection of Human Health and the Environment	Fail	Very Good	Excellent	Excellent	Excellent
2. Compliance with ARARs	Not Applicable	Acceptable	Acceptable	Acceptable	Acceptable
3. Long-term Effectiveness and Permanence	Fail	Poor*	Very Good	Excellent	Excellent
4. Reduction of TVM through Treatment	Fail	Good	Poor	Very Good	Very Good
5. Short-term Effectiveness	Excellent	Very Poor*	Very Good	Good	Good
6. Implementability	Excellent	Good	Very Good	Poor	Poor
7. Cost	Excellent	Poor ($4,336,200)[3]	Very Good ($2,457,600)[3]	Very Poor ($6,573,800)[3]	Very Poor ($5,065,200)[3]
8. Community Acceptance	Fail	TBD	TBD	TBD	TBD
9. State Acceptance	Fail	TBD	TBD	TBD	TBD
State Criteria Rating					
1. Health and Safety Risks Posed by Site Conditions	Poor	Very Good	Very Good	Good	Very Good
2. Effect of Contamination upon Beneficial Uses of Resources	Not Applicable	Good	Not Applicable	Good	Good
3. Effect of Contamination upon Groundwater Resources	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
4. Site-specific Characteristics	Poor	Very Poor	Excellent	Very Good	Very Good
5. Cost Effectiveness	Excellent	Very Poor	Very Good	Very Poor	Very Poor
6. Potential Environmental Impacts of Remedial Action	Excellent	Good	Very Good	Poor	Poor
Overall Rating (Federal and State)	**Fail**	**Poor***	**Very Good**	**Poor**	**Poor**

Notes:

[1] Alternative 4A proposes to excavate soil where soil vapor concentrations exceed Soil Gas Remedial Goals (SGRGs).

[2] Alternative 4B proposes to excavate soil where soil vapor concentrations exceed SGRGs below future residential structures.

[3] Estimated costs are presented in Table 8 and Appendix C.

ARARs = Applicable or Relevant and Appropriate Requirements

ICs = Institutional Controls

NCP = National Contingency Plan

SVE = Soil Vapor Extraction

TVM = Toxicity, Volume, Mobility

TBD = To Be Determined

VMS = Vapor Mitigation System

* Overall Alternative 2 rating due to the VMS controlling vapor instrusion; however, the SVE will not operate effectively due to high water table, relatively impermeable subsurface material, and the time constraints of the Phase 1 construction.

Table 8
Summary of Estimated Relative Costs of Potential Soil Gas Remedial Alternatives
Midway-Bayshore Village Redevelopment
Daly City, CA

Alternative	Description	Capital Cost[1]	O&M Cost[1]	Total Cost[1]
Alternative 1	No Action	$ -	$ -	$ -
Alternative 2	SVE and VMS with ICs and Monitoring	$ 3,493,200	$ 843,000	$ 4,336,200
Alternative 3	VMS with ICs and Monitoring	$ 1,819,300	$ 638,300	$ 2,457,600
Alternative 4A[2]	Soil Gas Hot Spot Excavation and VMS with ICs and Monitoring	$ 5,928,600	$ 638,300	$ 6,566,900
Alternative 4B[3]	Soil Gas Hot Spot Targeted Excavation and VMS with ICs and Monitoring	$ 4,426,900	$ 638,300	$ 5,065,200

Notes:

[1] See notes, assumptions, and exclusions included in cost estimates provided in Tables C-1, C-2, C-3A, and C-3B in Appendix C.

[2] Alternative 4A proposes to excavate soil where soil vapor concentrations exceed Soil Gas Remedial Goals (SGRGs).

[3] Alternative 4B proposes to excavate soil where soil vapor concentrations exceed SGRGs below future residential structures.

IC - institutional control

O&M - operation and maintenance

SVE - soil vapor extraction

VMS - vapor mitigation system

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FIGURES

Legend

Master Plan Redevelopment Area

Notes:
1. Topographic basemap is provided through Langan's Esri ArcGIS software licensing and ArcGIS online © 2011 National Geographic Society, i-cubed.
2. All features shown are approximate.

1,500 0 1,500
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Project	MIDWAY-BAYSHORE VILLAGE REDEVELOPMENT DALY CITY SAN MATEO COUNTY CALIFORNIA
Figure Title	SITE LOCATION MAP
Project No.	770650101
Date	JUNE 2021
Scale	1 " = 1,500 '
Drawn By	OG
Figure	1

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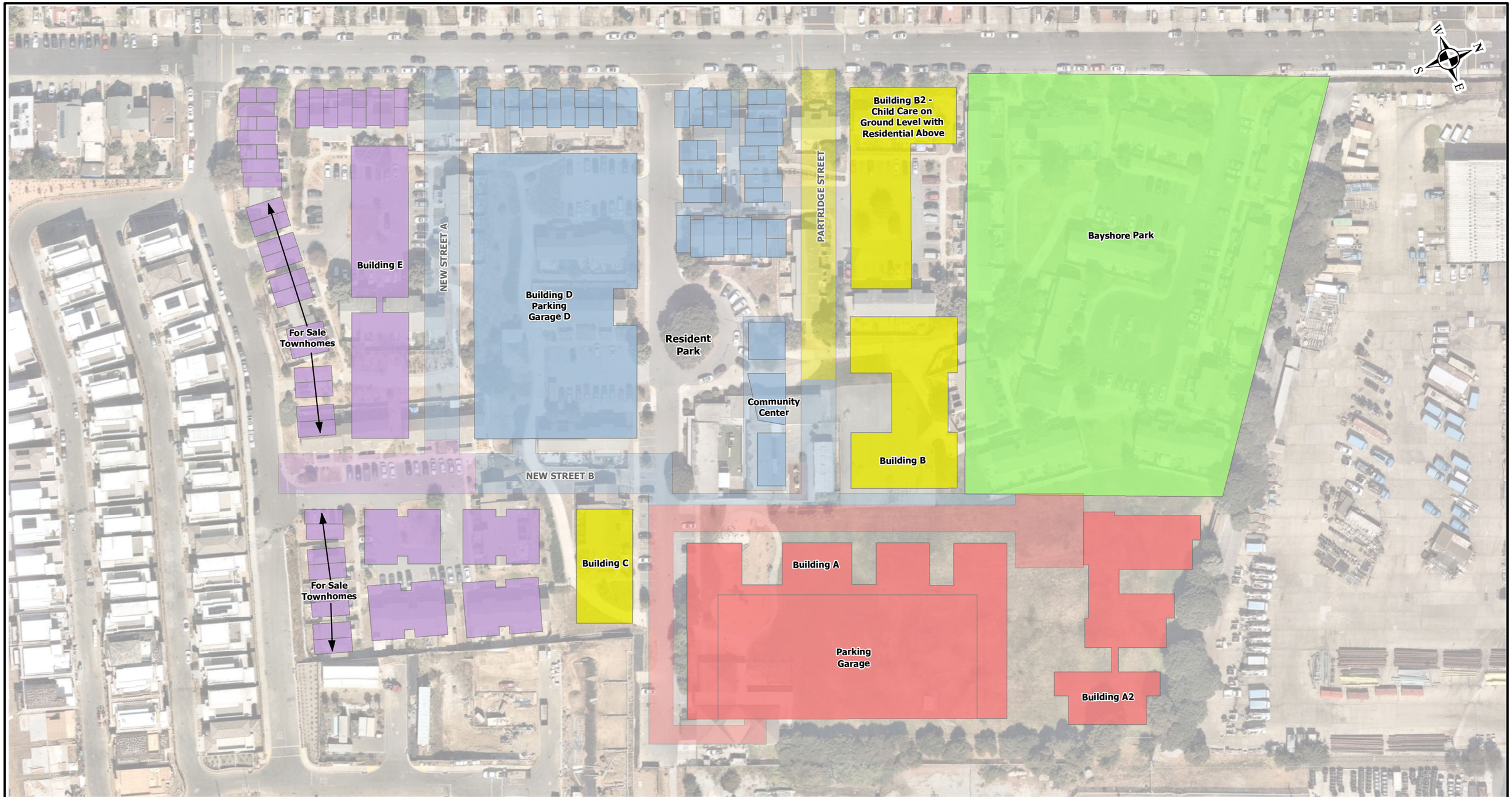
Path: \\langan.com\data\SJO\data1\770650101\Project Data\ArcGIS\MXD\Environmental_Figures\2021-02 RAP Redline\Figure 1 - Site Location Map.mxd Date: 6/29/2021 User: jenzminger Time: 9:47:14 AM



Legend

- Construction Phase 1
- Construction Phase 2
- Construction Phase 3
- Construction Phase 4
- Construction Phase 5
  Bayshore Park returned to City of Daly City

Notes:
1. Aerial imagery provided by Nearmap, 05/25/2021.
2. All features shown are approximate.

100 0 100
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Project
MIDWAY-BAYSHORE VILLAGE REDEVELOPMENT
DALY CITY
SAN MATEO COUNTY CALIFORNIA

Figure Title
PHASED CONSTRUCTION PLAN

Project No.	Figure
770650101	2
Date: JUNE 2021	
Scale: 1 " = 100 '	
Drawn By: OG	

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Legend

Approximate location of 96-inch storm drain line installed in 2002

Notes:
1. Basemap provided by David Baker Architects, 6/3/2020.
2. All features shown are approximate.

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Project
MIDWAY-BAYSHORE VILLAGE REDEVELOPMENT
DALY CITY
SAN MATEO COUNTY CALIFORNIA

Figure Title
MASTER PLAN REDEVELOPMENT AREA

Project No.	770650101
Date	JUNE 2021
Scale	1 " = 100 '
Drawn By	OG
Figure	3

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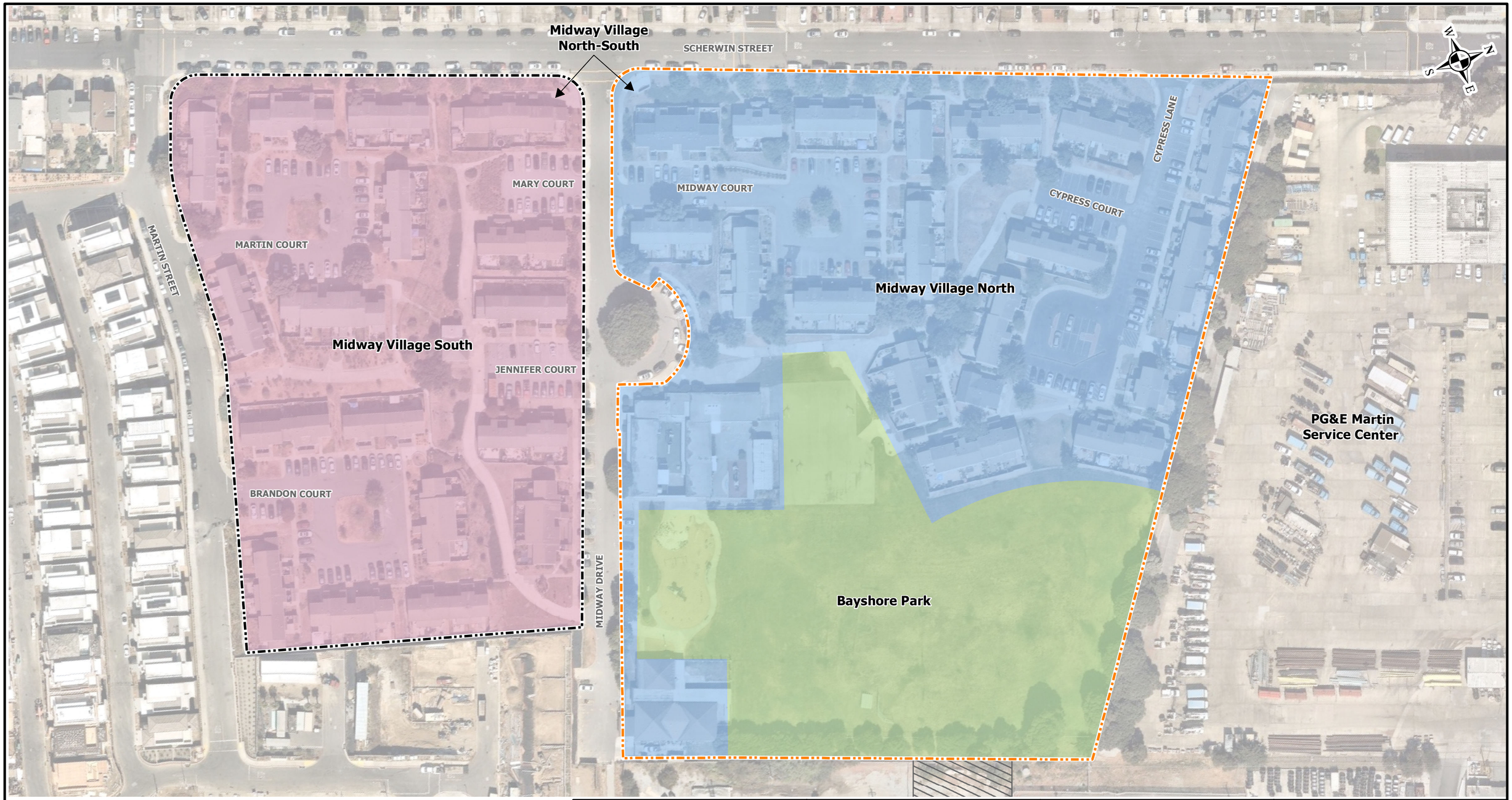

Legend

- Bayshore Park
- Midway Village North
- Midway Village South
- Approximate off-site drainage ditch location
- Midway Village South site boundary
- Midway Village North site boundary

Notes:
1. Aerial imagery provided by Nearmap, 05/25/2021.
2. All features shown are approximate.

100 0 100
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Project
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DALY CITY
SAN MATEO COUNTY CALIFORNIA

Figure Title
MIDWAY VILLAGE NORTH-SOUTH

Project No.	770650101
Date	JUNE 2021
Scale	1 " = 100 '
Drawn By	JNE

Figure 4

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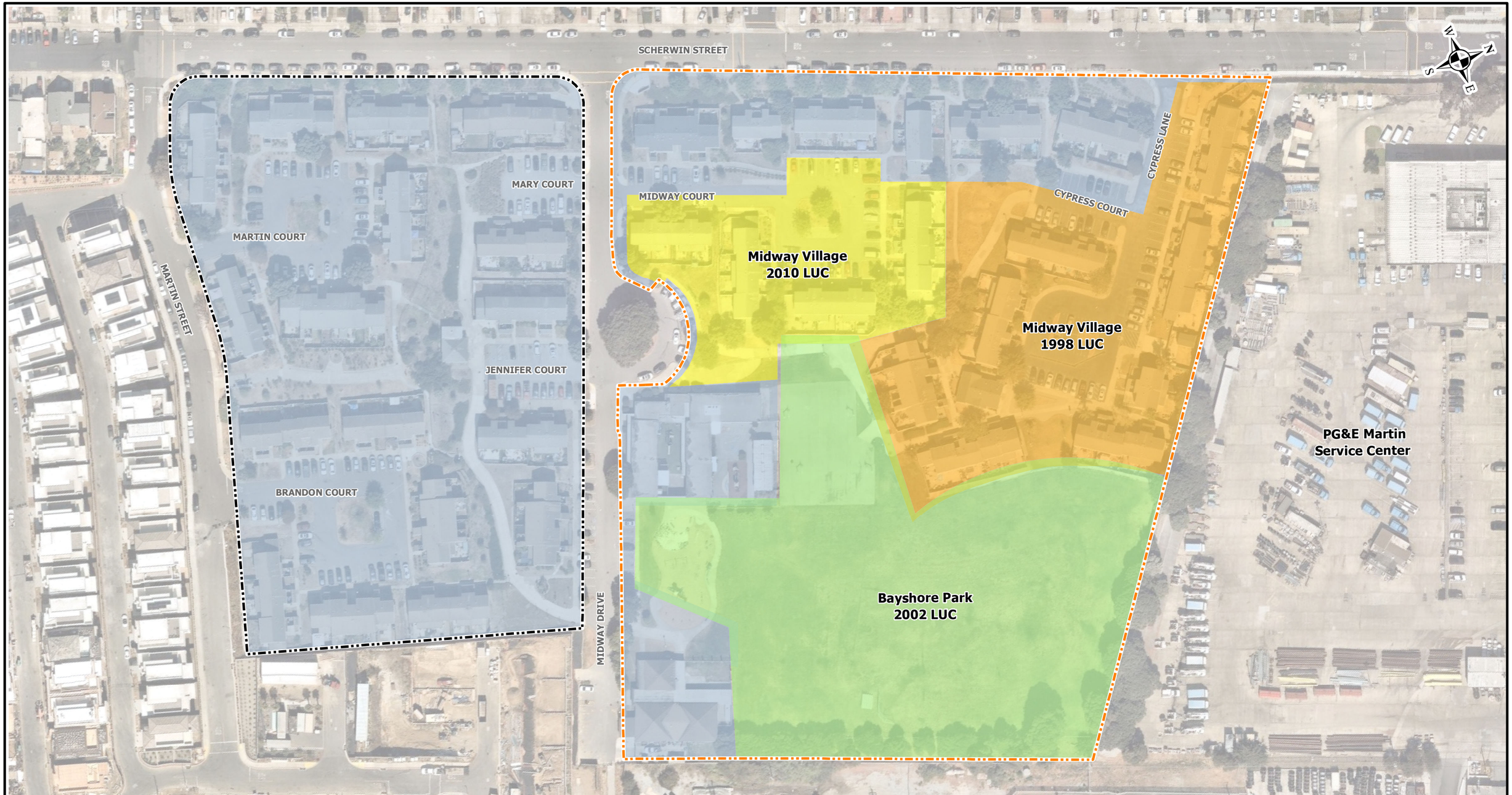

Legend

- Midway Village 1998 LUC
- Bayshore Park 2002 LUC
- Midway Village 2010 LUC
- Parcels not included in LUCs
- Midway Village South Site Boundary
- Midway Village North Site Boundary

Notes:
1. LUC - Land Use Covenant
2. LUC boundaries are approximate; see deed restrictions for exact boundaries.
3. Aerial imagery provided by Nearmap, 05/25/2021.
4. All features shown are approximate.

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Figure Title
LAND USE COVENANT AREAS

Project No.	770650101
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Scale	1 " = 100 '
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Figure	5

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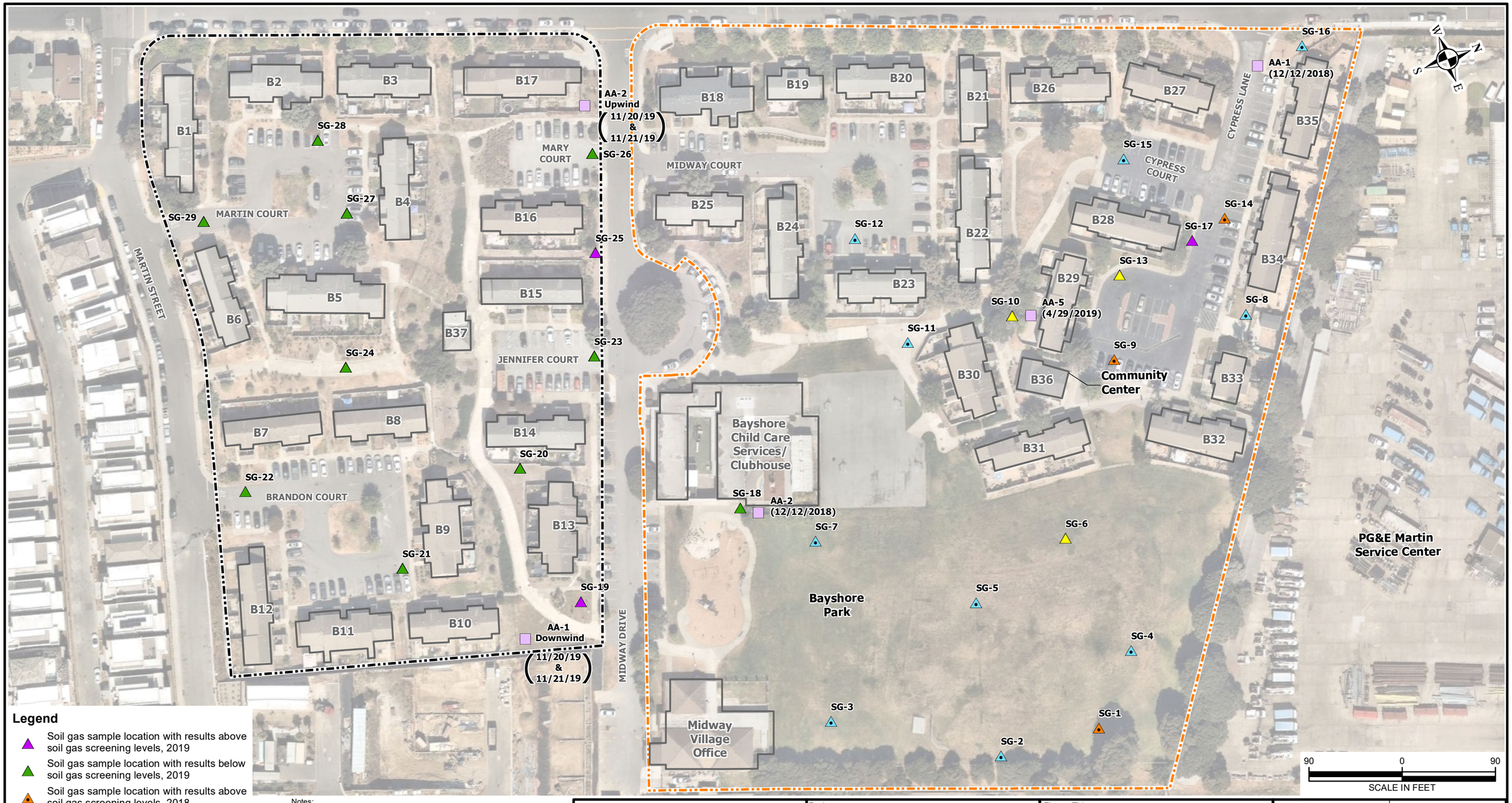

Legend

- Soil gas sample location with results above soil gas screening levels, 2019
- Soil gas sample location with results below soil gas screening levels, 2019
- Soil gas sample location with results above soil gas screening levels, 2018
- Soil gas sample location with results below soil gas screening levels, 2018
- Soil gas sample not collected due to water in borehole
- Ambient air sample location
- Building footprint
- Midway Village South Site Boundary
- Midway Village North Site Boundary

Notes:
1. Ambient air sample locations were chosen based on meteorological data checked using a Daly City online weather app during sampling activities.
2. DTSC - California Department of Toxic Substances Control
3. USEPA - United States Environmental Protection Agency
4. HERO HHRA Note 3 (April 2019): DTSC Human and Ecological Risk Office Human Health Risk Assessment Note 3 DTSC Modified Screening Levels (SLs), June 2018.
5. Residential Soil Gas Screening Levels from USEPA, SLs Summary Table, November 2019, and DTSC HERO Note 3 have been calculated using an attenuation factor of 0.001.
6. AA - Ambient Air
7. Aerial imagery provided by Nearmap, 05/25/2021.
8. All features shown are approximate.

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Project
MIDWAY-BAYSHORE VILLAGE REDEVELOPMENT
DALY CITY
SAN MATEO COUNTY CALIFORNIA

Figure Title
SOIL GAS SAMPLE LOCATIONS

Project No.	770650101
Date	JUNE 2021
Scale	1 " = 90 '
Drawn By	OG
Figure	6

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Path: \\langan.com\data\SJO\data1\770650101\Project Data\ArcGIS\MXD\Environmental_Figures\2021-02 RAP Redline\Figure 6 - Soil Gas Locations.mxd Date: 6/29/2021 User: jenzminger Time: 10:26:39 AM

SCHERWIN STREET

MARTIN STREET

MARTIN COURT

MARY COURT

MIDWAY COURT

JENNIFER COURT

BRANDON COURT

CYPRESS COURT

CYPRESS LANE

MIDWAY DRIVE

Bayshore Park

SG-1 SG-2 SG-3 SG-4 SG-5 SG-6 SG-7 SG-8 SG-9 SG-10 SG-11 SG-12 SG-13 SG-14 SG-15 SG-16 SG-17 SG-18 SG-19 SG-20 SG-21 SG-22 SG-23 SG-24 SG-25 SG-26 SG-27 SG-28 SG-29

Sample	Date Collected	Ethyl-benzene
		µg/m³
SG-25	11/21/19	2,520
DUP-1	11/21/19	2,600
Residential SGSLs [1]		1,100.0

Sample	Date Collected	Vinyl Chloride
		µg/m³
SG-19	11/20/19	14.7
Residential SGSLs [1]		9.50

Sample	Date Collected	Benzene	Naphtha-lene
		µg/m³	
SG-14	12/12/18	709	6,750
Residential SGSLs [1]		97.0	83.0

Sample	Date Collected	Benzene	Naphtha-lene
		µg/m³	
SG-17	04/29/19	381	145.0
Residential SGSLs [1]		97.0	83.0

Sample	Date Collected	Benzene	Ethyl-benzene	Naphtha-lene
		µg/m³		
SG-9	12/13/18	46,600	8,270	116,000
Residential SGSLs [1]		97.0	1,100.0	83.0

Sample	Date Collected	Naphtha-lene
		µg/m³
SG-1	12/13/18	7,950
Residential SGSLs [1]		83.0

PG&E Martin Service Center

125 0 125

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Legend

- Soil gas sample location with results above SGSLs, 2019
- Soil gas sample location with results below SGSLs, 2019
- Soil gas sample location with results above SGSLs, 2018
- Soil gas sample location with results below SGSLs, 2018
- Soil gas sample not collected due to water in borehole
- Midway Village South site boundary
- Midway Village North site boundary

Notes:
1. Soil Gas Screening Levels (SGSLs) from USEPA, Screening Levels (SLs) Summary Table, November 2019, and DTSC HERO Note 3 have been calculated using an attenuation factor of 0.001.
2. USEPA - United States Environmental Protection Agency
3. DTSC - California Department of Toxic Substances Control
4. HERO HHRA Note 3 (April 2019): DTSC Human and Ecological Risk Office Human Health Risk Assessment Note 3 DTSC Modified Screening Levels, June 2018.
5. µg/m³ - micrograms per cubic meter
6. DUP - Duplicate Sample
7. Aerial imagery provided by Nearmap, 05/25/2021.
8. All features shown are approximate.

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Figure Title
SOIL GAS EXCEEDANCES

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Scale 1 " = 125 '
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Figure 7

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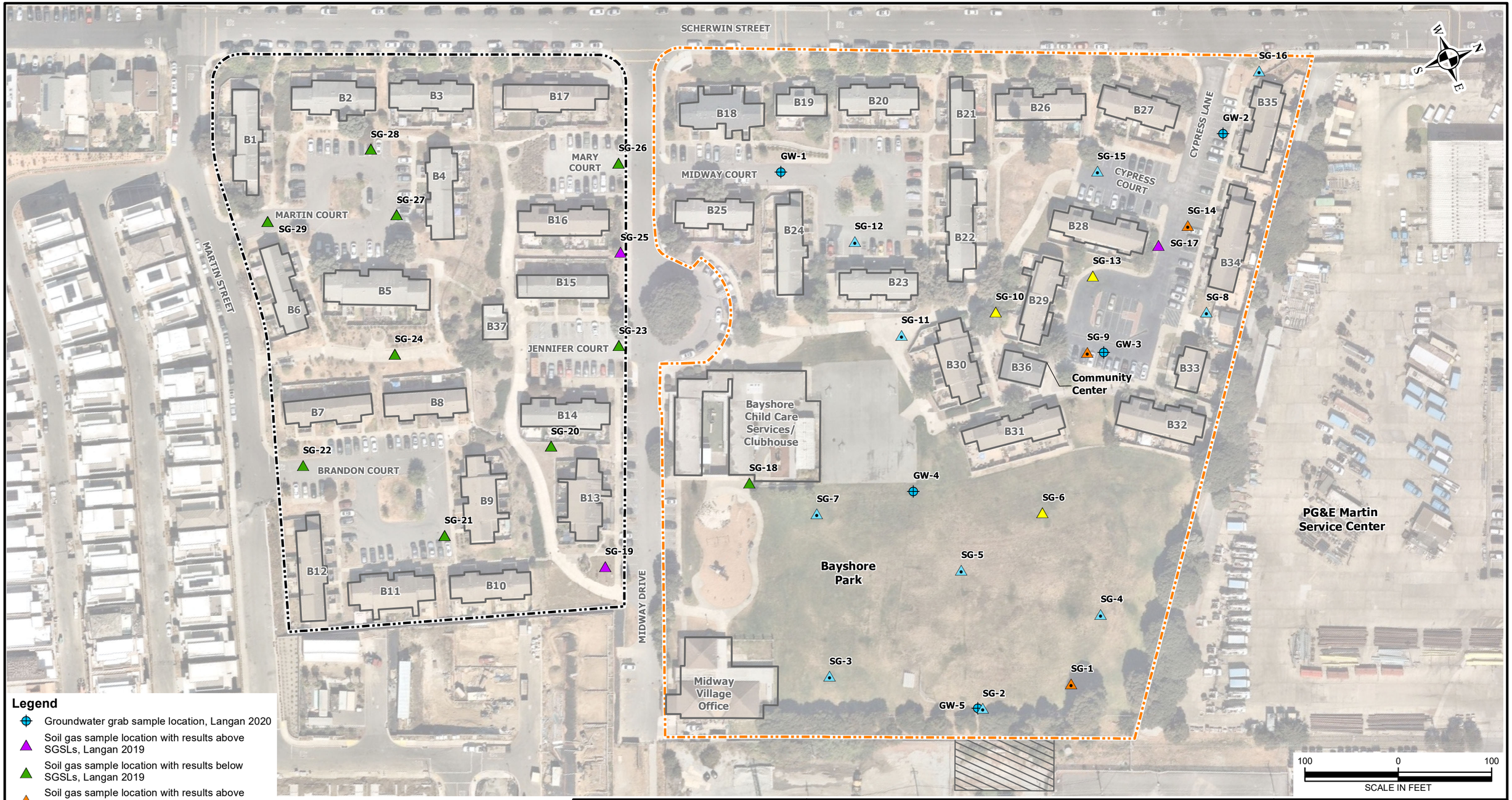

Legend

- Groundwater grab sample location, Langan 2020
- Soil gas sample location with results above SGSLs, Langan 2019
- Soil gas sample location with results below SGSLs, Langan 2019
- Soil gas sample location with results above SGSLs, Langan 2018
- Soil gas sample location with results below SGSLs, Langan 2018
- Soil gas sample not collected due to water in borehole
- Approximate off-site drainage ditch location
- Building footprint
- Midway Village South site boundary
- Midway Village North site boundary

Notes:
1. Residential Soil Gas Screening Levels (SGSLs) from USEPA, Screening Levels (SLs) Summary Table, November 2019, and DTSC HERO Note 3 have been calculated using an attenuation factor of 0.001.
2. USEPA - United States Environmental Protection Agency
3. DTSC - California Department of Toxic Substances Control
4. HERO HHRA Note 3 (April 2019): DTSC Human and Ecological Risk Office Human Health Risk Assessment Note 3 DTSC Modified SLs, June 2018.
5. Aerial imagery provided by Nearmap, 05/25/2021.
6. All features shown are approximate.

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Project
MIDWAY-BAYSHORE VILLAGE REDEVELOPMENT
DALY CITY
SAN MATEO COUNTY CALIFORNIA

Figure Title
GRAB GROUNDWATER SAMPLE LOCATIONS

Project No.	770650101
Date	JUNE 2021
Scale	1 " = 100 '
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Figure 8

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Figure 9A
Human Health Conceptual Site Model
Midway-Bayshore VIllage
Daly City, California

Langan Project: 750650101
June 2021

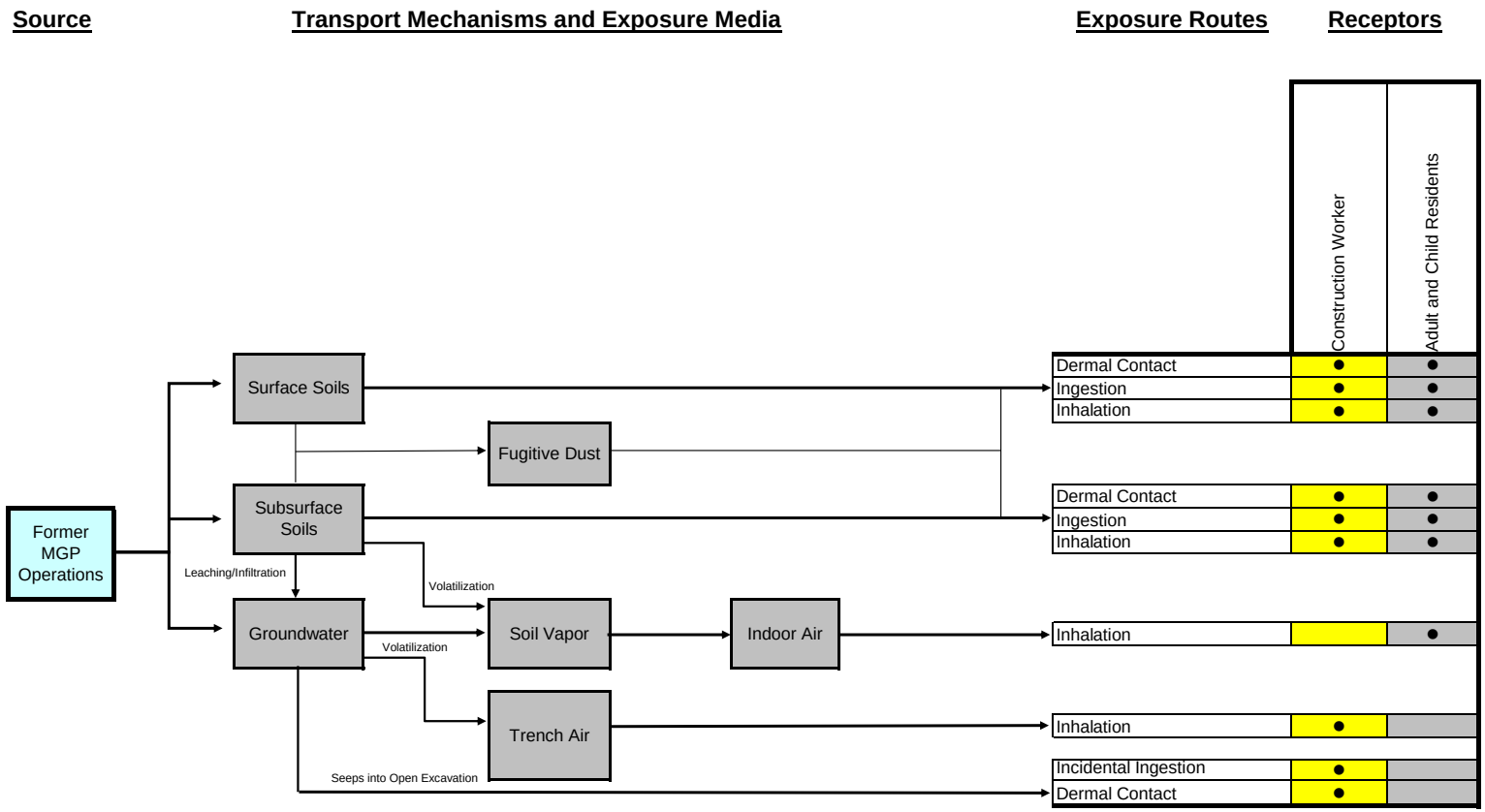


FIGURE 9A

HUMAN HEALTH CONCEPTUAL SITE MODEL
MIDWAY-BAYSHORE VILLAGE REDEVELOPMENT
DALY CITY, CALIFORNIA

NOTES:
● = POTENTIAL EXPOSURE PATHWAY

BLANK = INCOMPLETE OR INSIGNIFICANT PATHWAY

1. HUMAN HEALTH CONCEPTUAL SITE MODEL WAS DEVELOPED IN LANGAN'S *HUMAN HEALTH RISK ASSESSMENT, MIDWAY-BAYSHORE VILLAGE REDEVELOPMENT, DALY CITY, CALIFORNIA,* DATED 24 SEPTEMBER 2020.

Figure 9B
Mitigated Human Health Conceptual Site Model
Midway-Bayshore VIllage
Daly City, California

Langan Project: 750650101
June 2021

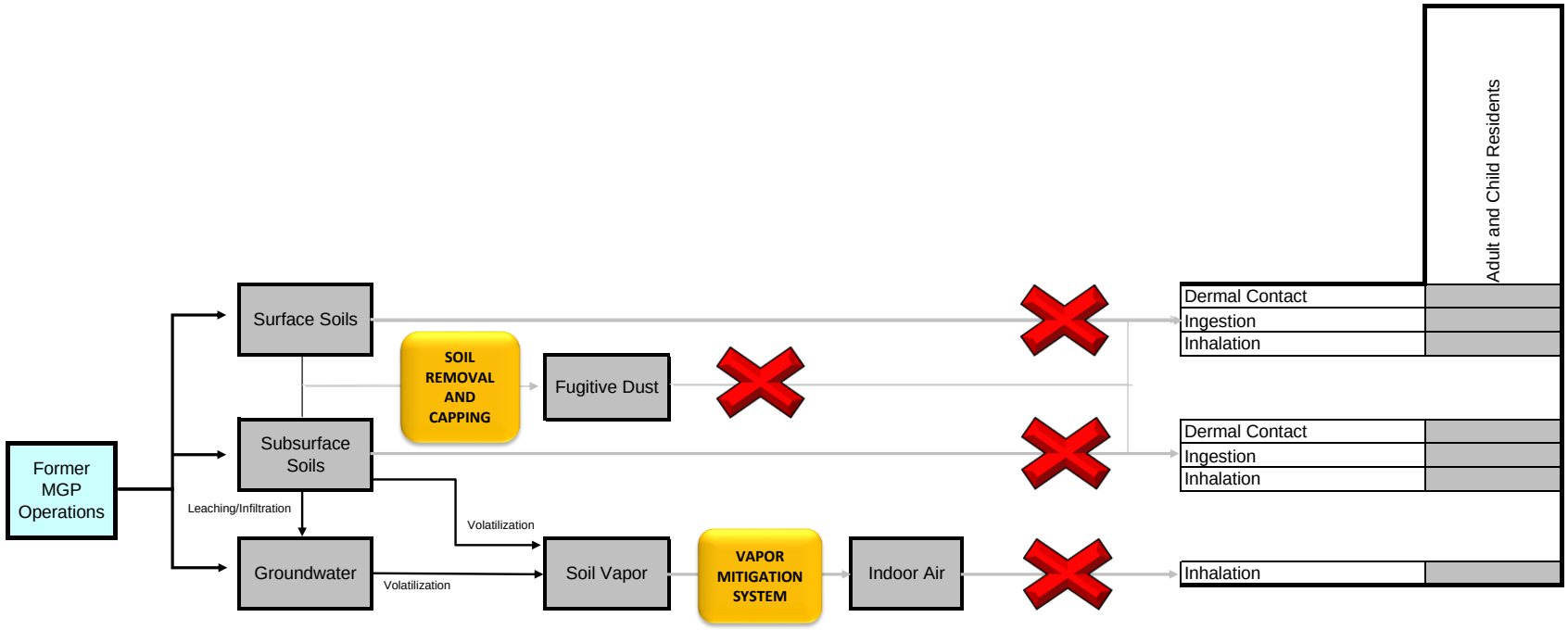


FIGURE 9B

MITIGATED HUMAN HEALTH CONCEPTUAL SITE MODEL
MIDWAY-BAYSHORE VILLAGE REDEVELOPMENT
DALY CITY, CALIFORNIA

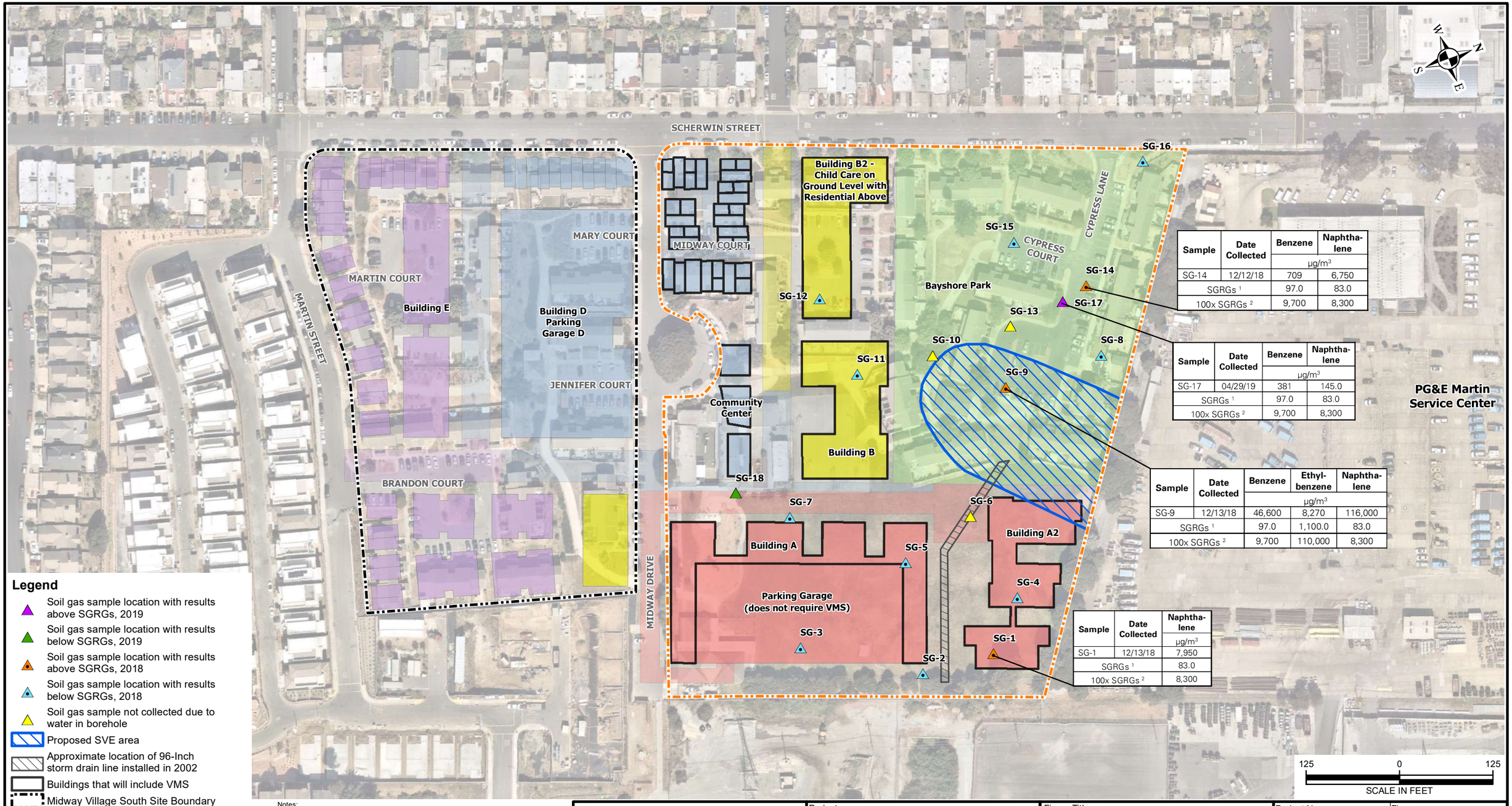
NOTES:

● = POTENTIAL EXPOSURE PATHWAY

✕ = POTENTIAL EXPOSURE PATHWAY INCOMPLETE

BLANK = INCOMPLETE OR INSIGNIFICANT PATHWAY

1. MITIGATED HUMAN HEALTH CONCEPTUAL SITE MODEL WAS DEVELOPED IN LANGAN'S *HUMAN HEALTH RISK ASSESSMENT, MIDWAY-BAYSHORE VILLAGE REDEVELOPMENT, DALY CITY, CALIFORNIA*, DATED 24 SEPTEMBER 2020.
2. CONSTRUCTION WORKER EXPOSURE TO CHEMICALS WILL BE MITIGATED BY USING PROCEDURES DESCRIBED IN A FORTHCOMING HEALTH AND SAFETY PLAN.



