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September 4, 2008

United States Environmental Protection Agency
Emergency Response Office
2250 Obispo Avenue, Suite 101
Signal Hill, California 90755

TDD: TO1-09-08-01-0001
Contract No. EP-S9-06-01

Attention: Craig Benson, Federal On-Scene Coordinator

Subject: **Letter Report, Mushroom Express Assessment**
Mushroom Express Site
33777 Valley Center Road
Valley Center, California
Latitude 33.265° North; Longitude 116.953° West

Dear Mr. Benson,

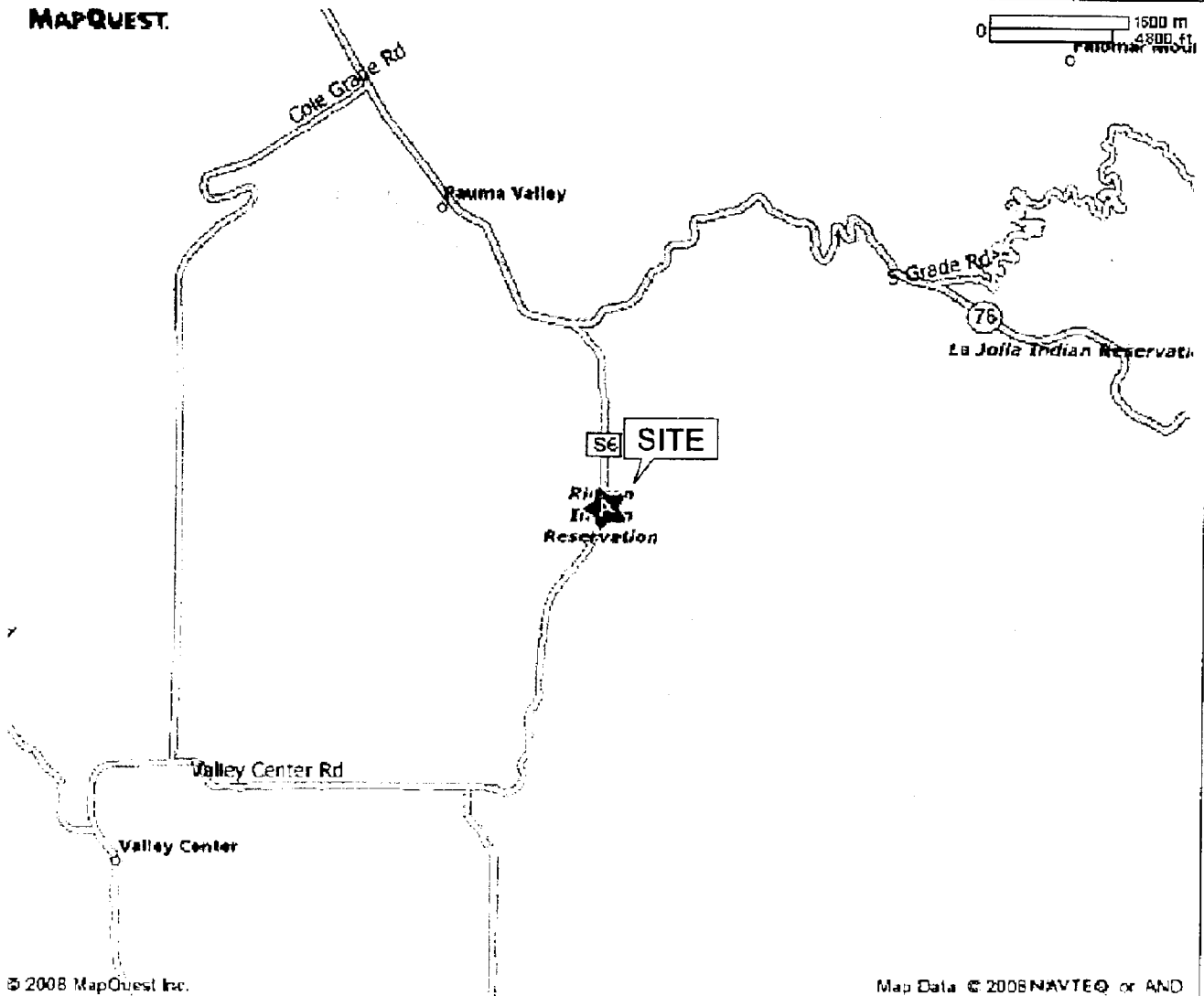
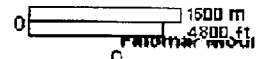
In January 2008, the United States Environmental Protection Agency, Region 9, Emergency Response Section (USEPA) requested technical support from the Team 9 Superfund Technical Assessment and Response Team (START) regarding the Mushroom Express site, located at 33777 Valley Center Road, Valley Center, San Diego County, California (Figure 1).

