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Secretary for
Environmental Protection



Department of Toxic Substances Control

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Acting Director
1001 "I" Street
Sacramento, California 95812-0806



Arnold Schwarzenegger
Governor

July 22, 2010

Mr. Eric Hoffman, Authorized Member Representative
Runkle Canyon, LLC
c/o KB Home Southern California
10990 Wilshire Boulevard
Los Angeles, California 90024

DEPARTMENT OF TOXIC SUBSTANCES CONTROL REVIEW AND COMMENTS ON THE RUNKLE CANYON RESPONSE PLAN, VENTURA COUNTY, CALIFORNIA

Dear Mr. Hoffman:

The California Department of Toxic Substances Control (DTSC), assisted by the California Department of Public Health's Radiologic Health Branch, has completed its review of public comments regarding the Response Plan prepared by Dade Moeller & Associates, dated December 4, 2008. DTSC made the Response Plan available for public comment from January 14, 2009 through February 13, 2009. The Response Plan includes three main components:

- Site summary, including a history of radionuclide sampling in Runkle Canyon, and a radiological health assessment
- Soil-Sampling Plan for Proposed Non-Residential Eastern and Southeastern Areas of Runkle Canyon (Appendix A)
- Plan for Removal of the Tar Material from the Drainage Areas of Runkle Canyon (Appendix B)

Based on DTSC's review of the Response Plan, and after careful consideration of the public comments, as well as review of analytical results from DTSC's own collection of samples, DTSC has reached the following conclusions:

White Crystalline Material

Based on sampling and analytical results DTSC has determined that the white crystalline material is an evaporite salt consisting of naturally-occurring minerals that does not pose a threat to human health or the environment. Based on this

determination, no additional action is required with regards to the white crystalline material.

Surface Water

Community members expressed concerns regarding some surface water samples that they had collected which exhibited some higher metals concentrations than samples collected during previous and subsequent investigations. To evaluate current conditions DTSC staff collected two samples after a rainstorm and analyzed the samples for metals concentrations. Surface water flow at the site is ephemeral so sampling runoff is only possible directly after rainstorms. These samples contained relatively low concentrations of metals which are comparable to concentrations detected during previous investigations. Arsenic, vanadium and chromium were not detected in the surface water samples. Analytical data from these two samples validate the analytical data from previous investigations; consequently, DTSC is not requiring additional surface water investigation.

Response Plan

DTSC reviewed the Response Plan prepared in response to an October 17, 2008 letter sent from DTSC to Runkle Canyon, LLC. DTSC approves the Response Plan, provided, however, that the Response Plan be amended in the following respects:

The Response Plan Summary states that DTSC requested "Further confirmation that there is no health risk from strontium-90 and cesium-137 in the soil." Revise this statement to present an objective of evaluating the health risk from strontium-90 and cesium-137 in soil rather than assuming from the beginning that no health threat exists.

Soil-Sampling Plan for Proposed Non-Residential Eastern and Southeastern Areas of Runkle Canyon (Appendix A)

Radiological Sampling

The fourteen samples proposed to be collected as described in the Soil-Sampling Plan for Proposed Non-Residential Eastern and Southeastern Areas of Runkle Canyon (Appendix A) shall be supplemented by twenty-two additional samples to be collected at the locations depicted in the attached site diagram. DTSC's proposed sampling locations and rationale for collection of the additional samples is described in the attached figure and table (Attachment 1). DTSC requires that 10% of the samples be replicates. DTSC staff will accompany sampling personnel during the radionuclide testing and provide oversight by evaluating specific sampling locations and collecting sample splits. Split samples obtained by DTSC personnel in the field shall be under DTSC chain-of-custody and sent to a DTSC contract laboratory

meeting the required performance standards, for analysis. All additional samples collected for radionuclides at the subject site shall be analyzed for strontium-90 and cesium-137 and no other radionuclides or chemicals.

Plan for Removal of the Tar Material (Appendix B)

Ventura County Watershed Protection District

The Ventura County Watershed Protection District commented that the proposed excavation activity may encroach upon red line channels located within their jurisdiction, and that an encroachment permit from the District will be required for any work in, on, over, under, adjacent or across both of these red line channels. Runkle Canyon LLC needs to contact the Watershed Protection District prior to beginning any excavation to verify the need for an encroachment permit, and to obtain an encroachment permit if one is required.