Sample	Date Collected	Benzene	Naphtha-lene
		µg/m³	
SG-14	12/12/18	709	6,750
SGRGs [1]		97.0	83.0
100x SGRGs [2]		9,700	8,300

Sample	Date Collected	Benzene	Naphtha-lene
		µg/m³	
SG-17	04/29/19	381	145.0
SGRGs [1]		97.0	83.0
100x SGRGs [2]		9,700	8,300

Sample	Date Collected	Benzene	Ethyl-benzene	Naphtha-lene
		µg/m³		
SG-9	12/13/18	46,600	8,270	116,000
SGRGs [1]		97.0	1,100.0	83.0
100x SGRGs [2]		9,700	110,000	8,300

Sample	Date Collected	Naphtha-lene
		µg/m³
SG-1	12/13/18	7,950
SGRGs [1]		83.0
100x SGRGs [2]		8,300

Legend

- Soil gas sample location with results above SGRGs, 2019
- Soil gas sample location with results below SGRGs, 2019
- Soil gas sample location with results above SGRGs, 2018
- Soil gas sample location with results below SGRGs, 2018
- Soil gas sample not collected due to water in borehole
- Proposed SVE area
- Approximate location of 96-Inch storm drain line installed in 2002
- Buildings that will include VMS
- Midway Village South Site Boundary
- Midway Village North Site Boundary

Construction Phase

- Construction Phase 1
- Construction Phase 2
- Construction Phase 3
- Construction Phase 4
- Construction Phase 5
  Bayshore Park returned to City of Daly City

Notes:
1. Soil Gas Remedial Goals (SGRGs) from USEPA, Screening Levels (SLs) Summary Table, November 2019, and DTSC HERO Note 3 have been calculated using an attenuation factor of 0.001.
2. The proposed SVE target area includes sample locations with concentrations reported at levels equal to or greater than 100x the SGRGs.
3. USEPA - United States Environmental Protection Agency
4. DTSC - California Department of Toxic Substances Control
5. HERO HHRA Note 3 (April 2019): DTSC Human and Ecological Risk Office Human Health Risk Assessment
6. µg/m³ - micrograms per cubic meter
7. DUP - Duplicate Sample
8. SVE - Soil Vapor Extraction
9. ICs - Institutional Controls
10. VMS - Vapor Mitigation System
11. Aerial imagery provided by Nearmap, 05/25/2021.
12. All features shown are approximate.

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Project
MIDWAY-BAYSHORE VILLAGE REDEVELOPMENT
DALY CITY
SAN MATEO COUNTY CALIFORNIA

Figure Title
ALTERNATIVE 2 - SVE WITH VMS, ICS, AND MONITORING

Project No.	770650101
Date	JUNE 2021
Scale	1 " = 125 '
Drawn By	JNE
Figure	10

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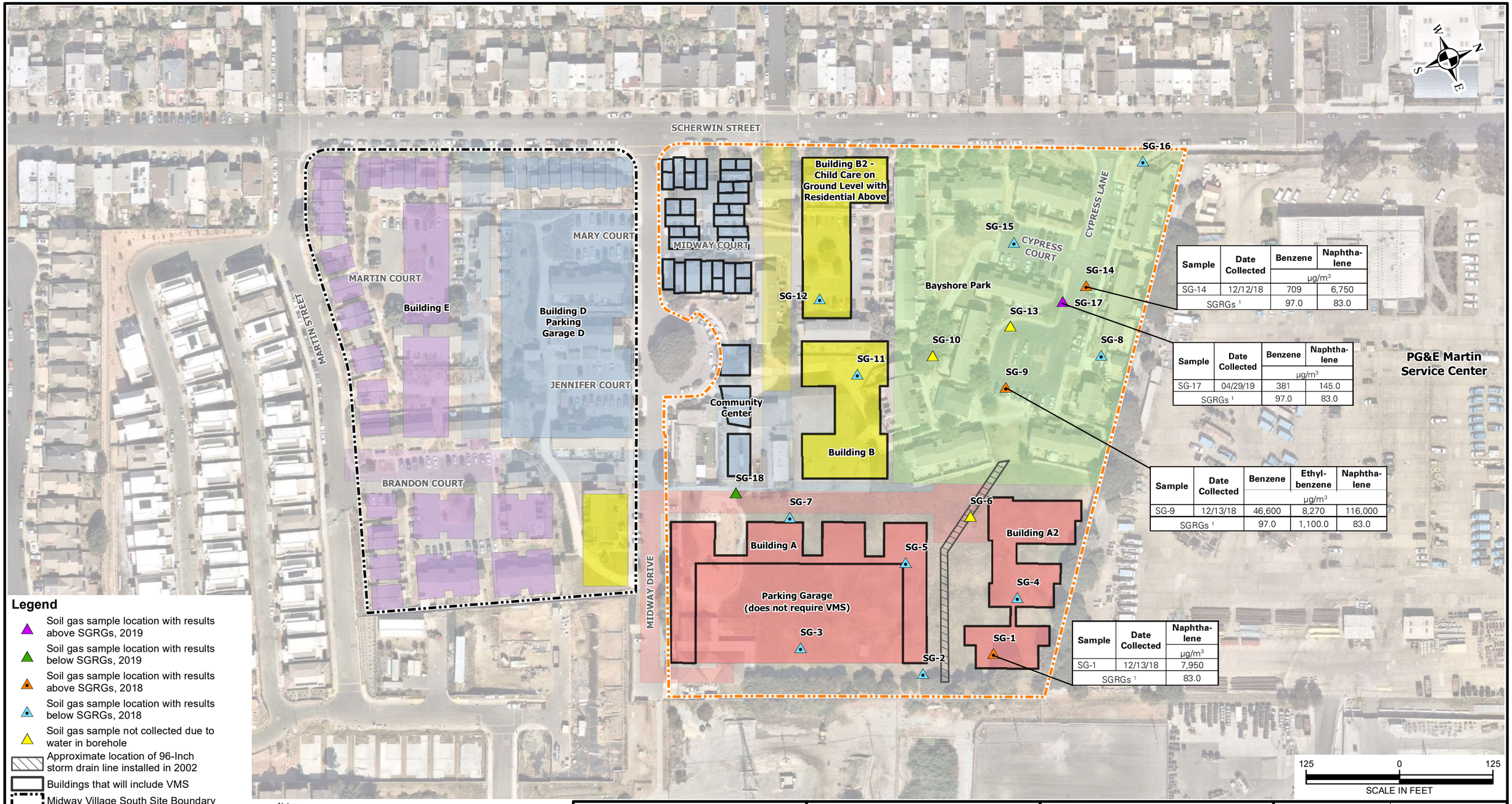

Sample	Date Collected	Benzene	Naphtha-lene
		µg/m³	
SG-14	12/12/18	709	6,750
SGRGs [1]		97.0	83.0

Sample	Date Collected	Benzene	Naphtha-lene
		µg/m³	
SG-17	04/29/19	381	145.0
SGRGs [1]		97.0	83.0

Sample	Date Collected	Benzene	Ethyl-benzene	Naphtha-lene
		µg/m³		
SG-9	12/13/18	46,600	8,270	116,000
SGRGs [1]		97.0	1,100.0	83.0

Sample	Date Collected	Naphtha-lene
		µg/m³
SG-1	12/13/18	7,950
SGRGs [1]		83.0

Legend

- Soil gas sample location with results above SGRGs, 2019
- Soil gas sample location with results below SGRGs, 2019
- Soil gas sample location with results above SGRGs, 2018
- Soil gas sample location with results below SGRGs, 2018
- Soil gas sample not collected due to water in borehole
- Approximate location of 96-Inch storm drain line installed in 2002
- Buildings that will include VMS
- Midway Village South Site Boundary
- Midway Village North Site Boundary

Construction Phase

- Construction Phase 1
- Construction Phase 2
- Construction Phase 3
- Construction Phase 4
- Construction Phase 5
  Bayshore Park returned to City of Daly City

Notes:
1. Soil Gas Remedial Goals (SGRGs) from USEPA, Screening Levels (SLs) Summary Table, November 2019, and DTSC HERO Note 3 have been calculated using an attenuation factor of 0.001.
2. USEPA - United States Environmental Protection Agency
3. DTSC - California Department of Toxic Substances Control
4. HERO HHRA Note 3 (April 2019): DTSC Human and Ecological Risk Office Human Health Risk Assessment
5. µg/m³ - micrograms per cubic meter
6. DUP - Duplicate Sample
7. ICs - Institutional Controls
8. VMS - Vapor Mitigation System
9. Aerial imagery provided by Nearmap, 05/25/2021.
10. All features shown are approximate.

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Project
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DALY CITY
SAN MATEO COUNTY CALIFORNIA

Figure Title
ALTERNATIVE 3 - VMS WITH ICS AND MONITORING

Project No.	770650101
Date	JUNE 2021
Scale	1 " = 125 '
Drawn By	JNE
Figure	11

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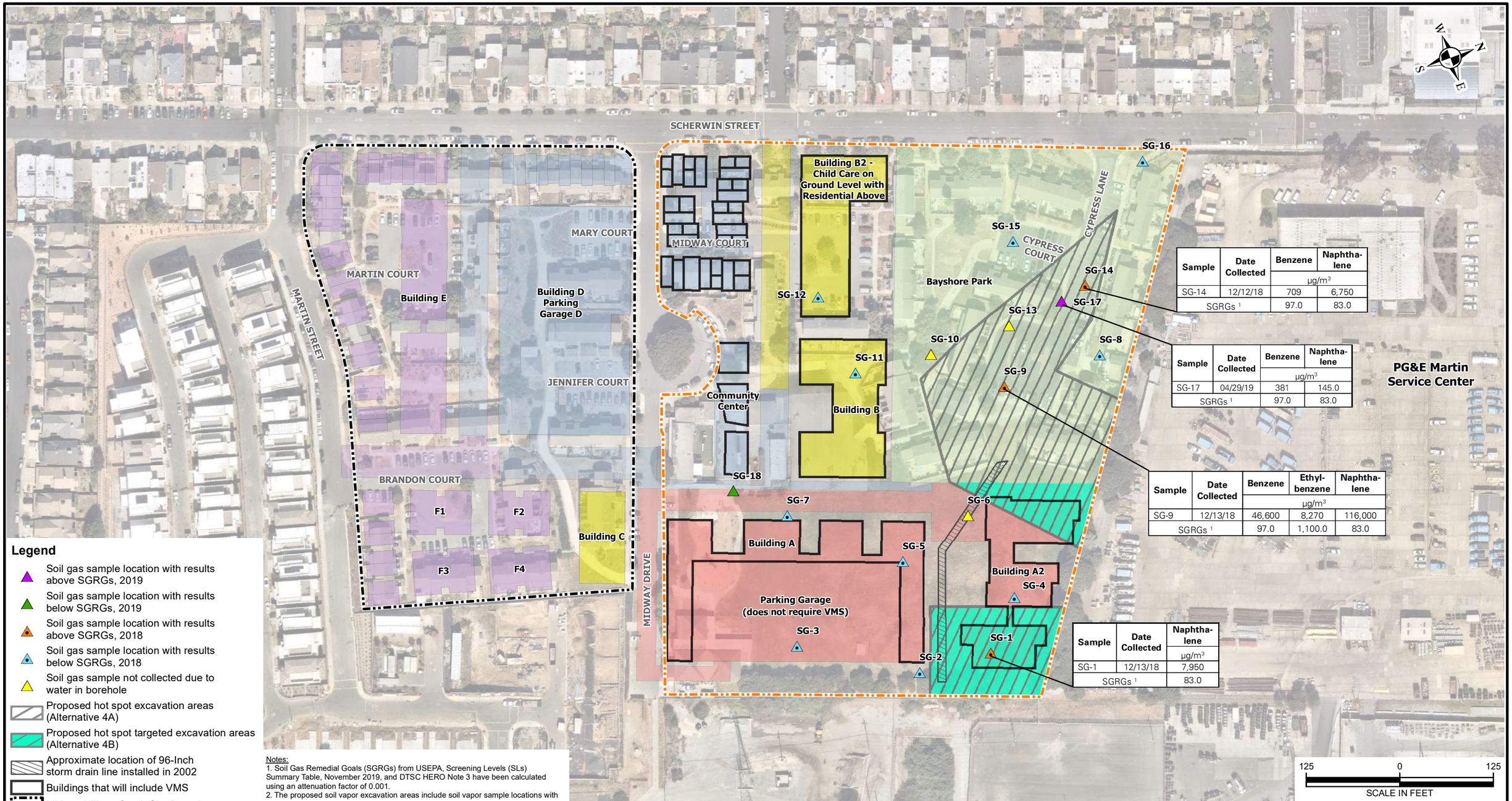

Sample	Date Collected	Benzene	Naphtha-lene
		µg/m³	
SG-14	12/12/18	709	6,750
SGRGs [1]		97.0	83.0

Sample	Date Collected	Benzene	Naphtha-lene
		µg/m³	
SG-17	04/29/19	381	145.0
SGRGs [1]		97.0	83.0

Sample	Date Collected	Benzene	Ethyl-benzene	Naphtha-lene
		µg/m³		
SG-9	12/13/18	46,600	8,270	116,000
SGRGs [1]		97.0	1,100.0	83.0

Sample	Date Collected	Naphtha-lene
		µg/m³
SG-1	12/13/18	7,950
SGRGs [1]		83.0

Legend

- Soil gas sample location with results above SGRGs, 2019
- Soil gas sample location with results below SGRGs, 2019
- Soil gas sample location with results above SGRGs, 2018
- Soil gas sample location with results below SGRGs, 2018
- Soil gas sample not collected due to water in borehole
- Proposed hot spot excavation areas (Alternative 4A)
- Proposed hot spot targeted excavation areas (Alternative 4B)
- Approximate location of 96-Inch storm drain line installed in 2002
- Buildings that will include VMS
- Midway Village South Site Boundary
- Midway Village North Site Boundary

Construction Phase

- Construction Phase 1
- Construction Phase 2
- Construction Phase 3
- Construction Phase 4
- Construction Phase 5
  Bayshore Park returned to City of Daly City

Notes:
1. Soil Gas Remedial Goals (SGRGs) from USEPA, Screening Levels (SLs) Summary Table, November 2019, and DTSC HERO Note 3 have been calculated using an attenuation factor of 0.001.
2. The proposed soil vapor excavation areas include soil vapor sample locations with concentrations greater than SGRGs.
3. Alternative 4A proposes to excavate soil where soil vapor concentrations exceed SGRGs.
4. Alternative 4B proposes to excavate soil where soil vapor concentrations exceed SGRGs below future residential structures.
5. USEPA - United States Environmental Protection Agency
6. DTSC - California Department of Toxic Substances Control
7. HERO HHRA Note 3 (April 2019): DTSC Human and Ecological Risk Office Human Health Risk Assessment
8. µg/m³ - micrograms per cubic meter
9. DUP - Duplicate Sample
10. ICs - Institutional Controls
11. VMS - Vapor Mitigation System
12. Aerial imagery provided by Nearmap, 05/25/2021.
13. All features shown are approximate.

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Langan Engineering and Environmental Services, Inc.

1 Almaden Boulevard, Suite 590
San Jose, CA 95113-2253

T: 408.551.6700 F: 408.551.0344 www.langan.com

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MIDWAY-BAYSHORE VILLAGE REDEVELOPMENT

DALY CITY

SAN MATEO COUNTY CALIFORNIA

Figure Title

ALTERNATIVES 4A AND 4B - SOIL GAS HOT SPOT EXCAVATION AND SOIL GAS HOT SPOT TARGETED EXCAVATION WITH VMS, ICS, AND MONITORING

Project No.	770650101
Date	JUNE 2021
Scale	1 " = 125 '
Drawn By	JNE
Figure	12

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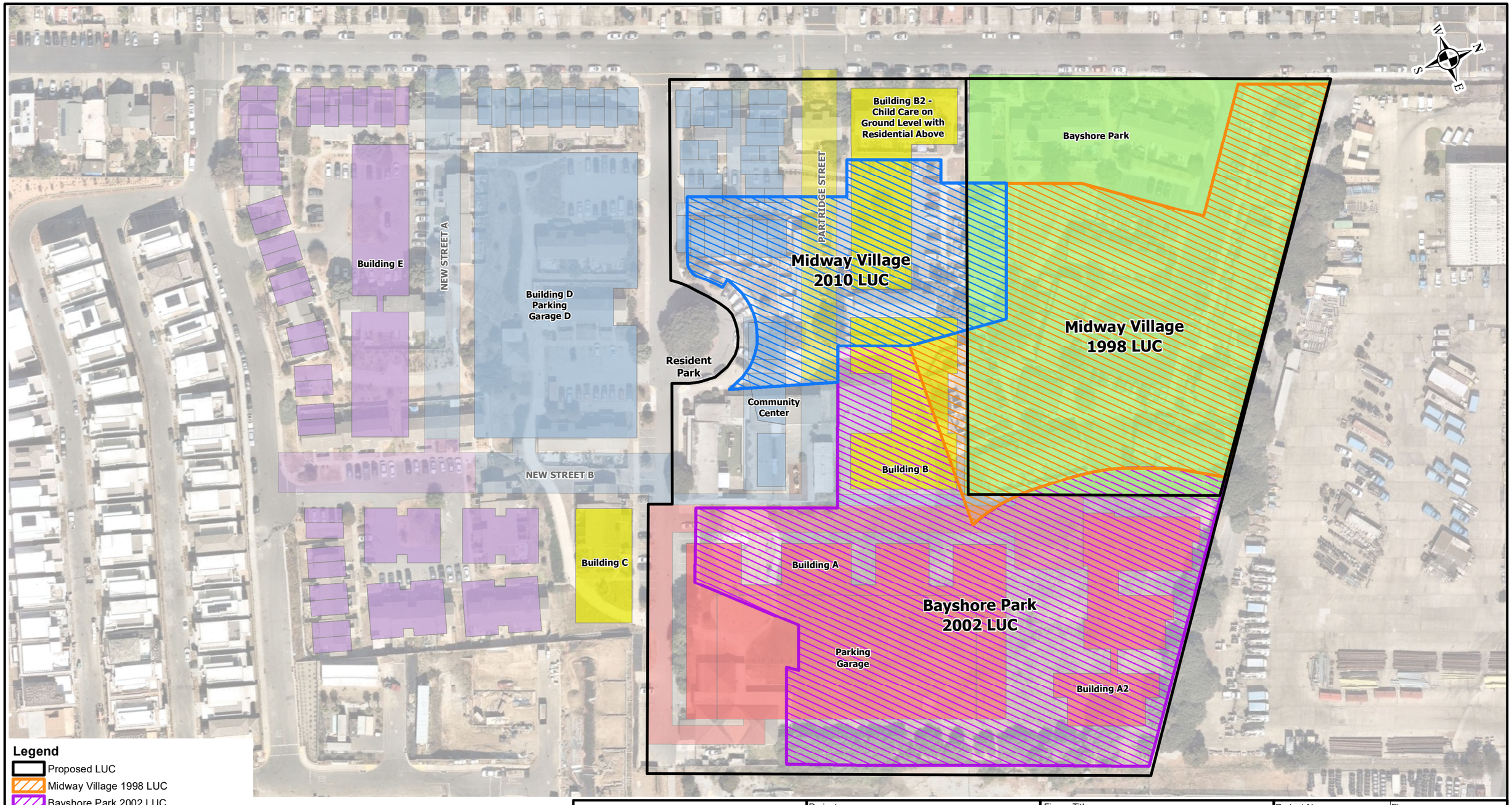
Path: \\langan.com\data\SJO\data1\770650101\Project Data\ArcGIS\MXD\Environmental_Figures\2021-02 RAP Redline\Figure 12 - Alternatives 4A 4B Soil Gas Hot Spot Excavation.mxd Date: 6/29/2021 User: jenzminger Time: 11:24:41 AM



Legend

- Proposed LUC
- Midway Village 1998 LUC
- Bayshore Park 2002 LUC
- Midway Village 2010 LUC

Construction Phase

- Construction Phase 1
- Construction Phase 2
- Construction Phase 3
- Construction Phase 4
- Construction Phase 5
- Bayshore Park returned to City of Daly City

Notes:
1. LUC - Land Use Covenant
2. LUC boundaries are approximate; see deed restrictions for exact boundaries.
3. Aerial imagery provided by Nearmap.com, 05/25/2021.
4. All features shown are approximate.

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Langan Engineering and Environmental Services, Inc.
1 Almaden Boulevard, Suite 590
San Jose, CA 95113-2253
T: 408.551.6700 F: 408.551.0344 www.langan.com

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Figure Title
PHASED CONSTRUCTION PLAN WITH LUC AREAS

Project No.	770650101
Date	JUNE 2021
Scale	1 " = 100 '
Drawn By	JNE
Figure	13

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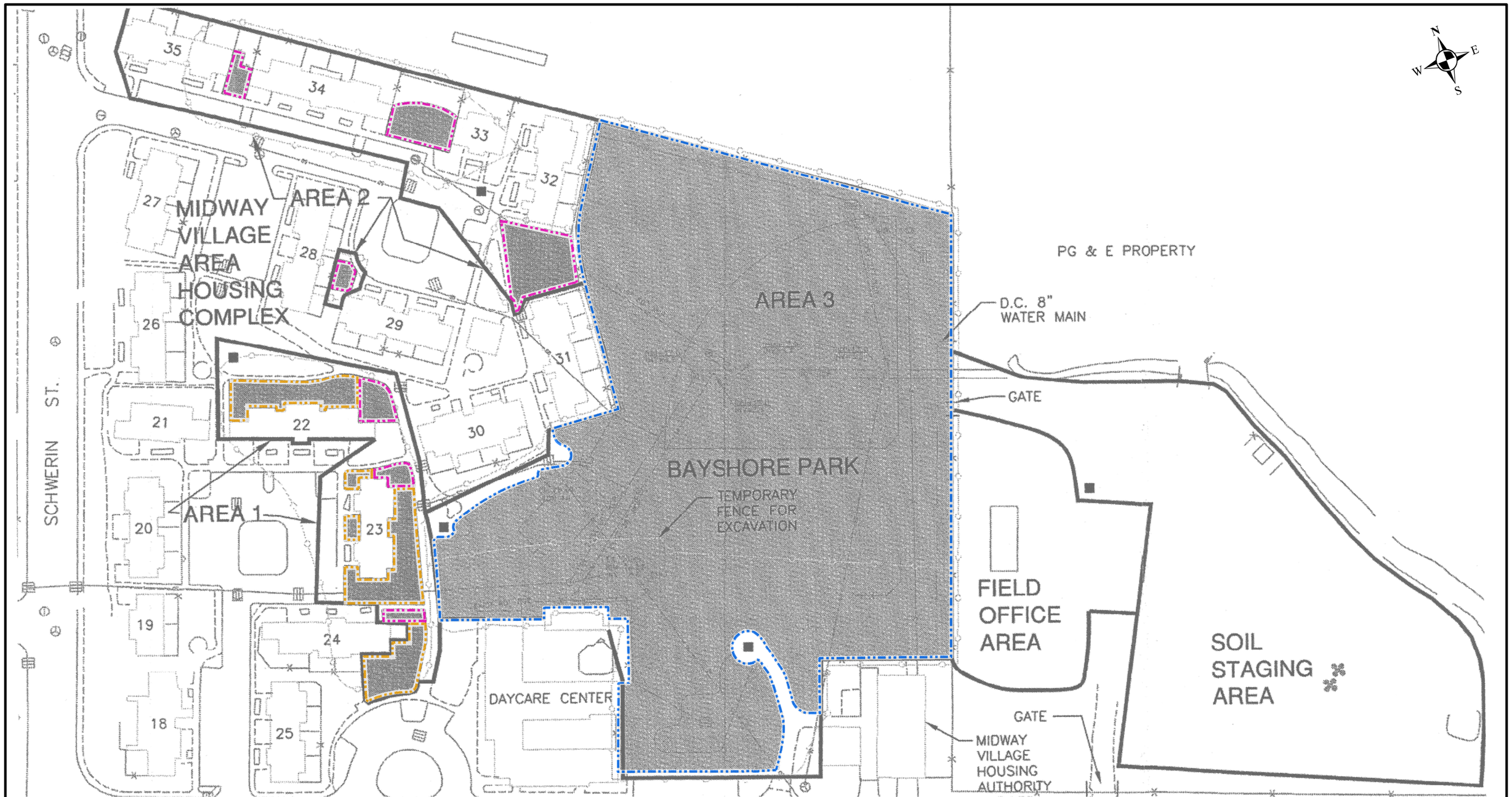
Path: \\langan.com\data\SJO\data1\770650101\Project Data\ArcGIS\MXD\Environmental_Figures\2021-02 RAP Redline\Figure 13 - Phased Construction Plan with CRUP Areas.mxd Date: 6/29/2021 User: jenzminger Time: 11:33:14 AM

APPENDIX A

FIGURE A-1 APPROXIMATE EXCAVATION DEPTHS PRESENTED IN ERRG 2002 REMOVAL ACTION COMPLETION REPORT



Legend

- Approximate area of 2-ft. bgs excavation
- Approximate area of 2.5-ft. bgs excavation
- Approximate area of 5-ft. bgs excavation

Notes:
1. Basemap provided by Engineering/Remediation Resources Group, Inc. (ERRG), 2002. Final Report Midway Village/Bayshore Park Removal Action Completion Report. 6 September.
2. All excavation boundaries are approximate; refer to 2002 RACR figure for exact boundaries.
3. RACR - Removal Action Completion Report
4. bgs - below ground surface
5. All features shown are approximate.

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Langan Engineering and Environmental Services, Inc.

1 Almaden Boulevard, Suite 590
San Jose, CA 95113-2253

T: 408.551.6700 F: 408.551.0344 www.langan.com

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Figure Title
APPROXIMATE EXCAVATION DEPTHS PRESENTED IN ERRG 2002 RACR

Project No.	Figure
770650101	A-1
Date: JUNE 2021	
Scale: 1 " = 80 '	
Drawn By: JNE	

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Path: \\langan.com\data\SJO\data1\770650101\Project Data\ArcGIS\MXD\Environmental_Figures\2021-02 RAP Redline\Figure A-1 - Approximate Excavation Depths in ERRG 2002 RACR.mxd Date: 6/29/2021 User: jenzminger Time: 11:44:20 AM

APPENDIX B

TABLE B-1 SOIL VOLUME SUMMARY FOR CAP REPLACEMENT

FIGURE B-1 PROPOSED CAP REPLACEMENT PLAN FOR MIDWAY VILLAGE NORTH LUCS

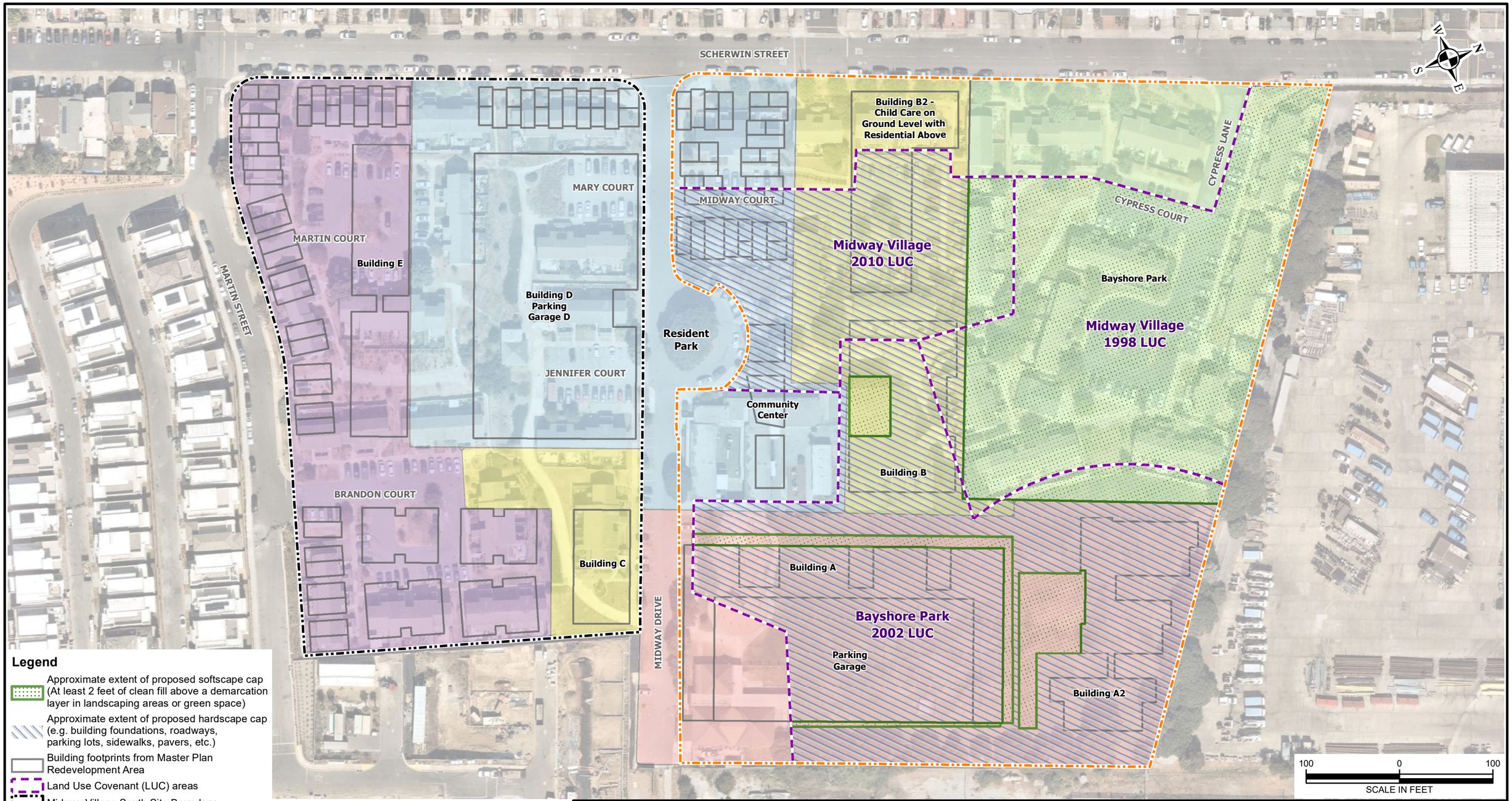
Table B-1
Soil Volume Summary for Cap Replacement
Midway-Bayshore Village Redevelopment
Daly City, CA

Construction Phase	Existing Cap	Volume of Contaminated Soil Export	Truck Loads of Contaminated Soil Export	Volume of Non-Contaminated Export[1]	Truck Loads of Non-Contaminated Export[1]	Total Truck Loads of Soil Export	Volume Import Fill	Truck Loads of Import Fill	Approximate Depths of Elevator Pits	Approximate Depth of Utilities and Bioretention Basins
Phase 1	Concrete, asphalt, and soil cap	2,108 CY	176	962 CY	81	257	4,407 CY	368	Yes, approximately 5 feet bgs	Yes, depths are between 4 and 15 feet bgs
Phase 2	Concrete, asphalt, and soil cap	100 CY	9	1,144 CY	96	105	8,100 CY	675	Yes, approximately 6.5 feet bgs	Yes, depths are between 4 and 12 feet bgs
Phase 3	Concrete, asphalt, and soil cap	57 CY	5	1,453 CY	122	127	0	0	Yes, approximately 6.5 feet bgs	Yes, depths are between 4 and 15 feet bgs
Phase 5	Concrete, asphalt, and soil cap	50 CY	5	0 CY	0	5	15,195[2] CY	1,267	No	Yes, depths are between 4 and 6 feet bgs

Notes:
All volumes are estimated
bgs - below ground surface
CY - cubic yards
LUC - Land Use Covenant
NA - not applicable
RAP - Remedial Action Plan
TBD - to be determined; utility plans for Phases 2 through 5 have not been designed.

[1] Excavated soil from outside LUC areas (Figure 13). Although these excavated soils are from areas outside of the existing cap, it is understood that they may contain contaminants of concern. These soils will be sampled and analyzed in accordance with the DTSC Clean Fill Guidnance, and should results indicate that the soils are contaminated, they will be disposed off-site.

[2] It is assumed that 1,453 CY of excavated Non-Contaminated Export[1] fill from Village North Phase 3 will be used for import fill for Phase 5 Bayshore Park, soil will be analyzed in accordance with the DTSC Clean Fill guidance. Soil export from Phase 3 and Phase 4 from Village South will be used as import fill for the remaining fill of Phase 5 Bayshore Park.



Legend

- Approximate extent of proposed softscape cap (At least 2 feet of clean fill above a demarcation layer in landscaping areas or green space)
- Approximate extent of proposed hardscape cap (e.g. building foundations, roadways, parking lots, sidewalks, pavers, etc.)
- Building footprints from Master Plan Redevelopment Area
- Land Use Covenant (LUC) areas
- Midway Village South Site Boundary
- Midway Village North Site Boundary

Construction Phase

- Construction Phase 1
- Construction Phase 2
- Construction Phase 3
- Construction Phase 4
- Construction Phase 5
  Bayshore Park returned to City of Daly City

Notes:
1. LUC - Land Use Covenant
2. LUC boundaries are approximate; see deed restrictions for exact boundaries.
3. Aerial imagery provided by Nearmap, 05/25/2021.
4. All features shown are approximate.

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Langan Engineering and Environmental Services, Inc.