The Mushroom Express site is a five-acre parcel of privately-held fee land that is located within the boundaries of the federal Rincon Indian Reservation. The non-tribal facility has functioned as a mixed-use commercial site, and for a number of years Mushroom Express operated as a produce management and mushroom growing business. The parcel contained two cinderblock/wood/concrete-foundation buildings totaling approximately 43,000 square feet (about one acre). The buildings were used for mushroom growing operations and citrus fruit packaging, and one of the structures also contained several apartments. In addition, the site owner leased open space on the property to several tenants for truck/trailer storage, equipment storage and a separate towing/impound business.

The buildings and associated out-structures, plus several above-ground storage tanks (ASTs), a waste oil storage area, a drinking water well, and many of the trucks, trailers and cars parked on the parcel were destroyed in the October 2007 southern California wildfire event. Due to the fire, both of the buildings' roofs and walls had caved in, and ash and debris were strewn about the foundations. Truck trailers parked nearby were destroyed, some of which were observed to contain drums that had vented in the fire.

In January 2008, the Rincon (Tribal) Environmental Department requested USEPA assistance with site evaluation and in efforts to compel the property owner to proceed with any necessary cleanup actions.

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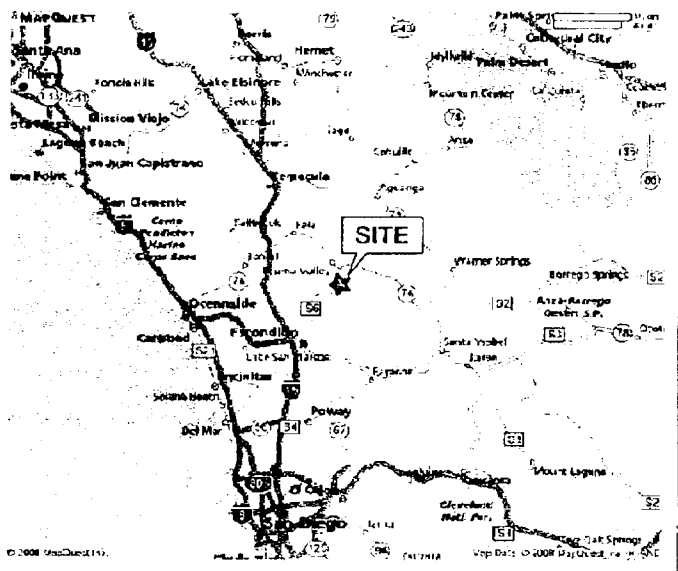


Figure 1
Site Location Map
Mushroom Express
33777 Valley Center Road
Valley Center, California



TDD: TO1-09-08-31-0001



USEPA/START Activities

On January 9, 2008, Federal On-Scene Coordinator (FOSC) Craig Benson tasked the START to prepare a sampling plan and be prepared to open and collect samples from drums at the site, and to perform hazard categorization (hazcat) testing of the contents found. The START therefore prepared a quality assurance sampling plan (QASP) for the site, titled, "*EPA Emergency Response Section (ERS) and Superfund Technical Assessment and Response Team (START) Emergency Response and Time Critical Quality Assurance Sampling Plan For Soil, Water and Miscellaneous Matrix Sampling*", (January 10, 2008)(Attachment 1).

January 11, 2008 Sampling Event

The USEPA and the START met with representatives of the Rincon Environmental Department on January 11, 2008 to conduct site inspection and sampling activities. The property owner, Mr. Marvin Donius, was present during the site inspection. The START conducted continuous air monitoring during the site inspection, using a Ludlum® Model 19 Micro R Meter to monitor radiation levels, as well as a 5-gas meter equipped with cyanide, photoionization, and hydrogen sulfide detectors and oxygen and lower explosive limit sensors. No readings were found to exceed background levels.

An on-site well house and its associated plumbing, located on the eastern border of the site, was found to have been destroyed by the fire. A large (4,000-gallon or more) AST, said by Mr. Donius to have contained diesel fuel and located to the south of the well, had one side blown out and was free of any obvious petroleum staining or odor. Most ASTs and drums found on the site were found to be empty. A small cinderblock-walled waste oil management area contained two open-bung drums holding small amounts of liquid. Some potentially oil-stained ground was visible immediately to the south of the waste oil management area. Two closed-bung drums were found on the western border of the property near the fence line, which also contained small amounts of liquid.

