

**Appendix B to Response to Comments
2008 Recirculated RDEIR**

**OCHCA Remedial Action Plan Letter
(March 4, 2005)**



COUNTY OF ORANGE
HEALTH CARE AGENCY

REGULATORY HEALTH SERVICES
ENVIRONMENTAL HEALTH

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March 4, 2005

David L. Craig
Chevron Environmental Management Company
9525 Camino Media, Room B-1045
Bakersfield, CA 93311

Subject: Remedial Action Plan dated February 2005

Re: West Coyote Oil Field
North of Rosecrans Avenue (between Beach Blvd. and Euclid)
Fullerton, CA 92833
OCHCA Case #97IC24

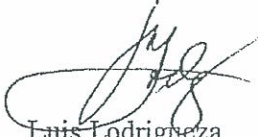
Dear Mr. Craig:

Please be advised that this Agency has reviewed the subject plan and found it acceptable for implementation provided the following considerations are addressed:

1. If, after notification, Agency staff could not be present to witness the collection of verification samples—to include not only samples from excavations and of treated soil but also of soils for reuse onsite—sampling activities must be re-scheduled.
2. In view of the presence of naphthalene—up to 7,500 ug/kg in well site sample MC145-PHI-6; 4,700 ug/kg in sample HS23-E-15; 34,000 ug/kg in sample TS AWT 51 Surface; 1,400 ug/kg in sample CD3-T1-10½; 3,500 ug/kg in sample MARKER110-N-5, among others—and the State's adoption of a 'unit risk factor' and a 'slope factor' for naphthalene (thereby requiring an acceptable incremental cancer risk from residual naphthalene contamination beneath a development site prior to any 'no further action' consideration), please refer to this Agency's letter dated October 20, 2004 for guidance on the further assessment of naphthalene-impacted sites within the above-referenced property.

If you have any questions regarding this matter, please contact Luis Lodrigueza at (714) 433-6253.

Sincerely,



Luis Lodrigueza
Hazardous Waste Specialist
Hazardous Materials Mitigation Section
Environmental Health Division

cc: Kamron Saremi, Santa Ana Regional Water Quality Control Board
Schaun M. Smith, Blasland, Bouck & Lee, Inc.,
14142 Denver West Parkway, Suite 350, Golden, CO 80401