



# County of San Diego

**ELISE ROTHSCHILD**  
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH  
LAND AND WATER QUALITY DIVISION  
P.O. BOX 129261, SAN DIEGO, CA 92112-9261  
Phone: (858) 505-6700 or (800) 253-9933 Fax: (858) 514-6583  
[www.sdcdeh.org](http://www.sdcdeh.org)

**AMY HARBERT**  
ASSISTANT DIRECTOR

May 2, 2019

Mr. William R. Inghram  
Warmington Residential CA  
3090 Pullman Street  
Costa Mesa, CA 92626

Dear Mr. Inghram:

VOLUNTARY ASSISTANCE PROGRAM (VAP) CASE #DEH2019-LSAM-000543  
ESCONDIDO 2.74  
2222 AND 2224 SOUTH ESCONDIDO BOULEVARD, ESCONDIDO, CA 92025

Staff of the Department of Environmental Health (DEH) have reviewed the October 19, 2018 *Phase I Environmental Site Assessment* (Phase I ESA), the November 8, 2018 *Limited Phase II Subsurface Investigation Report* (Phase II ESA), the November 13, 2018 *Supplemental Subsurface Investigation Report* (Supplemental Phase II ESA), and the December 27, 2018 *Screening Health Risk Evaluation* (SHRE), all prepared by Hillmann Consulting LLC (Hillmann).

According to the Phase I ESA, the subject Property is located on the east side of South Escondido Boulevard between Brotherton Road and Sherman Way in a mixed-use commercial-residential section of Escondido. The Property occupies 2.74 acres and includes a commercial building that was constructed in 1949 and a residence built in 1979. The Property is being considered for redevelopment for residential purposes. The Property appears to have operated as a welding shop and a junkyard since circa 1949. There was the potential for soil contamination from heavy metals, total petroleum hydrocarbons (TPH), polychlorinated biphenyls (PCBs), and volatile organic compounds (VOCs) due to past and current operation as a junkyard. There was also the potential for vapor encroachment due to potential historic VOC and petroleum releases. These were considered to be a Recognized Environmental Condition (REC) in connection with the Property. *De minimis* staining was noted throughout the welding shop on the concrete floor, likely from various lubricants used on the machines. Due to the fact that there are no floor drains and staining appeared limited, this was not considered to be a REC in connection with the Property.

The Phase II ESA reported on soil and soil gas sampling to identify potential contamination from the historical operations at the Site. The investigation included soil gas sampling to determine future possible vapor intrusion impacts. Results from soil gas sampling indicated low levels of PCE which are slightly above current Department of Toxic Substances Control (DTSC) screening levels for future residential construction, indicating a potential vapor intrusion risk that requires additional investigation. In addition, a couple of samples had high concentrations of heavy metals including lead and cadmium that exceed current residential screening levels. These results indicated that additional assessment of the Site was warranted.

The Supplemental Phase II ESA reported on an additional investigation that included additional soil and soil gas sampling to attempt to define the vertical and lateral extents of contamination. Results from soil sampling for lead and cadmium indicate the lateral extent of contamination was not yet defined, but the

vertical extent of contamination was limited to surficial soil (<1.5 feet below grade). This material will require excavation and removal followed by a confirmation soil sampling program to define the final extent of contamination.

The SHRE presented results to determine if the presence of trace concentrations of metals (most notably cadmium and lead), and petroleum hydrocarbons in soil plus a few VOCs detected in soil gas could pose a health risk to future occupants of the Site.

The SHRE concluded that a proper risk assessment study could yield a positive risk management decision, especially if additional preventative measures are undertaken as part of the proposed development. This might include excluding the welding shop area from proposed housing using it instead for roadways or parking. In addition, if this area was provided with liquid boot protection, it could possibly be used for residential purposes with no other action required. Hillmann recommended pursuing a proper risk assessment and/or considering possible mitigating factors if necessary.

At the time of the submittal of the VAP application, DEH was obligated to notify DTSC and the San Diego Regional Water Quality Control Board (RWQCB) if they object to DEH as lead agency for the case. The RWQCB responded that they do not object to DEH as lead agency for the case but concluded that PCBs were not sampled or analyzed. The RWQCB recommended that, since this is a very old junkyard and could have received anything, the Site should be screened for pesticides and PCBs.

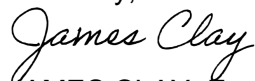
Based on our review of the documents, DEH concurs with Hillmann's recommendation to conduct a human health risk assessment (HHRA). DEH also concurs with the RWQCB's recommendation to conduct sampling for PCBs and pesticides. Because of the length of time this Site was used as a junkyard and because of its once rural location, tanks and piping used to store and convey pesticides may have been stored on the Site at various times in the past, hence the need for soil sampling for pesticides.

In addition, due to the VOCs detected in soil gas, DEH also requires that a groundwater sample(s) be collected to determine if groundwater has been impacted.

DEH requires that a workplan for additional soil sampling for pesticides and PCBs, and groundwater assessment be submitted. The workplan can also propose the scope of remedial excavation activities for the areas of elevated metals concentrations. Following DEH review of the workplan, the results of the assessments performed to date can be included in a comprehensive HHRA.

Please contact me at (858) 505-6969 if you have any questions.

Sincerely,



JAMES CLAY, Environmental Health Specialist III  
Site Assessment and Mitigation Program

cc: Mr. Brandon Clements, Hillmann (by email)