At FOSC Benson's direction, the START collected samples from each of the four drums that had any contents using Level C personal protection, and conducted hazcat tests on the contents. The contents of all four were determined to be slightly-oily water. The drums were marked as containing oil and water and temporarily left in place.

The Rincon Environmental Department representative requested USEPA assistance in investigating the potentially oil-stained soil located to the south of the waste oil management area, as well as a sump and two septic systems described by Mr. Donius to be located on the site.

February 28, 2008 Site Visit

On February 28, 2008, the USEPA and the START conducted another site visit, meeting with Mr. Donius, Rincon Environmental Department representative Eric Mendoza, and others. The primary purpose of the meeting was to discuss and agree to a final sampling strategy to identify areas of potential soil contamination, groundwater quality and potential contamination associated with fire-impacted materials. FOSC Benson and Mr. Mendoza expressed to Mr. Donius that the USEPA and the Tribe maintained an interest in overseeing a voluntary cleanup of the site. Mr. Donius agreed to



finance the sampling and analysis effort. A tentative March 30, 2008 timeframe for sampling implementation was scheduled.

Since the January 11, 2008 site activities, Mr. Donius had removed some scrap metal off-site, San Diego Gas and Electric removed a transformer, and an insurance company removed one truck trailer from the property. The truck had contained burnt paint cans which were no longer on site.

FOSC Benson requested that the following items be addressed by Mr. Donius:

- Management of physical hazards, including falling walls
- Management of Environmental hazards
 - Submission of a Sampling and Analysis Plan (SAP) to include the following criteria:
 - 1) Data Quality Objectives
 - 2) Sample Methodologies, including analysis and sample collection methods
 - 3) Sample media are groundwater, surface soil, and burn ash
 - 4) Submit to USEPA and Rincon Environmental Department for review and approval
 - 5) Collect and submit to lab all environmental samples by March 31, 2008
 - Identification of facilities to receive all materials and wastes moved off-site.

Sampling Plan Review

On April 1, 2008, the START received a SAP from environmental contractor Marc Boogay. A delay in the submittal of a draft SAP was experienced after Mr. Donius and the attorney representing the previous site owner, Rincon Mushroom Corporation of America, could not reach a conflict-of-interest resolution. The Rincon Mushroom Corporation of American is a holder in a security interest on the property under a first deed of trust. Marc Boogay was subsequently hired by Mr. Donius to prepare and implement the SAP. Several draft SAP versions were reviewed before approval on May 8, 2008. An extensive list of analytes was required by the USEPA for the water samples, and the analytes required for the soils included total petroleum hydrocarbons (TPH) and California Title 22 metals. The finalized SAP prepared by Marc Boogay is presented in Attachment 2.

June 14, 2008 Site Owner-Sponsored Sampling Event

On June 14, 2008, with START oversight, Marc Boogay and assistants collected pre- and post-purge water samples from the on-site well; collected interval-depth soil samples from south of the waste oil management area and around the large AST, collected soil samples on a grid from an area of burned trucks to the north of the northern foundation, and collected two composite ash samples, one from an area north of the northern foundation and the other from the an area around the perimeter of the waste oil management area. An onsite sump, which is a "closed sump" (no outlet) according to Mr. Donius, located between the two former buildings, was found to be full of rubble and could not be investigated or sampled. One of the septic systems was found and uncovered, and was found to contain water with no odor. Although Mr. Boogay offered to sample the water, the START recommended against doing so because of his lack of appropriate personal protective equipment (PPE) or a plan to deal with potential coliform-contaminated material.



Upon receipt of the data from the sampling episode, all water sample results were found to be negative or below USEPA maximum contaminant levels for all investigated analytes. Two soil samples exceeded the site-specific action level of 100 milligrams per kilogram (mg/kg) for TPH, one to the southwest of the AST and the other to the south of the waste oil management area. The two ash composite samples exceeded the California total threshold limit concentration (TTLC) or extrapolated soluble threshold limit concentration (STLC) for copper and zinc.

As a result of these findings, FOSC Benson requested that the START collect additional characterization samples of the ash. The START prepared a second QASP, dated July 22, 2008 (Attachment 1).

July 29, 2008 START Sampling Event

The USEPA and the START visited the site on July 29, 2008 in order to collect additional samples of ash in an attempt to further delineate the lateral extent of burn ash. Mr. Donius was also present, and FOSC Benson requested that he follow up with a plan to map the two septic systems.

The START collected eight soil and/or ash samples to obtain information to assist with the delineation of ash-contaminated areas of the site. The samples were composite samples, collected from six separate locations within each area and homogenized into one sample. The sampling locations are presented on Figure 2.

