

On October 30, 2004, Leighton personnel collected six (6) soil samples at six (6) locations every 0.5 feet to 2.5 feet below grade. The purpose of the additional samples was to assess the vertical extent of OCP impacted soil. The samples were analyzed for OCPs by US EPA Method 8081A by Calscience Environmental Laboratories, Inc. of Garden Grove, California. Up to five (5) OCPs were detected in the 36 samples. The detected OCPs included: 4,4'-DDD, 4,4'-DDE, 4,4'-DDT, Dieldrin and Toxaphene. Sample locations are shown on Figure 2. The concentration range is summarized below.

4,4'-DDD – 7 to 110 ug/kg  
 4,4'-DDE – 26 to 270 ug/kg  
 4,4'-DDT – 6.4 to 180 ug/kg  
 Dieldrin – 13 to 17 ug/kg  
 Toxaphene – 120 to 1,600 ug/kg

Toxaphene was detected in 9 of the 36 samples at a concentrations above the USEPA Region 9 Preliminary Remediation Goals (PRG) for soil of 440 ug/kg for residential use (EPA, 2004). Levels of 4,4'-DDE, 4,4'-DDT, 4,4'-DDD and dieldrin were detected below their respective PRG level. Therefore, toxaphene is a recognized environmental issue of concern.

To estimate the volume of soil with toxaphene above the USEPA Region 9 Preliminary Remediation Goals (PRG) for soil of 440 ug/kg for residential use, the site was divided into seven (7) areas with toxaphene above the PRG for residential use. The seven (7) areas are shown on Figure 2. The depth of toxaphene impacted soil was estimated based on the existing data. The volume of soil is summarized the table below.

Area #	Square Feet	Depth (in ft.)	Estimated Cubic Yards
Area 1	755,000	1.0	28,000
Area 2	965,000	2.5	89,400
Area 3	267,500	1.5	14,900
Area 4	497,500	1.0	18,500
Area 5	1,042,500	0.5	19,300
Area 6	577,500	0.5	10,700
Area 7	550,000	0.5	10,200

The total estimated volume of OCP impacted soil is 191,000 cubic yards. Should it be determined that the OCP impacted soil need to be removed from the site, the estimated cost to load, transport and disposed of this soil at an approved landfill in San Diego County is approximately \$16.4M. This estimated cost includes preparing a Property Mitigation Plan for submittal and approval with the County of San Diego Department of Environmental Health (SD-DEH), collection and testing of profile samples, collection and testing of confirmation samples, monitoring of removal of OCP impacted soil, loading, transporting and disposal of OCP

