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January 6, 2021

Vic Pal, Case Manager
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Subject: Draft Feasibility Study/Remedial Action Plan for UPC OU-2 Site

Dear Mr. Pal:

Thank you for the opportunity to review and comment on the draft Feasibility Study/Remedial Action Plan (“FS/RAP”) for Universal Paragon Corporation (“UPC”) Operable Unit 2 (“UPC OU-2”), an approximately 140-acre parcel of land located in the southern portion of the former Southern Pacific railyard located in Brisbane, California. In reviewing the draft FS/RAP, the City of Brisbane (“City”) offers the following comments:

1. First and foremost, the City wants to make sure that UPC implements a remedy that is (1) protective of human health and the environment and (2) consistent with Measure JJ. In doing so, the cost of remediation should not be the driver in the remedy selection process.
 - a. Given that the preferred remedy results in most of the contamination being left in place, the City would like to see some mass removal of the most contaminated soil. Therefore, it is the City’s preference that material containing chemical concentrations in excess of State of California Total Threshold Limit Concentrations (“TTLC”) in the upper two feet of existing soil be excavated and disposed of at an off-site facility in accordance with applicable laws and regulations, rather than simply being left in place and capped.
2. Conceptually, with proper financing and implementation, the proposed remedy in the UPC OU-2 FS/RAP should be protective of current and future City residents and workers (both onsite and offsite) and the environment. Nevertheless, information regarding current soil vapor conditions and the extent of the chlorinated volatile organic compound (“CVOC”) impacted area are not available and specific details about how the remedy will be implemented are not presented in the FS/RAP.

To address potential concerns regarding the protectiveness of the remedial actions to be implemented and their compliance with the City's requirements and standards, including Measure JJ, the City requests to remain engaged with UPC and the San Francisco Bay Regional Water Quality Control Board ("Water Board") during the Implementation phase of the environmental remediation process. More specifically, the City would like to be provided the opportunity to review and comment on the future Remedial Design Implementation Plan and other UPC submittals to the Water Board regarding topics such as:

- a. Cap and utility corridor design;
- b. Soil vapor sampling;
- c. Soil survey/assessment of the Industrial Way area;
- d. Evaluation and treatment of CVOC impacts to soil and groundwater in the CVOC-impacted area;
- e. Soil management plan;
- f. Vapor intrusion assessments;
- g. Vapor intrusion mitigation system design;
- h. Indoor air sampling;
- i. Construction mitigation measures (e.g., dust control plan, stormwater pollution prevention plans, etc.);
- j. Air monitoring;
- k. Soil excavation, grading, and management;
- l. Import fill standards;
- m. Haul routes and transportation procedures;
- n. Long-term maintenance plans including associated financial assurances;
- o. Final sea rise analysis (to confirm that potential impacts due to rising groundwater levels are addressed in addition to potential inundation threats); and
- p. Land use restrictions.

Thank you for your consideration of these comments. Please contact me at 415-508-2113 should you have any questions regarding this letter.

Sincerely,



Karen Cunningham
Mayor, City of Brisbane

Cc: Clay Holstine, City Manager
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