After saving a portion of each sample for later use, the START shipped the samples to Emax Laboratory, Inc. of Torrance, California for total metals analysis by USEPA Method 6010B. The results of the sampling are presented in Table 1. As only three of the 16 investigated metal analytes (copper, lead, and/or zinc) exceeded their TTLC action levels, only these analytes are presented in Table 1. The laboratory data reporting sheets for the samples are presented in Attachment 3.

The sample identified as EPA-Ash8 was collected in an area suspected to be free of contamination, on the northwest corner of the property, to help establish background analyte concentrations.

Based on the results of the sampling, FOSC Benson requested that Mr. Donius acquire an environmental cleanup contractor to remove the contaminated ash material and the minor amount of TPH-contaminated soil. FOSC Benson also volunteered START field support for the cleanup, in the form of a field x-ray fluorescence (XRF) instrument, to be used to delineate areas of contamination and provide confirmatory analysis of a successful ash removal.

August 6, 2008 Site Meeting

On August 5, 2008, at FOSC Benson request, the START notified the Rincon Environmental Department about a site meeting to occur on August 6, 20078 and invited their attendance. On August 6, the START met at the site with the cleanup contractor, Environmental Recovery Services, Inc. (Enviroserv) and Mr. Boogay. The START provided them with the latest data and discussed required site remediation activities and the XRF confirmation sampling support that would be provided.