Confirmation Sampling

The Plan for Removal of the Tar Material (Appendix B) describes the excavation, removal and proper disposal of approximately 30 cubic yards of tar-like material from piles of mined aggregate (sand and gravel) within the "Fish Tail" of three drainages that converge within the property. Runkle LLC must perform confirmation sampling to verify that the tar-like material has been removed. The confirmation sampling shall verify that, at the completion of the removal, benzo(a)anthracene concentrations in soil do not exceed the United States Environmental Protection Agency, Region 9, Preliminary Remediation Goal and site-specific clean-up goal of 0.015 milligrams/kilogram. A minimum four sidewall samples and three samples from the bottom of the excavation area shall be collected and the results provided in a completion report provided to DTSC within 90 days of completing the excavation work.

Former Quarry Area

The former quarry was inspected by DTSC staff on July 13, 2010 and DTSC determined that fill material is present at the base of the quarry (see Attachment 2 DTSC Daily Filed Report). Sampling of the fill material is required to evaluate whether the fill presents a threat to human health and the environment. At the direction of DTSC, the Runkle LLC consultant shall place three trenches in the fill area, using a backhoe, to assess the nature of the fill and for collection of samples. The trenches will allow evaluation of the fill and assess if ash from burn material is present. There was no ash or debris present at the surface during DTSC's inspection. DTSC will collect two discrete samples from each trench, one at 0-6 inches and one from three to four feet below grade surface. DTSC will

send the samples to the DTSC Environmental Chemistry Laboratory (ECL) and analyze the samples for chemicals known to be used at the Former Santa Susana Field Laboratory, Area IV, including metals, strontium-90, cesium-137, volatile organic compounds, total petroleum hydrocarbons (TPH), and polychlorinated biphenyls (PCBs). If burned debris is present in the fill, then the analytical testing will also include semi-volatile compounds and dioxins.

Schedule

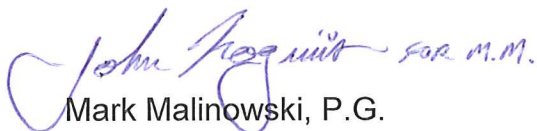
Runkle Canyon, LLC shall provide a revised Response Plan and Appendices modified to incorporate the above identified changes. The revised plan will call for samples to be collected by Runkle Canyon LLC, and split samples by DTSC, not later than July 31, 2010. The revised plan shall call for the laboratory analytical results to be expedited. Given the additional sampling, the sampling will likely take two to three days to complete rather than a single day identified in the original response plan.

Runkle Canyon, LLC shall submit a written report with a summary of the analytical results not later than August 31, 2010. The report shall also contain a revised radiological risk assessment to include all sample results obtained pursuant to the Response Plan, together with all prior sampling results taken at the subject property.

If the plan and report identified above are received by the dates specified, then DTSC anticipates being able to issue a final decision no later than September 30, 2010.

If you have any questions regarding the above, please contact me at (916) 255-3717 or Mr. Richard Brausch at (916) 327-1186.

Sincerely,


Mark Malinowski, P.G.
Project Director

Attachment: *DTSC Proposed Sample Locations and Rationale*
DTSC July 13, 2010 Quarry Inspection Report

cc: (see next page)

Mr. Eric Hoffman
July 22, 2010
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cc: (via e-mail)

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Attachment 1
Proposed Sampling Figure and Table

Attachment 1 - DTSC Proposed Supplemental Sampling
Sampling locations shown on attached figure.

Proposed Sample	Rationale	Proximate previous locations
PS-1	Proximate location to SSFL and along minor wind pattern	MB-3, SS-7, SS-7A
PS-2	Evaluate potential drainage from SSFL onto Runkle Canyon Property- SS-6 was elevated	SS-6 (elevated)
PS-3	Evaluate potential drainage from SSFL onto Runkle Canyon Property	SS-6 (elevated), MB-4
PS-4	Evaluate potential drainage from SSFL onto Runkle Canyon Property	NA
PS-5	Evaluate potential drainage from SSFL onto Runkle Canyon Property	NA
PS-6	Evaluate potential drainage from SSFL meets main Runkle Canyon Drainage	NA
PS-7	Evaluate potential in drainage from SSFL aerial (major wind direction) deposition.	NA
PS-8	Evaluate potential in drainage from SSFL aerial (major wind direction) deposition.	SS-5, SS-5A
PS-9	Evaluate elevated Strontium 90 result in SS-3	SS-3 (elevated)
PS-10	Evaluate drainage from elevated readings at GP-52-M	GP-59-M
PS-11	Evaluate elevated Strontium 90 result in GP-52-M	GP-52-M (elevated)
PS-12	Evaluate elevated Strontium 90 result in GP-52-M	GP-52-M (elevated)
PS-13	Evaluate elevated Strontium 90 result in GP-44-M	GP-44-M
PS-14	Evaluate sediment up-drainage of GP-44-M (elevated)	NA