1 Almaden Boulevard, Suite 590
San Jose, CA 95113-2253

T: 408.551.6700 F: 408.551.0344 www.langan.com

Project
MIDWAY-BAYSHORE VILLAGE REDEVELOPMENT
DALY CITY
SAN MATEO COUNTY CALIFORNIA

Figure Title
PROPOSED CAP REPLACEMENT PLAN FOR MIDWAY VILLAGE NORTH LUCS

Project No.	770650101
Date	JUNE 2021
Scale	1 " = 100 '
Drawn By	JNE
Figure	B-1

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Path: \\langan.com\data\SJO\data1\770650101\Project Data\ArcGIS\MXD\Environmental_Figures\2021-02 RAP Redline\Figure B-1 - Proposed CAP Replacement Plan.mxd Date: 6/29/2021 User: jenzminger Time: 11:49:07 AM

APPENDIX C

PRELIMINARY REMEDIATION COST ESTIMATES

Table C-1
Alternative 2
SVE and VMS with ICs and Monitoring
Midway Village
Remedial Action Plan Amendment
Daly City, CA

TABLE C-1. PRELIMINARY REMEDIATION COST ESTIMATE - ALTERNATIVE 2 - SVE AND VMS WITH ICS AND MONITORING

	DESCRIPTION OF ITEM	QUANTITY	UNIT	COST	TOTAL COST	ASSUMPTION
Construction Items						
I.	**REMEDIATION DESIGN & PERMITTING**					
	SOIL VAPOR EXTRACTION (SVE)					
A.	Design Parameter Test Work Plan	1	LS	$ 7,500	$ 7,500	Assume $7,500 typical.
B.	Design Parameter Test Implementation and Data Evaluation	1	LS	$ 30,000	$ 30,000	Assume installation of one SVE well and three vapor monitoring points (10 feet, 20 feet, and 30 feet away from extraction well) to determine extraction rates for vapor and vacuum propagation. Assume incremental cost of well installation, covered by Task II. C. SVE Well Installation.
C.	Full Scale Soil Vapor Extraction (SVE) Design	1	LS	$ 35,000	$ 35,000	SVE design and report preparation. Assume SVE treatment area of approximately 43,000 square feet.
D.	Utility Survey and Confirmation of Utility Depth	1	LS	$ 15,000	$ 15,000	Assume work around existing subsurface utilities.
E.	Bid Documents & Support	1	LS	$ 10,000	$ 10,000	Subcontractors, procurement, and planning.
F.	Permitting - Air	1	LS	$ 15,000	$ 15,000	Assume Bay Area Air Quality Management District (BAAQMD) air permitting fee and application.
G.	Permitting - Drilling	1	LS	$ 4,000	$ 4,000	Assume City of Daly City well permits at $125 per parcel for design parameter test wells and SVE wells.
	VAPOR MITIGATION SYSTEM (VMS)					
A.	VMS Remediation Design & Permitting (see Table C-2 for details)	1	LS	$ 130,000	$ 130,000	
				SUBTOTAL	**$ 246,500**	
II.	**REMEDIATION CONSTRUCTION**					
	SVE					
A.	Office Engineering	1	LS	$ 10,000	$ 10,000	
B.	Survey	1	LS	$ 5,000	$ 5,000	
C.	SVE Well Installation	1	LS	$ 27,000	$ 27,000	Assume the installation of a total of 16 2-inch polyvinyl chloride (PVC) extraction wells, including the SVE well installed during design parameter test. Assume 16 wells installed to a depth of 5 feet below ground surface. Assume installation of four vapor monitoring points, including the three installed during design parameter test.
D.	SVE Well Installation Oversight	1	LS	$ 10,000	$ 10,000	Assume installation of five extraction wells per day over four days and field preparations (Langan rates).
E.	SVE System Fabrication and Installation	1	LS	$ 58,000	$ 58,000	Assume one vapor extraction system with 200 standard cubic feet per minute (SCFM) blower and rental of two 1,000-pound vapor-phase granular activated carbon (VGAC) vessels. Assume six month rental periods over 1.5 years and installation.
F.	Carbon Fees	2	Each	$ 6,000	$ 12,000	Assume two 1,000-pound units in series and carbon fees.
G.	Connection and System Startup	1	LS	$ 35,000	$ 35,000	Assume electrical connection, mechanical connection, system start-up fees, and engineering oversight (Langan rates).
H.	Waste Disposal	1	LS	$ 3,000	$ 3,000	Assume one soil drum and one decontamination water drum per five extraction wells installed; assume waste is hazardous.
I.	Contingency Construction Delay Fees	6	Months	$ 170,000	$ 1,020,000	Assume Phase 1 SVE implementation would increase construction delay fees by $170,000 per month for six months (Devcon Construction, Phase 1 Cost Estimate, January, 2020).
	VMS					
A.	VMS Remediation Construction (see Table C-2 for details)	1	LS	$ 1,295,000	$ 1,295,000	
				SUBTOTAL	**$ 2,475,000**	
III.	**ENVIRONMENTAL CONSULTING SERVICES DURING CONSTRUCTION AND REMEDIATION**					
	SVE					
A.	SVE System Construction and System Startup Oversight	1	LS	$ 20,000	$ 20,000	
B.	Client Consultation	1	LS	$ 10,000	$ 10,000	Assume presence at kickoff meeting and conference calls.
C.	Agency Meetings	6	Each	$ 1,500	$ 9,000	Assume quarterly meetings with regulatory agencies for 1.5 years.
	VMS					
A.	VMS Construction Oversight (see Table C-2 for details)	1	LS	$ 50,000	$ 50,000	
				SUBTOTAL	**$ 89,000**	
IV.	**SVE PERFORMANCE MONITORING AND O&M (FIRST 1.5 YEARS ONLY)**					
A.	Vapor Monitoring and Operation and Maintenance (O&M)	1	LS	$ 156,000	$ 156,000	Assume vapor sampling required at influent, midpoint, and effluent locations for permitting requirements and system performance monitoring. Assumes 3 vapor samples collected over 18 events. Assumes weekly monitoring for two months followed by monthly O&M, 18 months of operation, VGAC rebedding event every 70 days with Langan oversight, and waste disposal (Langan rates).
B.	Additional O&M Visits	1	LS	$ 22,000	$ 22,000	Assume additional or emergency O&M visits as needed; assume one visit per month (Langan rates).
				SUBTOTAL	**$ 178,000**	
V.	**SVE REMEDIATION CLOSEOUT**					
A.	Soil Vapor Extraction Completion Report	1	LS	$ 20,000	$ 20,000	Assume $20,000 typical.
B.	Soil Vapor Extraction System Removal	1	LS	$ 100,000	$ 100,000	Assume SVE well and piping abandonment and SVE system and VGAC removal. Includes work plan, permitting, and reporting.
				SUBTOTAL	**$ 120,000**	
VI.	**VMS COMPLETION REPORT AND O&M MANUAL**					
A.	VMS Completion Reports	1	LS	$ 30,000	$ 30,000	Assume phased VMS completion reports corresponding with construction phases. Assume Phase 1 completion report will include Building A and Building A2. Assume Phase 2 completion report will include Building B, Building B2, and the townhomes (Building C in Village South not included). Assume Phase 3 completion report will include the community center (Building D and townhomes in Village South not included).
B.	Operation and Maintenance (O&M) Manuals	1	LS	$ 20,000	$ 20,000	Assume phased O&M Manuals corresponding with construction phases. Assume Phase 1 O&M Manual will include Building A and Building A2. Assume Phase 2 O&M Manual will include Building B, Building B2, and the townhomes (Building C in Village South not included). Assume Phase 3 O&M Manual will include the community center (Building D and townhomes in Village South not included).
				SUBTOTAL	**$ 50,000**	

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Table C-1
Alternative 2
SVE and VMS with ICs and Monitoring
Midway Village
Remedial Action Plan Amendment
Daly City, CA

TABLE C-1. PRELIMINARY REMEDIATION COST ESTIMATE - ALTERNATIVE 2 - SVE AND VMS WITH ICS AND MONITORING

		DESCRIPTION OF ITEM	QUANTITY	UNIT	COST	TOTAL COST	ASSUMPTION
Construction Items							
VII.	**VMS ANNUAL O&M COSTS (FIRST FIVE YEARS ONLY)**						
A.	Field Inspection	5	Each	$ 5,000	$ 25,000	Assume inspection of membrane and wind turbines annually for five years.
B.	VMS O&M Sampling	1	LS	$ 160,000	$ 160,000	Assume riser air monitoring for the six buildings in future Village North at the following intervals: immediately following completion of construction, three months after the completion of construction, and six months after the completion of construction. Assume sub-slab sampling and pressure monitoring at the following intervals: every six months for three years followed by yearly sampling for two years.
C.	Report Preparation	5	Each	$ 10,000	$ 50,000	Assume annual inspection report for five years.
D.	Regulatory Agency Review Support	5	Each	$ 10,000	$ 50,000	Assume $10,000 typical.
				SUBTOTAL	**$ 285,000**	
VIII.	**VMS PERIODIC O&M COSTS (FIVE YEAR REVIEW FOR 30 YEARS)**					
A.	Field Inspection	6	Each	$ 5,000	$ 30,000	
B.	VMS O&M Sampling	6	Each	$ 20,000	$ 120,000	Assume riser air monitoring for the six buildings every five years for a total of 30 years of monitoring (Langan rates). Assume sub-slab sampling no longer required.
C.	Report Preparation	6	Each	$ 10,000	$ 60,000	Assume five year report for 30 years.
D.	Regulatory Agency Review Support	6	Each	$ 10,000	$ 60,000	Assume $10,000 typical.
				SUBTOTAL	**$ 270,000**	
IX.	**OPTION TO CHANGE TO ACTIVE VMS**					
A.	Active VMS Connection and Startup	6	Each	$ 2,000.00	$ 12,000	Assume two buildings would need to be converted to active VMS. Assume radon fan installation at each riser at approximately $2,000 per fan, including labor. Assume six total risers will need to be retrofitted.
B.	Permitting - Air	1	LS	$ 15,000	$ 15,000	Assume Bay Area Air Quality Management District (BAAQMD) air permitting fee and application for two buildings, if required. Assume emissions do not require treatment.
				SUBTOTAL	**$ 27,000**	
X.	**IMPLEMENTATION OF INSTITUTIONAL CONTROLS (ICs)**					
A.	Preparation of deed restriction, legal description, notification signage and outreach	1	LS	$ 30,000	$ 30,000	
				SUBTOTAL	**$ 30,000**	
				O&M Costs	$ 733,000	
				15% Contingency	$ 109,950	
				Rounded Total O&M Costs	**$ 843,000**	
				Capital Costs	$ 3,037,500	
				15% Contingency	$ 455,625	
				Rounded Total Capital Costs	**$ 3,493,200**	
				TOTAL	**$ 4,336,200**	

NOTES:

1. This Preliminary Remediation Cost Estimate was prepared in consideration of the environmental data presented in the Langan's 2020 Human Health Risk Assessment (HHRA; Langan, 2020).

2. This Preliminary Remediation Cost Estimate is an approximate cost of construction and reflects available cost information for construction located in the San Francisco Bay Area, California.

3. This Preliminary Remediation Cost Estimate represents an opinion of the probable costs of construction, within a reasonable degree of certainty. This estimate does not guarantee the cost of labor, material, or equipment, nor the means, methods and procedures of the Contractor's work as determined by the Contractor and/or Owner, nor the competitive bidding submissions.

4. This Preliminary Remediation Cost Estimate of probable construction cost based on our experience and qualifications as an engineer and shall be deemed to represent our opinion and judgment. This estimate cannot and does not guarantee that proposals, bids or actual costs will be the same as or within any specific percentage of this estimate of probable construction cost.

5. This Preliminary Remediation Cost Estimate is an order-of-magnitude estimate, has been developed for the sole purpose of evaluating and comparing potential remedial action alternatives, is assumed to be accurate within -10% to +25%, and may require adjustment if new information becomes available.

6. Inherent in soils, foundations, groundwater, and other environmental investigations, actual conditions may vary materially from those noted at test points or sample intervals. Because of these inherent uncertainties, changed or unanticipated conditions may arise during construction activities at the project site subsequent to the initial investigation(s) that could potentially affect project scope and cost. Therefore, this estimate, with respect to potential construction costs, including environmental remediation costs, shall not be deemed a guaranteed maximum price or cost of the project.

ASSUMPTIONS/EXCLUSIONS:

1. This estimate does not include General Contractor's overhead, profit and general conditions.

2. All unit prices shown in this estimate should be verified by a local Contractor.

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Table C-2
Alternative 3
VMS with ICs and Monitoring
Midway Village
Remedial Action Plan Amendment
Daly City, CA

TABLE C-2. PRELIMINARY REMEDIATION COST ESTIMATE - ALTERNATIVE 3 - VMS WITH ICS AND MONITORING

	DESCRIPTION OF ITEM	QUANTITY	UNIT	COST	TOTAL COST	ASSUMPTION
Construction Items						
I.	**REMEDIATION DESIGN & PERMITTING**					
A.	VMS Designs, presented in Remedial Design Implementation Plan Report	1	LS	$ 90,000	$ 90,000	VMS design and report preparation for proposed buildings (Langan rates). Assume cost per VMS design is approximately $15,000 per building.
B.	Bid Documents & Support	1	LS	$ 40,000	$ 40,000	Construction documents including specifications, subcontractors, procurement, and planning.
				SUBTOTAL	**$ 130,000**	
II.	**REMEDIATION CONSTRUCTION**					
A.	VMS - Piping Installation	1	LS	$ 50,000	$ 50,000	Assume 136,800 square foot building footprint for Phases 1, portions of Phase 2, and Portions of Phase 3 of construction within future Village North. Assume $10 per foot of piping (Schedule 40 PVC) and installation labor. Includes perimeter inlet vent and sub-slab sample port installation. Assume approximately one sub-slab sampling port per 10,000 square feet of building footprint for a total of 16 ports for all buildings.
B.	VMS - Vapor Barrier Membrane Installation	1	LS	$ 1,200,000	$ 1,200,000	Assume $8 per square foot for the vapor barrier membrane (Liquid Boot with VI-20 Geomembrane or equivalent), required under all building footprints. Includes materials and installation. Assume 8 elevator pits will require Coreflex or similar waterproofing/vapor barrier material, costing $28 per square foot.
C.	VMS - Above-slab Components	1	LS	$ 45,000	$ 45,000	Assume approximately one riser per 7,500 square feet. Assume 23 risers and associated above-slab piping will be installed.
				SUBTOTAL	**$ 1,295,000**	
III.	**ENVIRONMENTAL CONSULTING SERVICES DURING CONSTRUCTION AND REMEDIATION**					
A.	Client and Contractor Meetings and Consultation	1	LS	$ 20,000	$ 20,000	Assume presence at kickoff meeting, meetings with contractors as needed, and general consultation. Includes Basis of Design Report, if required.
B.	Agency Meetings	1	LS	$ 5,000	$ 5,000	Assume biannual meetings for two years.
C.	VMS Remediation Oversight	1	LS	$ 25,000	$ 25,000	Assume general oversight during and after system installation. Includes ten site visits per building, on average.
				SUBTOTAL	**$ 50,000**	
IV.	**VMS COMPLETION REPORT AND O&M MANUAL**					
A.	VMS Completion Reports	1	LS	$ 30,000	$ 30,000	Assume phased VMS completion reports corresponding with construction phases. Assume Phase 1 completion report will include Building A and Building A2. Assume Phase 2 completion report will include Building B, Building B2, and the townhomes (Building C in Village South not included). Assume Phase 3 completion report will include the community center (Building D and townhomes in Village South not included).
B.	Operation and Maintenance (O&M) Manuals	1	LS	$ 20,000	$ 20,000	Assume phased O&M Manuals corresponding with construction phases. Assume Phase 1 O&M Manual will include Building A and Building A2. Assume Phase 2 O&M Manual will include Building B, Building B2, and the townhomes (Building C in Village South not included). Assume Phase 3 O&M Manual will include the community center (Building D and townhomes in Village South not included).
				SUBTOTAL	**$ 50,000**	
V.	**VMS ANNUAL O&M COSTS (FIRST FIVE YEARS ONLY)**					
A.	Field Inspection	5	Each	$ 5,000	$ 25,000	Assume inspection of membrane and wind turbines annually for five years.
B.	VMS O&M Sampling	1	LS	$ 160,000	$ 160,000	Assume riser air monitoring for the six buildings at the following intervals: immediately following completion of construction, three months after the completion of construction, and six months after the completion of construction. Assume sub-slab sampling and pressure monitoring at the following intervals: every six months for three years followed by yearly sampling for two years.
C.	Report Preparation	5	Each	$ 10,000	$ 50,000	Assume annual inspection report for five years.
D.	Regulatory Agency Review Support	5	Each	$ 10,000	$ 50,000	Assume $10,000 typical.
				SUBTOTAL	**$ 285,000**	
VI.	**VMS PERIODIC O&M COSTS (FIVE YEAR REVIEW FOR 30 YEARS)**					
A.	Field Inspection	6	Each	$ 5,000	$ 30,000	
B.	VMS O&M Sampling	6	Each	$ 20,000	$ 120,000	Assume riser air monitoring for the six buildings every five years for a total of 30 years of monitoring (Langan rates). Assume sub-slab sampling no longer required.
C.	Report Preparation	6	Each	$ 10,000	$ 60,000	Assume five year report for 30 years.
D.	Regulatory Agency Review Support	6	Each	$ 10,000	$ 60,000	Assume $10,000 typical.
				SUBTOTAL	**$ 270,000**	
VII.	**OPTION TO CHANGE TO ACTIVE VMS**					
A.	Active VMS Connection and Startup	6	Each	$ 2,000.00	$ 12,000	Assume two buildings would need to be converted to active VMS. Assume radon fan installation at each riser at approximately $2,000 per fan, including labor. Assume six total risers will need to be retrofitted.
B.	Permitting - Air	1	LS	$ 15,000	$ 15,000	Assume Bay Area Air Quality Management District (BAAQMD) air permitting fee and application for two buildings, if required. Assume emissions do not require treatment.
				SUBTOTAL	**$ 27,000**	

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Table C-2
Alternative 3
VMS with ICs and Monitoring
Midway Village
Remedial Action Plan Amendment
Daly City, CA

TABLE C-2. PRELIMINARY REMEDIATION COST ESTIMATE - ALTERNATIVE 3 - VMS WITH ICS AND MONITORING

			DESCRIPTION OF ITEM	QUANTITY	UNIT	COST	TOTAL COST	ASSUMPTION
Construction Items								
VIII.	**IMPLEMENTATION OF INSTITUTIONAL CONTROLS (ICs)**							
		A.	Preparation of deed restriction, legal description, notification signage and outreach meetings	1	LS	$ 30,000	$ 30,000	
						SUBTOTAL	**$ 30,000**	
						O&M Costs	$ 555,000	
						15% Contingency	$ 83,250	
						Rounded Total O&M Costs	**$ 638,300**	
						Capital Costs	$ 1,582,000	
						15% Contingency	$ 237,300	
						Rounded Total Capital Costs	**$ 1,819,300**	
						TOTAL	**$ 2,457,600**	

NOTES:

1. This Preliminary Remediation Cost Estimate was prepared in consideration of the environmental data presented in the Langan's 2020 Human Health Risk Assessment (HHRA; Langan, 2020).

2. This Preliminary Remediation Cost Estimate is an approximate cost of construction and reflects available cost information for construction located in the San Francisco Bay Area, California.

3. This Preliminary Remediation Cost Estimate represents an opinion of the probable costs of construction, within a reasonable degree of certainty. This estimate does not guarantee the cost of labor, material, or equipment, nor the means, methods and procedures of the Contractor's work as determined by the Contractor and/or Owner, nor the competitive bidding submissions.

4. This Preliminary Remediation Cost Estimate of probable construction cost based on our experience and qualifications as an engineer and shall be deemed to represent our opinion and judgment. This estimate cannot and does not guarantee that proposals, bids or actual costs will be the same as or within any specific percentage of this estimate of probable construction cost.

5. This Preliminary Remediation Cost Estimate is an order-of-magnitude estimate, has been developed for the sole purpose of evaluating and comparing potential remedial action alternatives, is assumed to be accurate within -10% to +25%, and may require adjustment if new information becomes available.

6. Inherent in soils, foundations, groundwater, and other environmental investigations, actual conditions may vary materially from those noted at test points or sample intervals. Because of these inherent uncertainties, changed or unanticipated conditions may arise during construction activities at the project site subsequent to the initial investigation(s) that could potentially affect project scope and cost. Therefore, this estimate, with respect to potential construction costs, including environmental remediation costs, shall not be deemed a guaranteed maximum price or cost of the project.

ASSUMPTIONS/EXCLUSIONS:

1. This estimate does not include General Contractor's overhead, profit and general conditions. The estimate also does not include permit/application fees.

2. All unit prices shown in this estimate should be verified by a local Contractor.

3. The Department of Toxic Substances Control (DTSC) may request post-construction indoor air monitoring. For the purpose of this cost estimate, post-construction indoor air monitoring is not included in item V. VMS Annual O&M Costs.

4. Vapor Barrier Membrane Installation cost assumes that only a vapor barrier and no waterproofing is required beneath the slab-on-grade foundations. If the waterproofing consultant does require waterproofing beneath the slab, cost of the vapor barrier would increase from $8 per square foot to approximately $20 per square foot.

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Table C-3A
Alternative 4A
Soil Gas Hot Spot Excavation and VMS with ICs and Monitoring
Midway Village
Remedial Action Plan Amendment
Daly City, CA

TABLE C-3A. PRELIMINARY REMEDIATION COST ESTIMATE - ALTERNATIVE 4A - SOIL GAS HOT SPOT EXCAVATION AND VMS WITH ICS AND MONITORING

	DESCRIPTION OF ITEM	QUANTITY	UNIT	COST	TOTAL COST	ASSUMPTION
Construction Items						
I.	**REMEDIATION DESIGN & PERMITTING**					
	EXCAVATION					
A.	Pre-Excavation Delineation Soil Gas Sampling	1	LS	$ 26,000	$ 26,000	Assume delineation soil gas sampling required prior to preparation of Excavation Work Plan. Based on previous sample locations and analytical results, assume ten soil gas samples required.
B.	Pre-Excavation Soil Characterization Sampling	1	LS	$ 36,800	$ 36,800	Assume pre-excavation soil characterization sampling required for off-site disposal. Assume disposal facility requires one sample required per 500 cubic yards. Assume one day of drilling 14 borings wihtin proposed excavation extents in order to collect 36 samples.
C.	Excavation Work Plan	1	LS	$ 50,000	$ 50,000	Assume Excavation Work Plan report will include Dust Control Plan and Storm Water Pollution Prevention Plan.
D.	Dewatering and Shoring Plan	2	LS	$ 30,000	$ 60,000	Assume remediation contractor will prepare two separate dewatering and shoring plans. One for the soil vapor spot excavation in Phase 1 and a second set of plans for Phase 5 (Bayshore Park).
E.	Bid Documents & Support	1	LS	$ 20,000	$ 20,000	Construction documents including specifications, subcontractors, procurement, and planning.
F.	Utility Survey and Confirmation of Utility Depth	1	LS	$ 15,000	$ 15,000	Assume work around existing subsurface utilities.
G.	Permitting - Excavation and Grading	1	LS	$ 5,000	$ 5,000	Assume City of Daly City excavation permits required. Assume $5,000 allowance for permits related to excavation.
H.	Permitting - Water	1	LS	$ 10,000	$ 10,000	Assume $10,000 allowance for City of Daly City Discharge Permit and discharge fees.
	VAPOR MITIGATION SYSTEM (VMS)					
A.	VMS Remediation Design & Permitting (see Table C-2 for details)	1	LS	$ 130,000	$ 130,000	
				SUBTOTAL	**$ 352,800**	
II.	**REMEDIATION CONSTRUCTION**					
	EXCAVATION					
A.	Survey Excavation Locations	1	LS	$ 5,000	$ 5,000	
B.	Equipment Mobilization and Demobilization	1	LS	$ 30,000	$ 30,000	
C.	Temporary Shoring	1	LS	$ 220,000	$ 220,000	Assumes approximately 20,000 square feet of steel sheeting, shoring installation to 15 feet below ground surface for excavation, removal, and salvage costs.
D.	Dewatering	1	LS	$ 6,000	$ 6,000	Assumes soil type is sand-silt, sand-clay mixture. Assume depth to groundwater in current Village North is 2 feet below ground surface. Assume depth to groundwater in current Bayshore Park is 7 feet below ground surface. Assume monthly rental of two 21,000-gallon wastewater tanks and two 2-inch diameter trash pump, pumping 75 gallons per minute (gpm) for 19 days.
E.	Excavate, Stockpile, Sort Material	19,180	CY	$ 3	$ 57,541	Labor and equipment for excavation, stockpiling, and sorting. Assume fill beneath current Bayshore Park is from approximately 2 to 10 feet below ground surface. Assume fill beneath current Village North is from approximately 0 to 5 feet below ground surface. Assume excavation of a total of 19,180 cubic yards of material, including 17,700 cubic yards of fill material to be disposed off-Site.
F.	Transportation & Disposal of Soil	1	LS	$ 1,766,600	$ 1,766,600	Assume transportation and disposal of fill material, not including existing clean fill cap from 0 to 2 feet below ground surface in current Bayshore Park. Assumes 75% of soil is Class II non-hazardous, 20% is Class I Non-Resource Conservation and Recovery Act (RCRA) California-hazardous material, and 5% is Class-I RCRA hazardous material based on historic waste classification results across the Site (Engineering/Remediation Resources Group, Inc., 2002).
G.	Import Clean Fill, Place, and Compact	17,709	CY	$ 30.00	$ 531,281	Includes seeding and vegetative cover for future Bayshore Park area.
H.	Wastewater Sampling and Water Treatment	1	LS	$ 25,000	$ 25,000	Assume approximately $5,000 for wastewater sample collection labor, supplies, and laboratory analysis. Assume $20,000 allowance for wastewater treatment via liquid-phase granular-activated carbon vessels.
I.	Contingency Construction Delay Fees	4	Months	$ 170,000	$ 680,000	Assume Phase 1 soil vapor hot spot excavation implementation would increase construction delay fees by $170,000 per month for four months (Devcon Construction, Phase 1 Cost Estimate, January, 2020).
	VMS					
A.	VMS Remediation Construction (see Table C-2 for details)	1	LS	$ 1,295,000	$ 1,295,000	
				SUBTOTAL	**$ 4,616,422**	
III.	**ENVIRONMENTAL CONSULTING SERVICES DURING CONSTRUCTION AND REMEDIATION**					
	EXCAVATION					
A.	Client and Contractor Meetings and Consultation	1	LS	$ 20,000	$ 20,000	Assume presence at kickoff meeting, meetings with contractors as needed, and general consultation.
B.	Agency Meetings	1	LS	$ 5,000	$ 5,000	Assume periodic meetings with DTSC.
C.	Excavation Oversight	3	Weeks	$ 5,550	$ 16,650	Assume general oversight during excavation. Assume approximately three weeks of Langan oversight for full days. Langan rates.
D.	Dust Montioring Equipment Rental	4	Weeks	$ 600	$ 2,400	Assumes Langan staff conducting excavation oversight can conduct air monitoring while on site and one week of baseline monitoring. Langan rates.
	VMS					
A.	VMS Construction Oversight (see Table C-2 for details)	1	LS	$ 20,000	$ 20,000	
				SUBTOTAL	**$ 64,050**	
IV.	**EXCAVATION COMPLETION REPORT**					
A.	Excavation Completion Report	1	LS	$ 15,000	$ 15,000	Assume $15,000 typical. Includes coordination with regulatory agencies.
				SUBTOTAL	**$ 15,000**	

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Table C-3A
Alternative 4A
Soil Gas Hot Spot Excavation and VMS with ICs and Monitoring
Midway Village
Remedial Action Plan Amendment
Daly City, CA

TABLE C-3A. PRELIMINARY REMEDIATION COST ESTIMATE - ALTERNATIVE 4A - SOIL GAS HOT SPOT EXCAVATION AND VMS WITH ICS AND MONITORING

	DESCRIPTION OF ITEM	QUANTITY	UNIT	COST	TOTAL COST	ASSUMPTION
Construction Items						
V.	**VMS COMPLETION REPORT AND O&M MANUAL**					
A.	VMS Completion Reports	1	LS	$ 30,000	$ 30,000	Assume phased VMS completion reports corresponding with construction phases. Assume Phase 1 completion report will include Building A and Building A2. Assume Phase 2 completion report will include Building B, Building B2, and the townhomes (Building C in Village South not included). Assume Phase 3 completion report will include the community center (Building D and townhomes in Village South not included).
B.	Operation and Maintenance (O&M) Manuals	1	LS	$ 20,000	$ 20,000	Assume phased O&M Manuals corresponding with construction phases. Assume Phase 1 O&M Manual will include Building A and Building A2. Assume Phase 2 O&M Manual will include Building B, Building B2, and the townhomes (Building C in Village South not included). Assume Phase 3 O&M Manual will include the community center (Building D and townhomes in Village South not included).
				SUBTOTAL	**$ 50,000**	
VI.	**VMS ANNUAL O&M COSTS (FIRST FIVE YEARS ONLY)**					
A.	Field Inspection	5	Each	$ 5,000	$ 25,000	Assume inspection of membrane and wind turbines annually for five years.
B.	VMS O&M Sampling	1	LS	$ 160,000	$ 160,000	Assume riser air monitoring for the six buildings at the following intervals: immediately following completion of construction, three months after the completion of construction, and six months after the completion of construction. Assume sub-slab sampling and pressure monitoring at the following intervals: every six months for three years followed by yearly sampling for two years.
C.	Report Preparation	5	Each	$ 10,000	$ 50,000	Assume annual inspection report for five years.
D.	Regulatory Agency Review Support	5	Each	$ 10,000	$ 50,000	Assume $10,000 typical.
				SUBTOTAL	**$ 285,000**	
VII.	**VMS PERIODIC O&M COSTS (FIVE YEAR REVIEW FOR 30 YEARS)**					
A.	Field Inspection	6	Each	$ 5,000	$ 30,000	
B.	VMS O&M Sampling	6	Each	$ 20,000	$ 120,000	Assume riser air monitoring for the six buildings every five years for a total of 30 years of monitoring (Langan rates). Assume sub-slab sampling no longer required.
C.	Report Preparation	6	Each	$ 10,000	$ 60,000	Assume five year report for 30 years.
D.	Regulatory Agency Review Support	6	Each	$ 10,000	$ 60,000	Assume $10,000 typical.
				SUBTOTAL	**$ 270,000**	
VIII.	**OPTION TO CHANGE TO ACTIVE VMS**					
A.	Active VMS Connection and Startup	6	Each	$ 2,000.00	$ 12,000	Assume two buildings would need to be converted to active VMS. Assume radon fan installation at each riser at approximately $2,000 per fan, including labor. Assume six total risers will need to be retrofitted.
B.	Permitting - Air	1	LS	$ 15,000	$ 15,000	Assume Bay Area Air Quality Management District (BAAQMD) air permitting fee and application for two buildings, if required. Assume emissions do not require treatment.
				SUBTOTAL	**$ 27,000**	
IX.	**IMPLEMENTATION OF INSTITUTIONAL CONTROLS (ICs)**					
A.	Preparation of deed restriction, legal description, notification signage and outreach meetings	1	LS	$ 30,000	$ 30,000	
				SUBTOTAL	**$ 30,000**	
				O&M Costs	$ 555,000	
				15% Contingency	$ 83,250	
				Rounded Total O&M Costs	**$ 638,300**	
				Capital Costs	$ 5,155,272	
				15% Contingency	$ 773,291	
				Rounded Total Capital Costs	**$ 5,928,600**	
				TOTAL	**$ 6,566,900**	

NOTES:

1. This Preliminary Remediation Cost Estimate was prepared in consideration of the environmental data presented in the Langan's 2020 Human Health Risk Assessment (HHRA; Langan, 2020).

2. This Preliminary Remediation Cost Estimate is an approximate cost of construction and reflects available cost information for construction located in the San Francisco Bay Area, California.

3. This Preliminary Remediation Cost Estimate represents an opinion of the probable costs of construction, within a reasonable degree of certainty. This estimate does not guarantee the cost of labor, material, or equipment, nor the means, methods and procedures of the Contractor's work as determined by the Contractor and/or Owner, nor the competitive bidding submissions.

4. This Preliminary Remediation Cost Estimate of probable construction cost based on our experience and qualifications as an engineer and shall be deemed to represent our opinion and judgment. This estimate cannot and does not guarantee that proposals, bids or actual costs will be the same as or within any specific percentage of this estimate of probable construction cost.

5. This Preliminary Remediation Cost Estimate is an order-of-magnitude estimate, has been developed for the sole purpose of evaluating and comparing potential remedial action alternatives, is assumed to be accurate within -10% to +25%, and may require adjustment if new information becomes available.

6. Inherent in soils, foundations, groundwater, and other environmental investigations, actual conditions may vary materially from those noted at test points or sample intervals. Because of these inherent uncertainties, changed or unanticipated conditions may arise during construction activities at the project site subsequent to the initial investigation(s) that could potentially affect project scope and cost. Therefore, this estimate, with respect to potential construction costs, including environmental remediation costs, shall not be deemed a guaranteed maximum price or cost of the project.

ASSUMPTIONS/EXCLUSIONS:

1. This estimate does not include General Contractor's overhead, profit and general conditions. The estimate also does not include permit/application fees.

2. All unit prices shown in this estimate should be verified by a local Contractor.

3. The Department of Toxic Substances Control (DTSC) may request post-construction indoor air monitoring. For the purpose of this cost estimate, post-construction indoor air monitoring is not included in item V. VMS Annual O&M Costs.

4. Vapor Barrier Membrane Installation cost assumes that only a vapor barrier and no waterproofing is required beneath the slab-on-grade foundations. If the waterproofing consultant does require waterproofing beneath the slab, cost of the vapor barrier would increase from $8 per square foot to approximately $20 per square foot.

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Table C-3B
Alternative 4B
Soil Gas Hot Spot Targeted Excavation and VMS with ICs and Monitoring
Midway Village
Remedial Action Plan Amendment
Daly City, CA

TABLE C-3B. PRELIMINARY REMEDIATION COST ESTIMATE - ALTERNATIVE 4B - SOIL GAS HOT SPOT TARGETED EXCAVATION AND VMS WITH ICS AND MONITORING

	DESCRIPTION OF ITEM	QUANTITY	UNIT	COST	TOTAL COST	ASSUMPTION
Construction Items						
I.	**REMEDIATION DESIGN & PERMITTING**					
	EXCAVATION					
A.	Pre-Excavation Delineation Soil Gas Sampling	1	LS	$ 19,000	$ 19,000	Assume delineation soil gas sampling required prior to preparation of Excavation Work Plan. Based on previous sample locations and analytical results, assume five soil gas samples required.
B.	Pre-Excavation Soil Characterization Sampling	1	LS	$ 23,100	$ 23,100	Assume pre-excavation soil characterization sampling required for off-site disposal. Assume disposal facility requires one sample required per 500 cubic yards. Assume one day of drilling six borings wihtin proposed excavation extents in order to collect 17 samples.
C.	Excavation Work Plan	1	LS	$ 40,000	$ 40,000	Assume Excavation Work Plan report will include Dust Control Plan and Storm Water Pollution Prevention Plan.
D.	Dewatering and Shoring Plan	1	LS	$ 30,000	$ 30,000	Assume remediation contractor will prepare dewatering and shoring plans.
E.	Bid Documents & Support	1	LS	$ 20,000	$ 20,000	Construction documents including specifications, subcontractors, procurement, and planning.
F.	Utility Survey and Confirmation of Utility Depth	1	LS	$ 10,000	$ 10,000	Assume work around existing subsurface utilities.
G.	Permitting - Excavation and Grading	1	LS	$ 5,000	$ 5,000	Assume City of Daly City excavation permits required. Assume $5,000 allowance for permits related to excavation.
H.	Permitting - Water	1	LS	$ 10,000	$ 10,000	Assume $10,000 allowance for City of Daly City Discharge Permit and discharge fees.
	VAPOR MITIGATION SYSTEM (VMS)					
A.	VMS Remediation Design & Permitting (see Table C-2 for details)	1	LS	$ 130,000	$ 130,000	
				SUBTOTAL	**$ 287,100**	
II.	**REMEDIATION CONSTRUCTION**					
	EXCAVATION					
A.	Survey Excavation Locations	1	LS	$ 5,000	$ 5,000	
B.	Equipment Mobilization and Demobilization	1	LS	$ 30,000	$ 30,000	
C.	Temporary Shoring	1	LS	$ 220,000	$ 220,000	Assumes approximately 20,000 square feet of steel sheeting, shoring installation to 15 feet below ground surface, removal, and salvage costs.
D.	Dewatering	1	LS	$ 4,000	$ 4,000	Assumes soil type is sand-silt, sand-clay mixture. Assume depth to groundwater in cuurent Village North is 2 feet below ground surface. Assume depth to groundwater in current Bayshore Park is 7 feet below ground surface. Assume monthly rental of one 21,000-gallon wastewater tank and 2-inch diameter trash pump, pumping 75 gallons per minute (gpm) for ten days.
E.	Excavate, Stockpile, Sort Material	8,463	CY	$ 3	$ 25,388	Labor and equipment for excavation, stockpiling, and sorting. Assume fill beneath current Bayshore Park is from approximately 2 to 10 feet below ground surface. Assume fill beneath current Village North is from approximately 0 to 5 feet below ground surface. Assume excavation of a total of 10,600 cubic yards of material, including 8,500 cubic yards of fill material to be disposed off-Site.
F.	Transportation & Disposal of Soil	1	LS	$ 844,200	$ 844,200	Assume transportation and disposal of fill material, not including existing clean fill cap from 0 to 2 feet below ground surface in current Bayshore Park. Assumes 75% of soil is Class II non-hazardous, 20% is Class I Non-Resource Conservation and Recovery Act (RCRA) California-hazardous material, and 5% is Class-I RCRA hazardous material based on historic waste classification results across the Site (Engineering/Remediation Resources Group, Inc., 2002).
G.	Import Clean Fill, Place, and Compact	8,463	CY	$ 30.00	$ 253,880	Includes seeding and vegetative cover for future Bayshore Park area.
H.	Wastewater Sampling and Water Treatment	1	LS	$ 25,000	$ 25,000	Assume approximately $5,000 for wastewater sample collection labor, supplies, and laboratory analysis. Assume $20,000 allowance for wastewater treatment via liquid-phase granular activated carbon vessels.
I.	Contingency Construction Delay Fees	4	Months	$ 170,000	$ 680,000	Assume Phase 1 soil vapor targeted excavation implementation would increase construction delay fees by $170,000 per month for four months (Devcon Construction, Phase 1 Cost Estimate, January, 2020).
	VMS					
A.	VMS Remediation Construction (see Table C-2 for details)	1	LS	$ 1,295,000	$ 1,295,000	
				SUBTOTAL	**$ 3,382,468**	
III.	**ENVIRONMENTAL CONSULTING SERVICES DURING CONSTRUCTION AND REMEDIATION**					
	EXCAVATION					
A.	Client and Contractor Meetings and Consultation	1	LS	$ 20,000	$ 20,000	Assume presence at kickoff meeting, meetings with contractors as needed, and general consultation.
B.	Agency Meetings	1	LS	$ 5,000	$ 5,000	Assume periodic meetings with DTSC.
C.	Excavation Oversight	2	Weeks	$ 5,550	$ 11,100	Assume general oversight during excavation. Assume approximately two weeks of Langan oversight for full days. Langan rates.
D.	Dust Montioring Equipment Rental	3	Weeks	$ 600	$ 1,800	Assumes Langan staff conducting excavation oversight can conduct air monitoring while on site and one week of baseline monitoring. Langan rates.
	VMS					
A.	VMS Construction Oversight (see Table C-2 for details)	1	LS	$ 20,000	$ 20,000	
				SUBTOTAL	**$ 57,900**	
IV.	**EXCAVATION COMPLETION REPORT**					
A.	Excavation Completion Report	1	LS	$ 15,000	$ 15,000	Assume $15,000 typical. Includes coordination with regulatory agencies.
				SUBTOTAL	**$ 15,000**	

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Table C-3B
Alternative 4B
Soil Gas Hot Spot Targeted Excavation and VMS with ICs and Monitoring
Midway Village
Remedial Action Plan Amendment
Daly City, CA

TABLE C-3B. PRELIMINARY REMEDIATION COST ESTIMATE - ALTERNATIVE 4B - SOIL GAS HOT SPOT TARGETED EXCAVATION AND VMS WITH ICS AND MONITORING

	DESCRIPTION OF ITEM	QUANTITY	UNIT	COST	TOTAL COST	ASSUMPTION
Construction Items						
V.	**VMS COMPLETION REPORT AND O&M MANUAL**					
A.	VMS Completion Reports	1	LS	$ 30,000	$ 30,000	Assume phased VMS completion reports corresponding with construction phases. Assume Phase 1 completion report will include Building A and Building A2. Assume Phase 2 completion report will include Building B, Building B2, and the townhomes (Building C in Village South not included). Assume Phase 3 completion report will include the community center (Building D and townhomes in Village South not included).
B.	Operation and Maintenance (O&M) Manuals	1	LS	$ 20,000	$ 20,000	Assume phased O&M Manuals corresponding with construction phases. Assume Phase 1 O&M Manual will include Building A and Building A2. Assume Phase 2 O&M Manual will include Building B, Building B2, and the townhomes (Building C in Village South not included). Assume Phase 3 O&M Manual will include the community center (Building D and townhomes in Village South not included).
				SUBTOTAL	**$ 50,000**	
VI.	**VMS ANNUAL O&M COSTS (FIRST FIVE YEARS ONLY)**					
A.	Field Inspection	5	Each	$ 5,000	$ 25,000	Assume inspection of membrane and wind turbines annually for five years.
B.	VMS O&M Sampling	1	LS	$ 160,000	$ 160,000	Assume riser air monitoring for the six buildings at the following intervals: immediately following completion of construction, three months after the completion of construction, and six months after the completion of construction. Assume sub-slab sampling and pressure monitoring at the following intervals: every six months for three years followed by yearly sampling for two years.
C.	Report Preparation	5	Each	$ 10,000	$ 50,000	Assume annual inspection report for five years.
D.	Regulatory Agency Review Support	5	Each	$ 10,000	$ 50,000	Assume $10,000 typical.
				SUBTOTAL	**$ 285,000**	
VII.	**VMS PERIODIC O&M COSTS (FIVE YEAR REVIEW FOR 30 YEARS)**					
A.	Field Inspection	6	Each	$ 5,000	$ 30,000	
B.	VMS O&M Sampling	6	Each	$ 20,000	$ 120,000	Assume riser air monitoring for the six buildings every five years for a total of 30 years of monitoring (Langan rates). Assume sub-slab sampling no longer required.
C.	Report Preparation	6	Each	$ 10,000	$ 60,000	Assume five year report for 30 years.
D.	Regulatory Agency Review Support	6	Each	$ 10,000	$ 60,000	Assume $10,000 typical.
				SUBTOTAL	**$ 270,000**	
VIII.	**OPTION TO CHANGE TO ACTIVE VMS**					
A.	Active VMS Connection and Startup	6	Each	$ 2,000.00	$ 12,000	Assume two buildings would need to be converted to active VMS. Assume radon fan installation at each riser at approximately $2,000 per fan, including labor. Assume six total risers will need to be retrofitted.
B.	Permitting - Air	1	LS	$ 15,000	$ 15,000	Assume Bay Area Air Quality Management District (BAAQMD) air permitting fee and application for two buildings, if required. Assume emissions do not require treatment.
				SUBTOTAL	**$ 27,000**	
IX.	**IMPLEMENTATION OF INSTITUTIONAL CONTROLS (ICs)**					
A.	Preparation of deed restriction, legal description, notification signage and outreach meetings	1	LS	$ 30,000	$ 30,000	
				SUBTOTAL	**$ 30,000**	
				O&M Costs	$ 555,000	
				15% Contingency	$ 83,250	
				Rounded Total O&M Costs	**$ 638,300**	
				Capital Costs	$ 3,849,468	
				15% Contingency	$ 577,420	
				Rounded Total Capital Costs	**$ 4,426,900**	
				TOTAL	**$ 5,065,200**	

NOTES:

1. This Preliminary Remediation Cost Estimate was prepared in consideration of the environmental data presented in the Langan's 2020 Human Health Risk Assessment (HHRA; Langan, 2020).

2. This Preliminary Remediation Cost Estimate is an approximate cost of construction and reflects available cost information for construction located in the San Francisco Bay Area, California.

3. This Preliminary Remediation Cost Estimate represents an opinion of the probable costs of construction, within a reasonable degree of certainty. This estimate does not guarantee the cost of labor, material, or equipment, nor the means, methods and procedures of the Contractor's work as determined by the Contractor and/or Owner, nor the competitive bidding submissions.

4. This Preliminary Remediation Cost Estimate of probable construction cost based on our experience and qualifications as an engineer and shall be deemed to represent our opinion and judgment. This estimate cannot and does not guarantee that proposals, bids or actual costs will be the same as or within any specific percentage of this estimate of probable construction cost.

5. This Preliminary Remediation Cost Estimate is an order-of-magnitude estimate, has been developed for the sole purpose of evaluating and comparing potential remedial action alternatives, is assumed to be accurate within -10% to +25%, and may require adjustment if new information becomes available.

6. Inherent in soils, foundations, groundwater, and other environmental investigations, actual conditions may vary materially from those noted at test points or sample intervals. Because of these inherent uncertainties, changed or unanticipated conditions may arise during construction activities at the project site subsequent to the initial investigation(s) that could potentially affect project scope and cost. Therefore, this estimate, with respect to potential construction costs, including environmental remediation costs, shall not be deemed a guaranteed maximum price or cost of the project.

ASSUMPTIONS/EXCLUSIONS:

1. This estimate does not include General Contractor's overhead, profit and general conditions. The estimate also does not include permit/application fees.

2. All unit prices shown in this estimate should be verified by a local Contractor.

3. The Department of Toxic Substances Control (DTSC) may request post-construction indoor air monitoring. For the purpose of this cost estimate, post-construction indoor air monitoring is not included in item V. VMS Annual O&M Costs.

4. Vapor Barrier Membrane Installation cost assumes that only a vapor barrier and no waterproofing is required beneath the slab-on-grade foundations. If the waterproofing consultant does require waterproofing beneath the slab, cost of the vapor barrier would increase from $8 per square foot to approximately $20 per square foot.

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APPENDIX D

CALIFORNIA ENVIRONMENTAL QUALITY ACT STATEMENT OF FINDINGS AND NOTICE OF DETERMINATION

CALIFORNIA ENVIRONMENTAL QUALITY ACT
STATEMENT OF FINDINGS

The Department of Toxic Substances Control (DTSC) has issued Findings for this project pursuant to the California Environmental Quality Act (CEQA; California Public Resources Code, Division 13, Section 21081) and implementing Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15091 et seq.)