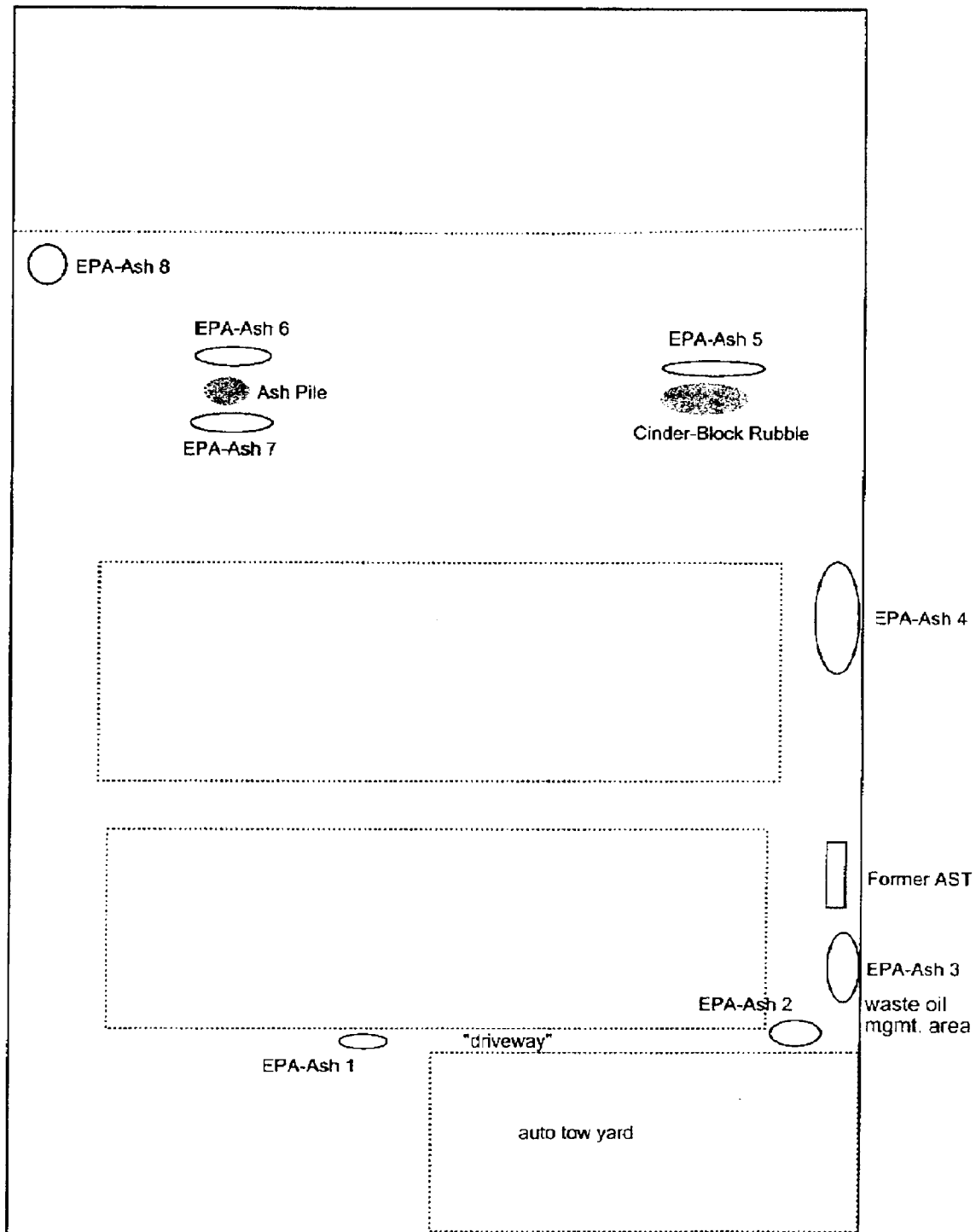


Figure 2
 Schematic of START Composite Sampling Locations
 July 29, 2008
 33777 Valley Center Road
 Valley Center, California

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Sample ID	Copper (TTLC = 2,500)	Lead (TTLC = 1,000)	Zinc (TTLC = 5,000)
EPA-Ash1	5090	4220	11900
EPA-Ash2	5190	2020	27200
EPA-Ash3	123	19.4	5420
EPA-Ash4	477	153	1970
EPA-Ash5	37.5	12.7	115
EPA-Ash6	381	151	688
EPA-Ash7	12.6	8.65	77.7
EPA-Ash8	5.60	5.74	50.2

Results in **bold** exceed TTLC

On this date, the START also performed calibration checks on the XRF instrument, and analyzed portions of the eight samples which had been collected on July 29, 2008. The correlation between the XRF sample results and laboratory results was very strong, with correlation coefficients of 0.995 to 0.998 for the three analytes, copper, lead, and zinc (Table 2).

August 8, 2008 START Site Visit

On August 8, 2008, the START visited the site with the XRF instrument and scanned other potential areas that could be contaminated with ash. Thirty additional areas were scanned, and three additional "hot spots" were found, which are shown on Figure 3.

August 17, 2008 Septic System Daylighting

The START visited the site on August 17, 2008 to witness a septic systems contractor's daylighting of the second septic system. The second system was successfully daylighted, and subsequently protected with wood cover and caution tape.

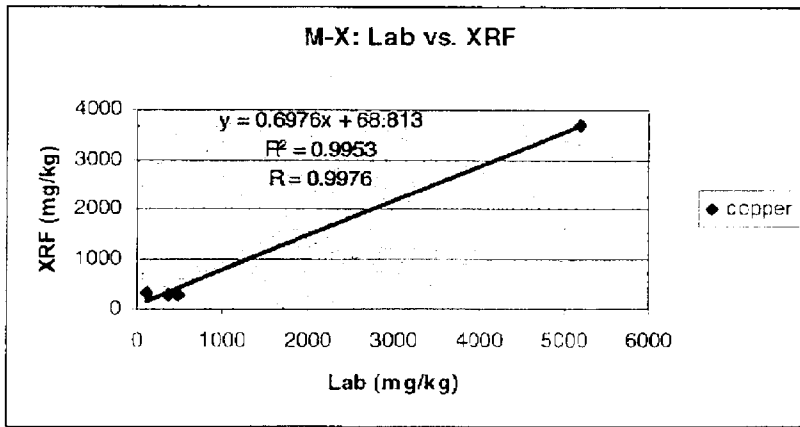
FOSC Benson has determined that the septic system issues are best placed under the jurisdiction of the USEPA's Ground Water Office, and will not be further addressed by the USEPA's Emergency Response Section.

August 22, 2008 Site Cleanup and Removal Activities

On August 14, 2008, an Enviroserve work plan describing the removal activities was submitted to USEPA FOSC Rich Martyn, as FOSC Benson was traveling at the time. FOSC Martyn approved the work plan on the same day, and Enviroserve forwarded the work plan on August 14, 2008 to the Rincon Environmental Department for their review and comment. As no comments from the Rincon Environmental Department were received by August 21, 2008, the START contacted the Rincon Environmental Department on August 21, 2008, notifying them of cleanup activities to occur on the following day and inviting their presence.

