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Secretary for
Environmental Protection



Department of Toxic Substances Control

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July 2, 2021

Supervisor Gordon Mar
San Francisco Board of Supervisor
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SUBJECT: Clarification of Environmental Conditions for 2550 Irving Street Site

Dear Honorable Supervisor Mar:

On Wednesday, June 30, 2021, the Mid-Sunset Neighborhood Association held a community meeting and circulated a letter (see Attachment 1) that inaccurately portrayed environmental conditions at the 2550 Irving Street project (Site). As the California Department of Toxic Substances Control (DTSC) project manager for this project, I am writing this letter to share the facts associated with the environmental conditions and clarify the next steps in our process for this Site.

On-Site Environmental Conditions

- The Tenderloin Neighborhood Development Corporation (TNDC) and The Police Credit Union (TPCU) have entered into separate voluntary cleanup agreements with DTSC. Under the terms of these agreements, TNDC is responsible for addressing on-Site conditions to support future redevelopment of the property and TPCU is responsible for addressing off-Site conditions north of Irving Street.
- Environmental investigations have been conducted at the Site since 2019. Some of these investigations were conducted prior to DTSC's involvement at the Site. However, DTSC has reviewed all data collected to date and agrees with the findings that tetrachloroethene (PCE) in soil vapor (air in between soil particles) is present at the Site, at the adjacent parking lot, and along Irving Street.
- The levels of PCE found in soil vapor at the 2550 Irving Street were at or below state and federal concentration for unacceptable risks, which is 1,500 $\mu\text{g}/\text{m}^3$. The levels of PCE for indoor air in a commercial setting at the 2550 Irving Street are also below the state and federal concentrations for unacceptable risks, which is 200 $\mu\text{g}/\text{m}^3$. This means that under its current use as a credit union, it is safe for credit union employees and members. As an extra

protective measure, TPCU replaced the air filters in the HVAC system in the credit union in January 2020.

- The Site in its current condition is acceptable for commercial use and occupancy. Action is needed, however, in order to ensure the Site is suitable for residential use. To address this, DTSC has required that TNDC prepare a draft Response Plan that provides methods to achieve acceptable conditions for future residential development at the Site.

Off-Site Environmental Conditions

- Off-Site investigations have also been conducted north of Irving Street. These investigations found PCE in soil gas an order of magnitude below what was found on-Site. The highest concentration of PCE in soil vapor north of Irving Street during the most recent sampling event in March 2021 was 260 $\mu\text{g}/\text{m}^3$ which is well below the unacceptable risk levels stated above (1,500 $\mu\text{g}/\text{m}^3$), similar to the sampling in September 2020. This provides evidence that the PCE in the soil vapor plume has remained stagnant and is not migrating at a pace that could potentially cause an unacceptable risk north of Irving Street.
- Based on these findings, DTSC determined that indoor air sampling was not needed for off-Site properties and that conditions should continue to be monitored. If at any time concentrations are shown to be increasing, then DTSC would proceed with additional measures, which could include indoor air sampling.
- DTSC is also aware of the potential for PCE contamination across the street at 2525 Irving Street related to operations associated with the former Albright Cleaners. As of June 2021, DTSC has been working to establish a voluntary cleanup agreement with the current family trust that owns this property. This will allow for additional investigations and response actions at this property and along the south side of Irving Street. A separate mailer will be sent to the community about this effort.

Draft Response Plan

- TNDC submitted a draft Response Plan to DTSC for review and approval. The draft Response Plan evaluates various remedial methods to achieve acceptable conditions for future residential development and proposes the installation of a vapor intrusion mitigation system. These systems are commonly used to provide long-term protection from PCE impacts at development sites throughout the San Francisco Bay Area and United States of America.
- Soil removal was evaluated in the draft Response Plan; however, DTSC feels this is not an effective remedy for this Site because of the low levels of PCE detected in only one out of 66 soil samples collected. Soil removal is effective under circumstances where contamination is highly concentrated and localized in soil, which is not the case at this Site. As such, a vapor intrusion mitigation system would prevent PCE in soil vapor from entering into the indoor air of the proposed building.

- DTSC has completed its review of the draft Response Plan and anticipates making it available for public review and comment in early July. The comment period will last for approximately 30 days and includes a public meeting to explain the draft Response Plan and accept public input. DTSC will respond to all comments received as part of the Response Plan approval process.

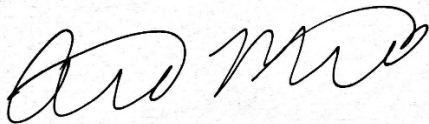
California Environmental Quality Act (CEQA)

- DTSC as part of its review of Site conditions and related documents checked to see if the Site would qualify to be listed on the Hazardous Waste and Substances Site (Cortese) List. This list is a planning document used by the State, local agencies, and developers to comply with CEQA requirements in providing information about the location of hazardous material release sites. The Cortese List is updated by DTSC at least annually. DTSC does not expect this Site would advance to the Cortese List now or in the future because it does not meet the statutory thresholds set forth in California Government Code Section 65962.5.
- The 2550 Irving Street Affordable Housing project is also exempt from CEQA under California Senate Bill 35, which allows for streamlined approvals for certain affordable multifamily residential developments on urban infill sites in cities and counties that do not meet their share of regional housing needs. As a result, DTSC would be filing a Notice of Exemption for this Site after Response Plan approval.

For More Information

We hope that this information will be useful in reducing confusion associated with Site environmental conditions and the regulatory process that will allow for future residential development at the Site. Should you or your constituents have any further questions, we encourage you to contact us using the information below.

Sincerely,



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