



EDMUND G. BROWN JR.  
GOVERNOR

MATTHEW ROXBOROUGH  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

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## San Francisco Bay Regional Water Quality Control Board

February 23, 2016  
Geotracker Case No. T10000007672

*Sent via electronic mail: No hard copy to follow*

West Yost Associates  
Attn. Mr. Andrew S. Rodgers  
425 South Main Street  
Sebastopol, CA 95472

Email: [arodgers@westyost.com](mailto:arodgers@westyost.com)

**Subject: Conditional Concurrence - Remedial Action Plan, Sampling and Analysis Plan, and Soil Management Plan - Hamilton Square Parcel, City of Novato, Marin County**

Dear Mr. Rodgers:

San Francisco Bay Regional Water Quality Control Board (Regional Water Board) staff received and reviewed public comments on the following documents: 1) the Remedial Action Plan; 2) the Sampling and Analysis Plan; and 3) the Soil Management Plan (collectively referred to as the RAP documents), dated October 2015, for the Hamilton Square Parcel, located at 970 C Street in the City of Novato. The documents were available for a 30-day public comment period that ended November 13, 2015. Water Board staff received and reviewed comments from the following people:

Ms. Amy Baxt, Mr. Erik Berkowit, Mr. James Nevin, Ms. Brigit Nevin,  
Ms. Steffanie Mosebrook, Ms. Tara Spellman, Ms. Cynthia Cannon, and  
Ms. Karen Maloney

Based on our review of the public comments we have provided comments to augment the RAP documents as described below. This letter provides concurrence with the RAP documents with the following conditions that must be completed in a manner acceptable to the Regional Water Board Executive Officer: 1) the recommendations below are incorporated into the RAP documents; and 2) any significant requirements that result from the final EIR are incorporated into the project via an amendment to the RAP documents.

DR. TERRY F. YOUNG, CHAIR | BRUCE H. WOLFE, EXECUTIVE OFFICER

1515 Clay St., Suite 1400, Oakland, CA 94612 | [www.waterboards.ca.gov/sanfranciscobay](http://www.waterboards.ca.gov/sanfranciscobay)

Please incorporate the following into the RAP documents:

1. **Fugitive dust:** Please clarify that stockpiles will be covered immediately once they have been determined to be inactive (this requirement is in addition to the commitment to cover all piles not used within 60 minutes), and that dust control best management practices (BMPs) will be implemented throughout the site to prevent dust from being generated.
2. **Air monitoring:** The RAP documents need to include additional details regarding air monitoring, including, but not limited to, contaminants to be monitored, monitoring equipment, location(s), frequency, responsible parties, corrective action measures in the event of an exceedance, and contingency plans if monitoring equipment fails.
3. **Asbestos and lead:** Test and analyze the tile and mastic still attached to the concrete slab in the vicinity of the bathroom for lead and asbestos. Any remaining lead and asbestos must be removed from the project site prior to soil remediation activities.
4. **Soil sample point 970-W20:** This sample point as shown on Figures 5 and 6 of the RAP documents shows Benzene with a maximum concentration of 0.069 mg/kg at 8 feet. Please clarify in the RAP that the concentration is only slightly above the Environmental Screening Level (ESL) of 0.044 mg/kg (ESL Summary Table A -Residential land use - groundwater is a current or potential source of drinking water), but significantly lower than the Residential ESL of 0.74 mg/kg where groundwater is not a current or potential source of drinking water (ESL Summary Table B -Residential land use - groundwater is not a current or potential source of drinking water. The result demonstrates that soil in that area is safe for residential use and that groundwater is safe in that area when drinking water is supplied by the City of Novato. It is extremely unlikely that shallow groundwater will be utilized for drinking water in this area. In addition, clarify that a human health risk assessment will be conducted after the remediation to evaluate the disposition of both soil and groundwater concentrations, post remediation.
5. **Post-Excavation Soil Sampling:** Please clarify that, at the request of the City of Novato, West Yost has committed to collecting soil samples during the post-excavation soil vapor survey as part of the Risk Assessment.
6. **Monitoring Data:** Please clarify that West Yost shall make air monitoring data available in a timely manner, if requested.
7. **Third-Party:** Please clarify that the City of Novato will be providing a third-party consultant that will be on-site to ensure that all remediation activities are implemented as specified in the approved RAP documents.

Mr. Andrew Rodgers  
Hamilton Square Parcel - RAP  
Case #T10000007672

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As discussed above, this concurrence is based on the completion of conditions in a manner acceptable to the Regional Water Board Executive Officer.

If you have any questions, please contact me at (510) 622-2338 or by e-mail at [margarete.beth@waterboards.ca.gov](mailto:margarete.beth@waterboards.ca.gov).

Sincerely,

Margarete Beth  
Environmental Scientist  
Groundwater Protection Division

Cc:

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