Table 2
Mushroom Express: Lab data vs. XRF Data

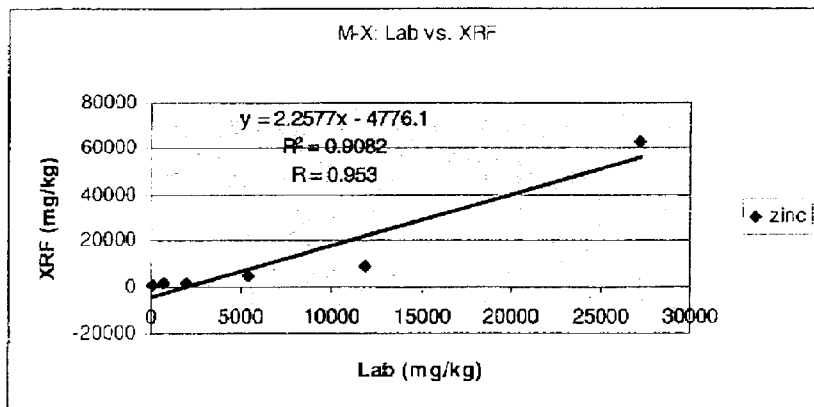
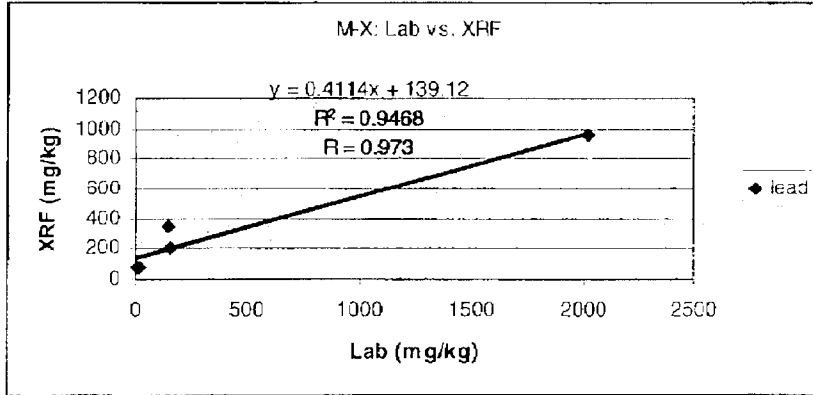
Copper			Lead			Zinc		
	Lab	XRF		Lab	XRF		Lab	XRF
EPA-Ash1	5090	930	EPA-Ash1	4220	480	EPA-Ash1	11900	8400
EPA-Ash2	5190	3700	EPA-Ash2	2020	960	EPA-Ash2	27200	63000
EPA-Ash3	123	310	EPA-Ash3	19.4	79	EPA-Ash3	5420	4380
EPA-Ash4	477	280	EPA-Ash4	153	210	EPA-Ash4	1970	1200
EPA-Ash5	37.5	<230	EPA-Ash5	12.7	<54	EPA-Ash5	115	215
EPA-Ash6	381	290	EPA-Ash6	151	340	EPA-Ash6	688	920
EPA-Ash7	12.6	<250	EPA-Ash7	8.65	<58	EPA-Ash7	77.7	<160
EPA-Ash8	5.6	<202	EPA-Ash8	5.74	73	EPA-Ash8	50.2	<140