A. PROJECT SUBJECT TO DTSC APPROVAL

PROJECT TITLE: Midway Village Remedial Action Plan Amendment		SITE CODING:
PROJECT ADDRESS: 45-47 Midway Drive	CITY: Daly City	COUNTY: San Mateo
PROJECT SPONSOR: MidPen Housing	CONTACT: Matthew Lewis	PHONE/ EMAIL: 510-817-2758 mlewis@midpen-housing.org

Approval Action Under Consideration by DTSC:

☐ Removal Action Workplan ☐ Interim Removal ☐ Initial Permit Issuance ☐ Permit Re-Issuance
☐ Corrective Measure Study/Statement of Basis ☐ Permit Modification ☐ Closure Plan
☒ Remedial Action Plan ☐ Regulations
☐ Other (specify):

STATUTORY AUTHORITY:

☐ California H&SC, Chap. 6.5 ☒ California H&SC, Chap. 6.8 ☐ Other (specify):

PROJECT DESCRIPTION: Soil vapor on the Midway Village/Bayshore Park site (Site) contains polycyclic aromatic hydrocarbons (PAHs) that result in potentially unacceptable risks and hazards for future residents; therefore, a vapor mitigation system (VMS) is proposed as the remedy to prevent exposure of future on-Site residents to Site soil vapor. The project involves approval of a Remedial Action Plan (RAP) Amendment for the Site. This site is the location of the Midway Village public housing project and Bayshore Park owned by Housing Authority of the County of San Mateo (HACSM). DTSC is overseeing the redevelopment under a voluntary agreement (HAS-FY17/18-113).

BACKGROUND: In the past, the Site was a military housing facility constructed during World War II by the U.S. Government. During construction of the military housing facility, soil contaminated with manufactured gas plant (MGP) residues from the adjacent former MGP site was used as fill material on approximately 20 acres. This soil contained polycyclic aromatic hydrocarbons (PAHs). In 1955, the U.S. government transferred this property to the HACSM. PAH-impacted soil was excavated from the Site twice, first in 1994 and again in 2001. The excavations were backfilled with two to five feet of clean soil and re-landscaped or covered with asphalt or concrete. The Midway Village portion of the Site is subject to two deed restrictions that were recorded in 1998 and 2010. The deed restrictions limit the land use to multiple family residential use and require that the cap be maintained. The Bayshore Park portion of the Site is subject to a deed restriction that was recorded in 2002. The deed restriction on Bayshore Park prohibits residential and other sensitive uses and requires non-interference with the cap (that is, all uses, and development of the property shall preserve the integrity of the cap).

A RAP prepared in 1993 only evaluated remedial action alternatives for soil at Midway Village and did not evaluate remedial actions at Bayshore Park. In the 1993 RAP, groundwater and soil gas were not identified as media of concern that could pose a human health risk. A RAW prepared in 1998 only evaluated remedial action alternatives for soil at Bayshore Park. The 1998 RAW remedy included soil excavation and capping with clean fill. An Explanation of Significant Differences (ESD) prepared in 2001 required excavation of additional soil across the entire Bayshore Park along with capping, institutional controls, and monitoring. In 2018 and 2019, soil gas samples were collected from Midway Village and used in preparation of a 2020 Human Health Risk Assessment (HHRA) to estimate potential human health risks for future residents and construction workers. The HHRA identified areas with elevated chemicals of potential concern (COPC) concentrations in soil gas associated with the vapor intrusion pathway that resulted in potentially unacceptable risks and hazards for future residents.

The HACSM is redeveloping Midway Village and Bayshore Park in the Midway Village Revitalization project. The County and their non-profit real estate developer, MidPen Housing Corporation are in the planning phase of the redevelopment process. The Amendment to the Remedial Action Plan addresses potential soil vapor contamination in the redevelopment.

PROJECT ACTIVITIES: The VMS will consist of the following elements:

Continuous, spray-applied vapor barrier membrane immediately beneath the structural foundation slab to mitigate vapor migration into the building;

Horizontal collection and venting system consisting of 3-inch diameter perforated polyvinyl chloride (PVC) pipe embedded in a 4-inch gravel layer installed below the vapor barrier to allow soil vapors that may otherwise collect beneath the slab to instead migrate and vent to the atmosphere outside the building;

Perimeter grade beam vents to facilitate convective airflow up the vertical riser pipes of the collection and venting systems by allowing fresh air to enter the space beneath the foundation slab;

A series of risers fitted with wind-assisted turbines to vent vapors to the atmosphere at roof level; and

Electrical service at the roof level if the VMS needs to be converted from a passive to active system (VMS design drawings included in the Remedial Design and Implementation Plan (RDIP) will require that electrical service be provided at the roof level).

The proposed VMS will be permitted by the Bay Area Air Quality Management District (BAAQMD).

DTSC used information and analysis in the Sustainable Communities Environmental Assessment (SCEA) to support a final determination about the type of environmental document required to be prepared for the proposed Midway Village Remedial Action Plan Amendment as provided by Sections 15162, 15163, and 15164 of the CEQA Guidelines. Specifically, the SCEA analyzed potential impacts related to contaminated soils in Section 4.3 (Air Quality) and Section 4.9 (Hazards and Hazardous Materials).

An SCEA is a form of CEQA documentation established by Senate Bill (SB) 375 to provide streamlined environmental review for certain “transit priority projects.” Transit priority projects are residential or mixed-use residential projects that provide a minimum net density of 20 dwelling units per acre and are located within 0.50 mile of a major transit stop or high-quality transit corridor (Public Resources Code [PRC] Section 21155[b]). An SCEA is comparable to an Initial Study-Mitigated Negative Declaration because the Lead Agency must find that all potentially significant impacts of a proposed project have been identified, adequately analyzed, and mitigated to a level of insignificance. However, unlike a Negative Declaration, the SCEA need not consider the cumulative effects of the proposed project that have been adequately addressed and mitigated in prior Environmental Impact Report(s) (EIRs). Also, growth-inducing impacts are not required to be referenced, described, or addressed, and project-specific or cumulative impacts from cars and light-duty truck trips on global climate change or the regional transportation network need not be referenced, described, or discussed.

B. LEAD AGENCY ENVIRONMENTAL DOCUMENT REVIEWED

Lead Agency: City of Daly City
Lead Agency’s Environmental Document: Midway Village Redevelopment Project, Sustainable Communities Environmental Assessment (SCEA)
Date Certified: June 12, 2020
State Clearinghouse Number: 2020049013

C. STATEMENT OF FINDINGS AND FACTS FOR ADEQUACY OF LEAD AGENCY ENVIRONMENTAL DOCUMENT

Using its independent judgment, DTSC makes the following findings:

☒ The Lead Agency Final Environmental Document includes a description of the Project now before DTSC for decision

☒ The Lead Agency Final Environmental Document adequately analyzed impacts associated with the Project before DTSC for decision.

☒ DTSC concurs with the findings made by the Lead Agency Final Environmental Document relating to the Project before DTSC for decision.

☒ Mitigation measures are included in the Lead Agency Final Environmental Document for the following resources that would potentially be affected by the DTSC project.

☐ Aesthetics	Mitigation Measure:
☐ Agricultural Resources	Mitigation Measure:
☒ Air Quality	Mitigation Measure AIR-1: refer to the Midway Village Redevelopment Project Sustainable Communities Environmental Assessment (June 2020) (Attachment A)
☐ Agricultural Resources	Mitigation Measure:
☐ Biological Resources	Mitigation Measures:
☐ Cultural Resources	Mitigation Measure:
☐ Energy	Mitigation Measure:
☐ Geology / Soils	Mitigation Measure:
☐ Greenhouse Gas Emissions	Mitigation Measures:
☒ Hazards / Hazardous Materials	Mitigation Measures HAZ-1 and HAZ-2: refer to the Midway Village Redevelopment Project Sustainable Communities Environmental Assessment (June 2020) (Attachment A):
☐ Hydrology / Water Quality	Mitigation Measure:
☐ Land Use / Planning	Mitigation Measure:
☐ Mineral Resources	Mitigation Measure:
☐ Noise	Mitigation Measure:
☐ Population / Housing	Mitigation Measure:
☐ Public Services	Mitigation Measure:
☐ Recreation	Mitigation Measure:
☒Transportation / Traffic	Mitigation Measure TRANS-1: refer to the Midway Village Redevelopment Project Sustainable Communities Environmental Assessment (June 2020) (Attachment A)
☐ Tribal Cultural Resources	Mitigation Measures:
☐ Utilities / Service Systems	Mitigation Measure:
☐ Wildfire	Mitigation Measure:

☒ Mitigation measures identified in the Lead Agency Final Environmental Document have been adopted by DTSC for this Project and will be implemented to avoid, reduce, or substantially lessen the project impacts. No additional mitigation measures are necessary, and no additional mitigation monitoring plan is required pursuant to CEQA.

For each significant environmental effect identified for the Project:

☒ Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the Lead Agency Final Environmental Document.

☒ Such changes or alterations are within the responsibility and jurisdiction of the City of Daly City not DTSC.

☒ Such changes have been adopted by this public agency or can and should be adopted by this public agency.

☐ Mitigation measures included in the Lead Agency Final Environmental Document are infeasible, and therefore, will not be incorporated into the DTSC Project for the following reasons: N/A

BASED ON THE ABOVE FINDINGS, DTSC CONCLUDES:

☒ The proposed Project will not result in significant and unavoidable effects to the environment.

☐ The proposed Project will result in significant and unavoidable effects to the following environmental resources:

☐ Air Quality
☐ Agricultural Resources
☐ Biological Resources
☐ Cultural Resources
☐ Energy
☐ Geology/ Soils
☐ Greenhouse Gas Emissions
☐ Hazards/Hazardous Materials
☐ Hydrology/ Water Quality
☐ Mineral Resources
☐ Noise
☐ Population/Housing
☐ Public Services
☐ Recreation
☐ Transportation/Traffic
☐ Tribal Cultural Resources
☐ Utilities/ Service Systems
☐ Wildfire

Impacts to these resources would remain significant even after applying mitigation measures described in the Lead Agency Final Environmental Document, or there is no feasible mitigation available.

In accordance with Cal. Code of Regs., title 14, section 15093, a Statement of Overriding Considerations was adopted by the Lead Agency for these resources. DTSC adopts a Statement of Overriding Considerations for these resources having determined that the DTSC Project benefits outweigh the significant environmental effects for the following reasons: The DTSC remedial actions reduce the exposure of contaminated soil, soil gas, and groundwater in order to render it safe for Site occupants. The DTSC remedial project also serves to protect human health and the environment, which are DTSC's responsibilities under the California Health and Safety Code.

☒ None of the conditions requiring a subsequent EIR or Negative Declaration pursuant to Cal. Code Regs., tit. 14 Section 15162 exist.

☒ In accordance with Cal. Code of Regs., title 14, section 15093, a Notice of Determination indicating the results of said Findings will be filed with the Governor's Office of Planning and Research / State Clearinghouse.

D. CERTIFICATION

		June 28, 2021
Project Manager's Signature		Date
Kim Walsh	Senior Environmental Scientist, Sup	916-251-8321
Project Manager's Name	Title	Phone #
Julie Pettijohn Julie Pettijohn (Jun 28, 2021 11:57 PDT)		Jun 28, 2021
Branch Chief's Signature		Date
Julie Pettijohn	Branch Chief	510-540-3843
Branch Chief's Name	Title	Phone #

Attachment A

AIR-1: Net Increase in Construction-Related Emissions.
Plan Bay Area EIR MM 2.2-2: When screening levels are exceeded (refer to Table 2.2-8 of PBA EIR), implementing agencies and/or project sponsors shall implement measures, where applicable, feasible, and necessary based on project- and site-specific considerations, that include, but are not limited to the following:

Construction Best Practices for Exhaust

The applicant/general contractor for the project shall submit a list of all off-road equipment greater than 25 horsepower (hp) that would be operated for more than 20 hours over the entire duration of project construction, including equipment from subcontractors, to BAAQMD for review and certification. The list shall include all information necessary to ensure the equipment meets the following requirement:
1) Be zero emissions OR 2) have engines that meet or exceed either EPA or ARB Tier 2 off-road emission standards; and 3) have engines that are retrofitted with an ARB Level 3 Verified Diesel Emissions Control Strategy (VDECS), if one is available for the equipment being used. Equipment with engines that meet Tier 4 Interim or Tier 4 Final emission standards automatically meet this requirement; therefore, a VDECS would not be required.
Idling time of diesel-powered construction equipment and trucks shall be limited to no more than two minutes. Clear signage of this idling restriction shall be provided for construction workers at all access points.
All construction equipment shall be maintained and properly tuned in accordance with the manufacturers' specifications.
Portable diesel generators shall be prohibited. Grid power electricity should be used to provide power at construction sites; or propane and natural gas generators may be used when grid power electricity is not feasible.

Construction Best Practices for Dust

All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. For projects over five acres in size, soil moisture should be maintained at a minimum of 12 percent. Moisture content can be verified by lab samples or a moisture probe.
All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. Dry power sweeping should only be performed in conjunction with thorough watering of the subject roads.
All vehicle speeds on unpaved roads and surfaces shall be limited to 15 mph.
All roadway, driveway, and sidewalk paving shall be completed as soon as possible. Building pads shall be paved as soon as possible after grading.
All construction sites shall provide a posted sign visible to the public with the telephone number and person to contact at the Lead Agency regarding dust complaints. The recommended response time for corrective action shall be within 48 hours. BAAQMD's Complaint Line (1-800-334-6367) shall also be included on posted signs to ensure compliance with applicable regulations.
All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity.
Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.
The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time.
All trucks and equipment, including their tires, shall be washed off before leaving the site.
Site accesses to a distance of 100 feet from the paved road shall be treated with a 6- to 12-inch compacted layer of wood chips, mulch, or gravel.
Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent.

These BMPs are consistent with recommendations in BAAQMD's CEQA guidelines and Planning Healthy Places [BAAQMD 2017]. Applicable mitigation measures shall be required at the time grading permits are issued.

TRANS-1: Construction Traffic
Plan Bay Area EIR MM 2.1-7: Implementing agencies shall require implementation of best practice strategies regarding construction activities on the transportation system and apply recommended applicable mitigation measures as defined by state and federal agencies. Examples of mitigation measures include, but are not limited to, the following:

prepare a transportation construction plan for all phases of construction;
establish construction phasing/staging schedule and sequence that minimizes impacts of a work zone on traffic by using operationally-sensitive phasing and staging throughout the life of the project;
identify arrival/departure times for trucks and construction workers to avoid peak periods of adjacent street traffic and minimize traffic affects;
identify optimal delivery and haul routes to and from the site to minimize impacts to traffic, transit, pedestrians, and bicyclists;
identify appropriate detour routes for bicycles and pedestrians in areas affected by construction;
coordinate with local transit agencies and provide for relocation of bus stops and ensure adequate wayfinding and signage to notify transit users;
preserve emergency vehicle access;
implement public awareness strategies to educate and reach out to the public, businesses, and the community concerning the project and work zone (e.g., brochures and mailers, press releases/media alerts);
provide a point of contact for residents, employees, property owners, and visitors to obtain construction information, and provide comments and questions;
provide current and/or real-time information to road users regarding the project work zone (e.g., changeable message sign to notify road users of lane and road closures and work activities, temporary conventional signs to guide motorists through the work zone); and
encourage construction workers to use transit, carpool, and other sustainable transportation modes when commuting to and from the site.

HAZ-1: Modification, Amendment, or Rescindment of Deed Restriction and Consultation with an Applicable Regulatory Agency and Development of a Worker Environmental Protection Program (WEAP).
As a condition of approval of the proposed project, the Applicant shall consult with DTSC regarding the Existing LUCs on the site. A modification, amendment, or rescindment to one or more of the Existing LUCs will be required for the site since the 2002 LUC does not allow for residential development on the Bayshore Park portion of the site. The Applicant will enter into an agreement with the applicable regulatory agency on the appropriate actions to take regarding the potentially contaminated soils on the project site. As a condition of the agreement, an environmental response document will be required for the proposed project, which will include but is not limited to:

Testing of soils and groundwater prior to the start of construction to identify contaminated soils and/or groundwater in the area;
Removal and disposal of any contaminated soils or groundwater;
Removal of any hazardous building materials in existing structures prior to demolition (e.g., asbestos, tile, lead-based paint, mercury switches and light fixtures, light fixtures with PCB transformers and ballast transformers);
Capping of any soil that will not be covered by structural improvements (i.e., landscaped areas or exposed soils in the park area);
Implementation of an SMP for the site;
Approval and implementation of a Worker Environmental Protection Program; and
Procedures to be followed in the event of discovery of unknown environmental conditions which may exist at the Site, such as subsurface structures, underground tanks and piping.

Consultation with the applicable regulatory agency and implementation of the environmental response document will include the general steps that will be taken to remediate the project site and reduce potential impacts to human health and the environment from the potentially contaminated soil and groundwater in the area.

Additionally, development and participation in a Worker Environmental Protection Program shall be required to ensure that all construction workers onsite are appropriately trained on the conditions of the site soils and the potentially hazards conditions of these soils. The Applicant and the contractor are responsible for ensuring that all onsite personnel attend the

WEAP presentation, receive a summary handout, and sign a training attendance acknowledgement form to indicate that the contents of the program are understood and to provide proof of attendance. Each participant of the WEAP presentation shall be responsible for maintaining their copy of the WEAP reference materials and making sure other onsite personnel are complying with the recommended precautions. The contractor shall keep the sign in sheet onsite and submit copies of the WEAP sign-in sheet to the Applicant's project manager who shall keep it on file at their offices.

A building permit cannot be issued, and thus, the proposed project cannot begin construction, until the 2002 LUC is either modified, amended, or rescinded.

HAZ-2: Hazardous Materials List Pursuant to California Government Code, Section 65962.5.
Plan Bay Area EIR MM 2.13-4: Implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations that include, but are not limited to:

> If the project is located on or near a hazardous materials and/or waste site pursuant to Government Code Section 65962.5, or has the potential for residual hazardous materials and/or waste as a result of location and/or prior uses, the project sponsor shall prepare a Phase I ESA in accordance with the American Society for Testing and Materials' E-1527-05 standard. For work requiring any demolition or renovation, the Phase I ESA shall make recommendations for any hazardous building materials survey work that shall be done. All recommendations included in a Phase I ESA prepared for a site shall be implemented. If a Phase I ESA indicates the presence or likely presence of contamination, the implementing agency shall require a Phase II ESA, and recommendations of the Phase II ESA shall be fully implemented.

CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF DETERMINATION

To: Office of Planning and Research
State Clearinghouse
P.O. Box 3044, 1400 Tenth Street, Room 212
Sacramento, CA 95812-3044

From: Department of Toxic Substances Control
Site Mitigation and Restoration Program
700 Heinz Avenue
Berkeley, CA 94710

Subject: FILING OF NOTICE OF DETERMINATION IN COMPLIANCE WITH SECTION 21108 OR 21152 OF THE PUBLIC RESOURCES CODE

Project Title: Midway Village Bayshore Park Remedial Action Plan Amendment

State Clearinghouse No.: 2020049013

Project Location: 45-47 Midway Drive, Daly City, California

County: San Mateo

Project Description:
The project involves approval of a Remedial Action Plan (RAP) Amendment for the Midway Village/Bayshore Park site (Site). This site is the location of the Midway Village public housing project and Bayshore Park owned by the Housing Authority of the County of San Mateo (HACSM). DTSC is overseeing Site cleanup under a voluntary agreement (HAS-FY17/18-113).

Background:
In the past, the Site was a military housing facility constructed during World War II by the U.S. Government. During construction of the military housing facility, soil contaminated with manufactured gas plant (MGP) residues from the adjacent former MGP site was used as fill material on approximately 20 acres. This soil contained polycyclic aromatic hydrocarbons (PAHs). In 1955, the U.S. government transferred this property to the San Mateo Housing Authority. PAH-impacted soil was excavated from the Site twice, first in 1994, and again in 2001. The excavations were backfilled with two to five feet of clean soil and re-landscaped or covered with asphalt or concrete. The Midway Village portion of the Site is subject to two deed restrictions that were recorded in 1998 and 2010. The deed restrictions limit the land use to multiple family residential use and require that the cap be maintained. The Bayshore Park portion of the Site is subject to a deed restriction that was recorded in 2002. The deed restriction on Bayshore Park prohibits residential and other sensitive uses and requires non-interference with the cap (that is, all uses, and development of the property shall preserve the integrity of the cap).

The HACSM is redeveloping Midway Village and Bayshore Park in the Midway Village Revitalization project. The County and their non-profit real estate developer, MidPen Housing Corporation, are in the planning phase of the redevelopment process. DTSC is reviewing an Amendment to the Remedial Action Plan to address soil vapor contamination in the redevelopment.

Project Activities: Soil vapor on the Site contains polycyclic aromatic hydrocarbons (PAHs) greater than residential screening levels; therefore, a vapor mitigation system (VMS) is proposed as the remedy to prevent exposure of future on-Site residents to Site-related vapor in indoor air. The VMS will consist of the following elements:

- Continuous, spray-applied vapor barrier membrane immediately beneath the structural foundation slab to mitigate vapor migration into the building;
- Horizontal collection and venting system consisting of 3-inch diameter perforated polyvinyl chloride (PVC) pipe embedded in a 4-inch gravel layer installed below the vapor barrier to allow soil vapors that may otherwise collect beneath the slab to instead migrate and vent to the atmosphere outside the building;
- Perimeter grade beam vents to facilitate convective airflow up the vertical riser pipes of the collection and venting systems by allowing fresh air to enter the space beneath the foundation slab;
- A series of risers fitted with wind-assisted turbines to vent vapors to the atmosphere at roof level; and
- Electrical service at the roof level if the VMS needs to be converted from a passive to active system (VMS design drawings included in Remedial Design and Implementation Plan (RDIP) will require that electrical service be provided at the roof level).

DTSC used information and analysis in the Sustainable Communities Environmental Assessment (SCEA) to support a final determination about the type of environmental document required to be prepared for the proposed Midway Village Remedial Action Plan Amendment as provided by Sections 15162, 15163, and 15164 of the CEQA Guidelines.

An SCEA is a form of CEQA documentation established by Senate Bill (SB) 375 to provide streamlined environmental review for certain "transit priority projects." Transit priority projects are residential or mixed-use residential projects that provide a minimum net density of 20 dwelling units per acre and are located within 0.50 mile of a major transit stop or high-quality transit corridor (Public Resources Code [PRC] Section 21155[b]). An SCEA is comparable to an Initial Study-Mitigated Negative Declaration because the Lead Agency must find that all potentially significant impacts of a proposed project have been identified, adequately analyzed, and mitigated to a level of insignificance. However, unlike a Negative Declaration, the SCEA need not consider the cumulative effects of the proposed project that have been adequately addressed and mitigated in prior Environmental Impact Report(s) (EIRs). Also, growth-inducing impacts are not required to be referenced, described, or addressed, and project-specific or cumulative impacts from cars and light duty truck trips on global climate change or the regional transportation network need not be referenced, described, or discussed.

As ☐ ~~Lead Agency~~ ☒ a Responsible Agency under the California Environmental Quality Act (CEQA), DTSC approved the above-described project on June 28, 2021 and has made the following determinations:

1. The project ☐ ~~will~~ ☒ will not have a significant effect on the environment.
2. An ☐ Negative Declaration ☒ Mitigated Negative Declaration ☐ Environmental Impact Report was prepared for this project pursuant to the provisions of CEQA.
3. Mitigation measures ☒ were ☐ ~~were not~~ made a condition of project approval.
4. A Statement of Overriding Considerations ☐ ~~was~~ ☒ was not adopted for this project.
5. Findings ☒ were ☐ ~~were not~~ made pursuant to the provisions of CEQA.

This is to certify that the final environmental document and the record of project approval are available to the public at the following locations:

DTSC File Room
700 Heinz Avenue
Berkeley, California 94710
(510) 540-3800 (call for an appointment)

DTSC website:
https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=41650007

Midway Village Community Center
26 Cypress Lane, Daly City, CA 94014;
Mondays, Wednesdays, and Fridays; 8 a.m. to 3 p.m.

Kim Walsh	Unit Chief	(916) 251-8321
Project Manager Name	Project Manager Title	Phone #
Julie Pettijohn Julie Pettijohn (Jun 28, 2021 11:56 PDT)		Jun 28, 2021
Supervisor Signature		Date
Julie Pettijohn	Branch Chief	(510) 516-5894
Supervisor Name	Supervisor Title	Phone #

TO BE COMPLETED BY OPR ONLY

Date Received For Filing and Posting at OPR:

APPENDIX E

STATEMENT OF REASONS AND NON-BINDING ALLOCATION OF RESPONSIBILITY

Appendix E

Statement of Reasons and Preliminary Non-Binding Allocation of Responsibility

Statement of Reasons

Pursuant to California Health and Safety Code (HSC) section 25356.1(e), the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) has prepared this Statement of Reasons as part of the Remedial Action Plan (RAP) Amendment for the Midway Village and Bayshore Park Sites located at 47 Midway Drive in Daly City, County of San Mateo, California. In accordance with HSC Section 25356.1(d), this RAP Amendment is consistent with federal regulations, specifically Section 25350, Subpart E of the National Oil and Hazardous Substances Pollution Contingency Plan, referred to as the National Contingency Plan (NCP) (40 C.F.R. 300.400 et seq.), including any amendments. The remedial alternatives in the RAP Amendment were evaluated based on the nine criteria specified in the NCP, and this evaluation resulted in the recommended remedial action to address future vapor intrusion risk. Health and Safety Code Section 25356.1(d) also requires that the remedial alternatives be evaluated for six additional factors unless these factors are adequately addressed through compliance with the NCP. Because the RAP Amendment's evaluation of remedial alternatives under the NCP adequately addresses the six factors listed in HSC Section 25356.1(d), a separate evaluation was not conducted.

The Final HHRA identified potentially unacceptable risks and hazards for future residents at Midway Village north of Midway Drive and the Bayshore Park location if converted to "sensitive" uses. The risks and hazards are associated with elevated soil gas concentrations and the hypothetical vapor intrusion pathway under a redevelopment scenario. The Department believes the remedial action proposed for the Midway Village Bayshore Park Site in the RAP Amendment will remedy future vapor intrusion risks and hazards associated with redevelopment. The proposed remedial action is in addition to the existing remedy to prevent direct contact with MGP waste in soil that was selected in the Final RAP (E&E, 1993c) and ESD (DTSC, 2001a) for Midway Village, and Final RAW (City of Daly City, 1998) and ESD (DTSC, 2001b) for Bayshore Park.

Preliminary Non-Binding Allocation of Responsibility

Health and Safety Code section 25356.1(e) requires DTSC to prepare a preliminary non-binding allocation of responsibility (the "NBAR") among all identifiable potentially responsible parties (PRPs) at a particular site, including those parties which may have

been released, or may otherwise be immune, from liability pursuant to Chapter 6.8 of the Health and Safety Code or any other provision of law. The NBAR, which based on the evidence available to DTSC is not binding on anyone, including PRPs or DTSC.

DTSC sets forth the following preliminary nonbinding allocation of responsibility for Midway Village and Bayshore Park Sites located at 47 Midway Drive in Daly City, County of San Mateo, California:

The United States, PG&E, City of Daly City (Daly City), the Housing Authority of the County of San Mateo (HACSM), and DTSC entered into a settlement agreement covering the Midway Village, and a settlement agreement covering the Bayshore Park Site. The intent of these settlement agreements was to allocate costs and responsibility for the remedies selected for the Sites (as noted in the RAW and RAP and ESDs noted above) and provide contribution protection. The settlement agreements contain covenants not to sue by the parties for the remedy as implemented under those remedy decision documents. For DTSC and for the United States Environmental Protection Agency (USEPA) the settlement agreement contains a carve out for natural resource damages and for reopeners in the event the remedy as constructed is no longer protective of human health and the environment. The settlement agreement also requires Daly City to maintain the cap at the Park, and for the signatories, and their successors, to comply with the terms of the Land Use Covenants for the sites.

The HACSM currently owns the Midway Village and Bayshore Park Sites. The HACSM has owned the Midway Village Site since 1976 and acquired the Bayshore Park site from Daly City in September 2020. The HACSM contracted with MidPen Housing Corporation to redevelop the Midway Village and Bayshore Park Sites to provide additional affordable housing and other amenities for the community. The redevelopment requires temporary removal of portions of the existing soil remedy (i.e., cap) and converting Bayshore Park from recreational to residential land use. The conversion of Bayshore Park to residential land use poses vapor intrusion risks if this exposure pathway is not controlled with a remedy.

Without reopeners having been triggered prior to construction of the new remedy, and unless a reopener is triggered in the future, this NBAR allocates 100% of the responsibility of addressing all existing contamination at the Site during and after redevelopment, as joint and several liability, to the Owner and the Operator of these Sites for the new remedy components being implemented under this RAP Amendment (for the caps and restrictions associated with the soils remedy and for indoor air mitigation measures). The allocation goes to the HACSM as the Owner of the Midway Village Site and new Owner of the Bayshore Park Site (acquired from Daly City) being repurposed for residential use, and to MidPen Housing Corporation as the Operator/Agent for HACSM (as Owner) for implementation of the new remedy, and for

the Operations and Maintenance obligations for the newly constructed remedy, and the compliance obligations under the Land Use Covenants/restrictions required to ensure protectiveness of human health and the environment. This allocation is informed by the language in the Midway Village Settlement Agreement, and the Bayshore Park Settlement Agreement including, but not limited to, paragraph 7.4 as quoted below.

“7.4 Any documents prepared by Daly City or the Housing Authority that effectuate the transfer in ownership or approve the redevelopment of the Bayshore Park Site, or any portion of the Midway Village Site, will provide releases from liability and indemnification to the United States, PG&E, Daly City, and the Housing Authority for any and all costs associated with hazardous substances at the sites from the individuals or entities accepting ownership of, or undertaking any redevelopment on, those sites.”

The RAP Amendment is silent as to any groundwater remedy for the site, therefore this RAP Amendment NBAR leaves in place the allocation of liability/responsibility and reopeners found in the Settlement Agreements referenced above.

APPENDIX F

ADMINISTRATIVE RECORD LIST

APPENDIX F
ADMINISTRATIVE RECORD LIST
REMEDIAL ACTION PLAN AMENDMENT FOR SOIL GAS
MIDWAY-BAYSHORE VILLAGE REDEVELOPMENT

(in chronological order)

Date	Author	Recipient	Title of Document	Document Link
08/93	Department of Toxic Substances Control (DTSC)	Public	Final Remedial Action Plan for Midway Village	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/5520566642/1994midway%20village%20remedial%20action%20plan.pdf
08/93	DTSC	Public	Final DTSC Letter - Final Remedial Action Plan for Midway Village	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/7836484611/rap.pdf
11/95	DTSC	Public	Third Amendment to Imminent and Substantial Endangerment Order and Remedial Action Order, Health and Safety Code Section 25358.3 (a) (1) and 25355.5 (a) (1) (B)	https://www.envirostor.dtsc.ca.gov/public/view_document?docurl=/public/deliverable_documents/3643689811/midway%20third%20ammendment%20to%20immenent%20and%20substantial%20endangerment%20order%20and%20remedial%20action%20order%2Epdf
11/95	DTSC	Public	Remedial Action Plan (RAP) Policy	https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/07/eo-95-007-pp.pdf
07/98	City of Daly City	Public	Removal Action Work Plan, Bayshore Park, City of Daly City, California	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/1800183951/Bayshore%20Park%20removal%20action%20workplan%20bayshore%20park.pdf
07/98	DTSC	Public	Final Removal Action Workplan Approval Record, Bayshore Park Site, Daly City, California	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/4522733390/Bayshore%20Park%20RAW%20Final%20DTSC%20Ltr.%207-20-1998.pdf
07/98	DTSC	Public	Negative Declaration, Bayshore Park, Daly City, California	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/9555570304/Bayshore%20Park%20Negative%20Declaration%201998.pdf
09/98	DTSC	Public	Covenant to Restrict Use of Property Environmental Restriction, Re: Midway Village Capped Area, Daly City, California Assessors Parcel Numbers (APN) 005-330-250, 005-330-270, 005-330-270,	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/1977475821/SMBR_DEED_41650007.pdf

Date	Author	Recipient	Title of Document	Document Link
			005-330-340, 005-330-350, 005-330-360, 005-330-370, and 005-330-380	
07/01	DTSC	Public	Explanation of Significant Differences, Extent of PAH Soil Contamination, Midway Village, Daly City	https://www.envirostor.dtsc.ca.gov/public/view_document?docurl=/public/deliverable_documents/4127088248/L%2D2001midway%20village%20explanation%20of%20significant%20differences%2Epdf
07/01	DTSC	Public	Explanation of Significant Differences, Extent of PAH Soil Contamination, Bayshore Park Site, Daly City	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/3712629020/Bayshore%20Park%20expalnation%20of%20significant%20differences.pdf
07/01	DTSC	Public	Initial Study/Negative Declaration for Midway Village/Bayshore Park ESD	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/1883954703/2001%20MidwayBayshore%20ESD%20Negative%20Dec.pdf
10/02	DTSC	Public	Covenant to Restrict Use of Property Environmental Restriction, (Re: San Mateo County Assessor's Parcel Numbers 005-330-330 and 005-330-390 a.k.a David R. Rowe Park)	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/2221509635/SMBR_DEED_41990001.pdf
05/03	DTSC	Public	Remedial Action Certification Form. Midway Village	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/4769101798/Midway%20Certification.pdf
05/03	DTSC	Public	Remedial Action Certification Form. Bayshore Park	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/7770703971/Bayshore%20Park%20Certification%205-13-2003.pdf
04/10	DTSC	Public	Proven Technologies and Remedies Guidance, Remediation of Chlorinated Volatile Organic Compounds in Vadose Zone Soil	https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/11/cVOC_040110.pdf
11/10	DTSC	Public	Covenant to Restrict Use of Property Environmental Restriction, (Re: County of San Mateo APN(s) 005-330-280, 005-330-290, 005-330-300, and 005-330-310, Midway Village,	http://www.co.sanmateo.ca.us/bos.dir/BosAgendas/agendas2010/Agenda20101102/20101102_a_18.pdf

Date	Author	Recipient	Title of Document	Document Link
			Daly City, California – Site Code 200212)	
10/11	DTSC	Public	Final Guidance for the Evaluation & Migration of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance)	https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/01/Final_VIG_Oct_2011.pdf
2014	Groundwater Monitoring & Remediation Wiley Periodicals, Inc. on behalf of National Ground Water Association	Public	Estimation of Generic Subslab Attenuation Factors for Vapor Intrusion Investigations	https://ngwa.onlinelibrary.wiley.com/doi/pdfdirect/10.1111/gwmr.12086
06/15	U.S. Environmental Protection Agency (EPA)	Public	Guide to Assessing and Mitigating the Vapor Intrusion Pathway from Subsurface Vapor Sources to Indoor Air	https://www.epa.gov/sites/production/files/2015-09/documents/oswer-vapor-intrusion-technical-guide-final.pdf
03/17	DTSC	Public	Change of PM Notification	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/6565641641/Midway%20Village%20and%20Bayshore%20Park%20Sites_Change%20of%20PM%20Ltr._3.09.20170001.pdf
05/17	Bay Area Air Quality Management District (BAAQMD)	Public	California Environmental Quality Act Air Quality Guidelines	https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf
10/18	Langan Engineering and Environmental Services, Inc. (Langan)	Public	Limited Soil Gas Sampling Work Plan, Midway-Bayshore Village Redevelopment, Daly City, California	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/4270130991/770650101.04%20PJC_Limited%20Soil%20Gas%20Sampling%20Work%20Plan%20Report_Midway-Baysh....pdf
11/18	DTSC	Public	Final Limited Soil Gas Sampling Work Plan Approval Email, Midway-Bayshore Village Redevelopment, Daly City, California	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/9943800210/RE_%20Updated%20Work%20Plan.pdf

Date	Author	Recipient	Title of Document	Document Link
10/18	Virginia Department of Environmental Quality (Virginia DEQ)	Public	Virginia Unified Risk Assessment Model – VURAM User Guide	https://www.deq.virginia.gov/home/showpublisheddocument?id=4068
01/19	Regional Water Quality Control Board (RWQCB)	Public	Update to Environmental Screening Levels Status Sheet	https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/ESL/2019%20ESL%20Status%20Sheet_Rev%202.pdf
02/19	Langan	Public	Midway Village Indoor Air Sampling Work Plan	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/4336377799/FINAL%20770650101.07%20DJS_Work%20Plan_Midway%20SubSlab%20and%20Indoor%20Air.pdf
02/19	Langan	Public	Midway Village Indoor Air Sampling Work Plan - Comment Letter	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/5395734488/HERO%20Ok%20of%20Revised%20Indoor%20Air%20Work%20Plan.pdf
06/19	DTSC	Public	Fourth Five-Year Review, Midway Village, Daly City, California	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/3515658318/final%20fourth%205YR%20Midway%20Village%202019.pdf
09/19	Langan	Public	Midway Village Indoor Air and Sub Slab Soil Gas Sampling and Analysis Work Plan Addendum	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/8237156748/Work%20Plan%20Addendum_1.pdf
09/19	DTSC	Public	Change in DTSC Project Manager Notification	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/4661533951/47%20Midway%20Drive%20DTSC%20informing%20of%20PM_09.18.2019.pdf
11/19	U.S. EPA	Public	Regional Screening Levels (RSLs) – Generic Tables	https://www.epa.gov/risk/regional-screening-levels-rsls-generic-tables
11/19	Langan	Public	Letter Subject: Village South Soil Gas Sampling Work Plan Addendum. From Dustyne Sutherland and Peter Cusack of Langan Engineering and Environmental Services, Inc.	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/2390287101/770650101.10%20DJS_Memo-Village%20South%20Soil%20Gas%20Sampling.pdf

Date	Author	Recipient	Title of Document	Document Link
11/19	DTSC	Public	Village South Soil Gas Sampling Work Plan Addendum Approval Email	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/1794556140/email%20approval.pdf
02/20	DTSC	Public	Supplemental Guidance: Screening and Evaluation Vapor Intrusion, Draft for Public Comments	https://dtsc.ca.gov/wp-content/uploads/sites/31/2020/02/Public-Draft-Supplemental-VI-Guidance_2020-02-14.pdf
04/20	Langan	Public	Groundwater Investigation Work Plan, Midway-Bayshore Village Redevelopment, Daly City, California.	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/7658781290/770650102.02%20DJS_Revised%20Groundwater%20Investigation%20Work%20Plan.pdf
04/20	Stantec	Public	Sustainable Communities Environmental Assessment (SCEA)	https://files.ceqanet.opr.ca.gov/261032-2/attachment/0e-tNY5PNVuPhAMWjBF-1wO-2PJbpkNwUIG_fxCR1y-ZZiKXnY07u_48P0NxikLXx7mQKNKHSCqrPeQM0
06/20	DTSC	Public	Human Health Risk Assessment (HHRA) Note 3 – DTSC-Modified Screening Levels (DTSC-SLs)	https://dtsc.ca.gov/wp-content/uploads/sites/31/2019/04/HHRA-Note-3-June-2020-A.pdf
10/20	DTSC	Public	Change of DTSC Project Manager Notification	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/7125929892/Midway%20Village%20Change%20of%20PM%20Letter%20101520.pdf
9/20	Langan	Public	Human Health Risk Assessment for Midway-Bayshore Village Redevelopment	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/8739958822/770650101.14%20DJS_Final%20HHRA-Midway-Bayshore%20Village.pdf
10/20	DTSC	Public	Approval of Human Health Risk Assessment for Midway-Bayshore Village Redevelopment	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/5130812704/Midway%20Village%20HHRA%20Approval.pdf
11/20	Langan	Public	Indoor Air and Sub Slab Results, Midway-Bayshore Village Redevelopment, Daly City, California	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/9821700155/770650102.05R%20DJS_Indoor%20and%20Sub-Slab%20Sampling%20Results_Midway%20Bayshore%20Daly%20City.pdf

Date	Author	Recipient	Title of Document	Document Link
11/20	DTSC	Public	Approval of Indoor Air and Sub Slab Sampling Results, Midway Village North, Midway Village, Daly City, California	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/1804524302/Midway%20Indoor%20Air%20Sub%20Slab%20Report%20Approval%20Letter.pdf
11/20	Langan	Public	Midway Village South Soil Gas Results Technical Memorandum	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/8787079334/770650101.15R%20DJS_Soil%20Gas%20Sampling%20Memo-Village%20South.pdf
12/20	DTSC	Public	Approval of Village South Soil Gas Sampling Results Technical Memorandum, Midway Village, Daly City, California	https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/5754440784/Midway%20South%20SG%20TM%20Approval%20Letter%2012042020.pdf

APPENDIX G

RESPONSIVENESS SUMMARY

CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

Department of Toxic Substances Control

Responsiveness Summary

Midway-Bayshore Village Redevelopment
45 and 47 Midway Drive
Daly City, California

June 2021

TABLE OF CONTENTS

Attachments

1. Current Land Use Covenants Map
2. DTSC Community Update and Public Notice
3. Comment Letters

1.0 INTRODUCTION

This Responsiveness Summary has been prepared by the California Department of Toxic Substances Control (DTSC) and responds to all public comments received during the 45-day public comment period on the Draft Remedial Action Plan Amendment (RAP Amendment) for the Midway Village and Bayshore Park redevelopment project located at 45 and 47 Midway Drive in Daly City, California 94014. This Responsiveness Summary will be incorporated as an appendix to the Final RAP Amendment. The final RAP Amendment will reflect any changes which DTSC determines are appropriate in response to public comments.