Attachment 1 - DTSC Proposed Supplemental Sampling (continued)

Proposed Sample	Rationale	Proximate previous locations
PS-15	Evaluate potential aerial deposition from SSFL (major wind direction). Strontium 90 result in GP-42-M (above 1.7 pCi/g DCGL)	GP-42-M
PS-16	Evaluate elevated Strontium 90 result in GP-40-M. Evaluate proposed residential property	GP-40-M
PS-17	Evaluate elevated Strontium 90 result in GP-38-M	GP-38-M
PS-18	Evaluate elevated Strontium 90 result in GP-04-D and sediment in former reservoir.	GP-04-D
PS-19	Evaluate elevated Strontium 90 result in GP-29-M	GP-29-M
PS-20	Evaluate proposed residential property (furthest from SSFL)	MBE-9 & MBE-10
PS-21	Evaluate proposed residential property	GP-13-M
PS-22	Evaluate proposed residential property	GP-06-M & GP-07-M

Attachment 2
DTSC Daily Field Report

DTSC
Daily Field Report

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Site/Facility: RUNKLE CANYON

Name JOHN NAGINIS	Date 7-13-2010	Day M (T) W T F S	Site Code 301383-11	PCA 12045
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Notes

13:00 - ARRIVE AT RUNKLE CANYON GATE MEET KRISTEN KEIPERT OF KB HOMES AND JAMES DEWODDY OF STANTEC COMPANY. DISCUSS PURPOSE OF VISIT: EXAMINE QUARRY AREA TO LOOK FOR FILL SOIL. IF FILL SOIL IS APPARENT THEN MAP OUT EXTENT AND DO A RECON. WITH METAL DETECTOR.

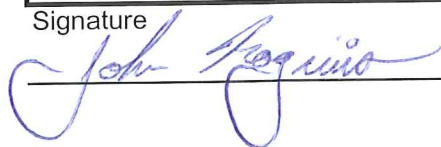
FOUND QUARRY WITH NO PROBLEMS. MANY BUSHES ARE GROWING OVER THE AREA. WE WENT THROUGH THE BUSHES TO THE QUARRY FACE LOOKING FOR SIGNS OF FILL MATERIAL AND DUMPING, SUCH AS ABNORMALLY FLAT AREAS OR ABRUPT CHANGES IN TOPOGRAPHY, TRASH OR DEBRIS STICKING OUT OF THE GROUND, OR ABRUPT CHANGES IN VEGETATION.

AN ARE OF FAIRLY FLAT GROUND THAT APPEARED TO HAVE A CHANGE IN SLOPE WITH THE SURROUNDING TOPOGRAPHY WAS IDENTIFIED ADJACENT TO THE MAIN RUNKLE ROAD, BETWEEN THE ROAD AND THE QUARRY. IT APPEARED TO BE AN AREA OF FILL SOIL WITH THE DEPTH OF FILL RANGING FROM 1 FOOT TO ABOUT 5 FEET AT MOST. I DID SEVERAL TRANSECTS ACROSS THE FILL WITH THE METAL DETECTOR (SCHONSTEDT) AND FOUND TWO ANOMALIES. ONE WAS FAIRLY DISTINCT AND DISCRETE AND THE OTHER WAS DIFFUSE.

I MAPPED THE PERIMETER OF THE APPARENT FILL AREA AS WELL AS THE TWO ANOMALIES USING A GPS UNIT. I ALSO MAPPED THE ADJACENT ROAD TO GIVE SOME CONTEXT TO THE LOCATION OF THE FILL. BEFORE LEAVING THE SITE I MAPPED SOME LANDMARKS IN THE AREA SO I GEOREFERENCE FIGURES OR MAPS.

I LEFT THE SITE AT ABOUT 15:30

Signature



Name

JOHN NAGINIS

Title

SENIOR GEO.