



February 3, 2014

Santa Barbara County Board of Supervisors  
105 East Anapamu Street  
Santa Barbara, CA 93101

Subject: January 30, 2014 Letter from Dr. Mark Kram regarding  
ARCO Dos Pueblos (aka Paradiso Del Mare)  
Highway 101/Winchester Canyon Road, Goleta, California  
**SMU Site # 297**

Dear Honorable Members of the Santa Barbara County Board of Supervisors:

The Santa Barbara County Public Health Department, Environmental Health Services Division (EHS) Site Mitigation Unit (SMU) Program has reviewed the January 30, 2014 letter to the Board of Supervisors that was prepared by Mr. Mark Kram regarding the Paradiso Del Mare project. SMU provides regulatory oversight at this site for the investigation and cleanup of soil and groundwater related to former oilfield operations. EHS previously provided testimony to Santa Barbara Planning Commission that stated that although there are known environmental concerns at the site, construction of the proposed development could proceed with proper mitigation measures. The following addresses additional issues raised by Dr. Kram in his letter:

- Dr. Kram states that SMU gave testimony that there was an explosion at the nearby Bacara Resort during its construction. This is incorrect. My testimony stated that work was halted when onsite gas meters detected methane that was above the Lower Explosive Limit. The Lower Explosive Limit is the concentration of flammable gas that, if exposed to an ignition source, could ignite. No explosion occurred during this event. Work was halted and mitigation measures were then employed during the excavation of the impacted soil, such that no fire or explosion occurred.
- Two sources of vapor could trigger a Vapor Intrusion investigation at this site: Elevated volatile chemicals in the soil or methane from the abandoned oil wells. Over 230 soil samples were collected and analyzed for Volatile Organic Compounds (VOCs). No significant concentrations of VOCs were found in these samples. The three oil wells were reabandoned and tested for methane leaks in 1996. No leaks were found. The Department of Oil Gas and Geothermal Resources considers all wells abandoned since the mid-1980's to be properly abandoned to current standards. Therefore, based upon these data, vapor intrusion sampling is not warranted.

- Dr. Kram states that the Environmental Protection Agency has endorsed the American Society for Testing and Materials (ASTM) Phase I guidance, which requires that vapor intrusion to be considered during a Phase I investigation. Phase I Investigations are record searches and do not involve actual collection of samples (which does occur during a Phase II investigation). The Phase I investigation for this site did identify the three oil wells and the potential for soil contamination, which are both potential vapor issues. Thus, the ASTM requirement to identify vapor issues has been satisfied at this site. Vapor intrusion sampling at this site is not warranted due to the lack of elevated VOCs detected in the soil and the abandonment of the oil wells to current standards.

In summary, it is EHS's opinion that Dr. Kram's letter raises issues that have already been considered by this Department and EHS stands by its previous conclusion that vapor sampling is not warranted at this site.

If you have any questions regarding the aforementioned, please call me at (805) 346-8216. Written correspondence regarding this matter should be sent to my attention at Santa Barbara County Environmental Health Services, 2125 Centerpointe Parkway, Suite 333 Santa Maria, CA 93455, via facsimile to (805) 346-8485, or e-mail to [tom.rejzek@sbcphd.org](mailto:tom.rejzek@sbcphd.org).

Sincerely,



Thomas M. Rejzek  
Professional Geologist #6461  
Certified Hydrogeologist #601  
LUFT/SMU Program

ec: Ms. Carmen Caceres-Schnell, AECOM  
Mr. Kyle Christie, ARCO Products Company  
Ms. Nicole Lieu, Santa Barbara County Planning Department

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