2.0 BACKGROUND

The Midway Village and Bayshore Park properties occupy a roughly 15.8-acre area located at 45 and 47 Midway Drive in Daly City. They are bordered by the Pacific Gas and Electric Company (PG&E) Martin Service Center to the north and northeast, Martin Street to the south and Schwerin Street to the west. Surrounding land uses are primarily residential and commercial. Bayshore School, located approximately 600 feet to the northwest of the Site, serves PreK-8 students.

From around 1908 to 1916, a manufactured gas plant (MGP) operated on the adjacent PG&E Martin Service Center property. The MGP produced gas for the lighting, heating, and cooking needs of the community until natural gas became readily available. In 1944, approximately 20,000 cubic yards of soil with MGP waste was moved from the PG&E property and used as fill material at the location of the current Midway Village and Bayshore Park. The Midway Village residential complex was constructed in 1976 and the park constructed in 1977.

The soil contamination issue was brought to DTSC's attention in 1990 after a PG&E contractor performed sampling at the Midway Village site. In the 1990s and early 2000s, the County of San Mateo and Daly City removed two to five feet of soil contaminated with chemical compounds associated with MGP waste, including polycyclic aromatic hydrocarbons (PAHs), under DTSC oversight. Approximately 16,000 cubic yards of contaminated soil was removed from areas without building features or paved surfaces. These areas were then backfilled with clean soil or covered with hardscape such as patios and walkways as a remedy to prevent human contact with any remaining soil contamination. Land Use Covenants (LUCs) were recorded with the County to restrict land uses in areas of the Site north of Midway Drive and on Bayshore Park (see Attachment 1 for a map showing the locations of the current LUCs). The LUCs require inspections and maintenance of the capped areas annually and a report that evaluates the effectiveness of the remedy every five years. Additional sampling of

indoor air and soil vapor from 2019 confirmed that the existing building foundations and clean soil cap remain effective in preventing exposure to volatile organic compounds (VOCs) found in soil vapor (air in between soil particles).

3.0 DRAFT REMEDIAL ACTION PLAN AMENDMENT

The Housing Authority of the County of San Mateo (HACSM) and MidPen Housing are planning to reconfigure the complex and replace the existing 150 units with 555 units. A new childcare facility would be constructed, and the park would be relocated to an area bordering Schwerin Street. The current Bayshore Park would be converted to residential use. The redevelopment construction would be conducted in phases. While the Site in its current condition is protective of the health of the residents and community, additional remediation is required to address soil vapor contamination and provide long-term protection for future residents of the new development.

The Draft RAP Amendment summarizes previous environmental work conducted at the Site and evaluates alternatives to mitigate potential soil vapor impacts from future redevelopment. It proposes the following activities:

- Installing vapor mitigation systems under proposed buildings north of Midway Drive that will prevent vapors in soil from entering the indoor air of these buildings. Proposed buildings south of Midway Drive would not require a vapor mitigation system because they are outside the area of significant soil gas contamination.
- Updating the existing Bayshore Park LUC to allow for residential use once vapor mitigation systems have been installed and tested.
- Updating the two existing LUCs on the Midway Village parcels north of Midway Drive to require vapor mitigation systems under the new buildings.
- Ongoing monitoring and maintenance of any soil or hardscape caps and new vapor mitigation systems to ensure they remain effective.
- Annual inspections and review every five years to confirm that the remedy continues to protect human health and the environment. HACSM will be responsible for these activities for redevelopment Phases 1, 2, and 3. Phase 4 is outside the area of contamination. The City of Daly City will be responsible for these activities for Phase 5 (the new Bayshore Park). These activities will be conducted under DTSC oversight.

The construction of the new complex and relocation of the park would require a variance to the existing LUCs to allow for residential use on the existing Bayshore Park as well as demolition and replacement of the existing hardscape and clean soil caps

that would be impacted by the redevelopment. The installation of utilities and building foundations would also require excavating and disposing of soil contaminated with MGP wastes.

As the lead agency under CEQA, the City of Daly City prepared a Sustainable Communities Environmental Assessment (SCEA) for the proposed Midway-Bayshore Village Redevelopment Project in April 2020 that evaluated and summarized its potential environmental effects. The SCEA recommended mitigation measures that would substantially reduce or avoid potentially significant environmental impacts. The City of Daly City is the lead agency under the California Environmental Quality Act (CEQA). As such, the City will be responsible for mitigation measure implementation oversight and compliance documentation. DTSC has reviewed the SCEA and concurs with the findings. The mitigation measures in the SCEA are in addition to DTSC's requirements for work practices that protect the community from exposure to contamination during the implementation of the RAP Amendment.

4.0 PUBLIC REVIEW PROCESS

The following summarizes the public review process for the Draft RAP Amendment.

Public Comment Period: DTSC held a comment period from March 17 to April 30, 2021.

Public Comment Period Notification: On March 12, 2021, DTSC published a Spanish notice in the main section of the *El Observador* newspaper. On March 17, 2021, DTSC published an English and Arabic public notice in the main sections of the *San Francisco Chronicle* and *San Mateo Daily Journal* newspapers and a Chinese public notice in the main section of the *Sing Tao Daily* newspaper. These public notices announced the start of the public comment period and solicited comments on the Draft RAP Amendment. Copies of the public notices are included in Attachment 2.

Community Update: On March 12, 2020, DTSC distributed a Community Update in English, Arabic, Chinese and Spanish via U.S. Mail to 1,703 addresses which included residences and businesses located within an approximately 0.5-mile radius of the Site; key representatives from San Mateo County and Daly City; local civic/community organizations; and DTSC's mandatory mailing list. Additionally, notification was sent to a total of 104 email addresses. Copies of the Community Update are provided in Attachment 2.

Public Meeting: On April 14, 2021, DTSC held a remote public meeting to provide information on the Draft RAP Amendment, answer questions, and accept public

comments. All questions were addressed during the public meeting and these are included in Section 5.0.

Information Repositories: Due to the COVID-19 pandemic, the local library repository was closed. Key decision-making documents, including the Draft RAP Amendment, were made available at the following physical and online locations:

- Midway Village Community Center, 26 Cypress Lane, Daly City, CA 94014; Mondays, Wednesdays, and Fridays; 8 a.m. to 3 p.m.
- DTSC's EnviroStor database at: www.envirostor.dtsc.ca.gov/public (Enter "Midway Village" and select from the drop-down menu.)

The following documents were made available to the public during the 45-day public comment period:

1. DTSC Community Update, March 2021, Public Comment Period for Midway-Bayshore Village Redevelopment-Draft Remedial Action Plan Amendment

2. DTSC Public Notice placed as a display advertisement in the *El Observador*, March 12, 2021 and the *San Francisco Chronicle, San Mateo Daily Journal* and *Sing Tao Daily,* March 17, 2021: Public Comment Period for Midway Village-Bayshore Park, Draft Remedial Action Plan Amendment Available for Review

3. Draft Remedial Action Plan Amendment for Soil Gas, Midway-Bayshore Village Redevelopment, Dated March 4, 2021

5.0 COMMENTS AND RESPONSES

The following summarizes all written and oral comments received during the public comment period. Copies of comment letters provided to DTSC are included as Attachment 3.

Remedial Action Plan Amendment – Written Comments Received During the Public Comment Period

1. **Commenter:** Tony Verreos, Brisbane Community Member

   Comment 1.1. In my opinion, everyone involved with this project seems to have done very good work. It seems the technology and engineering have learned from past mistakes, and significantly, if not dramatically, improved on the protective measures of the barriers.

The communications are laborious to read. One discussing soils removal and replacement seemed to be saying more than 10X the removed soils will be imported? Are they building a mountain? Other than that, it all looks fine, and my guess is that those who oppose it will never be satisfied.

Response: Thank you for your comment. We appreciate the feedback on communications as well as the protective measures proposed for this Site.

The development will be conducted in phases. For Phase 1 and 2, the developer will import roughly 12,600 cubic yards of clean soil (1,050 truckloads) over an approximately four-year period. You are correct that this is more than the clean soil needed to backfill the excavations that will occur as part of the development construction. The additional clean soil will be used to raise the grade at the Site to address drainage issues and prepare the Site for building construction.

DTSC will require that all import soil be tested to ensure that the new soil being placed at the Site meets our requirements for clean fill.

2. **Commenter:** Danielle Starring, PG&E Environmental Remediation Director

Comment 2.1 We agree with the following statement made in DTSC's (Julie Pettijohn) January 20, 2021 letter to PG&E (Danielle Starring, Greg Ritter) and others regarding this project:

"This redevelopment will provide additional affordable housing and other amenities for the community. The redevelopment requires temporary removal of portions of the existing soil remedy (i.e., cap) and converting Bayshore Park from recreational to residential land use. The conversion of Bayshore Park to residential land use poses vapor intrusion risks if this exposure pathway is not controlled with an appropriate remedy/mitigation measure. While the current residences have not been impacted by vapor intrusion, the redevelopment of Midway Village north of Midway Drive requires an appropriate remedy for vapor intrusion to ensure long-term protectiveness for residential use."

Response: Thank you for your comment. Yes, the RAP Amendment and variance, if approved, will involve temporary removal and replacement of portions of the existing cap. Implementing the RAP Amendment under the variance would also involve a change in land use from recreational to residential for the existing Bayshore Park. As such, the RAP Amendment proposes that vapor intrusion

risks be mitigated by installing vapor mitigation systems below the buildings designed for occupancy, changes to the LUCs, long-term operation and maintenance, and five-year reviews.

Comment 2.2 In regards to vapor intrusion risk for future buildings at Midway Village South, we have two questions: are existing results sufficient to assess the risk in light of (a) the locations of the future buildings and (b) volatilization that may occur as a result of soil disturbance during the redevelopment process?

Response: Soil is contaminated with polycyclic aromatic hydrocarbons (PAHs) north of Midway Drive, but not south of Midway Drive based on soil samples collected. This is consistent with the site history. During construction of the military housing facility by the Federal government, soil contaminated with PAHs was taken from the PG&E property and used as fill on what was then Parcel 4, the present location of Midway Village north of Midway Drive. Grading operations would not cause volatilization of PAHs since there is no source of contaminated fill at south of Midway Village.

Approximately half of the area south of Midway Drive would be redeveloped during Phases 2 and 3 and those phases also include areas of known contamination north of Midway Drive. As such, these redevelopment phases will be conducted under a DTSC-approved Remedial Design and Implementation Plan (RDIP) including a Community Air Monitoring Plan (CAMP). The RDIP and CAMP will provide procedures to be implemented if unknown contamination is encountered. This will provide an additional measure of protection for the community.

The maximum cumulative incremental lifetime cancer risk for soil gas south of Midway Drive was within the US Environmental Protection Agency's risk management range, but greater than DTSC's level for further evaluation. DTSC evaluated the risk estimates for Midway Village south considering the findings from the indoor air study at Midway Village North, an area of greater soil and soil gas contamination. The results of the indoor air study at Midway Village north of Midway Drive found that the soil and building foundations were effective in preventing vapor intrusion. Based on these factors, DTSC concluded that no further action was required for soil gas south of Midway Drive. The remedy to prevent potential vapor intrusion focuses north of Midway Drive due to the presence of soil contamination and the estimated risks associated with concentrations in soil gas.

Comment 2.3 The DRAPA (Draft Remedial Action Plan Amendment) says groundwater at the Site does not currently nor is it anticipated in the future to support any beneficial uses. The RWQCB's (Regional Water Quality Control Board's) Basin Plan says groundwater at the Site is currently used for industrial process supply (PRO) and industrial service supply (IND) and may in the future be also used for municipal and domestic water supply (including drinking water) (MUN) and agricultural water supply (AGR).

a. The DRAPA should (i) be corrected to identify PRO and IND as current uses and (ii) explain how the proposed remedial action will protect current uses (e.g., no one drinks groundwater in PRO and IND scenarios.)

b. The DRAPA should explain why future uses will not include MUN and AGR (e.g., the area is completely built out; all current MUN and AGR users obtain their water via pipe from sources other than groundwater; hence, it's likely all future MUN and AGR users will do the same; plus, a land use covenant will prohibit Site users from using groundwater.)

Response: DTSC agrees with the comment and will require these corrections be made in the Final RAP Amendment and the existing and potential beneficial uses considered. The discussion of the Basin Plan groundwater uses will be evaluated using the State Evaluation Criteria – Effect of Contamination upon Groundwater Resources in the Final RAP Amendment.

The redevelopment Site is located in the Visitacion Valley groundwater basin (https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/planningtmdls/basinplan/web/docs/ADA_compliant/BP_chapter_2.pdf).

The existing beneficial uses for this groundwater basin are industrial process supply and industrial service supply. The potential beneficial uses are municipal and agricultural water supply. However, there are no industrial, municipal, or agricultural supply wells on or near the redevelopment Site (https://smcmaps.maps.arcgis.com/apps/webappviewer/index.html?id=5244f966052348e1aa02eed4ad14f659.).

Comment 2.4 Regarding VMS:

a. What criteria will be used to determine whether to convert from passive to active VMS? Are those criteria sufficient to protect residents from vapor intrusion risk? If so, what are the bases for that conclusion?

b. To stay effective, both passive and active VMS need periodic inspection, maintenance, repair, and replacement forever. What assurance is there that the money to pay for these things will always be available? [Note: lack of funding to pay for maintenance of affordable housing is a documented challenge. See, https://affordablehousingonline.com/blog/hard-maintain-quality-public-housing/.]

Response:

a. For redevelopment phases requiring vapor mitigation systems (VMS), the Remedial Design Implementation Plans (RDIPs) will include criteria for determining whether the passive vapor mitigation system (VMS) should be converted to active. The Draft RDIP for Phase 1 is currently under review by DTSC and includes draft criteria for converting the passive system to active. The RDIPs will only be finalized after approval by DTSC including technical experts from DTSC's Human and Ecological Risk Office and Engineering and Special Projects Office. A Final RDIP is required before each phase of construction that includes a VMS.

DTSC will require monitoring of vapor concentrations from vapor sampling ports below the building foundations (sub-slab). In addition, DTSC will require indoor air sampling prior to occupancy to confirm that the VMS is effective, and the building is safe for occupancy. The data will be used to calculate how much soil gas concentrations are reduced before entering indoor air; this measures what is known as an attenuation factor for the building slab or foundation. The magnitude and trends of vapor concentrations below the building foundations will be evaluated, together with the attenuation factor and other lines of evidence, to determine whether the passive VMS needs to be converted to active.

b. The existing Midway Village is no longer a public housing project, and the new housing will also not be public housing. The redeveloped phases of Midway Village will consist of private, affordable housing complexes managed by MidPen Management Corp. HACSM will remain the landowner of the Site and will provide DTSC with a financial guarantee that the mitigation requirements will be maintained. Since HACSM is a public agency, DTSC does not require them to put up a bond or other kind of deposit with this guarantee.

MidPen, as the affordable housing operator, will have an operating reserve and an annual budget to pay for long-term maintenance.

Comment 2.5 DTSC's January 20, 2021 letter to PG&E (and others) regarding the project said:

"The NBAR allocates 100% of the responsibility of addressing all existing contamination at the Site during and after redevelopment, as joint and several liability, to the Owner (HACSM) and the Operator (MidPen) of these Sites for the new remedy components being implemented under the RAP Amendment (for the caps and restrictions associated with the soils remedy and for indoor air mitigation measures)."

"This allocation is informed by the language in the settlement agreements regarding transfer in ownership or redevelopment."

The language referred to is apparently Paragraph 7.4 of the 2008 Bayshore Park Settlement Agreement, which required documents prepared by Daly City and HACSM transferring any part of the Site or approving the redevelopment project to release and indemnify PG&E for all costs associated with hazardous substances.
https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/8927250504/Bayshore%20settlement%20executed.pdf

The transfer and approval documents were prepared and did not include the required releases and indemnities. PG&E has provided HACSM and MidPen with a release and indemnification that, if executed, would correct this oversight. DTSC should not approve the DRAPA – or the proposed variance to the land use covenants at the Site contemplated in DTSC's (Julie Pettijohn) April 16, 2021 letter to PG&E (Danielle Starring, Greg Ritter) and others – until HACSM and MidPen have executed the release and indemnification and returned it to PG&E.

Response: Thank you for your comment. The purpose of the RAP Amendment is to address soil gas contamination, determine if changes are needed to the prior decision documents, and if so, what those changes should be. The RAP Amendment process is not for the purpose of adjudicating liability. DTSC's January 20, 2021 notification letter sets forth its interpretation of the effect of the settlement agreements if a RAP Amendment were to be approved. PG&E's reference to paragraph 7.4 of the 2008 Settlement Agreement in its comment

regarding the RAP Amendment refers to a mutual covenant between the U.S. and HACSM and Daly City and PG&E. Those promises and obligations are enforceable by those Responsible Parties against each other under the terms of the 2005 agreement, as well as the 2008 agreement.

If there are cooperating parties willing and capable to implement the remedy changes needed, and DTSC can oversee implementation of required remediation so that human health and environment are protected, DTSC need not deny those additional protectiveness measures simply because a dispute is occurring among the Responsible Parties. Any dispute that arises between those parties may be resolved by those parties with all the tools at their disposal, separate from the RAP Amendment process. DTSC expects that the Responsible Parties will comply with the terms of the 2005 and 2008 Midway Village and Bayshore Park Settlement Agreements, and that these Responsible Parties will be able to resolve those issues among themselves.

3. **Commenter:** Audra Pittman, Bayshore Elementary School District Superintendent

Comment 3.1 What is the difference between soil vapor extraction and focused excavation in soil gas area?

Response: Soil vapor extraction (SVE) applies a vacuum to extract air with contaminant vapors from below ground for treatment above ground using a treatment system. The extracted air is typically treated using granular activated carbon acting like a filter to remove the contaminant vapors from the air. SVE does not work well when groundwater is shallow, and soil is wet or even very moist. Clay soil or soil high in organic content is also a problem for SVE. Midway/Bayshore has these conditions. In conditions where SVE would be effective, treatment often takes several years to complete.

Focused excavation removes the contaminated soil in areas with soil gas concentrations above screening levels– the same areas that would be targeted with SVE. (Soil gas is simply the air between solid soil particles.) The contaminated soil is a source of contaminant vapors in the void space between soil particles. Focused excavation can be effective if the subsurface is homogenous and the contaminated soil is completely removed. For this site, the conditions underground are not homogenous due different soil types, utility corridors, and concrete debris that make vapor pathways uncertain. In addition,

the contaminated soil would not be completely removed and remaining contaminated soil would be a continued source of contaminant vapors. (Removing all soil contamination at Midway Village and Bayshore Park was not evaluated to address soil gas contamination because increasing the volume of contaminated soil removed increases risk to the community (i.e., greater risk of air quality impacts, increased traffic impacts), and greater environmental impacts associated with diesel exhaust. Perhaps the most important consideration was that other alternatives were available that were equally health protective.) For sites with homogenous subsurface conditions and a well-defined source of contamination, focused excavation is an effective alternative for cleanup; it does, however, result in greater short-term risk to the community during the excavation process.

Comment 3.2 Why isn't there an option to do soil vapor extraction, vapor mitigation systems, focused excavation in soil gas area, and land use controls and engineering controls?

Response: The effectiveness of SVE is expected to be limited because the soil and shallow groundwater conditions at Midway Village and Bayshore Park are not favorable for SVE. Focused excavation may partially remove contaminated soil but could not fully address the soil gas concentrations that are of concern. Combining the two technologies (SVE and focused soil excavation) would reduce the mass of contamination on the site. However, the combination would not be more effective at preventing vapor intrusion into buildings than the proposed remedy which blocks the vapors from moving into the buildings. The proposed remedy would maintain the existing soil cap and install vapor mitigation systems for all future buildings in Midway Village North. The proposed remedy would also include land use restrictions to prevent digging or using groundwater. The land use restrictions would also require that the remedy be maintained. There would be annual inspections and a review of the effectiveness of the remedy every five years into perpetuity. The proposed remedy was selected based on criteria set in the Code of Federal Regulations. The criteria include health protectiveness, long-term effectiveness, and cost.

Comment 3.3. How do we get to a point where the land is safe enough for residents to have gardens in the ground?

Response: Areas south of Midway Drive, where ownership townhomes will be located under redeveloped conditions, will be allowed to have their own gardens as they are not subject to the land use covenants that require the maintenance of

the hardscape or clean soil covers. This is because the soil there is not contaminated with MGP waste.

Under redeveloped Site conditions, community gardens with edible plants would be installed outside of the areas with land use controls. Other landscaped and outdoor recreation spaces would be capped with clean soil and/or hardscape to protect site users from contact with contaminated soils.

For areas north of Midway Drive, land use controls prohibiting in-ground gardens for edible produce were part of the soil remedy completed in 2002. The land use restrictions do however allow gardens in containers above ground that do not allow roots to penetrate the soil cap. This RAP Amendment is specifically for soil gas and not for soil as that remedy was previously completed and continues to be effective in protecting public health and the environment.

Removing the land use controls that prohibit in-ground gardens for edible produce would require removing the remaining contaminated soil to meet residential standards under DTSC oversight. To do this, the party doing the cleanup would have to request that DTSC rescind or modify the land use covenant. The process would only take place if the property owner proposed another RAP Amendment for soil including a public comment period and meeting, a remedial design and implementation plan, full removal of contamination to residential standards, and a remedial action completion report before the land use covenant could be rescinded. All those steps would be required to ensure that the project is completed in a way that protects public health during and after construction. This could only take place if the property owner or developer initiated the process. It would a lengthier and more costly process and result in greater short-term risk to the community during the process when the contaminated soil is being removed and transported offsite for disposal.

4. **Commenter:** Linda Jansen, Peninsula Family Services Board of Director

Comment 4.1 The Midway Early Learning Center, part of a larger, multifamily residential and park redevelopment, will be built on soil that contains polycyclic aromatic hydrocarbons (PAHs). We understand that mitigation measures for the new building and adjacent outdoor play area will reflect established standards for residential use. Are there separate standards for childcare or outdoor play settings? If not, could you explain why a residential standard is the highest and best standard to rely on for Peninsula Family Service's use?

Response: Thank you for your inquiry. The residential standard is the most protective level of cleanup and this is the standard we use for not only homes, but also schools and childcare facilities. For this site, we are looking at indoor air screening levels for contaminants in soil vapor. We would ensure that levels of contaminants are below those screening levels which are set to protect children and adults. The models that we use assume that the users of the site are residents, which are defined as living on the property from birth through age 26, for 350 days per year, 24 hours per day. The reason that we use this model is that the greatest sensitivities are during early-age childhood development.

Because this model assumes residential use, it is also protective for those on the property who are there for shorter periods of time (such as just during the day while the childcare center is open). We have high confidence that these screening levels protect not only the residents and any visitors, but also the children and staff at the childcare center.

Comment 4.2 Does the residential standard apply to outdoor migration as well as indoor?

Response: Yes, DTSC applies the same screening levels to outdoor air. In an outdoor setting, such as an outdoor play area, any volatile organic compounds found in soil gas would naturally dissipate. The health concern arises in indoor spaces where these contaminants can accumulate over a period of time. By evaluating this Site under the residential standard, DTSC is ensuring the Site will be protective of residents, childcare center children and staff, and other Site users whether in indoor or outdoor spaces.

5. **Commenter:** Dana Dillworth, Brisbane Baylands Community Advisory Group (BBCAG) Founder/Member

Comment 5.1 Apparently your minds are made up, CEQA is to be ignored and this is a perfunctory exercise. To make the guiding reason for your preferred alternative be finances related to a prematurely signed contract, not part of this record, this is a first for me.

Consider the public to be outraged at such a fragmented and piecemealed environmental plan and document.

Response: Thank you for your comments. Please note that the California Environmental Quality Act (CEQA) was not ignored during this process. Rather, the City of Daly City, as the lead agency for the redevelopment, prepared a Sustainable Communities Environmental Assessment (SCEA) under CEQA for the proposed Midway-Bayshore Village Redevelopment Project in April 2020. The SCEA evaluated and summarized its potential environmental effects and recommended mitigation measures to substantially reduce or avoid potential significant environmental impacts. There was a 30-day public review period for the SCEA.

For the RAP Amendment, DTSC reviewed the SCEA and determined that the work related to the proposed remedy was adequately addressed by the SCEA and concurred with the findings of that document.

A copy of the SCEA is available on the City of Daly City's website at: https://dalycity.org/DocumentCenter/View/1006/Midway-Village-Redevelopment-Sustainable-Communities-Environmental-Assessment-SCEA-PDF.

The Draft RAP Amendment supplements the previously DTSC-approved Remedial Action Plan for the Site that included a soil remedy of removing two to five feet of contaminated soil, and placement of either a clean soil or hardscape cap to prevent access to any remaining soil contamination. Land use covenants (LUCs) were also established to restrict certain areas of the Site and require ongoing monitoring and maintenance of the capped areas. This remedy will continue to be enforced throughout the redevelopment project along with the proposed remedy in the RAP Amendment for soil vapor. There would be annual inspections and a review of the effectiveness of the remedy every five years into perpetuity. The proposed remedy was selected based on criteria set in the Code of Federal Regulations. The criteria include health protectiveness, long-term effectiveness, and cost.

Comment 5.2 Prior to PG&E dumping coal tar residue into the marshes, this area was pristine shoreline, tidal marsh. You provide clues, but only mention it in a later section on groundwater. The near surface groundwater level and presence of marsh and the natural creek you call a ditch running through this project area are summarily dismissed if not ignored. You note these remnant wetlands as low spots, of little importance. Apparently, you are unaware of PG&E's earlier mitigation and Brisbane's General Plan Marsh designation to understand its importance. They are wetland remediation and stormwater detention facilities for the PAHs you wish to leave in place. Perhaps you could

include similar natural attenuation methods in your project area? No need for the groundwater to be clean; we dirtied it, no further use? What hubris. Impacts to potential rare and endangered frog, snake, and insect species habitat isn't mentioned, yet you are adjacent to San Bruno Mountain County Park, an ecological wonderland. An endemic environmental hot spot that relies on our stewardship of their watershed. Somehow this information is absent in your Executive Summary.

Response: Habitat for ecological receptors is not discussed in the Draft RAP Amendment, because the Draft RAP Amendment is specifically for soil gas and not for soil. DTSC provided oversight for the previous remediation efforts focused on soil and that remedy continues to be effective in protecting public health and the environment. The Site was previously remediated under DTSC jurisdiction, and the work was performed as required preventing contaminated soil from running off the site in stormwater. The Draft RAP Amendment evaluates soil gas remedial alternatives for future residential receptors.

DTSC is currently reviewing a report on contaminants in groundwater at Midway Village and Bayshore Park. This *Groundwater Investigation Report* addresses ecological risk to off-site receptors. Once we have finalized the report, it will be made available to the public on EnviroStor at https://envirostor.dtsc.ca.gov/public/ (search for "Midway Village"). At DTSC's request, additional groundwater samples from Bayshore Park will be collected for analysis of 34 polycyclic aromatic hydrocarbons (PAHs) to evaluate whether contaminants in groundwater at Midway Village North are moving off-site. If groundwater results indicate a potential ecological risk (if groundwater discharges to surface water), then an ecological risk assessment will be conducted. If significant ecological risks are identified, then remedial alternatives would be evaluated.

Comment 5.3 You fail to mention extent of pollution from this former gas manufacturing use, as you have merely tested five foot deep, 16 borings in 15 acres. Totally inadequate!

Response: Thorough soil investigations were conducted in the 1990s and 2000s to determine the extent of contamination to support the previous soil remedy of hardscape and clean soil covers. A total of 439 soil samples were collected from depths ranging from ground surface to 25 feet below ground surface to characterize soil contamination at the site. The more recent sampling was conducted to determine the extent of soil vapor contamination so that the

proposed soil vapor remedy could be developed. This was done because the redevelopment proposed residential use of Bayshore Park and because soil vapor investigation methods have advanced and environmental regulations have become more stringent since the 1990s and 2000s.

DTSC also oversees investigation and remediation efforts at the PG&E Martin Service Center property, the source of the MGP impacts in the area. As such, we have a detailed understanding of the extent of contamination in the subsurface from former gas manufacturing activities.

Comment 5.4. Serial Land Use Covenants of 1998, 2001, 2010 and yet to be determined future agreements say it all: an error in the system. CEQA frowns upon fragmented environmental work. A problem with always accepting the lowest, cheapest, most passive remediation techniques and not looking beyond your property lines.

Response: DTSC regularly reviews Sites where we provide environmental oversight to ensure the ongoing protection of public health. As a result, what may appear as fragmented environmental work is actually additional work to improve the remedy at the Site. There are annual inspections, and the remedy is reviewed every five years. Advances in scientific knowledge can lead to further remediation and may include additional land use covenants.

The most recent five-year review confirmed that the clean soil caps and hardscape covers continue to be protective.

Comment 5.5 These coal tar sludge-laden lands' current LUC's reflect that they are not good for any life-supporting activity, no childcare, medical or rehabilitation facility, no food production, no water use, no soil exposure, no uses whatsoever…except for housing? What happened to Open Space and habitat restoration? To accept that, you have to have faith that someone crunched the numbers correctly, that reports aren't fudged, and that they understand the environment sufficiently to determine your fate. Have they?

Response: DTSC is part of the California Environmental Protection Agency and it is our mission is to protect California's people, communities, and environment from toxic substances and to enhance economic vitality by restoring contaminated land. DTSC does not have the authority to determine whether a property is used for housing, open space, or commercial use. Once those decisions are made at the local government level, it is within our authority to

impose land use restrictions when warranted to protect human health and the environment. These land use zoning decisions are made at the local government level with public participation. A General Plan is a local government's guiding document that provides a comprehensive long-term plan for the physical development of the city or county. DTSC only has the authority to ensure that conditions are safe for the proposed intended use when sites are redeveloped.

At this Site, the currently permitted land uses are for multiple family residential use of Midway Village and the park use at Bayshore Park. DTSC's remediation efforts have been conducted so that the Site is safe for current residents, the childcare facility, park users, and the community under current land uses with applicable land use restrictions. On June 8, 2020, the City Council of the City of Daly City held a public hearing and approved a General Plan Amendment to allow the redevelopment of Midway Village/Bayshore Park. The Amendment approved the relocation of David R. Rowe Park (also known as Bayshore Park) and designated the new Park's location (along Schwerin Street) as 'Public Park' in the General Plan. The additional remediation work proposed in the RAP Amendment would be protective for future residents, childcare facility users, park users, and the community.

Comment 5.6 Have you considered the impacts from the adjacent PG&E plant and the City of Brisbane studying the need for battery storage?

Workshop "I" – May 6, 2021 7:30 p.m. Utility-Scale Battery Storage

Response: Thank you for calling our attention to this. The City of Daly City would determine the appropriateness of a battery storage facility in proximity to residents. Any sites proposed for battery storage would need approval from the City for that use. DTSC encourages you to connect with local elected officials to discuss this further.

Comment 5.7 Have you considered sea-level rise "from five to ten feet or more by century's end" (Wasserman 2018 report) and liquefaction of the un-engineered fill which you only require two feet of clean soil as an adequate remediation? Where is the comprehensive plan versus the piecemeal, patchwork, learn as-you-go, another trial-and-error human housing experiment? Hinkley Déjà vu.

Response: According to the document titled *Adapting to Rising Tides: Short Report Summary of Regional Sea Lea Level Rise Vulnerability and Adaption*

Study (2020) prepared by BCDC (San Francisco Bay Conservation & Development Commission), MTC (Metropolitan Transportation Commission), and ABAG (Association of Bay Area Governments), the least-likely scenario is 46.8 inches of sea level rise by 2060. Under the Likely Range scenario, the sea level rise would be 48 inches by 2120.[1] As the Chair of BCDC, Mr. Wasserman was one of the signatories on the report.

As discussed in the SCEA, the lowest portion of the Midway Village project site, which is a little more than one mile west of the San Francisco Bay Shoreline, is approximately 8 feet (or 96 inches) above mean sea level. The Site is also outside of the influence of sea level rise as shown on the National Oceanic and Atmospheric Administration sea level rise map (NOAA 2019). Therefore, Rockridge Geotechnical judged the risk of sea level rise directly impacting the project (including the remedy) as very low in a letter dated May 10, 2021 to MidPen. DTSC concurred with that judgment. Rockridge Geotechnical provided an initial site-specific geotechnical report (in Appendix G of the SCEA) and have provided technical consulting during the redevelopment design phase.

The two feet of clean soil is being placed as a cap and is not meant to address liquefaction. The potential adverse impacts of liquefaction, as well as the presence of existing fill overlying a marsh deposit, will be addressed by improving the ground beneath the northernmost two buildings.

Comment 5.8 Rather than keep promoting a mistake of risking people's lives, every day working and playing in an unsafe former industrial area, <u>you must require the entire removal of the sludge as recommended in Alternative 4.</u> However, time is of the essence. Clean up should be total, all at once- not a staggered, patchy, pollute-and-expose residents over time project. That is a direction in your mission to protect the public from exposure to toxic chemicals if you think living in a construction zone for multiple years is an acceptable environment.

Response: DTSC reviewed a range of remediation options to address soil gas including Alternative 4 according to a set of criteria established under state and federal law. DTSC determined that the proposed alternative – vapor mitigation systems with land use covenants and ongoing monitoring and maintenance of the soil and hardscape caps – represents the best balance of all criteria

[1] According to California State Guidance, under the H++ scenario (which represents the highest risk and least likely scenario that assumes high rates of Antarctic ice loss) sea level rise could reach 46.8" by 2060. Under the Likely Range, or Low-Risk Aversion high-emissions scenario, 48" of sea level rise will not occur until 2120.

considered. We did not select Alternative 4 because it can be very difficult to reliably excavate soil to remove contamination in soil vapor, and it increases risk to the community during the construction when large quantities of waste are disturbed. Mitigation measures such as those proposed in the preferred alternative are effective measures that still provide long-term protection of public health.

Comment 5.9 How can these be the only certifiable Environmental Impact Report remedial choices? Where's the Common Sense LUC alternative of no housing, no human use without full clean up?

Response: DTSC does not have jurisdiction over the land uses at any given Site. However, we do oversee projects to ensure that the remediation conducted at a site is protective of public health and the environment for the current and/or proposed land use. For this Site, residential land use is proposed so the preferred alternative and current remedy is held to residential environmental standards.

The City of Daly City reviews land uses and more information regarding their review of this development can be found in the Sustainable Communities Environmental Assessment (SCEA) they prepared in April 2020. A copy of the SCEA is available on the City of Daly City's website at: https://dalycity.org/DocumentCenter/View/1006/Midway-Village-Redevelopment-Sustainable-Communities-Environmental-Assessment-SCEA-PDF.

Comment 5.10 Throwing a meager layer of clean dirt on top, requiring a test and fill crack program, ignoring global warming and earthquake potentials is not a way to protect the public's health. You have not adequately explored exposures from liquefaction during an earthquake so your mitigation measures are not adequate.

Response: Capping is a commonly used and very effective method for addressing contaminants in soil as it blocks the potential exposure pathway between the contaminated soil and people, thereby minimizing risk. The use of caps is also a sustainable remediation method as it reduces material put in landfills and minimizes truck traffic and associated air pollution and greenhouse gas emissions. The cap is not meant to address liquefaction. The SCEA addresses the question of liquefaction and provides corresponding mitigation measures (see Section 4.7 and Appendix G of the SCEA).

Comment 5.11 Where is the San Mateo County Department of Environmental Health's response to this proposal? Where's their response behind such a piecemealed approach? A continuous health study of the present and future residents should be required, rather than make suppositions that there has been no exposure, no risk, and that your systems are effective, or that all impacts are adequately considered from the present, limited testing status. A complete health study of present and future residents should be a requirement.

Response: The San Mateo County Department of Environmental Health was notified of the public comment period on the Draft RAP Amendment, and we have not received any comments from them.

DTSC has been supportive of past health studies conducted at the Site and would be supportive of future health studies. From our study of Site conditions, the Site is protective of the health of residents and the surrounding community in its current condition. The additional activities in the RAP Amendment will ensure the Site remains protective for future residents and the community under the new development. The caps will continue to be monitored and maintained annually and DTSC will complete a review of remediation methods at the Site every five years to ensure the remedies remain protective. Should Site conditions change, DTSC would require additional measures to keep residents and the community protected from significant risks related to the residual contamination.

Comment 5.12 It is not right to ask future residents to add this to their chemical load or expect that layers of unproven Glad Wrap plastic between them and chronic illness, infertility and perhaps death is an acceptable risk mitigation. My, how far we have strayed.

Response: There are proven engineered technologies that block exposure pathways. The clean soil and hardscape caps act as effective barriers to remaining contaminated soil. The vapor mitigation systems will work in a similar manner by blocking vapors below the building foundation and venting vapors through piping and out into the air above the roofline so that the vapors are not impacting indoor air. The vapor mitigation systems may be switched from passive to active systems, if needed, allowing for greater flexibility and protection should Site conditions change. By blocking vapors from intruding into indoor air, those who use the buildings will be protected from exposure to these chemicals.

Comment 5.13 It is worth the extra money to ensure the cleanup is adequate for future generations. Your concept of the diminution of Chemicals of Concern in a one-time study is another way of confirming it is continuously off-gassing, continuously putting communities at risk. Such spotty and insufficient studies that support turning your highest concentrations of cyanide and naphthalene into a community recreation area – in itself shows you haven't considered these additional unacceptable risks.

Response: DTSC required soil gas sampling in 2018/2019 and indoor air sampling of residences in 2019 to understand current Site conditions. These results found that the soil and building foundations are effective barriers between chemicals in soil gas and indoor air in the current buildings. DTSC also has conducted five-year reviews of Site conditions since the completion of the original remedy in the 1990s and 2000s. Each of these reviews has found that the clean soil and hardscape caps have provided an effective barrier between the contamination soil and residents/community members using the Site.

Finally, the alternatives in the RAP Amendment were evaluated according to a set of criteria established under state and federal law. The chosen alternative represents the best balance of all criteria considered, including long-term protection of human health.

Comment 5.14 This document is inadequate as a CEQA document as it needs to consider the Public's health and the environment as a whole, not as a means to receive a grant.

Response: The RAP Amendment only considers the environmental impacts and mitigation measures needed for the remediation project, not those required for the entire redevelopment project. The City of Daly City prepared the Sustainable Communities Environmental Assessment (SCEA), a CEQA document, to cover the entire redevelopment project. DTSC reviewed the SCEA and concurred with the findings related to the remediation project. A copy of the SCEA is available on the City of Daly City's website at: https://dalycity.org/DocumentCenter/View/1006/Midway-Village-Redevelopment-Sustainable-Communities-Environmental-Assessment-SCEA-PDF.

6. **Commenter:** Mark A. Rigau, Senior Trial Counsel, US Department of Justice

Comment 6.1 The United States offers several observations and comments on the DRAPA (Draft RAP Amendment). Overall, as described/written,

the proposed remedial action (which consists of the installation of vapor mitigation system ["VMS"], replacement of cap/fill, and institutional controls and monitoring) appear likely to be at least as or more protective than the remedy that is currently in place for the completed project. That said, it is apparent that many of the details are not included in the DRAPA and are proposed to be presented in the Remedial Design and Implementation Plans ("RDIPs") for the various phases of the development (e.g., specific areas where capping will take place, utility trenches will be located, etc.).

Response: Thank you for your comments. The Draft RAP Amendment is developed to summarize the investigation findings, screen remedial alternatives, and provide the proposed remedy to address soil vapor impacts at the Site. The Remedial Design and Implementation Plans will provide further specifics for how the remedy will be implemented for each phase of development. The RDIPs will include the design for building vapor mitigation systems, the specific areas where capping will take place, community protection measures, and more. An RDIP will be done for each phase so that specifics can be tailored to the redevelopment plan for each phase on this project since the site logistics will differ between phases and the overall development construction covers a span of 10 years. The RDIPs will be completed and must be approved by DTSC (and its team of technical experts) before each phase of construction can begin.

Comment 6.2 The DRAPA should provide detailed information from prior studies prepared for the project. For example, on April 6, 2020, Daly City published an environmental assessment ("EA") for the proposed project. See: https://dalycity.org/DocumentCenter/View/1006/Midway-Village-Redevelopment-Sustainable-Communities-Environmental-Assessment-SCEA-PDF. The EA states that the "maximum depth of cut and fill onsite would range from 13 to 26 feet" and would affect "12 of the 15 acres" of the site. *Id.* At 2-52. The DRAPA notes that cap material from Village North or Fill Material from Village South may be moved within or between various portions of the Site, managed or re-used without the need for sampling. This assumes that these materials do not contain contaminated fill material, though it is not entirely clear if this is the case given that the stated 13 to 26 feet depth of cut and fill would go significantly deeper than the existing remedy cap. DTSC should require the DRAPA to be amended to include more details of the proposed subsurface work and identify the sampling and mitigation measures that will be implemented to address any environmental issues that may arise.

Response: The Draft RAP Amendment dated March 4, 2021 that was released for public comment states "*Cap material from Midway Village North or fill material from Midway Village South may be moved within or between various portions of the Site if required sampling and analytical results confirm the cap material and fill material is suitable for reuse. Reused soils must meet current standards for fill material. Fill material must also be screened for naturally occurring asbestos. The sampling frequency and required analytical testing will be outlined in the RDIPs.*" In addition, DTSC will require sampling be completed for any clean fill that is brought onto the Site whether that is from the Midway Village south area or another source to ensure it qualifies as clean protective material in accordance with DTSC's *Information Advisory: Clean Imported Fill Material* (2001).

