



Environmental Health Services

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May 26, 2020

City of Santa Barbara
Attn: Ms. Jill Zachary
PO Box 1990
Santa Barbara, CA 93102-1990

Subject: Ortega Park
604 E. Ortega Street, Santa Barbara, California
SMU# 760, Global ID# T10000014371, APN# 031-172-002

Dear Ms. Zachary:

The Santa Barbara County Public Health Department, Environmental Health Services Division (EHS), Site Mitigation Unit (SMU) has reviewed the *Phase II Environmental Site Assessment Report (Report)*, dated June 13, 2019, for the subject site. EHS has the following comments for this site:

1. The *Report* notes that on the 5.35 acre site, fifteen(15) soil brings were advanced to four (4) feet below ground surface(bgs), and five(5) hydropunch borings were advanced to ten (10) feet bgs.
2. The *Report* indicates that this site is a former city dump (landfill) used from circa 1902 – 1930, and then was converted to a park. The planned major renovation of the park will include, replacing the pool, installing a splash pad, building a skate park and replacing the existing grass field with an artificial turf field and replacing the bathroom/pool facilities building. Several of these facilities will require excavating to depths of approximately six to eight (6-8) feet bgs.
3. The *Report* notes in the Figures and Tables elevated soil sample results for the following:
 - a. Total Petroleum Hydrocarbons (TPH) in the diesel and motor oil ranges (RB3-7 & RB9-12).
 - b. Metals: arsenic, barium chromium, lead, mercury, thallium and zinc (RB5-7, RB9-11, HP3-5).
 - c. Polycyclic Aromatic Hydrocarbons (PAHs) - Benzo(a)pyrene equivalents (RB3, RB5 – 8).
4. The *Report* notes in the Figures and Tables elevated groundwater sample results for the following:
 - a. Total Petroleum Hydrocarbons (TPH) in the diesel and motor oil ranges.
 - b. Volatile Organic Compounds (VOCs): one sample result for benzene was equal to the MCL
5. The figures indicate impacts are located at the following percentages over the 5.35 acres:
 - a. Figure 3 depicts the TPH distribution in soil at approximately 8 %, or about 0.43 acres.
 - b. Figure 4 depicts Lead (Pb) distribution in soil at approximately 39 %, or about 2.09 acres.
 - c. Figure 5 depicts PAH concentrations in soil at approximately 14 %, or about 0.75 acres.
6. While additional assessment could further refine the spatial distribution of compounds of concern (COCs), due to property's historic use as a dump, those dollars may be better spent removing and

disposing of impacted soils when encountered during park renovation activities, which may reportedly occur in a phase approach. Thus, following an EHS approved corrective action plan / soil management plan appears to be the most cost effective way to appropriately handle impacted soils when encountered during park renovation activities.

7. Since the planned significant renovation will encounter hazardous materials, multiple work agencies will likely have restrictions on how and when work will be allowed to proceed. The agencies most likely with restrictions include but are not limited to:
 - a. SBCo-EHS - will require all excavated impacted soils, above cleanup goals (appropriate ESLs), to be properly disposed of offsite and not used for fill onsite or anywhere else.
 - b. The City of Santa Barbara may have storm water management requirements such as storm water infiltration basins depending on the grading plan. If so, those areas may need to be either above determined levels or remediated to those levels.
 - c. The Central Coast–Regional Water Quality Control Board may have additional requirements for lead in soil pertaining to leaching to groundwater.
 - d. The Santa Barbara APCD - may restrict when work can occur, such as when school is out of session, and will likely require various dust control methods.
8. This directive letter is not a *“Corrective Action Plan”* or a *“Soil Management Plan.”*

After a careful review of the *Report*, EHS has the following directives:

- A. Upload the Phase II ESA Report, EDF lab data and boring logs to GeoTracker by **June 1, 2020**, and upload all future required data, EDF, boring logs, reports, to GeoTracker within 8-weeks of the completion of field work.
- B. Submit a corrective action plan / soil management plan, including a draft grading plan indicating the depths of excavations in various areas, to EHS by **June 10, 2020**
- C. Materials left-in-place exceeding hazardous waste thresholds may require a Land Use Covenant.
- D. Submit to EHS a schedule for implementation, 30-days after receiving approval from Community Development, and implement the plan within 120-days
- E. Notify EHS one-week prior to the start of field work.

If you have any other questions regarding the aforementioned, please contact me at (805) 346-8344, or via email at steve.nailor@sbcphd.org. Written correspondence regarding this matter should be sent to EHS at Attn: Steven Nailor 2125 S. Centerpointe Parkway, Suite 333, Santa Maria, CA 93455.

Respectfully yours,



E. Steven Nailor, REHS, EIT
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LUFT & SMU Programs

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GeoTracker