

February 21, 2025



Mr. Ahmad Aboughaida
Project Manager
Site Mitigation and Restoration Program
Department of Toxic Substances Control (DTSC)
Via Email Ahmad.Aboughaida@dtsc.ca.gov

RE: Escondido Neighbors United comments on October 2024 Soil Vapor Probe & Indoor Air Sampling Report and the Semiannual Monitoring Event, Chatham Site

Dear Mr. Aboughaida,

Escondido Neighbors United has reviewed the new documents posted to Envirostor. We have the following questions and comments and request a response.

Soil Vapor Testing and Results

We were very concerned to learn about the presence of the Chatham Barrel Yard Chemicals of Concern (COC) in soil vapor samples collected in the three most downstream soil vapor monitoring locations along Felicita Road.

1. Has DTSC required that the full extent of the soil vapor (SV) plume be defined? If not, why not? We are unconvinced that the soil vapor plume is limited to the exact locations where the probes are located. Similarly, what data has been collected and what analysis can be conducted to establish that the soil vapor probes are located at locations where the highest concentrations of the COCs are in the soil vapor plume? We request DTSC require additional sampling points and modeling to confirm that the full extent of soil vapor releases have been identified.
2. We request that DTSC conduct an analysis (or share results if you have already) as to whether or not the soil vapor test results indicate that additional groundwater monitoring wells should be installed to better understand how the plume is responding to the 'remedy' of natural attenuation.
3. Please share analysis done to determine if the groundwater vapor plume extends beyond what is currently interpreted to be defined area which may represent an additional human health risk?
4. Since it has rained last week, Felicita Road, very close to the SV monitoring sites is 'seeping' again, now in two places. Does this pose an exposure to drivers, walkers, and bikers since soil vapors are present in those locations?
5. We are attaching the new easement the County has with the city for the discharge area from Oak Creek into Felicita Creek. We've just had our first big storm event of the year and, indeed, much sediment flowed in the creek south of Via Rancho. As you will read, in Section G. the Easement admits "*the improvements will allow a greater volume of water to flow under Felicita Road...*" but, goes on to make assumptions that increasing and concentrating flows will "*not adversely impact Felicita Park.*". We do not agree, but either way, the

document does not state that the contamination plume or the creek will not be impacted. We expect that the Oak Creek development will continue to add significant loads to the creek and may impact the behavior of the plume.

Bottom-line, the heavy rains have started and the flows are huge, as is the sediment transport. Significant continuing and visible sediment loading into Felicita Creek south of Via Rancho continues to occur. We are concerned that this may alter the movement of the contaminant plume and/or contamination. We request that DTSC conduct an independent analysis of whether this increased sedimentation is affecting contaminant transport or exposure risks from contamination in and under the creek.

6. Has the new landowner of the property directly south of Felicita Park which contains the SG-18 location been contacted and updated on the activities of the remedial program?

Ground and surface water monitoring

1. Sadly, again, the monitoring shows VOCs in the surface waters in Felicita Creek in the public park. Again, the results show the VOCs daylighting in the same area FC-14 to FC-10. We repeat our request that this small, but high-use, publicly accessible section of the creek be posted about the presence of contamination **at creekside**. One of the previous kiosk notices (near wedding venue) has been removed and not replaced. We request that all kiosks carry the warning until the creek is posted.
2. Thank you for adding the Schulte1 well and we are happy to see it is getting a treatment system.

Since, as we understand, the Regional Water Board is no longer reviewing the water related reports, it is incumbent on DTSC to boost its water related reviews. Please let us know who in your department is the water quality specialist that we can speak with regarding Chatham.

We appreciate your efforts and thank you for the opportunity to comment on these documents.

Sincerely,

Laura Hunter

Ron Forster

Carol and Ken Austin

Denise Rolan

Brenda and Dan Townsend

Phil Lauder

Tina Iki

Scott Swalley

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cc.

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