DTSC will review and approve the details of subsurface work, sampling, and mitigation measures in each of the RDIPs prepared for the phases of construction. As noted in the response to **Comment 6.1**, the development is phased over a number of years and this allows us the flexibility to address work specific to each phase of the project.

Comment 6.3 Similarly, because of the depth of the proposed cut and fill and trenching activities, groundwater should be evaluated as part of the DRAPA. While polycyclic aromatic hydrocarbons are generally not very mobile in groundwater, impacted groundwater in certain areas may affect outdoor air concentrations, and should be considered during the design of the VMS. Further, workers may be exposed to impacted groundwater during construction activities.

Response: The proposed remedy addresses the potential for vapor intrusion into new occupied structures north of Midway Drive whether the source of the vapor is from groundwater or soil or a combination of both. The vapor mitigation system will be designed to remove vapor from beneath structures and block the potential exposure pathway of vapors below the foundation from entering indoor air. DTSC is also requiring that soil and groundwater management protocols be included in the RDIPs to ensure appropriate measures are taken during soil disturbing work given the likelihood that contaminated groundwater will be encountered. The RDIPs will include a health and safety plan with monitoring requirements, action levels, and hazard controls for worker protection. These measures will control exposure of construction workers to contaminated soil or groundwater. In addition, the RDIPs will include a Community Air Monitoring Plan (CAMP) to ensure that residents and the community are not exposed to dust and vapors emanating from the construction site be it from contaminated soil or groundwater.

Comment 6.4 Although the VMS (as described) should adequately address potential indoor air pathways, it is unclear as to whether the outdoor air pathway is adequately addressed. This may be discussed further in future RDIPs. The DRAPA should be amended to include additional information regarding VMS, including potential volatilization of hazardous substance and impacts due to grading activities.

Response: DTSC will require additional construction phase-specific information in the RDIP to address the potential volatilization of hazardous substances and any impacts due to grading activities. A DTSC-approved CAMP will be implemented to protect nearby residents, commercial workers, and the public from exposure to PAHs, VOCs, and dust in ambient air during construction. Worker health and safety air monitoring will be included in the General Contractor's Health and Safety Plan, which will be prepared by a Certified Industrial Hygienist. The General Contractor's implementation of the RDIP will be overseen by MidPen's environmental consultant and DTSC.

Comment 6.5 As noted in DTSC's January 20, 2021 notice letter, there are two settlement agreements for the Midway Village and Bayshore Park Sites. In 2005, HACSM, Daly City, PG&E, and the United States (collectively the "Responsible Parties") entered into a settlement agreement with DTSC regarding the Midway Village Site. In 2008, DTSC entered into a settlement agreement ("2008 Settlement Agreement") with the Responsible Parties, principally to add the Bayshore Park Site, though the 2008 Settlement Agreement contains provisions that cover both Midway Village and Bayshore Park Sites. The 2008 Settlement Agreement provided for the reimbursement of DTSC's response costs, imposed obligations on Daly City and HACSM, and provided releases and reservations. Relevant here, the 2008 Settlement specifically provides:

> Any documents prepared by Daly City or the Housing Authority that effectuate the transfer in ownership or approve the redevelopment of the Bayshore Park Site, or any portion of the Midway Village Site, will provide releases from liability and indemnification to the United States, PG&E, Daly City, and the Housing Authority for any and all costs associated with hazardous substances at the sites from the individuals or entities accepting ownership or, undertaking any redevelopment on, those sites.

See 2008 Settlement at Section 7.4 (emphasis added).

Based on the recently disclosed documents, it appears that Daly City and HACSM are in breach of the 2008 Settlement. MidPen Housing Corporation, while not a party to the original settlement, was required to provide the releases and indemnification as part of any transfer in ownership or redevelopment documentation produced for either the Midway Village or Bayshore Park Sites. The requisite releases and indemnification from HACSM and the developer should have been included in each document associated with the redevelopment proposal, including the documents relating to the selection of MidPen as the project developer and the long-term lease. *See, e.g.,* San Mateo County Resolution File #20-641, dated September 15, 2020 (San Mateo County Board of Supervisors resolution authorizing the Executive Director of the HACSM to execute a certificate of acceptance and an Affordable Housing and Property Disposition Agreement, including a 99-year lease of the property, and related redevelopment documents with the developer, MidPen);https://sanmateocounty.legistar.com/LegislationDetail.aspx?ID=4640722&GUID=B5642605-836E-4D42-8BE8-D180EC2768B0&Options=&Search=

Numerous redevelopment documents, including the DRAPA, and at least one transfer in ownership that have been submitted to DTSC do not include the releases and indemnification required under Section 7.4 of the 2008 Settlement.

As noted in DTSC's January 20, 2021 letter, under the settlement agreements Daly City is obligated to maintain the remedy for the Bayshore Park Site and HACSM is obligated to maintain the remedy for the Midway Village Site. DTSC's letter further stated that the Non-binding Allocation of Responsibility ("NBAR") "allocates 100% of the responsibility of addressing all existing contamination at the Site during and after redevelopment, as joint and several liability, to the Owner (HACSM) and the Operator (MidPen) of these Sites for the new remedy components being implemented under the RAP Amendment." However, the 2008 Settlement Agreement releases and indemnification are much broader in scope. Because the proposed Midway Village redevelopment includes grading and trenching of depths up to 26 feet (well below the average groundwater depth), groundwater should be included in the NBAR allocation of liability. *See supra,* Comments on the DRAPA.

The documents relating to the DRAPA, as well as related studies and other documents submitted to DTSC, do not contain the releases and indemnification provisions required under the 2008 Settlement Agreement. As a result, the United States requests that DTSC require compliance with the terms of the 2008 Settlement Agreement prior to any further development approvals. The United

States is willing to work with DTSC, HACSM, MidPen and PG&E to find an acceptable solution.

Response: Please see the above response to **Comment 2.5** regarding enforcement of the Settlement Agreement.

7. **Commenter:** Clara Johnson, Acting BBCAG Chair

Comment 7.1 The BBCAG believes that all buildings built on the Midway Village property should have active soil Vapor Monitoring Systems and that they should be reported on quarterly for the first two years and semi-annually for the subsequent thirty years. Monitoring for soil vapor in park and hardscape areas should continue for 30 years and reporting should occur at semi-annual intervals.

Response: Thank you for your comments. Contaminants from former gas manufacturing activities are present in soil north of Midway Drive, but investigations have not found this contamination south of Midway Drive. In addition, a risk assessment found that there is not a significant health risk south of Midway Drive that would warrant the need for vapor mitigation systems. As such, DTSC concluded that no further action was required for soil gas south of Midway Drive.

For properties north of Midway Drive, DTSC will require pre-occupancy monitoring of vapor concentrations below the building foundations using permanent sub-slab (beneath the ground) vapor points combined with indoor air sampling in each building to confirm that vapor mitigation systems are operating effectively, and the building is safe for occupancy. Annual vapor mitigation system monitoring will be discussed in the Remedial Design and Implementation Plan and the Operations and Maintenance Plan. DTSC is currently reviewing the monitoring schedule.

The data collected for the soil vapor remedy will be reviewed at least annually to assess whether vapor mitigation systems should be switched to active. Additional frequency of monitoring may be established depending on data results. Every five years, DTSC will review the health protectiveness of the remedy.

Comment 7.2 The new cap on Midway Village north should be more protective than the current cap. Since many complaints were received of negative impacts on human health when the old caps were relied upon to protect human health, a better cap will provide a margin of error.

Response: The new cap that would replace the current cap is similar to other caps that are already used in remediation projects on other sites. Clean soil and hardscape capping technology has not changed significantly since the original caps were installed and it is still an effective measure to protect the health of current and future residents. DTSC has conducted five-year reviews of the existing clean soil/hardscape caps since they were installed and each review has found that the caps continue to be protective of public health and the environment.

Comment 7.3 We are very concerned about off-Site migration of contaminants in groundwater. There should be more monitoring locations on the north and east sides of the Midway property and some on the adjacent PG&E Martin Service Center since the drainage flows toward the Bay. The path of drainage from this site and the adjacent PG&E Martin Service Center runs through the Levinson Marsh under Bayshore Blvd. through the brick arch tunnel through the north ditch to the internal drainage channel on the Baylands under Hwy 101 and into the Bay. The Amendment states that the monitoring of groundwater at Midway is ongoing. That is a good thing, because the amount of contaminants that are finding their way offsite may depend on the amount of rainfall and the amount of water in the Levinson Marsh. There should be monitoring done of the drainage downstream beyond the Levinson Marsh. Perhaps, there are COPC's that migrated into the Marsh and that are slowly leaking from it through the City of Brisbane's Baylands area into the Bay. How will we ever know unless you investigate? Using a formula result of what RWQCB thinks should have happened, may not account for a probably contaminated Marsh, that should be, but hasn't been tested in a long time, if ever.

Response: DTSC is currently reviewing a *Groundwater Investigation Report*. Once we have finalized the report, it will be made available to the public on EnviroStor at https://envirostor.dtsc.ca.gov/public/ (search for "Midway Village"). At DTSC's request, additional groundwater samples from Bayshore Park will be collected for analysis of 34 polycyclic aromatic hydrocarbons (PAHs) to assess whether contaminants in groundwater at Midway Village North are moving off-site. If groundwater results indicate a potential ecological risk (if groundwater discharges to surface water), then an ecological risk assessment will be conducted. Without clear lines of evidence that contaminated groundwater from Midway Village is moving off-Site to the marsh or the Bay, DTSC would likely not require additional groundwater sampling in Midway Village as part of this project.

Comment 7.4 The transportation of excavated dirt from and to Midway Village will create heavy long-term truck traffic. The cities of Brisbane and San Francisco should be involved in planning the routes and timing of this traffic.

Response: Thank you for your suggestion. DTSC does not provide oversight over the final truck routes as these are reviewed and approved by Daly City. However, MidPen has obtained confirmation from the City that they plan on offering neighboring jurisdictions the chance to review the proposed truck route since the route will inevitably run through their jurisdictions.

Remedial Action Plan Amendment – Questions/Comments Received and Addressed During the Public Meeting with Clarifications to Responses as Noted.

8. **Commenter:** Clara Johnson, Acting BBCAG Chair

Comment 8.1. In the presentation, you said that there would be a cap of the same type that is already being used under current buildings. I wondered why you wouldn't have a better or improved cap, given it has been a while since the previous cap was built?

Response: The cap that would be replaced is similar to other caps that are already used in remediation projects on other sites. The technology of the cap has not changed in the way that the technology for evaluating soil gas and vapor intrusion has changed over the years and it is still an effective measure.

Comment 8.2. Wouldn’t it be a good idea to have some additional type of item that is placed under the foundation to make the cap function better?

Response: The new buildings would have a vapor barrier (Vapor Mitigation System, or “VMS”) that does not exist under the current buildings, so in that sense, this would be an improvement to the protectiveness of the property with the redevelopment.

Comment 8.3. How confident are you about the direction of the groundwater? This area is uphill from Bayshore Boulevard and I understood the drainage might go through the 11th and Marsh intersection, then it goes through the Rick Arch sewer under Bayshore Boulevard, and it flows into the area that is part of the Baylands and located in Brisbane. I'm concerned about how contaminated the water is that's flowing through the whole system that ends up in

the Bay. I understand your investigations of the groundwater that may be going off-site are not complete and wonder why you went ahead now without having that information. Is there any possibility that you will need to change both the development and your amendment, if you find that it is that there is off-site contaminated water? Also, will there be on-going monitoring of the groundwater?

Response: The previous investigations that were done at Midway Village and Bayshore Park didn't identify contaminated groundwater transport off-site as an issue of concern. However, during recent investigations we found groundwater shallower than we understood from the previous investigations.

DTSC is collecting this data now out of an abundance of caution and we are hopeful that, because of the characteristics of the contamination, the potential for off-site transport via groundwater to surface water is low. At the same time, it is important to evaluate this pathway to be sure.

For context, the shallow groundwater was found during the recent soil gas investigation that was conducted to evaluate the risk of putting housing on Bayshore Park where housing has not existed before. During this soil gas investigation, we found groundwater just below the surface that was not there during the original survey. We knew that the groundwater was potentially in contact with the MGP contamination, so we wanted to evaluate it and make sure that we were addressing both the pathway that Clara was talking about and make sure that there weren't any implications for the redevelopment or the people that are on the Site right now.

DTSC asked the County (clarification: Housing Authority of the County of San Mateo) to perform a groundwater investigation to determine if additional action will be necessary. We are currently reviewing the results of the groundwater investigation and when the investigation report is final, the County will be responsible for implementing any appropriate recommendations that come out of that report. For example, if we review the results and we find that it is appropriate to do monitoring, then the County would implement that.

Comment 8.4. Would the County hire an environmental firm to make this investigation? If they are not, isn't that a conflict of interest since they own the property? If they have, I just want to know if they are using County employees or if they are hiring an independent company.

Response: The County has consultants that are working for them, and any of this work that the County does will be conducted under DTSC oversight.

Comment 8.5. The tenants who have occupied Midway Village have been very vocal and persistent in their allegations of the harm that has come to them, based on their living there. Yet you are saying that your testing showed there weren't any VOCs entering their units. If that is not how they were exposed, then how were they exposed? It seems like a kind of a mystery. If everything was working fine, why was there allegations of various kinds of harm? This started about 10 years ago.

Response: DTSC has concluded that the current conditions on the Site are safe for the residents at Midway Village and the soil remediation that was completed in 2002 remains protective.

DTSC first got involved with the site in 1990, so I'm not quite sure how to address concerns that are based on a time prior to when DTSC was involved.

Comment 8.6. My last question is with relation to all the truck trips. This location is located across the street or across let's say two streets from San Francisco, and it's located very close to Brisbane. So, when you talk about how Daly City is going to figure out what the best route, will they be consulting with San Francisco and Brisbane? The trucks will have to go through either one of those cities before they get to 101 and it can be a big issue depending on the traffic.

Response: That's a good question. DTSC will follow up with MidPen and the Housing Authority regarding this. (Since Ms. Johnson posed this question during the public meeting, DTSC has followed up with MidPen regarding coordination of the traffic plan with neighboring Cities. The City of Daly City has informed MidPen that they plan on offering neighboring jurisdictions the chance to review the proposed truck route since the route will inevitably run through their jurisdictions.)

9. **Commenter:** LaDonna Williams

Comment 9.1. You mentioned that the current conditions are safe in Midway for the residents. However, during your presentation, you said that there is no vapor barrier that exists currently, but you guys will be implementing one

later. This tells me all of this time, the residents have been exposed to vapor intrusion, correct?

Response: No. Recently there was testing of indoor air quality in various units in Midway Village north and the childcare center, and the results indicated that existing building foundations have been protective against soil vapor intrusion. There is new development that's being placed on Bayshore Park, so there is going to be housing in an area that hasn't been developed with housing before. However, all residential buildings north of Midway Drive will have the vapor intrusion measures placed under them, not just buildings in the Bayshore Park area.

Comment 9.2. You mentioned there is going to be housing built on the park, so we get that there is no housing there right now. But in the past, and maybe currently, that's the area where the schoolchildren used to be able to go play and do their physical ed requirements. I'm referring to the current housing, as it exists now, since there are no barriers in place. Are the residents not being currently exposed until you make these proposed changes?

Response: No. DTSC conducted an indoor air study, during which we collected samples from the air beneath the foundations and in the indoor air. We did not find that the soil vapor was moving through the soil and foundations into the homes.

Comment 9.3. I know there has been a health study in the past, but my other question is when was the last time a human health study has been done on the residents? There was documentation that showed contaminants being drawn not only up under the units, but from the outside into the units through their heating system. There were pictures taken in different residents' apartments, where they had vegetation or weeds growing in cracks that were literally coming up through their floorboards and alongside the wall. We know that there are some elements getting into places, but many residents were also complaining of breathing problems and issues that were going on.

And Mrs. Clara, thank you for your questions. You mentioned that you haven't heard of complaints lately, but she did know that they were adamant about health concerns in the past. We also know several of the residents have passed away and several of those residents were the main ones that were complaining because they knew of the historic and current contamination.

I know you guys have spent lots of money in this redevelopment plan and you are sitting here confidently claiming that the residents are safe. However, you admit that there is contamination underneath the homes and that there has been

some sort of remediation, which is what the two feet or five feet of concrete that is supposed to be this barrier, yet folks can't even plant gardens currently.

The issue that I have is you have got this fantastic plan to remediate and keep low-income and disadvantaged people on a toxic dump and there is no one asking if it is humane to keep people living on a toxic dump site that is next to PG&E where these contaminant levels have been tested at 500,000 PPMs in certain areas. Is there anyone amongst you all that will say you know something is not right here? We have been taught your mission is to protect human health and the public, yet you are okay with going ahead with the development and building on a toxic dump site that has historically been contaminated. You have residents who have lived there for years then passed away, and that isn't raising any level of concern with you people.

My last comment is: Are any of you - Kim and the others, the toxicologists, the geologists, the new folks that are coming in to build - are any of you going to live on this site with your families?

Response: The work that DTSC is overseeing is to evaluate the Site and the plans for the redevelopment to ensure that Site is safe for anyone to live there. For current residents, we did an indoor air study and an evaluation of the concentrations underneath the buildings in 2019. This survey was conducted by a consulting firm hired by the Housing Authority, and the firm worked under our oversight. The firm’s name is Langan. They posted the results of the report on Envirostor.

DTSC also provided summaries of the information to the residents. We met with the residents whose homes were sampled to sit down and discuss the results, then we provided a written letter to them with the data so that they would have that directly.

Comment 9.4. How many homes were tested?

Response: DTSC responded that several homes were tested but did not have the exact number during the public meeting. Since the public meeting when this comment was received, DTSC has confirmed that 13 indoor air locations were sampled: four indoor air locations in the Midway Village Office, Community Center, and Bayshore Child Care Center, and nine indoor air locations from the residential units at Midway Village. Each location was sampled twice; once in February 2019 and once in October 2019.

For more context on your earlier questions, DTSC works on several former manufacturing gas plant sites, as Asha has indicated. These MGPs are all over the Bay Area and in San Francisco because before there was electricity in buildings, gas was the way that people got lighting and heating into their homes. Unfortunately, that left some byproducts. It used to be legal to do anything with this waste before modern environmental regulations. It is an unfortunate thing, but I can tell you we work on several redevelopment projects all over the Berkeley Regional Area, from Monterey County north to the Oregon coastal border. We also have plenty of other properties that DTSC and other departments work on that are redevelopment properties and by and large, no property is essentially pristine. That is why DTSC goes to great lengths to investigate the site, look at the past history, look for contamination and come up with a remedy or combination of remedies – so that we can be certain that once the redevelopment occurs and after it is complete down the road, the future land users will be safe.

Comment 9.5. I appreciate that, but I noticed you mentioned Berkeley. The majority of these remediated sites or contaminated sites house low-income minorities, particularly African Americans in these areas and on these sites. That is a historic fact, so I know on your end when you guys look at this it's sort of normal, as you mentioned, and you feel these former MGP sites are all over the place, and at one point they were legal.

Here in Vallejo, we are dealing with the same exact thing, where there was a PG&E former MGP that is located right next to low-income housing with young children and you're finding the same health abnormalities there that you found in Midway and Treasure Island.

Parts of Hunter's Point, Sunnydale and Potrero Hill - these are all areas where there is largely disadvantaged and low-income minority populations. The problem is it has been an acceptable practice to allow the most vulnerable to live on a contaminated dump site and at what point do the folks in charge say we have to do something different.

It's like what we're seeing played out on national television with policing against African Americans. It has been an accepted practice that is a genocide of a population of people because of their racial background or their racial makeup. But they both equal genocide. At what point do we push the envelope and say that it is not acceptable to allow people, the most vulnerable people, to live on a toxic dump and we go about our lives, like everything is okay?

Response: We hear what you are saying, and DTSC is working on expanding our reach with the new funding initiative. Moving forward, we'll make sure we are able to connect with communities in areas where there are no redevelopment efforts happening.

There are going to be opportunities for public input on how to spend that money, so we will make sure that you are added to that list and can get involved.

Comment 9.6. Will the public's input actually be taken or is it a process to give public comment, then it is ignored, and the agency goes on to do what they were planning on doing anyway?

Response: That's why we want to hear from you. DTSC has new leadership and management, starting with the Office of Environmental Equity. We are trying to do what we can and expand our reach, so that we can do better. We need your voice to participate, because I think you will be able to move things in the direction that you'd like to see.

Comment 9.7. Well, I'm hoping that it really is a new direction for DTSC, but I'm disappointed to hear that your Site Chief thinks that Midway Village is safe when there is no updated information on the health of the community or historical analysis to see how many people have passed away that have been long-time residents. I'll stop there because I know we have to stop at eight but thank you for taking my comment.

Response: Thanks so much, LaDonna. Before you go, we will provide you with the ATSDR studies that you mentioned having a hard time finding. (DTSC provided Ms. Williams with links to the ATSDR studies on April 21, 2021 as promised.)

10. **Commenter:** Lonnie (no last name or affiliation provided)

Comment 10.1. I knew someone who worked over in that area and I was fully aware of what was going on around there. He told me about some things that he was afraid of – he said it was very dangerous and that he didn't like working in that area. I'm hearing the same thing from you folks that I hear from the Restoration Advisory Board for the shipyard. The same exact answers. They also said it's safe, we did these tests and look what's going on now. That's the problem.

Can you provide statistical data about those residents, who's homes you went to? How long have they been living in that community? I'm curious how long they have been living on the premises.

It would have been good if you could have done some testing with individuals who have been living there 15 or 20 years and weren't able to leave, as Mrs. LaDonna Williams was saying. These individuals are poor. They have no way of being able to find other areas to live because of their situation. This is a disadvantaged community.

It's important that we can assist those individuals who are not feeling well. I'm wondering how many long-term tenants you have actually talked to. I know there is some type of respiratory problem, because back in 1991 through 2008 or 2009, people had some serious problems. I'm just concerned to some of the things that you are saying, because it doesn't sound right. Can you provide that data for me? I will appreciate that because I would like to know how long all of those tenants that they've tested have they been there.

Response: First, I'd like to clarify what work DTSC did because something Lonnie mentioned is making me think that there might be some confusion about the type of study that we did. Our study was not a study of the health of the current residents at Midway Village; it was sampling the indoor air and sampling underneath the buildings to figure out if the VOCs could be getting out from underneath the building and into the indoor air.

We didn't perform a health assessment. We're not doctors or nurses. We're scientists and engineers and have been gathering information to make sure that that pathway of vapors moving into indoor air wasn't complete and that there wasn't exposure.

In selecting the testing locations, we used the soil gas data that was collected before the indoor air study to try to identify areas that we should target. We were looking for the most likely areas where there might be vapors moving into indoor air. Another criteria we used to select spots was determining a solid cross section of some of the current residences. We wanted to have good spatial coverage over the Midway Village development.

Comment 10.2. That doesn't answer my question. Here's the issue: I understand that you went down to collect those samples, but it is kind of heinous

for them to not check on the people that live there and to reach out to them asking if they have any health problems or health issues.

What was the purpose of that? I understand that you have to find out and you had to go through that process, but I don't particularly like the people that you choose. I think you should have worked with people from the community to have them set the narrative, not anyone else, because this is their health. Rather than the consultants that are hired by PG&E because they are going make sure they provide the data that PG&E wants. PG&E have been in many situations like this in the past and I say that as someone who used to work for PG&E. I'm very aware of some of the things that they've done in the past and they're still doing the same thing and are not concerned about the people's health.

People's health should be the main focus and, on top of that, when it comes to the testing and sampling, it should be more cohesive. Let's find out how these individuals are feeling in this community, and how long they've been living there, and what kind of problems have they had in the past and present. Thank you.

Response: Thank you for your comment – we do appreciate it.

11. **Commenter:** Pat Dodson

Comment 11.1. I have noticed that Mrs. LaDonna Williams brought up some questions that you can't answer. I see the hesitancy of the people when she asked, "Would you move your families here?" I heard no answer, but I heard interruptions from something else.

That says a lot. You don't mind hurting other people as long as it's not you. That's bad. That's really bad. I don't know how long you plan to put people on this site again, but I hope you change your mind and make sure it is safe. We have a similar site in Vallejo and the PG&E people are out here now trying to mitigate soil contamination from years ago and it's been buried under the cement. I don't know what they're going to do because it's been there almost 100 years. I'm guessing that the same kind of problem exists in this other land area. I'm hoping that you can clean it up, but it doesn't sound like it's going to be successful. I just hope that the developers and the engineers make sure it's clean or change their mind and do something else with the property where human life is not at stake.

That's what I'm asking. We have enough people sick already. Please don't add to it by using the property. It may be worth a lot of money, but please use it some

other way, if there are health impact still and you can't address them. The biggest thing that you said was your silence when asked would you move you or your family in that place. Not a peep. It was very quiet. Thank you very much. I'm through.

Response: Thank you for your comments, Pat. The work that we are doing is to make this development safe for anyone: you, me, your neighbor, whomever. If we weren't clear on that when the question was previously asked, I do want to be clear that this work is to make it safe for anyone.

12. **Commenter**: Teresa Faapuaa

Comment 12.1. I'm hearing everybody's concerns and they are all valid. Concern from one human being to another human being and not being selfish is important. I used to work at Midway in 2011. I first started working there for a child development center on the site.

My question is will the developer be able to choose what plan he is going to implement? I heard that you guys did some testing of the inside and outside air and compared the samples and I also remember hearing that there will be two treatment options. Which option do you think the developer will go for? I'm sure he's going to go for the cheaper option.

Response: The proposed option is to implement the vapor mitigation system and land use control. The vapor mitigation system has a system of piping in the gravel layer underneath the new buildings with an engineered barrier above that. The foundation is then built on top of that, so it will block any vapors from moving from the soil into the indoor air in the buildings.

Before anyone moves into the buildings, the vapor mitigation system has to be tested and we have to make sure that there are no leaks in that barrier. Once it is tested and confirmed to be effective, then people could move in.

Comment 12.2. What happens if it doesn't work? It is already constructed. And if they find there is suspected leakage or if it's not working, what is the updated timeline? Basically, how do we know that the developers are not just in a rush to push their way through just to move new people in? I'm confused on why it was developed if it was not tested.

Response: If the vapor mitigation system doesn't work, we'll go back to the drawing board. However, we are confident that it will work.

To ensure that everything is done by the book, DTSC requires a report of all the construction that has been done, including the installation of a vapor mitigation system and testing of that system. The report needs our approval before any tenants can move in. DTSC also has staff on-site observing when these systems are put in. Our staff will take photos and ask the developers tough questions, so the ability for shortcuts is greatly diminished. DTSC is watching it from the moment that they start putting the framework in all the way through completion and we're also there when the developers begin doing the indoor air sampling. We are there to ensure they're doing a good job so DTSC feels confident that we can allow for occupancy.

Comment 12.3. Will that report be available to the community and the residents?

Response: Yes, it will be posted on Envirostor so the public can review it.

Comment 12.4. When is your next test for Midway Village since you guys did one for 2019? Also, what percentage and where on the Midway area that you guys test at? I don't remember seeing you guys over here at all.

Response: Langan completed two rounds of indoor air testing under DTSC oversight during that study in 2018 and 2019 and didn't find any indications that there was any vapor intrusion from the subsurface into the indoor air. That was consistent with early studies that were done many years ago, so we don't have plans to continue to do indoor air testing for the existing buildings. We will send you the specific locations of the areas where we tested. (The air sampling locations are shown on Figure 4 of the Indoor Air Sampling Report available on EnviroStor at: https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/9821700155/770650102.05R%20DJS_Indoor%20and%20Sub-Slab%20Sampling%20Results_Midway%20Bayshore%20Daly%20City.pdf)

If the proposed remedy is approved and the variances issued, the redevelopment will start as early as this summer. The project team plans to build the new housing for the folks that are living there, then the existing housing will be demolished.

Remedial Action Plan Amendment – Comments Received in the Q&A function during the Public Meeting and Not Addressed During the Public Meeting.

13. **Commenter:** LaDonna Williams

Comment 13.1 That still did not answer the question if YOU would live on the site or move your family on the site.

Response: The work that we are doing is to make this development safe for everyone. We have high confidence that our remediation efforts are protective and prevent exposure pathways.

Comment 13.2 It's not safe. There would be no need for a Vapor Intrusion Barrier if there was no Vapor Intrusion which it is.

Response: Thank you for your concern for the residents of Midway Village. It is our agency's responsibility to ensure that the site conditions are safe for residential use. Recent indoor air sampling results indicate that there is no vapor intrusion into current buildings. The existing building foundations continue to be an effective barrier. Vapor mitigation systems were not available when the current buildings were constructed. For future buildings, the vapor mitigation system will be installed as an added precaution. It is a proven engineered technology that provides long-term protection for residents of all ages.

Comment 13.3 Watching it does not stop past and current toxic exposure to the Residents health.

Response: It is our agency's mission to cleanup sites and prevent toxic exposure. Where contamination remains in place, we monitor regularly to ensure that conditions continue to be protective and make changes to the remedy if conditions change. Since remediation efforts were completed, Midway residents been protected from exposure to contamination from MGP waste at the site. Site conditions are currently safe and we will ensure they will continue to be safe with the new development.

Comment 13.4 The early test confirmed there was exposure to Vapor Intrusion that causes seizures and a hit of illnesses.

Response: The earliest indoor air sampling was completed in 2002. The study concluded that no further evaluation of indoor air was warranted. The report from

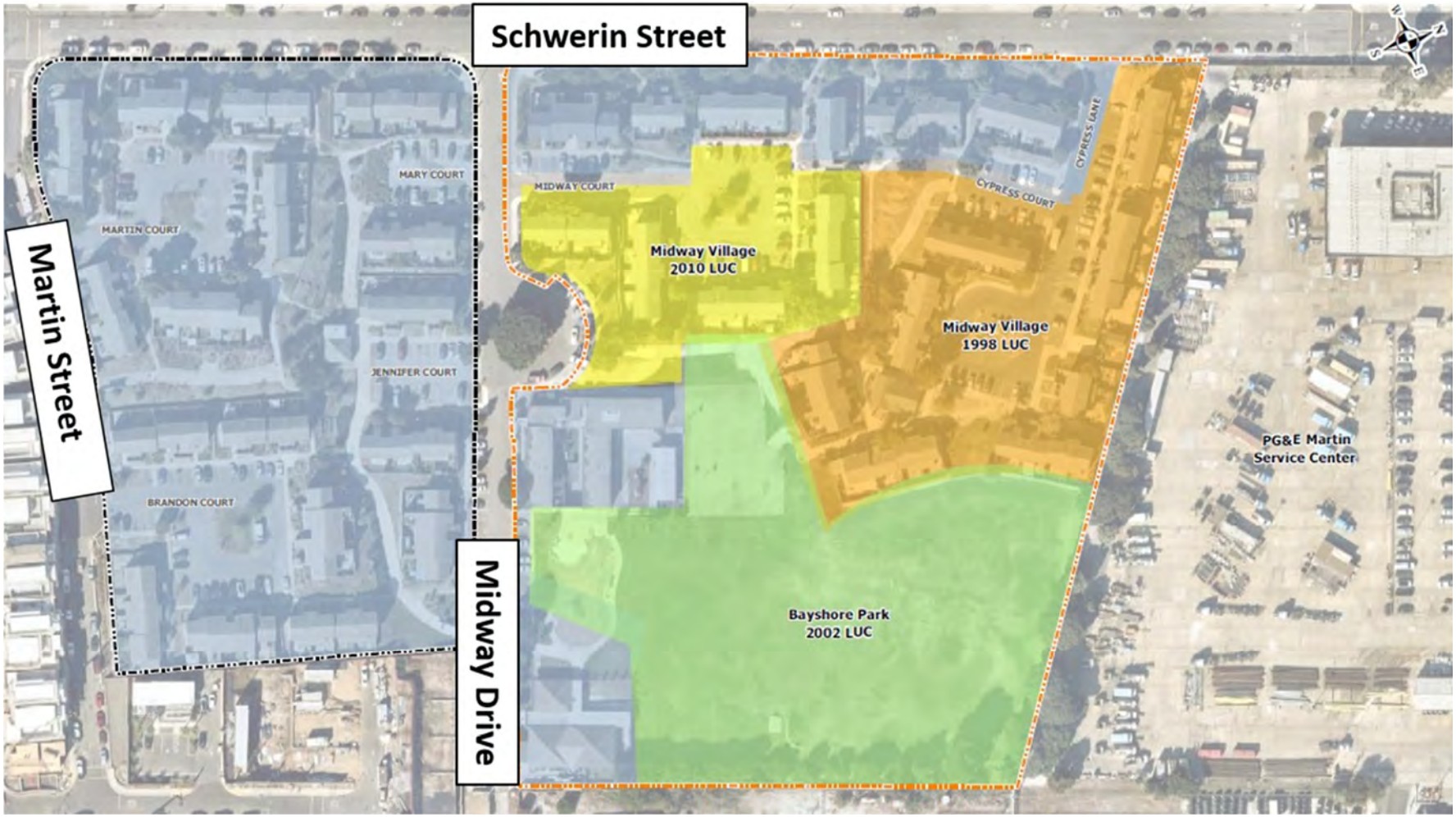
that testing is in Appendix E of the Second Five Year Review Report available on EnviroStor at: https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/4196027457/2007%20Midway%20Village%205%20Year%20Review%20Final.pdf.

Recent indoor air sampling was conducted in 2019 after the 2018 soil gas study identified soil gas contamination. Two rounds of indoor air testing were performed. The study concluded that there is no risk to human health at the current residential units from VOCs from former manufactured gas plant operations and that there is no seasonal impact to the indoor air quality.

Prepared by: _____ June 28, 2021

Kim Walsh, MPH **Date**
Project Manager/Unit Chief, DTSC Berkeley Office

Attachment 1
Current Land Use Covenant Map


Schwerin Street
Martin Street
Midway Drive
MARY COURT
MIDWAY COURT
MARTIN COURT
JENNIFER COURT
BRANDON COURT
CYPRESS LANE
CYPRESS COURT
Midway Village
2010 LUC
Midway Village
1998 LUC
Bayshore Park
2002 LUC
PG&E Martin
Service Center

Attachment 2
DTSC Community Update and Public Notice

March 2021

DTSC PUBLIC NOTICE

Department of Toxic Substances Control – Our mission is to protect the people, communities, and environment of California from harmful chemicals by cleaning up contaminated sites, enforcing hazardous waste laws, and compelling the development of safer products.

Public Comment Period for Midway Village-Bayshore Park
Draft Remedial Action Plan Amendment Available for Review

WHAT IS BEING PROPOSED? The California Department of Toxic Substances Control (DTSC) invites you to review and comment on the draft Remedial Action Plan (RAP) Amendment for the Midway Village and Bayshore Park (Site) redevelopment project located at 45 and 47 Midway Drive in Daly City, CA 94014. The Housing Authority of the County of San Mateo (County) and MidPen Housing are proposing to reconfigure the complex and replace the existing 150 units with 555 units. A new childcare facility would be constructed, and the park would be relocated to an area bordering Schwerin Street. The draft RAP Amendment proposes additional protections for future residents by installing a vapor mitigation system underneath the newly constructed buildings, where needed. This vapor mitigation system is a barrier that would protect the indoor air from volatile organic compounds (VOCs) found in soil vapor (spaces between soil particles). Approximately 2,315 cubic yards (194 truckloads) of soil contaminated with chemical compounds associated with manufactured gas plant waste, including polycyclic aromatic hydrocarbons (PAHs), would be excavated and transported to a permitted facility for disposal. Land use restrictions would be updated and recorded with the County.

California Environmental Quality Act (CEQA): As required by CEQA, the City of Daly City prepared a Sustainable Communities Environmental Assessment (SCEA) for the proposed project that evaluated and summarized its potential environmental effects and recommended mitigation measures to minimize those potential environmental impacts. DTSC has reviewed the SCEA and concurs with the findings.

HOW DO I PARTICIPATE? From **March 17, 2021 to April 30, 2021**, we encourage you to review and provide comments on the draft RAP Amendment. Please send comments to: Kim Walsh, DTSC Unit Supervisor, 700 Heinz Avenue, Berkeley, CA 94710 or by email to Kimberly.Walsh@dtsc.ca.gov. **You are invited to attend a remote public meeting on April 14, 2021 from 6:30 p.m. to 8:00 p.m. at:** https://dtsc-ca-gov.zoom.us/j/89870752404 or call 1-669-900-6833 and Meeting ID 898 7075 2404#

WHERE DO I GET MORE INFORMATION? You may view the documents at the Midway Village Community Center located at 26 Cypress Lane, Daly City, CA 94014 [call (650) 489-8533 for more information] or online at: www.envirostor.dtsc.ca.gov/public (enter site code 41650007) For questions, please contact: Kim Walsh, Project Manager, at (916) 251-8321, or Kimberly.Walsh@dtsc.ca.gov; Asha Setty, Public Participation Specialist, at (510) 540-3910, toll free at (866) 495-5651, or Asha.Setty@dtsc.ca.gov; For media requests, please contact: Russ Edmondson, Public Information Officer at (916) 323-3372 or Russ.Edmondson@dtsc.ca.gov

Hearing impaired individuals may use the California Relay Service at 711 or 800-735-2929 TTY/VCO/HCO to voice.

Additional information on DTSC sites can be found through our **EnviroStor**. (rev. 5-2020)

مارس 2021

إشعار عام من إدارة مكافحة المواد السامة

إدارة مكافحة المواد السامة - مهمتنا هي حماية الأفراد والجماعات والبيئة في ولاية كاليفورنيا من المواد الكيميائية الضارة عن طريق تنظيف المواقع الملوثة، وفرض قوانين النفايات الخطرة، وتطوير منتجات أكثر أمانًا.

فترة التعليق العام على ميدواي فيليدج -حديقة بايشور مسودة تعديل خطة الإجراءات الإصلاحية المتاحة للمراجعة

ما المقترح؟ تدعوكم إدارة مكافحة المواد السامة (DTSC) في ولاية كاليفورنيا إلى مراجعة مسودة تعديل خطة الإجراءات الإصلاحية (RAP) والتعليق عليها لمشروع إعادة تطوير ميدواي فيليدج وحديقة بايشور (الموقع) الواقع في 45 و47 ميدواي درايف في دالي سيتي، كاليفورنيا 94014. تقترح هيئة الإسكان في مقاطعة سان ماتيو (المقاطعة) ومؤسسة "MidPen Housing" إعادة تشكيل المجمع واستبدال 150 وحدة موجودة بـ 555 وحدة جديدة . سيتم إنشاء مرفق جديد لرعاية الأطفال، ونقل الحديقة إلى منطقة مجاورة لشارع شفيرين. يقترح مشروع تعديل خطة الإجراءات الإصلاحية حماية إضافية للمقيمين في المستقبل عن طريق تركيب نظام تخفيف البخار أسفل المباني المشيدة حديثًا، عند الحاجة. نظام تخفيف البخار عبارة عن حاجز يحمي الهواء الداخلي من المركبات العضوية المتطايرة (VOCs) الموجودة في بخار التربة (الفراغات بين جزيئات التربة). سيتم حفر ما يقرب من 2315 ياردة مكعبة (194 حمولة شاحنة) من التربة الملوثة بالمركبات الكيميائية المرتبطة بمخلفات مصانع الغاز، بما في ذلك الهيدروكربونات العطرية متعددة الحلقات، ونقلها إلى منشأة مسموح بها للتخلص منها. سيتم تحديث قيود استخدام الأراضي وتسجيلها مع المقاطعة.

قانون جودة البيئة في كاليفورنيا (CEQA): وفقًا لما يقتضيه قانون جودة البيئة في كاليفورنيا، أعدت مدينة دالي تقييمًا بيئيًا للمجتمعات المستدامة (SCEA) للمشروع المقترح الذي قام بتقييم وتلخيص اثاره البيئية المحتملة واجراءات التخفيف الموصى بها لتقليل تلك الآثار البيئية المحتملة. قامت إدارة مكافحة المواد السامة بمراجعة التقييم البيئي للمجتمعات المستدامة والموافقة على النتائج.

كيف يمكنني المشاركة؟ من **17 مارس 2021 إلى 30 أبريل 2021**، نحن نشجعك على مراجعة وتقديم التعليقات على مسودة تعديل خطة الإجراءات الإصلاحية. يرجى إرسال التعليقات إلى: كيم والش، مشرف وحدة إدارة مكافحة المواد السامة، 700 هايلز أفينيو بيركلي، كاليفورنيا 94710 أو عن طريق البريد الإلكتروني Kimberly.Walsh@dtsc.ca.gov. **أنت مدعو لحضور اجتماع عام عن بُعد في 14أبريل 2021 من الساعة 6:30 مساءً. حتى 8:00 مساءً في:** https://dtsc-ca-gov.zoom.us/j/89870752404 أو الاتصال بـ 1-669-900-6833 ومعرّف الاجتماع هو 898 7075 #2404

أين يمكنني الحصول على مزيد من المعلومات؟ يمكنك الاطلاع على المستندات في مركز Midway Village Community Centre الموجود في 26 Cypress Lane، Daly City، CA 94014 [اتصل بـ (650) 489-8533 لمزيد من المعلومات] أو عبر الموقع الإلكتروني: www.envirostor.dtsc.ca.gov/public (أدخل رمز الموقع 41650007) للأسئلة، يرجى الاتصال بـ: كيم والش، مدير المشروع، على رقم (916) 251-8321، أو Kimberly.Walsh@dtsc.ca.gov؛ آشا سيتي، أخصائية المشاركة العامة، على رقم (510) 540-3910، الهاتف المجاني (866) 495-5651، أو Asha.Setty@dtsc.ca.gov؛ لطلبات الإعلام، يرجى الاتصال بـ: روس إدموندسون، مسؤول الشؤون الإعلامية على (916) 323-3372 أو Russ.Edmondson@dtsc.ca.gov

Hearing impaired individuals may use the California Relay Service at 711 or 800-735-2929 TTY/VCO/HCO to voice.

