Department of Toxic Substances Control

Matthew Rodriquez
Secretary for
Environmental Protection

Deborah O. Raphael, Director
700 Heinz Avenue
Berkeley, California 94710-2721

Edmund G. Brown Jr.
Governor

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Ms. Cindy Cathey
Superintendent
San Leandro Unified School District
14735 Juniper Street
San Leandro, California 94579

Dear Ms. Cathey:

Thank you for the opportunity to comment on the Initial Study and Mitigated Negative Declaration for the Pacific Sports Complex and Burrell Field Project (Project), in San Leandro. The Project consists of demolition of the existing football field, construction of new football field, team rooms and rest rooms, reconfiguration of the existing parking lot, construction of a new parking lot, replacement of the existing softball field, little league baseball field and soccer field; and installation of a 30-foot high green netting structure along the I-880 frontage.

As you may be aware, the California Department of Toxic Substances Control (DTSC) oversees the cleanup of sites where hazardous substances have been released pursuant to the California Health and Safety Code, Division 20, Chapter 6.8. As a Responsible Agency, DTSC is submitting comments to ensure that the environmental documentation prepared for this project under the California Environmental Quality Act (CEQA) adequately addresses activities pertaining to releases of hazardous substances.

In page 41 of the Initial study, Hazardous and Hazardous Materials Section 8 (b) indicates that soil sampling was conducted for lead along I-880 frontage and test results indicated lead levels are below Environmental Protection Agency (EPA) and California EPA thresholds. However, this section doesn't indicate what EPA threshold levels were considered. DTSC requested soil sampling results from the San Leandro School District and lead concentrations range from 79 milligrams per kilograms (mg/kg) to 350 mg/kg. The California human health screening levels in soils for lead are 80 mg/kg for residential land use and 320 mg/kg for industrial/commercial land use. Since this project is a sports complex for children, an appropriate screening level for lead should be chosen to protect the children from exposure to lead and appropriate mitigation measures should be implemented. Lead may cause a range of health effects, from

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behavioral problems and learning disabilities, to seizures and death. Children six years old and under are most at risk.

On page 2 of the Mitigated Negative Declaration, Mitigation Measure AIR-1 indicates that haul trucks will transport soil, sand and debris offsite. Since the sampling results indicated that lead concentrations are up to 350 mg/kg, additional testing will be required before soil is hauled offsite for disposal. (2)

If previously unidentified hazardous substances, sumps, underground tanks or any other structures are encountered during excavation and grading, DTSC should be informed and the issues will need to be addressed as part of this project. For example, if hazardous substances were encountered, the project should include: (1) an assessment of air impacts and health impacts associated with the excavation activities; (2) identification of any applicable local standards which may be exceeded by the excavation or demolition activities, including dust levels and noise; (3) transportation impacts from the removal or remedial activities; and (4) risk of public upset should there be an accident at the Site. (3)

If you have any questions or would like to schedule a meeting, please contact Jayantha Randeni at (510) 540-3806. Thank you in advance for your cooperation in this matter.

Sincerely,

for Karen M. Toth, P.E., Unit Chief
Brownfields and Environmental Restoration Program

cc: Governor's Office of Planning and Research
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