

Evaluation of the Adequacy of "Superfund" Site Investigation & Remediation
Relative to Site Redevelopment
Southern Pacific Sacramento Railyard Site
Issues of Soil-Lead Residues in Property Transfer

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Issues

- Adequacy of Current Federal and State Superfund RI/FS's and
- Property Transfer Site Assessments for Evaluating Potential Real and Perceived Hazards of Residual Chemicals to Future Property Uses
 - Lenders Beware: Lead Is a Long-Term Sleeper" That Is Not Being Adequately Investigated, Evaluated, or Remediated in Site Assessments
- Adequacy of Clean-Up
 - Remediation of Contaminated Sites Relative to Future Uses of Area
 - Potential Significance of Soil-Lead Residues in Property Transfers Chemically Remediation of Southern Pacific Railyard

Some Soils at Southern Pacific Railyard Highly
Contaminated with Lead & Other Hazardous Chemicals

DTSC Allows Two Lead Remediation Levels - Selection Depends on Initial Re-Use Proposed for Land

- Industrial/Commercial Development: 950 mg/kg
 - A Few Feet of Low-Lead Soil Containing up to 950 mg/kg Pb (Veneer) Covering Soil
 - Requires Deed Restriction, Land-Use Restriction
 - Additional Remediation Required as Part of Activities That Could Bring Soil Containing 950 mg/kg Pb to Surface
- Residential/Public Access to Soil/Unrestricted Use: 174 mg/kg

Purpose of Superfund RI/FS and Remediation

- Overall Purpose: to Significantly Reduce the Hazards of Chemicals at the Site to Users of Adjacent Properties
 - Stop Off-Site Transport
 - Remediate On-Site & Off-Site Contamination
 - Contain Contaminants On-Site or Transport Off-Site for Treatment
- Purpose Is *Not* to Protect Long-Term Public Health & Environmental Quality from Impacts of Residual Chemicals Left at the Site after Remediation

Adequacy of "Superfund" Investigation and Remediation

- In Some Respects, Superfund RI/FS Process Presents an Arbitrary Approach for Determining the Degree of Site Investigation and Remediation
- Decisions Regarding the Detail of the Investigation and the "Adequacy" of Remediation Often "Negotiated"
- Pressure to Rapidly Remediate Sites to Justify Use of Funds
- Degrees of Protection of Public Health and the Environment