For copper, "<" values deleted, Ash 1 deleted

For lead, "<" values deleted, Ash 1 deleted

For zinc, "<" values deleted



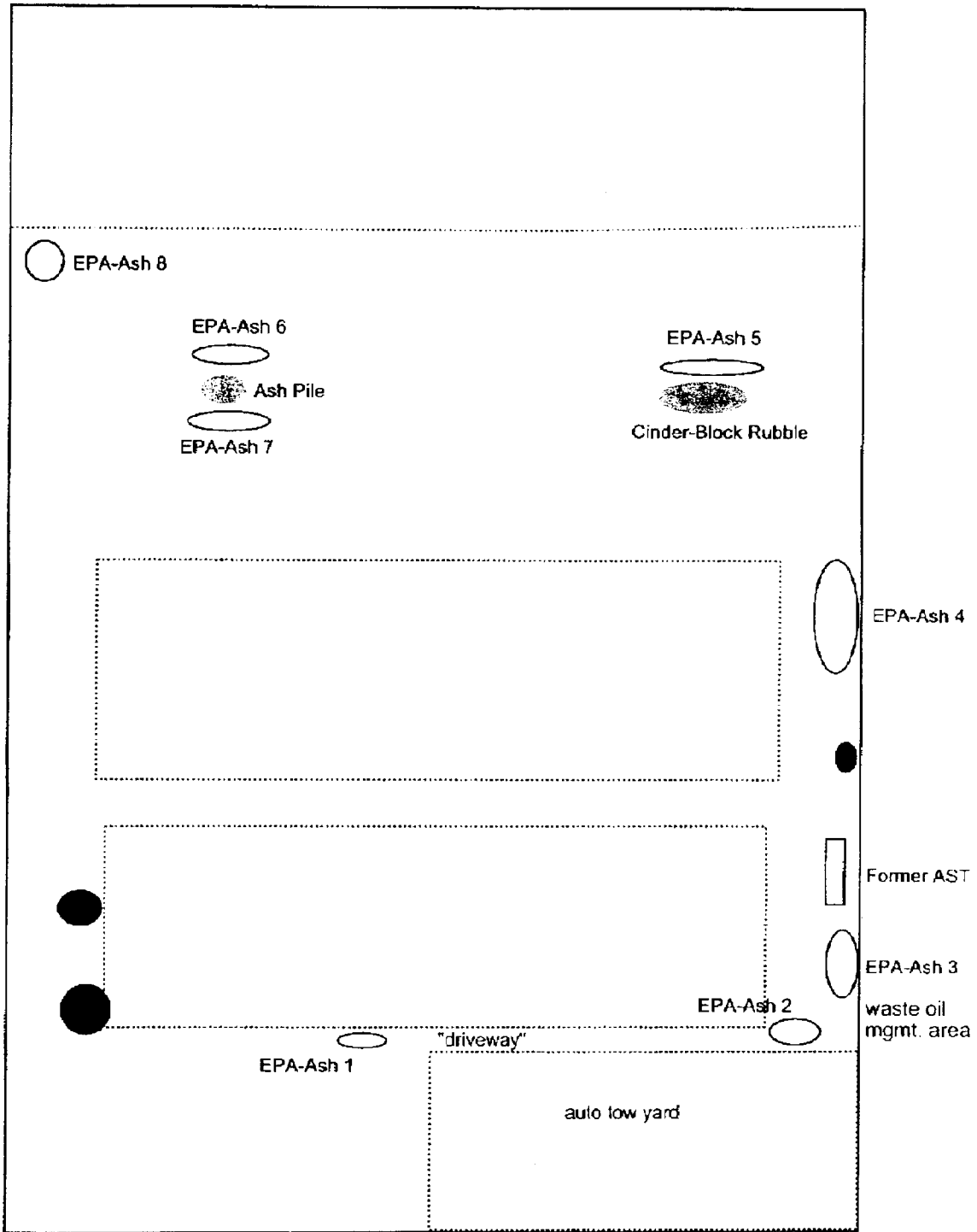


Figure 3
Schematic of START Composite Sampling Locations
and Additional Areas Identified by XRF
 33777 Valley Center Road
 Valley Center, California



On August 22, 2008, the START met Enviroserv personnel at the site, and removal activities commenced. Mr. Boogay visited the site twice during the work day, but there were no other site visitors. Figure 4 indicates the areas of the site which underwent removal and confirmation analysis activities. Due to time constraints for work completion, field analytical methods were used to conduct post-removal confirmatory analyses.

Both ash piles which were found to be contaminated through the original composite samples (and corroborated, in part, through START samples EPA-Ash2 and EPA-Ash3) were removed into trucks using a backhoe bucket. The three hot spots discovered on August 8 were removed in the same manner, as was the pile of ash from which EPA-Ash1 was collected. Removal areas which happened to be on concrete were then swept and the additional material removed by shovel, and then pressure-washed. All backhoe and sweeping activities were conducted with water spray dust suppression. The complete "driveway", from west of the EPA-Ash1 pile to the waste oil management area, was swept and pressure-washed. All areas from which ash was removed were then scanned by the START with the XRF at multiple locations within each area, and any locations which approached or exceeded any TTLC limit for any metal was additionally excavated or swept and pressure washed. The northern ash pile and the "driveway" required additional cleanup due to additional hot spots discovered through the XRF confirmation scanning procedure.

