



Alan C. Lloyd, Ph.D.
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

700 Heinz Avenue, Suite 200
Berkeley, California 94710-2721



Arnold Schwarzenegger
Governor

April 6, 2005

FILE COPY

Mr. Doug Mosteller
Cherokee Investment Partners, LLC
4500 S. Ulster Street, Suite 500
Denver, Colorado 80237

Dear Mr. Mosteller:

The Department of Toxic Substances Control (DTSC) received the Work Plan to Stockpile Clean Sediments at the Zeneca/Former Stauffer Chemical Company site located in Richmond, California. The work plan was submitted as required by the Site Investigation Order, Docket No. 04/05-006 (Order). As part of the Habitat Enhancement Area remediation and restoration, approximately 6000 cubic yards of soil will be imported to the site and stockpiled in an area south of Building 240. Soil management and dust control measures will be conducted as described in the Remedial Design Detail Addendum dated August 9, 2004. Since the implementation of the Remedial Design Detail Addendum and its subsequent revisions, DTSC has observed that modifications to the plan are required prior to approval of this work plan. Pursuant to section 6.8 of the Order, these modifications are as follows:

1. The condition of all haul roads must be continuously monitored. All pot holes and ruts must be repaired prior to the next day that trucks will be using the haul road.
2. If dust generated at the Site cannot be adequately controlled by the use of water, other dust suppressants and/or additional gravel should be applied to the haul road(s) or point of dust generation. Use of the haul road(s) will cease until the additional control measures are put into place.
3. The water truck used to provide dust suppression and to clean on and off-site paved streets must be in proper working order. If the water truck is unable to supply a sufficient amount of water to provide dust suppression, use of the haul roads will cease until a suitable replacement water truck is at the site and operational.
4. A street sweeper capable of maintaining the on and off-site paved roads free of dust generated by the site must be available at the site. The street sweeper should not generate additional dust while in operation. If the street sweeper is not able to keep the paved streets clean, hauling operations must cease until a new street sweeper is obtained.
5. In the event the hand held air monitoring instruments detect concentrations

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approaching or above action levels, the stockpiles will immediately be covered with plastic tarps that are weighted down.

6. Please clarify the number of stockpiles that will be created and provide the maximum physical dimensions of the piles.

Except for items 5 and 6, these conditions are also applicable while off-hauling the stockpiled hazardous waste soils (i.e. tarped pile and stockpiles located within the bermed area) located on Lot 3.

If you have any questions regarding this letter, please contact me at (510) 540-3843 or Lynn Nakashima of my staff at (510) 540-3839.

Sincerely,



Barbara J. Cook, P.E., Chief
Northern California – Coastal Cleanup
Operations Branch

cc: Mr. William Carson
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