Additional information on DTSC sites can be found through our **EnviroStor**. (rev. 5-2020)

2021 年 3 月

有毒物質控制局通告

有毒物質控制局 – 我們的使命是通過清潔受污染的場地、實施危險廢棄物相關法律、並強制製造化學屬性安全的產品來保護加利福尼亞州人民、社區和環境免受有害化學物質的影響。

中途村-海濱公園□ Midway Village-Bayshore Park□ 的公眾意見徵詢期

整治行動計劃修訂草案可供審核

擬議內容是什麼？加利福尼亞州有毒物質控制局（DTSC）邀請您審查並評論位於加利福尼亞州戴利市郵編為94014的Midway Drive 45和47號的中途村（Midway Village）和海濱公園（Bayshore Park）（場地）重建項目的整治行動計劃（RAP）修正案。聖馬刁縣（以下簡稱“縣”）的住房委員會和 MidPen Housing 開發公司擬議對綜合大樓進行重新配置，並將現有的150個單元改換為555個單元。將會建造一個新的托兒設施，並將公園搬遷至與什未林（Schwerin）街接壤的地區。 整治行動計劃（RAP）修正案草案擬議為未來居民提供額外的保護，方法是在有需要的新建築的下方安裝蒸氣減排系統。該蒸汽減排系統是一種屏障，可以保護室內空氣免受土壤蒸汽（土壤顆粒之間的空間）中的揮發性有機化合物（VOC）的影響。大約2315立方碼（相當於194輛的卡車載運量）的被與天然氣工廠產生的廢物（包括多環芳烴）相關的化學物質所污染的土壤將被挖掘出來，並被運輸到允許的設施中廢置。並且將向縣裏更新土地使用限制並記錄下來。.

加州環境質量法 (CEQA): 根據加州環境質量法（CEQA）的要求，戴利市為擬建項目起草了可持續社區環境評估（SCEA），評估並總結了其潛在的環境影響，並提出了整治措施，以將這些潛在的環境影響降至最低。 加利福尼亞州有毒物質控制局（DTSC）已審核了可持續社區環境評估（SCEA），並同意調查結果。

我如何參與？從 **2021 年 3 月 17 日至 2021 年 4 月 30 日**，我們鼓勵您對整治行動計劃（RAP）修正案草案進行審查並提出意見。 請將評論發送至：加利福尼亞州伯克利市郵編為 94710 的亨氏大街 700 號加利福尼亞州有毒物質控制局（DTSC）分局主管，金●沃爾什（Kim Walsh, DTSC Unit Supervisor, 700 Heinz Avenue, Berkeley, CA 94710），或通過電子郵件發送至 Kimberly.Walsh@dtsc.ca.gov。 **邀請您參加 2021 年 4 月 14 日下午 6:30 到晚上 8:00 舉行的遠程公開會議**。請輸入 https://dtsc-ca-gov.zoom.us/j/89870752404 或致電 1-669-900-6833 和 會議 ID 898 7075 2404# 出席會議。

我在哪裡可以獲得更多信息？您可以在位於加利福尼亞州戴利市郵編為 94014 的賽普拉斯巷（Cypress Lane）26 號的中途村（Midway Village）社區中心查看文檔（有關詳細信息，請致電（650）489-8533）或在線訪問：www.envirostor.dtsc.ca.gov/public（輸入場地代碼 41650007）。如有疑問，請聯繫：項目經理 Kim Walsh，電話（916）251-8321，電郵 Kimberly.Walsh@dtsc.ca.gov；公眾參與專家 Asha Setty，電話：（510）540-3910，免費電話：（866）495-5651，電郵 Asha.Setty@dtsc.ca.gov；媒體方面的要求，請聯繫：公共信息官 Russ Edmondson，電話（916）323-3372，電郵 Russ.Edmondson@dtsc.ca.gov

聽力有障礙的人士可以撥打711或800-735-2929（聾啞人電話 / 只聽不說 / 只說不聽的加利福尼亞中繼服務）來發聲。

有毒物質控制局負責監管場地的其他信息可以通過我們的EnviroStor查詢。 (rev. 5-2020)

MARZO DE 2021

DTSC AVISO PÚBLICO

Departamento de Control de Sustancias Tóxicas, Nuestra misión es proteger a la gente, las comunidades y el medio ambiente de California de los productos químicos nocivos, limpiando los sitios contaminados, haciendo cumplir las leyes sobre residuos peligrosos y obligando a desarrollar productos más seguros.

Período de comentarios públicos para Midway Village-Bayshore Park

Borrador de la Enmienda del Plan de acción correctiva disponible para revisión

¿QUÉ ES LO QUE SE PROPONE? El Departamento de Control de Sustancias Tóxicas de California (DTSC) lo invita a revisar y comentar sobre el borrador de la Enmienda del Plan de acción correctiva (RAP) para el proyecto de reurbanización de *Midway Village and Bayshore Park* (Sitio) ubicado en *45 and 47 Midway Drive, Daly City, CA 94014*. La Autoridad de Vivienda del Condado de San Mateo (Condado) y *MidPen Housing* proponen reconfigurar el complejo y reemplazar las 150 unidades existentes por 555 unidades. Se construiría una nueva guardería y el parque se trasladaría a un área que bordea *Schwerin Street*. El borrador de la Enmienda RAP propone protecciones adicionales para los futuros residentes al instalar un sistema de mitigación de vapor debajo de los edificios recién construidos, donde sea necesario. Este sistema de mitigación de vapor es una barrera que protegería el aire interior de los compuestos orgánicos volátiles (VOC) que se encuentran en el vapor del suelo (espacios entre las partículas del suelo). Aproximadamente 2,315 yardas cúbicas (194 camionadas) de suelos contaminados con compuestos químicos asociados con desechos de las plantas de gas manufacturado, incluyendo los hidrocarburos aromáticos policíclicos (HAP), serían excavados y transportados a una instalación autorizada para su eliminación. Las restricciones de uso de la tierra se actualizarían y registrarían en el Condado.

Ley de Calidad Ambiental de California (CEQA): como lo requiere la CEQA, la Ciudad de Daly City elaboró una Evaluación ambiental de comunidades sostenibles (SCEA) para el proyecto propuesto que evaluaba y resumía sus posibles efectos ambientales y recomendó medidas de mitigación con el fin de minimizar esos posibles impactos ambientales. El DTSC ha revisado la SCEA y está de acuerdo con los hallazgos.

¿CÓMO PUEDO PARTICIPAR? Del **17 de marzo de 2021 al 30 de abril de 2021**, lo animamos a que revise y proporcione sus comentarios sobre el borrador de la Enmienda de RAP. Envíe sus comentarios a: *Kim Walsh, DTSC Unit Supervisor, 700 Heinz Avenue, Berkeley, CA 94710* o por correo electrónico a Kimberly.Walsh@dtsc.ca.gov. **Usted está invitado a asistir a una reunión pública remota el 14 de abril de 2021, de 6:30 p.m. a 8:00 p.m.** a https://dtsc-ca-gov.zoom.us/j/89870752404 o llame al 1-669-900-6833, ID de la reunión 898 7075 2404#.

¿DÓNDE OBTENGO MÁS INFORMACIÓN? Puede ver los documentos en *Midway Village Community Center* ubicado en *26 Cypress Lane, Daly City, CA 94014* [llame al (650) 489-8533 para obtener más información] o en línea a: www.envirostor.dtsc.ca.gov/public (ingrese el código del sitio 41650007) Si tiene alguna pregunta, comuníquese con: Kim Walsh, Jefe del Proyecto, al (916) 251-8321, o Kimberly.Walsh@dtsc.ca.gov; Asha Setty, Especialista en Participación Pública, al (510) 540-3910, llamada gratuita al (866) 495-5651, o Asha.Setty@dtsc.ca.gov; Para solicitudes de los medios, comuníquese con: Russ Edmondson, Oficial de Información Pública, al (916) 323-3372 o Russ.Edmondson@dtsc.ca.gov

Las Personas con Discapacidad Auditiva pueden usar el Servicio de Retransmisión de California en el 711 o en el 800-735-2929 TTY/VCO/HCO para expresar su opinión.

Se puede encontrar información adicional sobre los sitios del DTSC a través de nuestro **EnviroStor**. (rev. 5-2020)

CLEANUP PROGRAM MARCH 2021

COMMUNITY UPDATE

Department of Toxic Substances Control – Our mission is to protect the people, communities, and environment of California from harmful chemicals by cleaning up contaminated sites, enforcing hazardous waste laws, and compelling the development of safer products.

Public Comment for Midway-Bayshore Village Redevelopment-Draft Remedial Action Plan Amendment

The California Department of Toxic Substances Control (DTSC) invites you to review and comment on the draft Remedial Action Plan (RAP) Amendment for the Midway Village and Bayshore Park (Site) redevelopment project located at 45 and 47 Midway Drive in Daly City, CA 94014. The Housing Authority of the County of San Mateo (County) and MidPen Housing are proposing to reconfigure the complex and replace the existing 150 units with 555 units. A new childcare facility would be constructed, and the park would be relocated to an area bordering Schwerin Street (see Figure 1 for proposed land use). The draft RAP Amendment proposes additional protections for future residents by installing a vapor mitigation system underneath the newly constructed buildings, where needed. This vapor mitigation system is a barrier that would protect the indoor air from volatile organic compounds (VOCs) found in soil vapor (spaces between soil particles).

PUBLIC COMMENT PERIOD
MARCH 17, 2021 to APRIL 30, 2021

DTSC invites you to review and comment on the draft RAP Amendment for the Midway Village and Bayshore Park redevelopment project. All comments must be received by April 30, 2021 to:

Kim Walsh, 700 Heinz Avenue Berkeley, CA 94710
Email: Kimberly.Walsh@dtsc.ca.gov; **Phone: (916) 251-8321**

REMOTE PUBLIC MEETING: DTSC will host a remote public meeting to provide information on the draft RAP Amendment, answer questions and receive public comments.

Date: **April 14, 2021**
Time: **6:30 to 8:00 p.m.**
Online: https://dtsc-ca-gov.zoom.us/j/89870752404
By Phone: Call 1-669-900-6833 and Enter Meeting ID 898 7075 2404#
Contact Asha Setty, DTSC Public Participation Specialist, at (510) 540-3910 or toll-free at (866) 495-5651 or Asha.Setty@dtsc.ca.gov for assistance.

Site Location and History

The Site is approximately 15.8 acres and includes Midway Village, a childcare center, and Bayshore Park. The Site is bordered by the PG&E Martin Service Center to the north and northeast, Martin Street to the south, and Schwerin Street to the west. From around 1905 to 1916, a manufactured gas plant (MGP) operated on the adjacent PG&E Martin Service Center property. The MGP produced gas for the lighting, cooking, and heating needs of local residents until natural gas became readily available. In 1944, approximately 20,000 cubic yards of soil with MGP waste was moved from the PG&E property

and used as fill material at the location of the current Midway Village and Bayshore Park. The Midway Village residential complex was constructed in 1976 and the park was constructed in 1977.

Past Environmental Activities

In the 1990s and early 2000s, the County and Daly City removed two to five feet of soil contaminated with chemical compounds associated with MGP waste, including polycyclic aromatic hydrocarbons (PAHs), with DTSC oversight. Approximately 16,000 cubic yards of contaminated soil was removed from areas without building features or paved surfaces. These areas were then backfilled with clean soil or covered with hardscape such as patios and walkways to prevent human contact with any remaining soil contamination. Land use covenants (LUCs) were recorded with the County to restrict land uses in certain areas of the Site. The LUCs require inspections and maintenance of the capped areas annually and a report that evaluates the effectiveness of the remedy every five years. Additional sampling of indoor air and soil vapor from 2019 confirmed that the existing building foundations and clean soil cap remain effective in preventing exposure to volatile organic compounds (VOCs) found in soil vapor.

Proposed Remedy

The draft RAP Amendment summarizes previous environmental work conducted at the Site and evaluates alternatives to mitigate potential soil vapor impacts from future redevelopment. DTSC is proposing the following activities to ensure the long-term protection of the health of future residents and the neighboring community:

- Installing vapor mitigation systems under proposed buildings north of Midway Drive that will prevent vapors in the soil from entering the indoor air of proposed buildings. Proposed buildings south of Midway Drive would not require a vapor mitigation system.
- Updating the existing Bayshore Park LUC to allow for housing once vapor mitigation systems have been installed and tested
- Updating the two existing LUCs on the Midway Village parcels north of Midway Drive to include the new buildings with vapor mitigation systems
- Ongoing monitoring and maintenance of the replaced caps and new vapor mitigation systems to ensure they remain effective
- Annual inspections and review every five years to confirm that the remedy continues to protect human health and the environment

The construction of the new complex and relocation of the park would require a variance to land use restrictions to allow demolition and replacement of existing caps that would be impacted by the redevelopment. The installation of utilities and building foundations would also require excavating and disposing of soil contaminated with MGP waste.

If the RAP Amendment is approved in 2021, the County and MidPen Housing anticipate work would be completed in five phases, with each phase of work lasting about two years. Each phase of work would require a Remedial Design and Implementation Plan which would include the specific details of the work planned. To protect the surrounding community during the remediation work, there would be strict environmental controls in place including monitoring of air, dust, and noise. A work notice would be mailed to the community prior to the start of each phase.

Excavation and Disposal of Contaminated Soil

Four of the five development phases would include excavation and disposal of soil contaminated with chemical compounds associated with MGP waste, including PAHs. The contaminated soil would be transported for disposal at a permitted landfill. The estimated contaminated soil to be removed in each phase is:

- Phase 1: 2,108 cubic yards (176 truckloads)
- Phase 2: 100 cubic yards (9 truckloads)
- Phase 3: 57 cubic yards (5 truckloads)
- Phase 5: For the future Bayshore Park, 50 cubic yards (5 truckloads)

Import and Export of Clean Soil

The development would require importing and exporting clean soil. Phases 1 and 2 would require importing clean soil to the site to backfill excavations and raise the grade. Import soil would be tested to ensure that the soil is uncontaminated. The estimated total amount of clean soil needed during these phases is 12,600 cubic yards (1,050 truckloads). The soil would be imported over an approximately four-year period. Phases 3, 4, and 5 would require exporting clean soil from the site. The estimated total amount of clean soil to be removed from the site is approximately 9,350 cubic yards (780 truckloads). The soil would be exported over an approximately two-year period.

Truck Route

At the peak of construction activities, there would be an average of 100 daily round trips and a maximum of 150 daily round trips on days when both imported soil and export are occurring at the Site. Trucks would follow a City-approved route that would limit traffic through local neighborhoods and follow Bayshore Boulevard to US 101 North or South.

Safety Measures

Work would be performed under project-specific plans including a Health and Safety Plan, Dust Control Plan, Perimeter Air Monitoring Plan, Noise Monitoring Plan, and Stormwater Pollution Prevention Plan. The following safety measures would be used to protect public health and the environment during cleanup activities:

- Work areas would be fenced to prohibit access
- Air monitoring would be conducted at the site of all excavation work
- Air and dust monitoring would occur upwind and downwind of construction areas and along the Site perimeter
- Noise monitoring would occur along the Site perimeter
- Water and plastic sheeting would be used to control dust
- Odor control such as spray foam would be used as necessary
- Site signage with phone number to report any concerns

California Environmental Quality Act (CEQA)

As the lead agency under CEQA for the redevelopment, the City of Daly City prepared a Sustainable Communities Environmental Assessment (SCEA) for the proposed Midway-Bayshore Village Redevelopment Project in June 2020 that evaluated and summarized its potential environmental effects. The SCEA also recommended mitigation measures that would substantially reduce or avoid potentially significant environmental impacts. DTSC has reviewed the SCEA and concurs with the findings.

Next Steps
DTSC will review and consider all public comments before making a final decision on the draft RAP Amendment. At the end of the public comment period, DTSC will evaluate all comments received and make any necessary changes to this document. DTSC will send a Response to Comments document to all those commented and provided contact information. The responses will also be included in the final RAP Amendment.

The proposed development would require changes to the land use restrictions currently in place. This variance to the existing land use restrictions will require a separate public hearing prior to the start of the proposed work. DTSC will mail a public notice at least 30 days in advance to announce the date and time of the hearing.

Information Repositories
You can view project documents online at: www.envirostor.dtsc.ca.gov/public (Enter "Midway Village" and select from the drop-down menu. Select the "Community Involvement" tab for documents to review.) You can review a hard copy of the draft RAP Amendment and CEQA document at the following locations:

- ***Midway Village Community Center*** located at 26 Cypress Lane, Daly City, CA 94014; Mondays, Wednesdays, and Fridays; 8 a.m. to 3 p.m.
  For more information about the repository, call A.J. Cuyson, Midway Village Resident Services Coordinator at (650) 489-8533.
- ***DTSC Berkeley Regional Office*** located at 700 Heinz Avenue, Berkeley, CA 94710; Call for appointment, dependent on Covid-19 restrictions in place, (510) 540-3800.

Contact Information

- Kim Walsh, DTSC Unit Supervisor at (916) 251-8321 or Kimberly.Walsh@dtsc.ca.gov
- Asha Setty, DTSC Public Participation Specialist at (510) 540-3910, toll-free at (866) 495-5651 or Asha.Setty@dtsc.ca.gov
- For media requests, please contact: Russ Edmondson, DTSC Public Information Officer at (916) 323-3372 or Russ.Edmondson@dtsc.ca.gov


Legend
Construction Phase 1
Construction Phase 2
Construction Phase 3
Construction Phase 4
Construction Phase 5
Bayshore Park Returned to City of Daly City
Martin Street
Building E
New Street A
Building D Parking Garage D
New Street B
Building C
Midway Drive
Resident Park
Community Center
Schwerin Street
Partridge Street
Building B2 Child Care on Ground Level with Residential Above
Building B
Building A
Parking Garage
Building A2
Bayshore Park

برنامج النظافة | مارس 2021

بيان بآخر التطورات المجتمعية

إدارة **مكافحة المواد السامة** - مهمتنا هي حماية الأفراد والجماعات والبيئة في ولاية كاليفورنيا من المواد الكيميائية الضارة عن طريق تنظيف المواقع الملوثة، وفرض قوانين النفايات الخطرة، وتطوير منتجات أكثر أمانًا.

التعليق العام على إعادة تطوير قرية ميدواي-بايشور — مسودة تعديل خطة العمل التصحيحية.

تدعوكم إدارة مكافحة المواد السامة (DTSC) في ولاية كاليفورنيا إلى مراجعة مسودة تعديل خطة الإجراءات الإصلاحية (RAP) والتعليق عليها لمشروع إعادة تطوير ميدواي فيليدج وحديقة بايشور (الموقع) الواقع في 45 و 47 ميدواي درايف في دالي سيتي، كاليفورنيا 94014. تقترح هيئة الإسكان في مقاطعة سان ماتيو (المقاطعة) ومؤسسة "MidPen Housing" إعادة تشكيل المجمع واستبدال 150 وحدة موجودة بـ 555 وحدة جديدة . سيتم إنشاء مرفق جديد لرعاية الأطفال، ونقل الحديقة إلى منطقة مجاورة لشارع شفيرين (انظر الشكل 1 للاستخدام المقترح للأرض). يقترح مشروع تعديل خطة الإجراءات الإصلاحية حماية إضافية للمقيمين في المستقبل عن طريق تركيب نظام تخفيف البخار أسفل المباني المشيدة حديثًا، عند الحاجة. نظام تخفيف البخار عبارة عن حاجز يحمي الهواء الداخلي من المركبات العضوية المتطايرة (VOCs) الموجودة في بخار التربة (الفراغات بين جزيئات التربة).

فترة التعليق العام
من 17 مارس 2021 إلى 30 أبريل 2021

تدعوكم إدارة مكافحة المواد السامة (DTSC) في ولاية كاليفورنيا إلى مراجعة مسودة تعديل خطة الإجراءات الإصلاحية (RAP) والتعليق عليها لمشروع إعادة تطوير ميدواي فيليدج وحديقة بايشور. يجب استلام جميع التعليقات بحلول أبريل 2021 ، XX إلى:

كيم والش، 700 هايلز أفينيو بيركلي، كاليفورنيا 94710
البريد الإلكتروني: Kimberly.Walsh@dtsc.ca.gov، **الهاتف: (916) 251-8321**

الاجتماع العام عن بُعد: ستستضيف إدارة مكافحة المواد السامة (DTSC) اجتماعًا عامًا عن بُعد لتقديم معلومات حول مسودة تعديل خطة الإجراءات الإصلاحية والإجابة عن الأسئلة وتلقي التعليقات العامة.

التاريخ: **14أبريل 2021**
الموعد: **6:30 إلى 8:00 مساءً.**
عبر الإنترنت: https://dtsc-ca-gov.zoom.us/j/89870752404
عبر الهاتف: اتصل بـ 1-669-900-6833 وأدخل معرّف الاجتماع 898 7075 2404#
يرجى الاتصال بأشا سيتي، أخصائية المشاركة العامة في إدارة مكافحة المواد السامة، على رقم (510) 540-3910 أو على الرقم المجاني (866) 495-5651 أو Asha.Setty@dtsc.ca .gov للمساعدة.

مقر وتاريخ الموقع

تبلغ مساحة الموقع حوالي 15.3 فدانًا ويشمل ميدواي فيليدج ومركز رعاية الأطفال وحديقة بايشور. يحد الموقع مركز خدمة PG&E Martin من الشمال والشمال الشرقي، وشارع مارتن من الجنوب، وشارع شفيرين من الغرب. من حوالي عام 1905 إلى عام 1916، تم تشغيل مصنع غاز مصنع (MGP) في موقع مركز خدمة PG&E Martin المجاور. أنتج مصنع MGP الغاز لأغراض الإضاءة والطبخ واحتياجات التدفئة للسكان المحليين حتى أصبح الغاز الطبيعي متاحًا بسهولة. في عام 1944، تم نقل ما يقرب من 20000 ياردة مكعبة من التربة مع نفايات مصنع MGP من موقع PG&E واستخدامها كمواد ردم في موقع قرية ميدواي الحالية وحديقة بايشور. تم إنشاء مجمع ميدواي فيلدج السكني في عام 1976 وتم إنشاء الحديقة في عام 1977.

الأنشطة البيئية السابقة

في فترة التسعينيات وأوائل العقد الأول من القرن الحادي والعشرين، أزالت مقاطعة دالي سيتي من قدمين إلى خمسة أقدام من التربة الملوثة بمركبات كيميائية مرتبطة بنفايات مصنع MGP، بما في ذلك الهيدروكربونات العطرية متعددة الحلقات (PAHs)، تحت إشراف إدارة مكافحة المواد السامة (DTSC). تمت إزالة ما يقرب من 16000 ياردة مكعبة من التربة الملوثة من المناطق التي لا توجد بها عناصر أو مواد بناء أو أسطح مرصوفة. تم ردم هذه المناطق بعد ذلك بتربة نظيفة أو تغطيتها بمواد صلبة مثل الأفنية المرصوفة والممرات لمنع ملامسة الأفراد لأي ملوث متبقي في التربة. تم تسجيل عقود استخدام الأراضي

مع المقاطعة لتقييد استخدامات الأراضي في مناطق معينة من الموقع. تتطلب عقود استخدام الأراضي عمليات تفتيش وصيانة للمناطق المغطاة سنويًا وتقرير يقيم فعالية المعالجة والإصلاح كل خمس سنوات. وأكدت عملية أخذ عينات إضافية من الهواء الداخلي وبخار التربة من عام 2019 أن أسس البناء الحالية وغطاء التربة النظيف تظل فعالة في منع التعرض للمركبات العضوية المتطايرة (VOCs) الموجودة في بخار التربة.

الإصلاح المقترح

يلخص مشروع تعديل خطة الإجراءات الإصلاحية الأعمال البيئية السابقة التي أُجريت في الموقع ويقيم البدائل للتخفيف من آثار بخار التربة المحتملة من عمليات إعادة التطوير المستقبلية . تقترح إدارة مكافحة المواد السامة الأنشطة التالية إلى لضمان الحماية طويلة المدى لصحة المقيمين في المستقبل والمجتمع المجاور:

- تركيب أنظمة تخفيف البخار تحت المباني المقترحة شمال ميدواي درايف والتي ستمنع الأبخرة الموجودة في التربة من دخول الهواء الداخلي للمباني المقترحة. لن تحتاج المباني المقترحة جنوب ميدواي درايف إلى نظام لتخفيف البخار.
- تحديث عقود استخدام الأراضي في حديقة حديقة بايشور الحالية للسماح بالإسكان بمجرد تركيب واختبار أنظمة تخفيف البخار.
- تحديث اثنين من عقود استخدام الأراضي الحاليين في أراضي ميدواي فيليدج شمال ميدواي درايف لتزويد المباني الجديدة بأنظمة تخفيف البخار
- المراقبة المستمرة وصيانة الأغطية المستبدلة وأنظمة تخفيف البخار الجديدة لضمان استمرارية فعاليتها
- عمليات التفتيش والمراجعة السنوية كل خمس سنوات للتأكد من أن عملية الإصلاح والمعالجة تستمر في حماية صحة الإنسان والبيئة

سيتطلب بناء المجمع الجديد ونقل الحديقة تباينًا في قيود استخدام الأراضي للسماح بهدم واستبدال الأغطية الموجودة التي ستتأثر بإعادة التطوير. سيتطلب تركيب المرافق وأسس المبنى أيضًا حفر والتخلص من التربة الملوثة بنفايات MGP

إذا تمت الموافقة على تعديل خطة الإجراءات الإصلاحية في عام 2021، فسيتم الانتهاء من العمل المتوقع في County and MidPen Housing على خمس مراحل، مع استمرار كل مرحلة من العمل لمدة عامين تقريبًا. ستتطلب كل مرحلة من مراحل العمل تصميمًا إصلاحيًا وخطة تنفيذ تتضمن التفاصيل المحددة للعمل المخطط له. لحماية المجتمع المحيط أثناء أعمال الإصلاح، ستكون هناك ضوابط بيئية صارمة بما في ذلك مراقبة الهواء والغبار والضوضاء. سيتم إرسال إشعار العمل بالبريد إلى المجتمع قبل بدء كل مرحلة.

حفر التربة الملوثة والتخلص منها

ستشمل أربع مراحل من مراحل التطوير الخمس الحفر والتخلص من التربة الملوثة بالمركبات الكيميائية المرتبطة بنفايات MGP، بما في ذلك الهيدروكربونات العطرية متعددة الحلقات. سيتم نقل التربة الملوثة للتخلص منها في مكب نفايات مسموح به. التربة الملوثة المقدرة المراد إزالتها في كل مرحلة هي:

- المرحلة الأولى: 2،108 ياردة مكعبة (176 حمولة شاحنة)
- المرحلة الثانية: 100 ياردة مكعبة (9 حمولات شاحنة)
- المرحلة الثالثة: 57 ياردة مكعبة (5 حمولات شاحنة)
- المرحلة الخامسة: لحديقة بايشور المستقبلية، 50 ياردة مكعبة (5 حمولات شاحنة)

استيراد وتصدير التربة النظيفة

سيتطلب التطوير استيراد وتصدير تربة نظيفة. تتطلب المرحلتان الأولى والثانية استيراد تربة نظيفة إلى الموقع لردم الحفريات ورفع المستوى. سيتم اختبار التربة المستوردة للتأكد من أن التربة غير ملوثة. الكمية الإجمالية المقدرة للتربة النظيفة المطلوبة خلال هذه المراحل هي 12600 ياردة مكعبة (1050 شاحنة محمولة). سيتم استيراد التربة خلال فترة أربع سنوات تقريبًا. تتطلب المراحل الثالثة والرابعة والخامسة تصدير تربة نظيفة من الموقع. يقدَّر إجمالي كمية التربة النظيفة التي سيتم إزالتها من الموقع بحوالي 9350 ياردة مكعبة (780 شاحنة محملة). سيتم تصدير التربة خلال فترة عامين تقريبًا.

طريق الشاحنات

في ذروة أنشطة البناء، سيكون هناك ما متوسطه 100 رحلة ذهابًا وإيابًا يوميًا و150 رحلة ذهابًا وإيابًا كحد أقصى في الأيام التي تحدث فيها عملية استيراد وتصدير في الموقع. ستتبع الشاحنات طريقًا معتمدًا من المدينة من شأنه أن يحد من حركة المرور عبر الأحياء المحلية ويتبع شارع بايشور إلى الولايات المتحدة 101 شمالًا أو جنوبًا.

تدابير السلامة

سيتم تنفيذ العمل في إطار الخطط الخاصة بالمشروع بما في ذلك خطة الصحة والسلامة وخطة التحكم في الغبار وخطة مراقبة الهواء المحيط وخطة مراقبة الضوضاء وخطة منع تلوث مياه الأمطار. يمكن استخدام تدابير السلامة التالية لحماية الصحة العامة والبيئة أثناء أنشطة التنظيف:

- سيتم تسييج مناطق العمل لمنع الوصول إليها
- سيتم إجراء مراقبة الهواء في جميع مواقع أعمال الحفر
- تتم مراقبة الهواء والغبار عكس اتجاه الريح وفي اتجاه الريح في مناطق البناء وعلى طول محيط الموقع
- قد تحدث مراقبة الضوضاء على طول محيط الموقع
- سيتم استخدام المياه والأغطية البلاستيكية للتحكم في الغبار
- يمكن استخدام التحكم في الرائحة مثل رغوة الرش حسب الضرورة
- لافتات الموقع مع رقم الهاتف للإبلاغ عن أي مخاوف

قانون جودة البيئة في كاليفورنيا (CEQA)

بصفتها الوكالة الرائدة بموجب قانون جودة البيئة في كاليفورنيا لإعادة التطوير، أعدت مدينة دالي تقييمًا بيئيًا للمجتمعات المستدامة (SCEA) لمشروع إعادة تطوير ميدواي فيليدج وحديقة بايشور المقترح في يونيو 2020 الذي قام بتقييم وتلخيص آثاره البيئية المحتملة. كما أوصى التقييم البيني للمجتمعات المستدامة بتدابير تخفيف من شأنها أن تقلل إلى حد كبير أو تتجنب الآثار البيئية الكبيرة المحتملة. قامت إدارة مكافحة المواد السامة بمراجعة التقييم البيني للمجتمعات المستدامة والموافقة على النتائج.

الخطوات التالية

ستقوم إدارة مكافحة المواد السامة بمراجعة ودراسة جميع التعليقات العامة قبل اتخاذ قرار نهائي بشأن مسودة تعديل خطة الإجراءات الإصلاحية. في نهاية فترة التعليق العام، ستقوم إدارة مكافحة المواد السامة بتقييم جميع التعليقات الواردة وإجراء أي تغييرات ضرورية على هذه الوثيقة. سترسل إدارة مكافحة المواد السامة وثيقة الرد على التعليقات إلى جميع أولئك الذين علقوا وقدموا معلومات الاتصال. كما سيتم تضمين الردود في التعديل النهائي لخطة الإجراءات الإصلاحية.

سيتطلب التطوير المقترح تغييرات في قيود استخدام الأراضي المعمول بها حاليًا. سيتطلب هذا التباين في قيود استخدام الأراضي الحالية جلسة استماع عامة منفصلة قبل بدء العمل المقترح. سترسل إدارة مكافحة المواد السامة إشعارًا عامًا بالبريد قبل 30 يومًا على الأقل من الإعلان عن تاريخ ووقت جلسة الاستماع.

وحدات تخزين المعلومات

يمكنك الاطلاع على مستندات المشروع عبر الإنترنت على: www.envirostor.dtsc.ca.gov/public (اكتب "Midway Village" و اختر من القائمة المنسدلة. اختر علامة التبويب "المشاركة المجتمعية" للاطلاع على المستندات.) يمكنك مراجعة النسخة الورقية من مسودة تعديل خطة العمل التصحيحية والوثيقة الخاصة بقانون جودة البيئة في كاليفورنيا بالمواقع التالية:

- يقع مركز ***Midway Village Community Centre*** في 26 Cypress Lane، Daly City، CA 94014،
أيام الاثنين والأربعاء والجمعة؛ من 8 صباحًا إلى 3 مساءً
لمزيد من المعلومات حول وحدة التخزين، اتصل بـ أ. جيه كويسون، منسق خدمات المقيمين في ميدواي فيليدج على رقم (650) 489-8533.
- يقع ***المكتب الإقليمي لـ DTSC Berkeley*** في 700 Heinz Avenue، Berkeley، CA 94710؛
اتصل للحصول على موعد، وفقًا لقيود فيروس كوفيد-19 المعمول بها، (510) 540-3800.

معلومات الاتصال

- كيم والش، مشرف وحدة إدارة مكافحة المواد السامة في (916) 251-8321 أو Kimberly.Walsh@dtsc.ca.gov
- أشا سيتي، أخصائية المشاركة العامة في إدارة مكافحة المواد السامة في (510) 540-3910. الرقم المجاني (866) 495- 5651 أو Asha.Setty@dtsc.ca.gov
- لطلبات الإعلام، يرجى التواصل مع: روس إدموندسون، مسؤول الإعلام في إدارة مكافحة المواد السامة على (916) 323-3372 أو Russ.Edmondson@dtsc.ca.gov


Martin Street
Schwerin Street
Partridge Street
Midway Drive
المبنى "هـ"
الشارع الجديد أ
المبنى "د"
مرآب السيارات "د"
الشارع الجديد ب
المبنى "ج"
حديقة عامة
مركز اجتماعي
المبنى "ب"
المبنى "أ"
مرآب السيارات
المبنى "i2"
حديقة بايشور
المبنى B2 – قسم رعاية الطفل بالطابق الأرضي مع الطوابق السكنية أعلاه
دليل الرموز
مرحلة البناء الأولى
مرحلة البناء الثانية
مرحلة البناء الثالثة
مرحلة البناء الرابعة
مرحلة البناء الخامسة
نقل حديقة بايشور إلى مدينة دالي سيتي

清理項目 2021 年 3 月

社區進展通報

有毒物質控制局 - 我們的使命是通過清潔受污染的場地、實施危險廢棄物相關法律、並強制製造化學屬性安全的產品來保護加利福尼亞州人民、社區和環境免受有害化學物質的影響。

針對中途-灣岸村（Midway - Bayshore Village）重新開發的公眾意見－整治行動計劃修正案草案

加利福尼亞州有毒物質控制局（DTSC）邀請您審查並評論位於加利福尼亞州戴利市郵編為94014的Midway Drive 45和47號的中途村（Midway Village）和海濱公園（Bayshore Park）（場地）重建項目的整治行動計劃（RAP）修正案。聖馬刁縣（以下簡稱“縣”）的住房委員會和MidPen Housing 開發公司擬議對綜合大樓進行重新配置，並將現有的150個單元改換為555個單元 (擬議土地用途見圖1)。整治行動計劃（RAP）修正案草案擬議為未來居民提供額外的保護，方法是在有需要的新建築的下方安裝蒸氣減排系統。該蒸汽減排系統是一種屏障，可以保護室內空氣免受土壤蒸汽（土壤顆粒之間的空間）中的揮發性有機化合物（VOC）的影響。

公眾意見徵詢期
2021年3月17日至2021年4月30日

加利福尼亞州有毒物質控制局（DTSC）邀請您對中途村（Midway Village）和海濱公園（Bayshore Park）重建項目的RAP修訂草案進行評論並發表評論。 所有評論必須在2021年4月30日之前收到，請寄到：

Kim Walsh, 700 Heinz Avenue Berkeley, CA 94710
電郵: Kimberly.Walsh@dtsc.ca.gov; **電話: (916) 251-8321**

遠程公開會議: 加利福尼亞州有毒物質控制局（DTSC）將主持一次遠程公開會議，以提供有關整治行動計劃（RAP）修正案草案的信息，回答問題並接收公眾意見。

日期: **2021年4月14日**
時間: **下午6:30到晚上8:00。**
在線: https://dtsc-ca-gov.zoom.us/j/89870752404
電話撥入: 致電 1-699-900-6833 並輸入會議ID 898 7075 2404#
如需協助請聯繫：Asha Setty, 加利福尼亞州有毒物質控制局（DTSC）公眾參與專家, 電話：（510）540-3910，免費電話：（866）495-5651，電郵Asha.Setty@dtsc.ca.gov。

場地位置和歷史

該場地面積約為 15.3 英畝，包括中途村（Midway Village），兒童保育中心和海濱公園（Bayshore Park）。與該場地的北部和東北部接壤的是太平洋煤氣電力公司（PG&E）的馬丁（Martin）服務中心，與該場地的南部接壤的是馬丁街（Martin Street），與該場地的西部接壤的是什未林街（Schwerin Street）。從 1905 年到 1916 年左右，一家生產煤氣的工廠（MGP）在鄰近的太平洋煤氣電力公司（PG&E）的馬丁（Martin）服務中心所處的物業經營。MGP 生產的煤氣用於滿足當地居民的照明、烹飪和取暖需求，

直到天然氣可供使用為止。 1944 年，大約有 20,000 立方碼含有 MGP 廢物的土壤從太平洋煤氣電力公司（PG&E ）的物業中移出，並用作當前中途村（Midway Village）和海濱公園（Bayshore Park）所在地的填埋材料。 中途村（Midway Village）住宅區建於 1976 年，海濱公園（Bayshore Park）建於 1977 年。

過去的環保活動

在 1990 年代和 2000 年代初，縣和戴利市在加利福尼亞州有毒物質控制局（DTSC）的監督下，清除了兩到五英尺厚的土壤，這些土壤被與 MGP 廢物（包括多環芳烴（PAH）。 從沒有建築設置或沒有鋪砌表面的區域清除了大約 16,000 立方碼的污染土壤。 然後在這些區域中填充乾淨的土壤或用硬景觀覆蓋，例如露台和人行道，以防止人類接觸任何剩餘的土壤污染物。與縣裏一起記錄了土地使用契約（LUC），以限制場地某些區域的土地使用。 土地使用契約（LUC）要求每年對封頂區域進行檢查和維護，並需要每五年對整治效果的報告進行評估。 從 2019 年開始對室內空氣和土壤蒸氣進行的額外採樣證實，現有的建築基礎和乾淨的土壤覆蓋層仍然可以有效防止土壤蒸氣中發現的揮發性有機化合物（VOC）暴露。

擬議的整治措施

整治行動計劃（RAP）修正案草案總結了之前在場地進行的環境工作，並評估了緩解未來重新開發對土壤蒸氣潛在影響的替代方法。 加利福尼亞州有毒物質控制局（DTSC）提出以下活動，以確保長期保護未來居民和鄰近社區的健康：

●在中途路（Midway Drive）以北的擬議建築物下方安裝蒸汽緩解系統，以防止土壤中的蒸氣進入擬議建築物的室內空氣。在中途路（Midway Drive）以南的擬建建築物將不需要蒸汽緩解系統。

●更新現有的海濱公園（Bayshore Park）土地使用契約（LUC），以便在安裝和測試了蒸汽緩解系統後可以允許營建住房。

●更新中途路（Midway Drive）以北的中途村（Midway Village）地塊上的兩個現有土地使用契約（LUC），以納入新的帶有蒸汽緩解系統的建築物。

●對更換的覆蓋層和新的蒸汽緩解系統進行持續的監視和維護，以確保它們保持有效。

●每年進行一次檢查並每五年進行一次審查，以確認該整治措施仍在繼續保護人類健康和環境。新建築群的建設和公園的搬遷將需要改變土地使用限制，以允許拆除和更換將受到重新開發影響的現有覆蓋層。公用事業和建築地基的安裝也將需要挖掘和處理被 MGP 垃圾污染的土壤。

如果整治行動計劃（RAP）修正案於 2021 年獲得批准，縣和 MidPen 住房開發公司預計將分五個階段完成工作，每個階段持續約兩年時間。每個工作階段都需要一個整治設計和實施計劃，其中應包括計劃工作的具體細節。為了在修復工作中保護周圍社區，將採取嚴格的環境控制措施，包括監測空氣、灰塵和噪音。在每個階段開始之前，都會將工作通知郵寄給社區。

開挖和處理受污染的土壤 五個開發階段中的四個階段將包括挖掘和處理被與 MGP 廢物（包括 PAHs）相關的化學化合物污染的土壤。 被污染的土壤將被運輸到允許的垃圾填埋場處理。 每個階段要去除的污染土壤估計為：

- 第 1 階段：2,108 立方碼（176 輛卡車的運載量）
- 第 2 階段：100 立方碼（9 輛卡車的運載量）
- 第 3 階段：57 立方碼（5 輛卡車的運載量）
- 第 5 階段：對於未來的 Bayshore Park，50 立方碼（5 輛卡車的運載量）

有毒物質控制局

清潔土壤的進出場地

發展將需要清潔的土壤進出場地。 第 1 階段和第 2 階段將需要將乾淨的土壤導入場地，以回填開挖並提高坡度。 將對進入的土壤進行測試，以確保土壤未被污染。 在這些階段中，估計需要的清潔土壤總量為 12,600 立方碼（1,050 卡車的運載量）。 土壤將在大約四年的時間內輸入。 第三階段，第四階段和第五階段將需要從現場輸出清潔土壤。 估計將從場地清除的干淨土壤總量約為 9,350 立方碼（780 卡車的運載量）。 土壤將在大約兩年的時間內輸出。

卡車路線

在建築活動的高峰期，有日子在工地上同時發生輸入土壤和輸出土壤，平均每天會有 100 次往返，而每天最多有 150 次往返。 卡車將遵循城市批准的路線，該路線將限制通過當地社區的交通，並沿著海濱大道（Bayshore Boulevard）抵達達美國 101 號高速公路南北雙向車道。

安全措施

將在特定項目計劃下進行工作，包括健康與安全計劃、粉塵控制計劃、周邊空氣監測計劃、噪聲監測計劃和雨水污染預防計劃。 在清理活動中，將使用以下安全措施來保護公共健康和環境：

- 工作區將被圍起來以禁止閑人進入
- 在所有開挖工作現場進行空氣監測
- 在施工區域的上、下風口以及工地周邊將進行空氣和灰塵監測
- 沿場地周邊進行噪聲監視
- 將使用水和塑料布來控制灰塵
- 如有必要，可使用氣味控製劑，例如噴霧泡沫
- 帶有電話號碼的場地標牌以便報告任何問題

加州環境質量法 (CEQA):

作為加州環境質量法（CEQA）下負責重新開發的牽頭機構，戴利市為擬議的中途-海濱村（ Midway-Bayshore Village）重新開發項目於 2020 年 6 月起草了可持續社區環境評估（SCEA），該項目評估並總結了其潛在的環境影響。 可持續社區環境評估（SCEA）還建議採取緩解措施，以減少或避免潛在的重大環境影響。 加利福尼亞州有毒物質控制局（DTSC）已審核了可持續社區環境評估（SCEA），並同意調查結果。

接下來的步驟

在對整治行動計劃（RAP）修正案草案做出最終決定之前，加利福尼亞州有毒物質控制局（DTSC）將審核並考慮所有公眾意見。 在公眾意見徵詢期結束時，加利福尼亞州有毒物質控制局（DTSC）將評估收到的所有意見，並對本文檔進行必要的更改。 加利福尼亞州有毒物質控制局（DTSC）將向所有發表評論並提供聯繫信息的人發送“評論回復”文檔。 答復也將包含在最終的整治行動計劃（RAP）修正案中。

擬議的開發將需要更改當前的土地使用限制。 與現有土地使用限制的差異將要求在擬議工作開始之前進行單獨的公開聽證。 加利福尼亞州有毒物質控制局（DTSC）將至少提前 30 天郵寄公告，以宣布聽證會的日期和時間。

信息庫

您可以在以下網址在線查看項目文檔：www.envirostor.dtsc.ca.gov/public（輸入“Midway Village”，然後從下拉菜單中選擇。選擇“Community Involvement”標籤以進行文檔審核。）您可以在以下地點查看整治行動計劃（RAP）修正案草案和加州環境質量法案（CEQA）文件的紙質副本：

- ***中途村（Midway Village）社區中心***，位於加利福尼亞州戴利市郵編為 94014 的賽普拉斯巷（Cypress Lane）26 號;
  星期一，星期三和星期五； 上午 8 點至下午 3 點
  有關存儲庫的更多信息，請致電中途村居民服務協調員 A.J.Cuyson，電話：（650）489-8533.
- ***加利福尼亞州有毒物質控制局（DTSC）分局***位於加利福尼亞州伯克利市郵編為 94710 的亨氏大街 700 號（700 Heinz Avenue, Berkeley, CA 94710）；
  請致電（510）540-3800 預約，具體取決於新冠疫情居家防疫的限制。

聯絡方式

- Kim Walsh, 加利福尼亞州有毒物質控制局（DTSC）分局主管，電話 (916) 251-8321 或電郵 Kimberly.Walsh@dtsc.ca.gov
- Asha Setty, 加利福尼亞州有毒物質控制局（DTSC） 公眾參與專家，電話 (510) 540-3910, 免費電話 (866) 495- 5651 或電郵 Asha.Setty@dtsc.ca.gov
- 媒體方面的要求, 請聯繫：Russ Edmondson， 加利福尼亞州有毒物質控制局（DTSC）公共信息官，電話（916）323-3372， 電郵 Russ.Edmondson@dtsc.ca.gov


圖標
施工第1階段
施工第2階段
施工第3階段
施工第4階段
建設第5階段
海濱公園暨返載利城
Martin Street
E樓
新街A
新街B
D樓
停車庫D
C樓
Midway Drive
居民公園
社區中心
Schwerin Street
Partridge Street
B2樓-有二層及以上為住宅
底層設有托兒中心
B樓
A樓
停車庫
A2樓
海濱公園

PROGRAMA DE LIMPIEZA MARZO DE 2021

AVISO COMMUNITARIO

Departamento de Control de Sustancias Tóxicas. Nuestra misión es proteger a la gente, las comunidades y el medio ambiente de California de los productos químicos nocivos, limpiando los sitios contaminados, haciendo cumplir las leyes sobre residuos peligrosos y obligando a desarrollar productos más seguros.