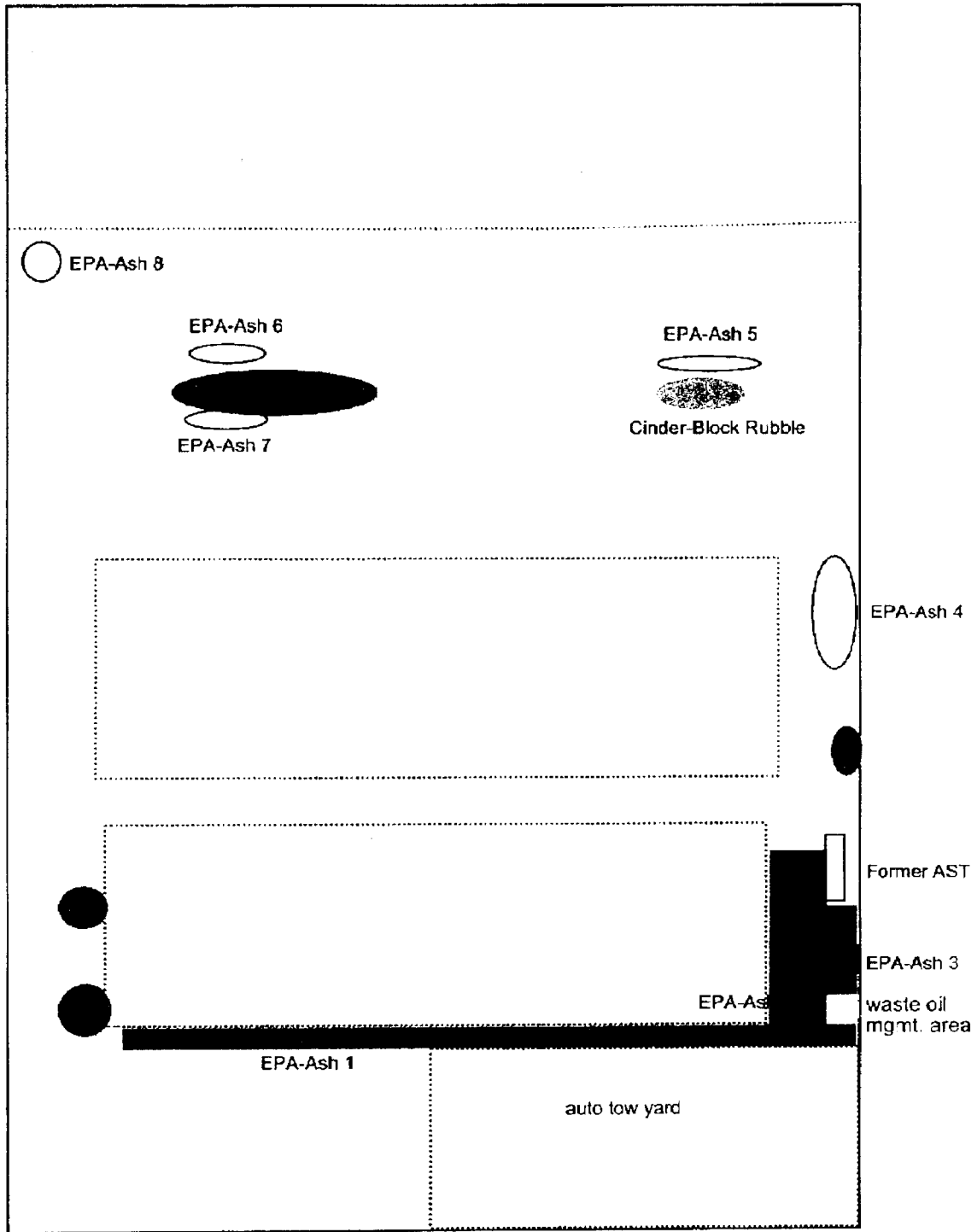
The two areas from which TPH-contaminated soil samples were collected were removed by hand shovel. Enviroserv then collected a confirmation soil sample from the bottom of each removal pit, and performed a PetroFlag® field analysis on each sample. One of the two confirmation samples, collected from a depth of approximately two feet below the southern end of the waste oil management area, still indicated the presence of TPH at greater than the 100 mg/kg action level with an indicated concentration of 3,000 mg/kg. An additional six inches of soil were therefore removed, and the subsequent confirmation sample was found to be 31 mg/kg. The confirmation sample collected from an area adjacent to the former AST was acceptable, with an analytical result of 87 mg/kg.

DISPOSITION OF WASTES

On August 22, 2008, 47 tons of contaminated ash, soil and debris were removed from the site in two trucks, and delivered to Western Environmental, Inc. of Mecca, California for proper disposal. In addition, three drums of ash, PPE, and contaminated debris were shipped to U.S. Ecology in Beatty, Nevada for proper disposal. The manifests for the transport of the material are provided in Attachment 4.

PHOTODOCUMENTATION

Photodocumentation of the removal activities is provided in Attachment 5.



● Areas of Removal and XRF Confirmation Analysis

Figure 4
 Areas of Contaminated Soil and Ash Removal
 August 22, 2008
 33777 Valley Center Road
 Valley Center, California

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CONCLUSIONS

TPH- and metals-contaminated ash and soil were successfully removed from the site on August 22, 2008. Field analytical techniques were used to document a successful removal. FOSC Benson has determined that future site septic tank investigations, if any, should be conducted under the jurisdiction of the USEPA Ground Water Office.

If you have any questions or comments regarding this letter report, please contact Giorgio Molinaro or Des Garner at 415/896-5858.

Sincerely,

Mike Schwennesen
Team 9 Project Manager

cc: Electronic Deliverable Systems 3
START Project File