Comentarios públicos para el borrador de la Enmienda al Plan de acción correctiva de la reurbanización Midway-Bayshore Village

El Departamento de Control de Sustancias Tóxicas de California (DTSC) lo invita a revisar y comentar sobre el borrador del Plan de acción correctiva (RAP) para el proyecto de reurbanización de Midway Village and Bayshore Park (Sitio), ubicado en *45 and 47 Midway Drive, Daly City, CA 94014*. La Autoridad de Vivienda del Condado de San Mateo (Condado) y *MidPen Housing* proponen reconfigurar el complejo y reemplazar las 150 unidades existentes por 555 unidades. Se construiría una nueva guardería y el parque se trasladaría a un área que bordea *Schwering Street* (consultar la Figura 1 para ver el uso de la tierra propuesto). El borrador de la Enmienda de RAP propone protecciones adicionales para los futuros residentes al instalar un sistema de mitigación de vapor debajo de los edificios recién construidos, donde sea necesario. Este sistema de mitigación de vapor es una barrera que protegerá el aire interior de los compuestos orgánicos volátiles (VOC) que se encuentran en el vapor del suelo (espacios entre las partículas del suelo).

PERÍODO DE COMENTARIOS PÚBLICOS 17 DE MARZO DE 2021 al 30 DE ABRIL DE 2021

El DTSC lo invita a revisar y comentar sobre el borrador de la Enmienda de RAP para el proyecto de reurbanización de *Midway Village and Bayshore Park*. Todos los comentarios deben recibirse antes del 30 de abril de 2021 a:

Kim Walsh, 700 Heinz Avenue Berkeley, CA 94710
Correo electrónico: Kimberly.Walsh@dtsc.ca.gov; **teléfono: (916) 251-8321**

REUNIÓN PÚBLICA REMOTA: el DTSC organizará una reunión pública remota con el fin de proporcionar información sobre el borrador de la Enmienda de RAP, responder preguntas y recibir comentarios públicos.

Fecha: **14 de abril de 2021**
Hora: **6:30 a 8:00 p.m.**
En línea: https://dtsc-ca-gov.zoom.us/j/89870752404
Por teléfono: llame al 1-669-900-6833 e ingrese el ID de la reunión 898 7075 2404#
Comuníquese con Asha Setty, Especialista en Participación Pública del DTSC, al (510) 540-3910 o llamada gratuita al (866) 495-5651 o Asha.Setty@dtsc.ca.gov para solicitar ayuda.

Ubicación e historia del Sitio

El Sitio mide aproximadamente 15.3 acres y abarca *Midway Village*, una guardería y *Bayshore Park*. El Sitio limita con *PG&E Martin Service Center* al norte y noreste, *Martin Street* al sur y *Schwerin Street* al oeste. Desde aproximadamente 1905 a 1916, se operó una planta de gas manufacturado (MGP) en la propiedad adyacente de *PG&E Martin Service Center*. La MGP producía gas para las necesidades de iluminación, cocina y calefacción de los residentes locales, hasta que estuvo disponible el gas natural. En

1944, aproximadamente 20,000 yardas cúbicas de suelos con desechos de MGP se trasladaron de la propiedad de PG&E y se utilizaron como material de relleno en la ubicación actual de *Midway Village and Bayshore Park.* El complejo residencial *Midway Village* se construyó en 1976 y el parque en 1977.

Actividades ambientales pasadas

En la década de 1990 y principios de la de 2000, el Condado y la Ciudad de Daly City eliminaron, con la supervisión del DTSC, de dos a cinco pies de suelos contaminados con compuestos químicos asociados con los desechos de la MGP, incluyendo hidrocarburos aromáticos policíclicos (PAH). Se eliminaron aproximadamente 16,000 yardas cúbicas de suelos contaminados de áreas sin características de construcción o superficies pavimentadas. Estas áreas se rellenaron después con suelos limpios o se cubrieron con una capa sólida como patios y pasillos, con el fin de evitar el contacto humano con cualesquiera restos de contaminación en los suelos. Los convenios de uso de la tierra (LUC, por sus siglas en inglés) se registraron con el Condado con el fin de restringir los usos de la tierra en ciertas áreas del Sitio. Los LUC requieren inspecciones y mantenimiento anuales de las áreas cubiertas y un informe que evalúa la efectividad del remedio cada cinco años. Un muestreo adicional del aire del interior y vapor del suelo de 2019 confirmó que los cimientos de los edificios existentes y la capa de suelo limpio siguen siendo eficaces para prevenir la exposición a compuestos orgánicos volátiles (VOC) que se encuentran en el vapor del suelo.

Remedios propuestos

El borrador de la Enmienda de RAP resume los trabajos ambientales realizados en el Sitio con anterioridad y evalúa las alternativas para mitigar los impactos potenciales del vapor del suelo de una futura reurbanización. El DTSC propone las siguientes actividades para garantizar la protección a largo plazo de la salud de los futuros residentes y la comunidad circundante:

- Instalación de sistemas de mitigación de vapor debajo de los edificios propuestos al norte de *Midway Drive*, que evitarían que los vapores del suelo entren al aire del interior de los edificios propuestos. Los edificios propuestos al sur de *Midway Drive* no requerirían un sistema de mitigación de vapor.
- Actualización de los LUC existentes de *Bayshore Park* con el fin de permitir viviendas una vez que se hayan instalado y probado los sistemas de mitigación de vapor.
- Actualización de los dos LUC existentes en las parcelas de *Midway Village* al norte de *Midway Drive*, con el fin de incluir los nuevos edificios con sistemas de mitigación de vapor.
- Monitoreo y mantenimiento continuo de las capas reemplazadas y los nuevos sistemas de mitigación de vapor con el fin de asegurar que sigan siendo efectivos.
- Inspecciones anuales y revisión cada cinco años para confirmar que el remedio continúa protegiendo la salud humana y el medio ambiente.

La construcción del nuevo complejo y la reubicación del parque requeriría una variación en las restricciones de uso de la tierra para permitir la demolición y reemplazo de los límites existentes que se verían afectados por la remodelación. La instalación de servicios públicos y cimientos de los edificios también requeriría la excavación y eliminación de los suelos contaminados con desechos de la MGP.

Si la Enmienda de RAP se aprueba en 2021, el Condado y *MidPen Housing* anticipan que los trabajos se completarán en cinco fases, y cada fase de trabajo durará aproximadamente dos años. Cada fase requeriría un Diseño correctivo y un Plan de implementación que incluiría los detalles específicos de los trabajos planificados. Se implementarán estrictos controles ambientales con el fin de proteger a la comunidad circundante durante los trabajos de remediación; estoy incluye el monitoreo del aire, polvo y ruido. Se enviará por correo un aviso de trabajo a la comunidad antes del inicio de cada fase.

Excavación y eliminación de los suelos contaminados

Cuatro de las cinco fases de desarrollo incluirían la excavación y eliminación de los suelos contaminados con compuestos químicos relacionados con los desechos de la MGP, incluyendo los PAH. Los suelos contaminados se transportarían para su eliminación en un vertedero autorizado. Se estima que los suelos contaminados que se eliminará en cada fase son:

- Fase 1: 2,108 yardas cúbicas (176 camionadas)
- Fase 2: 100 yardas cúbicas (9 camionadas)
- Fase 3: 57 yardas cúbicas (5 camionadas)
- Fase 5: para el futuro *Bayshore Park*, 50 yardas cúbicas (5 camionadas)

Importación y exportación de suelos limpios

El desarrollo requeriría importar y exportar suelos limpios. Las Fases 1 y 2 requerirían la importación de suelos limpios al Sitio para rellenar las excavaciones y elevar el grado. Se analizarían los suelos importados para garantizar que no estén contaminados. La cantidad total estimada de suelos limpios necesaria durante estas fases es de 12,600 yardas cúbicas (1,050 camionadas). Los suelos se importarían durante un período de aproximadamente cuatro años. Las fases 3, 4 y 5 requerirían exportar suelos limpios del Sitio. La cantidad total estimada de suelos limpios que se eliminarán del Sitio es de aproximadamente 9,350 yardas cúbicas (780 camionadas). Los suelos se exportarían durante un período de aproximadamente dos años.

Ruta de camiones

En el pico de las actividades de construcción, habría un promedio de 100 viajes de ida y vuelta diarios y un máximo de 150 viajes de ida y vuelta diarios en los días en que se planifica tanto la importación como la exportación de suelos. Los camiones seguirían una ruta aprobada por la Ciudad que limitaría el tráfico atravesando los vecindarios locales y seguirían *Bayshore Boulevard* hasta *US101 North* o *South*.

Medidas de seguridad

Los trabajos se realizarían según los planes específicos del proyecto, e incluyen un Plan de salud y seguridad, un Plan de control de polvo, un Plan de monitoreo del aire del perímetro, un Plan de monitoreo de ruido y un Plan de prevención de la contaminación por aguas pluviales. Se utilizarían las siguientes medidas de seguridad para proteger la salud pública y el medio ambiente durante las actividades de limpieza:

- Las áreas de trabajo estarían cercadas para prohibir el ingreso
- El monitoreo del aire se realizaría en el lugar de todos los trabajos de excavación
- El control del aire y el polvo se realizaría a barlovento y a favor del viento de las áreas de construcción y a lo largo del perímetro del Sitio
- El control de ruido se produciría a lo largo del perímetro del Sitio
- Se utilizarían agua y láminas de plástico para controlar el polvo
- Se utilizaría el control de olores, como la espuma en aerosol, según sea necesario
- Señalización en el Sitio con número de teléfono para informar cualquier preocupación

Ley de Calidad Ambiental de California (CEQA)

Como la agencia líder bajo CEQA para la reurbanización, la Ciudad de Daly City elaboró una Evaluación ambiental de comunidades sostenibles (SCEA) para el Proyecto de reurbanización propuesto de *Midway-Bayshore Village* en junio de 2020 que evaluó y resumió sus potenciales efectos ambientales. La SCEA también recomendó medidas de mitigación que reducirían sustancialmente o evitarían impactos ambientales potencialmente significativos. El DTSC ha revisado la SCEA y está de acuerdo con los hallazgos.

Department of Toxic Substances Control

Próximos pasos
El DTSC revisará y considerará todos los comentarios públicos antes de tomar una decisión final sobre el borrador de la Enmienda de RAP. Al finalizar el período de comentarios públicos, el DTSC evaluará todos los comentarios recibidos y hará los cambios necesarios a este documento. El DTSC enviará un documento de Respuesta a comentarios a todas aquellas personas que comentaron y proporcionaron su información de contacto. Las respuestas también se incluirán en la Enmienda de RAP final.

El desarrollo propuesto requeriría cambios en las restricciones de uso de la tierra actualmente vigentes. Esta variación de las restricciones de uso de la tierra existentes requerirá una audiencia pública separada antes del inicio de los trabajos propuestos. El DTSC enviará por correo un aviso público con al menos 30 días de anticipación para anunciar la fecha y la hora de la audiencia.

Repositorios de información
Puede ver los documentos del proyecto en línea en: www.envirostor.dtsc.ca.gov/public (ingrese "*Midway Village*" y seleccione el menú desplegable. Seleccione la pestaña "*Community Involvement*" [Participación de la comunidad] para ver los documentos.) Puede revisar una copia impresa del borrador de la Enmienda de RAP y el documento de CEQA en las siguientes ubicaciones:

- ***Midway Village Community Center*** ubicado en *26 Cypress Lane, Daly City, CA 94014*; lunes, miércoles y viernes, de 8 a.m. a 3 p.m.
  Para obtener más información sobre el repositorio, comuníquese con A.J. Cuyson, Coordinador de Servicios para residentes de *Midway Village*, al (650) 489-8533.
- ***DTSC Berkeley Regional Office*** ubicada en *700 Heinz Avenue, Berkeley, CA 94710*; Llame para programar una cita, dependiendo de las restricciones vigentes de Covid-19, al (510) 540-3800.

Información de contactos

- Kim Walsh, Supervisora de Unidad de DTSC, (916) 251-8321 o Kimberly.Walsh@dtsc.ca.gov
- Asha Setty, Especialista en Participación Pública de DTSC, (510) 540-3910, llamada gratuita (866) 495- 5651 o Asha.Setty@dtsc.ca.gov
- Para solicitudes de los medios, comuníquese con: Russ Edmondson, Oficial de Información Pública de DTSC, al (916) 323-3372 o Russ.Edmondson@dtsc.ca.gov


Leyenda
Construcción Fase 1
Construcción Fase 2
Construcción Fase 3
Construcción Fase 4
Construcción Fase 5
Bayshore Park devuelto a la Ciudad de Daly City
Martin Street
Schwerin Street
Partridge Street
Midway Drive
Calle nueva A
Calle nueva B
Edificio E
Edificio D Garage de estacionamiento D
Estacionamiento de residentes
Centro comunitario
Edificio C
Edificio A
Garage de estacionamiento
Edificio B
Edificio B2 Guardería en la Planta Baja con Residencias arriba
Bayshore Park
Edificio A2

Attachment 3
Comment Letters

Pacific Gas and Electric Company

Danielle Starring
Director
Environmental Remediation

77 Beale Street, B28P
San Francisco, CA 94105
danielle.starring@pge.com

April 29, 2021

Via Email (Kimberly.Walsh@dtsc.ca.gov)
Kim Walsh
DTSC Unit Supervisor
700 Heinz Avenue
Berkeley, CA 94710

Subject: PG&E Comments on Midway Village-Bayshore Park Draft Remedial Action Plan Amendment

Dear Ms. Walsh,

Pacific Gas and Electric Company (PG&E) is pleased to submit the following comments on the Midway Village-Bayshore Park Draft Remedial Action Plan Amendment (DRAPA). PG&E supports the upgrade and addition of affordable housing in the Bay Area. For the redevelopment that is the subject of the DRAPA, PG&E encourages DTSC and the entities responsible for the redevelopment to take all steps necessary to ensure that the current and future residents and the surrounding community remain safe both during and after the proposed redevelopment.

1. We agree with the following statement made in DTSC's (Julie Pettijohn) January 20, 2021 letter to PG&E (Danielle Starring, Greg Ritter) and others regarding this project:

   "This redevelopment will provide additional affordable housing and other amenities for the community. The redevelopment requires temporary removal of portions of the existing soil remedy (i.e., cap) and converting Bayshore Park from recreational to residential land use. The conversion of Bayshore Park to residential land use poses vapor intrusion risks if this exposure pathway is not controlled with an appropriate remedy/mitigation measure. While the current residences have not been impacted by vapor intrusion, the redevelopment of Midway Village north of Midway Drive requires an appropriate remedy for vapor intrusion to ensure long-term protectiveness for residential use."

2. In regards to vapor intrusion risk for future buildings at Midway Village South, we have two questions: are existing test results sufficient to assess the risk in light of (a) the locations of the future buildings and (b) volatilization that may occur as a result of soil disturbance during the redevelopment process?

3. The DRAPA says groundwater at the Site does not currently nor is it anticipated in the future to support any beneficial uses. The RWQCB's Basin Plan says

Pacific Gas and Electric Company

Danielle Starring
Director
Environmental Remediation

77 Beale Street, B28P
San Francisco, CA 94105
danielle.starring@pge.com

groundwater at the Site is currently used for industrial process supply (PRO) and industrial service supply (IND) and may in the future also be used for municipal and domestic water supply (including drinking water) (MUN) and agricultural water supply (AGR).

a. The DRAPA should (i) be corrected to identify PRO and IND as current uses and (ii) explain how the proposed remedial action will protect current uses (*e.g.*, no one drinks groundwater in PRO and IND scenarios).

b. The DRAPA should explain why future uses will not include MUN and AGR (*e.g.*, the area is completely built out; all current MUN and AGR users obtain their water via pipe from sources other than groundwater; hence, it's likely all future MUN and AGR users will do the same; plus, a land use covenant will prohibit Site users from using groundwater).

4. Regarding VMS:

a. What criteria will be used to determine whether to convert from passive to active VMS? Are those criteria sufficient to protect residents from vapor intrusion risk? If so, what are the bases for that conclusion?

b. To stay effective, both passive and active VMS need periodic inspection, maintenance, repair, and replacement forever. What assurance is there that the money to pay for these things will always be available? [Note: lack of funding to pay for maintenance of affordable housing is a documented challenge. See, https://affordablehousingonline.com/blog/hard-maintain-quality-public-housing/.]

5. PG&E encourages DTSC to scrutinize the draft Remedial Design and Implementation Plan prior to approval, and to monitor ongoing adherence to the Plan, for the safety and protection of the residents and the surrounding community, including workers at PG&E's neighboring Martin Service Center.

6. DTSC's January 20, 2021 letter to PG&E (and others) regarding the project said:

- "the NBAR allocates 100% of the responsibility of addressing all existing contamination at the Site during and after redevelopment, as joint and several liability, to the Owner (HACSM) and the Operator (MidPen) of these Sites for the new remedy components being implemented under the RAP Amendment (for the caps and restrictions associated with the soils remedy and for indoor air mitigation measures)."

Pacific Gas and Electric Company

Danielle Starring
Director
Environmental Remediation

77 Beale Street, B28P
San Francisco, CA 94105
danielle.starring@pge.com

- "This allocation is informed by the language in the settlement agreements regarding transfer in ownership or redevelopment."

The language referred to is apparently Paragraph 7.4 of the 2008 Bayshore Park Settlement Agreement, which required documents prepared by Daly City and HACSM transferring any part of the Site or approving the redevelopment project to release and indemnify PG&E for all costs associated with hazardous substances. www.envirostor.dtsc.ca.gov/public/deliverable_documents/8927250504/Bayshore%20settlement%20executed.pdf.

The transfer and approval documents were prepared and did not include the required releases and indemnities. PG&E has provided HACSM and MidPen with a release and indemnification that, if executed, would correct this oversight. DTSC should not approve the DRAPA – or the proposed variance to the land use covenants at the Site contemplated in DTSC's (Julie Pettijohn) April 16, 2021 letter to PG&E (Danielle Starring, Greg Ritter) and others – until HACSM and MidPen have executed the release and indemnification and returned it to PG&E.

Thank you for your consideration.

Sincerely,

Danielle Starring, P.E.
Director, PG&E Environmental Remediation

cc (via email): Julie Pettijohn (Julie.Pettijohn@dtsc.ca.gov)
Mark Rigau (mark.rigau@usdoj.gov)
Greg Ritter (gari@pge.com)
Monali Sheth (msheth@smcgov.org)
Mike Callagy (mcallagy@smcgov.org)
Raymond Hodges (housing@smchousing.org)
Rose Zimmerman (rzimmerman@dalycity.org)
Shawnna Maltbie (citymanager@dalycity.org)
Abby Goldware Potluri (agoldware@midpen-housing.org)
Matt Lewis (Mlewis@midpen-housing.org)
Barbara Deffenderfer (bdeffenderfer@smcgov.org)

Pacific Gas and Electric Company

Danielle Starring
Director
Environmental Remediation

77 Beale Street, B28P
San Francisco, CA 94105
danielle.starring@pge.com

Nicholas Targ (nicholas.targ@hklaw.com)
Charles Morrow (cmorrow@dalycity.org)
Tatum Mothershead (tmothershead@dalycity.org)
Larry McDaniel (Larry.McDaniel@dtsc.ca.gov)
Nelline Kowbel (Nelline.Kowbel@dtsc.ca.gov)
Grant Cope (Grant.Cope@dtsc.ca.gov)

To: Cal EPA - Department of Toxic Substance Control
From: Dana Dillworth, Founder/Member of Brisbane Baylands Community Advisory Group
RE: Draft Remedial Action Plan Amendment for Midway Village
April 30, 2021

Alternative 3 - Hurry up, build first, assess later. Apparently your minds are made up, CEQA is to be ignored and this is a perfunctory exercise. To make the guiding reason for your preferred alternative be finances related to a prematurely signed contract, not part of this record, this is a first for me.

Consider the public to be outraged at such a fragmented and piecemealed environmental plan and document.

Prior to PG&E dumping coal tar residue into the marshes, this area was pristine shoreline, tidal marsh. You provide clues, but only mention it in a later section on groundwater. The near surface groundwater level and presence of marsh and the natural creek you call a ditch running through this project area are summarily dismissed if not ignored. You note these remnant wetlands as low spots, of little importance. Apparently you are unaware of PG&E's earlier mitigation and Brisbane's General Plan Marsh designation to understand its importance. They are wetland remediation and stormwater detention facilities for the PAH's you wish to leave in place. Perhaps you could include similar natural attenuation methods in your project area?

No need for the groundwater to be clean; we dirtied it, no further use? What hubris. Impacts to potential rare and endangered frog, snake, and insect species habitat isn't mentioned, yet you are adjacent to San Bruno Mountain County Park, an ecological wonderland. An endemic environmental hot spot that relies on our stewardship of their watershed. Somehow this information is absent in your Executive Summary.

You fail to mention the full extent of pollution from this former gas manufacturing use, as you have merely tested five foot deep, 16 borings in 15 acres. Totally inadequate!

Serial Land Use Covenants of 1998, 2001, 2010 and yet to be determined future agreements say it all: an error in the system. CEQA frowns upon fragmented environmental work. A problem with always accepting the lowest, cheapest, most passive remediation techniques and not looking beyond your property lines.

These coal tar sludge-laden lands' current LUC's reflect that they are not good for any life-supporting activity, no childcare, medical, or rehabilitation facility, no food production, no water usage, no soil exposure, no uses whatsoever… except for housing? What happened to Open Space and habitat restoration? To accept that, you have to have faith that someone crunched the numbers correctly, that reports aren't fudged, and that they understand the environment sufficiently to determine your fate. Have they?

Have you considered the impacts from the adjacent PG&E plant and the City of Brisbane studying the need for battery storage?

> Workshop "I" - May 6, 2021 7:30pm Utility-Scale Battery Storage.

Have you considered sea-level rise "from five to ten feet or more by century's end" (Wasserman 2018 report) and liquefaction of the un-engineered fill which you only require two feet of clean soil as an adequate remediation? Where is the comprehensive plan vs. the piecemeal, patchwork, learn as-you-go, another trial-and-error human housing experiment? Hinkley Deja vu.

Preference for Alternative 4 with total, one-phase cleanup.
Rather than keep promoting a mistake of risking people's lives, every day working and playing in an unsafe former industrial area, you must require the entire removal of the sludge as recommended in Alternative 4. However, time is of the essence. Clean up should be total, all at once- not a staggered, patchy, pollute-and-expose residents over time project. That is a dereliction of your mission to protect the public from exposure to toxic chemicals if you think living in a construction zone for multiple years is an acceptable environment.

How can these be the only certifiable Environmental Impact Report remedial choices? Where's the Common Sense LUC alternative of no housing, no human use without full clean up?

Throwing a meager layer of hopefully clean dirt on top, requiring a test and fill crack program, ignoring global warming and earthquake potentials, and hoping it works is not a way to protect the public's helath. You have not adequately explored exposures from liquefaction during an earthquake so your mitigation measures are not adequate.

Where is the San Mateo County Department of Environmental Health's response to this proposal? Where's their response behind such a piecemealed approach? A continuous health study of the present and future residents should be required, rather than make suppositions that there has been no exposure, no risk, and that your systems are effective, or that all impacts are adequately considered from the present, limited testing status. A complete health study of present and future residents should be a requirement.

It is not right to ask future residents to add this to their chemical load or expect that layers of unproven Glad Wrap plastic between them and chronic illness, infertility, and perhaps death is an acceptable risk mitigation. My, how far we have strayed.

> "Recent environmental investigations indicate that soil gas at Midway Village and Bayshore Park is impacted by chemicals including benzene, chloroform, ethylbenzene, naphthalene, tetrachloroethene (PCE), 1,2,4-trimethylbenzene (TMB), vinyl chloride, and total xylenes. These compounds were identified as chemicals of potential concern (COPCs) for the vapor intrusion pathway."
>
> (page 16) April 2019 : "MPG-related VOCs detected during soil gas sampling events at Midway Village North included benzene, ethylbenzene, 1,4-DCB, naphthalene, xylenes, 1,2,4-trimethylbenzene (1,2,4-TMB), and 1,3,5-TMB."
>
> "Other detected VOCs that are not considered MGP-related COPCs included bromomethane, carbon tetrachloride, chloroethane, chloroform, chloromethane dichlorodifluoromethane, PCE, styrene, trichlorofluoromethane, trichlorotrifluoroethane, and vinyl chloride." etc. Potentially higher without attenuation factors.

It is worth the extra money to ensure the clean up is adequate for future generations. Your concept of the diminution of Chemicals of Concern in a one-time study is another way of confirming it is continuously off-gassing, continuously putting communities at risk. Such spotty and insufficient studies that support turning your highest concentrations of cyanide and naphalene into a community recreation area - in itself shows you haven't considered these additional unacceptable risk levels.

This document is inadequate as a CEQA docuement as it needs to consider the Public's health and the environment as a whole, not as a means to receive a grant.

U.S. Department of Justice

Environment and Natural Resources Division

Environmental Defense Section
450 Golden Gate Avenue
Suite 07-6714 (US Mail)
Suite 07-6549 (temp FedEx, no signature required)
San Francisco, CA 94102

Telephone (415) 744-6487
Facsimile (415) 744-6476

April 30, 2021

Kim Walsh
Unit Supervisor
California Department of Toxic Substances Control
700 Heinz Avenue
Berkeley, California 94710-2721
Kimberly.walsh@dtsc.ca.gov
Transmitted via Email Only

Re: Comments on the Draft Remedial Action Plan Amendments for Midway Village

Dear Ms. Walsh,

Thank you for providing the opportunity for the United States to comment on the proposed Draft Remedial Action Plan Amendments ("DRAPA") for the proposed Midway Village Redevelopment Project, which was forwarded to the United States on March 17, 2021. As a general observation, it appears that the proposed redevelopment project has been under consideration for several years before the United States Department of Justice received notice via a letter from Julie Pettijohn of the California Department of Toxic Substances Control ("DTSC") on January 20, 2021. As a result, there are a significant number of lengthy documents associated with the proposed redevelopment project that have been developed over the past several years and this letter is not intended to address those documents. Rather, in its capacity as a settling party in prior settlements with DTSC, Daly City, the Housing Authority of the County of San Mateo ("HACSM"), Pacific Gas & Electric ("PG&E") regarding the Midway Village and Bayshore Park Sites, the United States provides the following general comments to the DRAPA to ensure that any redevelopment of the Midway Village and Bayshore Park sites is protective of human health and the environment. In addition, the United States notes that it appears that the terms of those prior settlement agreements have not been met. As a party to those agreements, DTSC should require that all documentation be in accordance with prior settlement agreements prior to any further development approvals for the project.

Comments on the Draft RAP Amendments

The United States offers several observations and comments on the DRAPA. Overall, as described/written, the proposed remedial action (which consists of the installation of a vapor mitigation system ("VMS"), replacement of cap/fill, and institutional controls and monitoring) appear likely to be at least as or more protective than the remedy that is currently in place for the completed project. That said, it is apparent that many of the details are not included in the DRAPA, and are proposed to be presented in the Remedial Design and Implementation Plans ("RDIPs") for the various phases of the development (e.g., specific areas where capping will take place, utility trenches will be located, etc.).

Additional Details Should Be Required: The DRAPA should provide detailed information from prior studies prepared for the project. For example, on April 6, 2020, Daly City published an environmental assessment ("EA") for the proposed project. *See* https://dalycity.org/DocumentCenter/View/1006/Midway-Village-Redevelopment-Sustainable-Communities-Environmental-Assessment-SCEA-PDF. The EA states that the "maximum depth of cut and fill onsite would range from 13 to 26 feet" and would affect "12 of the 15 acres" of the site. *Id.* at 2-52. The DRAPA notes that cap material from Village North of Fill Material from Village South may be moved within or between various portions of the Site, managed or re-used without the need for sampling. This assumes that these materials do not contain contaminated fill material, though it is not entirely clear if this is the case given that the stated 13 to 26 feet depth of cut and fill would go significantly deeper than the existing remedy cap. DTSC should require the DRAPA to be amended to include more details of the proposed subsurface work and identify the sampling and mitigation measures that will be implemented to address any environmental issues that may arise.

Groundwater Impacts of the Proposed Redevelopment Should Be Included: Similarly, because of the depth of the proposed cut and fill and trenching activities, groundwater should be evaluated as part of the DRAPA. While polycyclic aromatic hydrocarbons are generally not very mobile in groundwater, impacted groundwater in certain areas may affect outdoor air concentrations, and should be considered during the design of the VMS. Further, workers may be exposed to impacted groundwater during construction activities.

VMS Should Be Explained: Although the VMS (as described) should adequately address potential indoor air pathways, it is unclear as to whether the outdoor air pathway is adequately addressed. This may be discussed further in future RDIPs. The DRAPA should be amended to include additional information regarding VMS, including potential volatilization of hazardous substance and impacts due to grading activities.

Settlement Agreements

As noted in DTSC's January 20, 2021 notice letter, there are two settlement agreements for the Midway Village and Bayshore Park Sites. In 2005, HACSM, Daly City, PG&E, and the United States (collectively the "Responsible Parties") entered into a settlement agreement with DTSC regarding the Midway Village Site. In 2008, DTSC entered into a settlement agreement ("2008 Settlement Agreement") with the Responsible Parties, principally to address the Bayshore Park Site, though the 2008 Settlement Agreement contains provisions that cover both the Midway Village and Bayshore Park Sites. The 2008 Settlement Agreement provided for the reimbursement of DTSC's response costs, imposed obligations on Daly City and HACSM, and provided releases and reservations. Relevant here, the 2008 Settlement specifically provides:

> Any documents prepared by Daly City or the Housing Authority that effectuate the transfer in ownership or approve the redevelopment of the Bayshore Park Site, or any portion of the Midway Village Site, will provide releases from liability and indemnification to the United States, PG&E, Daly City, and the Housing Authority for any and all costs associated with hazardous substances at the sites from the individuals or entities accepting ownership or, or undertaking any redevelopment on, those sites.

See 2008 Settlement at Section 7.4 (emphasis added).

Based on the recently disclosed documents, it appears that Daly City and HACSM are in breach of the 2008 Settlement. MidPen Housing Corporation, while not a party to the original settlement, was required to provide the releases and indemnification as part of any transfer in ownership or redevelopment documentation produced for either the Midway Village or Bayshore Park Sites. The requisite releases and indemnification from HACSM and the developer should have been included in each document associated with the redevelopment proposal, including the documents relating to the selection of MidPen as the project developer and the long-term lease. *See, e.g.*, San Mateo County Resolution File #20-641, dated September 15, 2020 (San Mateo County Board of Supervisors resolution authorizing the Executive Director of the HACSM to execute a certificate of acceptance and an Affordable Housing and Property Disposition Agreement, including a 99-year lease of the property, and related redevelopment documents with the developer, MidPen); https://sanmateocounty.legistar.com/LegislationDetail.aspx?ID=4640722&GUID=B5642605-836E-4D42-8B E8-D180EC2768B0&Options=&Search=. Numerous redevelopment documents, including the DRAPA, and at least one transfer in ownership that have been submitted to DTSC do not include the releases and indemnification required under Section 7.4 of the 2008 Settlement.

As noted in DTSC's January 20, 2021 letter, under the settlement agreements Daly City is obligated to maintain the remedy for the Bayshore Park Site and HACSM is obligated to maintain the remedy for the Midway Village Site. DTSC's letter further stated that the Non-binding Allocation of Responsibility ("NBAR") "allocates 100% of the responsibility of addressing all existing contamination at the Site during and after redevelopment, as joint and several liability, to the Owner (HACSM) and the Operator (MidPen) of these Sites for the new remedy components being implemented under the RAP Amendment." However, the 2008 Settlement Agreement releases and indemnification are much broader in scope. Because the proposed Midway Village redevelopment includes grading and trenching of depths up to 26 feet (well below the average groundwater depth), groundwater should be included in the NBAR allocation of liability. *See supra,* Comments on the DRAPA.

The documents relating to the DRAPA, as well as related studies and other documents submitted to DTSC, do not contain the releases and indemnification provisions required under the 2008 Settlement Agreement. As a result, the United States requests that DTSC require compliance with the terms of the 2008 Settlement Agreement prior to any further development approvals. The United States is willing to work with DTSC, Daly City, HACSM, MidPen, and PG&E to find an acceptable solution.

Thank you for your consideration.

Sincerely,

s/ Mark A. Rigau
Mark A. Rigau
Senior Trial Counsel
United States Department of Justice
Environment and Natural Resources Division
Environmental Defense Section

450 Golden Gate Avenue
Suite 07-6714 (U.S. Mail only)
Suite 07-6549 (temporary FedEx delivery – no signature required on deliveries please)
San Francisco, California 94102
Phone: 415-744-6487 direct
Email: mark.rigau@usdoj.gov

Cc (via email): Julie Pettijohn (julie.pettijohn@dtsc.ca.gov)
Greg Ritter (gari@pge.com)
Monali Sheth (msheth@smcgov.org)
Mike Callagy (mcallagy@smcgov.org)
Raymond Hodges (housing@smchousing.org)
Rose Zimmerman (rzimmerman@dalycity.org)
Shawnna Maltbie (citymanager@dalycity.org)
Abby Goldware Potluri (agoldware@midpen-housing.org)
Matt Lewis (mlewis@midpen-housing.org)
Barbara Deffenderfer (bdeffenderfer@smcgov.org)
Nicholas Targ (Nicholas.targ@hklaw.com)
Charles Morrow (cmorrow@dalycity.org)
Tatum Mothershead (tmothershead@dalycity.org)
Larry McDaniel (Larry.McDaniel@dtsc.ca.gov)
Nelline Kowbel (nelline.kowbel@dtsc.ca.gov)
Grand Cope (Grant.Cope@dtsc.ca.gov)
Kim Walsh Kimberly.Walsh@dtsc.ca.gov

April 30, 2021

TO: Kimberly Walsh, Project Manager, DTSC at Kimberly.Walsh@dtsc.ca.gov

FROM: Clara Johnson, Acting Chair-BBCAG at clara-a-johnson@sbcglobal.net

SUBJECT: Comments on Midway Village-Bayshore DRAP Amendment

The DTSC has taken great care in the preparation of this Amendment. I appreciate those efforts. There are a number of issues still to be addressed. I understand that you have chosen Alternative 3 to be your remediation method.

The COPCs for the site are Manufactured Gas Plant-related VOCs and SVOCs, including naphthalene, benzene, toluene, ethylbenzene, xylenes [BTEX], 1,2,4-trimethylbenzene [TMB], 1,3,5-TMB and cyanide and PAH's

The BBCAG believes that all buildings built on the Midway Village property should have active soil Vaper Monitoring Systems and that they should be reported on quarterly for the first two years and semi-annually for the subsequent thirty years.

Monitoring for soil vapor in park and hardscape areas should continue for 30 years and reporting should occur at semi-annual intervals. The new cap on Midway Village North should be more protective than the current cap. Since many complaints were received of negative impacts on human health when the old caps were relied upon to protect human health. A better cap will provide a margin for error.

We are very concerned about offsite migration of contaminants in groundwater. There should be more monitoring locations on the North and East sides of of the Midway property and some on the adjacent PG&E Martin Service Center since the drainage flows toward the Bay. The path of drainage from this site and the adjacent PG&E Matin Service Center runs through the Levinson Marsh under Bayshore Blvd through the brick arch tunnel through the north ditch to the internal drainage channel on the Baylands under Hwy 101 and into the Bay. The Amendment states that the monitoring of groundwater at Midway is ongoing.

That is a good thing, because the amount of contaminants that are finding their way offsite may depend on the amount of rainfall and the amount of water in the Levinson Marsh. There should be monitoring done of the drainage downstream beyond the Levinson Marsh. Perhaps, there are COPC's that migrated into the Marsh and that are slowly leaking from it through the City of Brisbane's Baylands area into the Bay. How will we ever know unless you investigate? Using a formula result of what RWQCB thinks should have happened, may not account for a probably contaminated Marsh, that should be but hasn't been tested in a long time, if ever.

The transportation of excavated dirt from and to Midway Village will create heavy long term truck traffic. The Cities of Brisbane and San Francisco should be involved in planning the routes and timing of this traffic.

The BBCAG appreciates the opportunity to comment on the Midway Village-Bayshore DRAP Amendment. We intend our comments to help protect human health and the life supporting quality of the environment.

Sincerely

Clara Johnson

Acting Chair, BBCAG