



**Yana Garcia**  
Secretary for  
Environmental Protection



Department of Toxic Substances Control

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Katherine M. Butler, MPH, Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200  
<https://dtsc.ca.gov/>



**Gavin Newsom**  
Governor

**Sent via Electronic Mail**

September 24, 2025

Ms. Ruth Boyd  
Bond Construction Manager  
Alameda Unified School District  
2060 Challenger Drive  
Alameda, California 94501  
[construction@alamedaunified.org](mailto:construction@alamedaunified.org)

DTSC COMMENT LETTER – SITE CHARACTERIZATION OF HEXAVALENT CHROMIUM, ALAMEDA UNIFIED SCHOOL DISTRICT, WOOD MIDDLE SCHOOL, 420 GRAND STREET, ALAMEDA, ALAMEDA COUNTY, CALIFORNIA (PROJECT CODE: 104891)

Dear Ms. Boyd:

The Department of Toxic Substances Control (DTSC) reviewed the *Site Characterization of Hexavalent Chromium* (SC Report – Terracon, September 2, 2025), received on September 2, 2025. The SC Report describes the characterization of hexavalent chromium-impacted soil at the Wood Middle School located at 420 Grand Street, Alameda, Alameda County (Site).

DTSC has identified issues in the SC Report that require clarification and/or modification.

**COMMENTS FROM DTSC'S PROJECT MANAGER**

No comments at this time.

**COMMENTS FROM DTSC'S HUMAN AND ECOLOGICAL RISK OFFICE (HERO)**

1. 95% Upper Confidence Level (UCL): HERO recommends determining if the hexavalent chromium soil contamination in the surface (0 - 0.5 feet [ft] below ground surface [bgs]) and that in the subsurface (2 and 4 ft bgs) belong to the same statistical population. If so, the exposure point concentration (EPC) can be based on a 95% UCL of all the dataset. If the 0 - 0.5, 2, and 4 ft bgs hexavalent

chromium concentrations do not belong to the same population, HERO recommends calculating separate EPC and the associated risk based on a 95% UCL for hexavalent chromium calculated from the datasets from each different depth (i.e., 0 - 0.5 ft bgs, 2 ft bgs, and 4 ft bgs separately). The risks and hazards under a residential exposure scenario associated with each EPC should be calculated and presented separately: Staff and students are most likely to interact with soil at 0 – 0.5 ft bgs, while utility and construction workers will likely interact with soil at deeper depths, therefore depth specific 95% UCL values may represent different exposure scenarios. Based on review of the dataset, HERO anticipates that both 95% UCLs for shallow and deep soil will most likely be below the residential soil screening level for hexavalent chromium, but requests presentation of this information in the document.

2. Land Use Covenant for Operable Unit (OU)-1: HERO recognizes that a land use covenant has been proposed for OU-1, but has not yet been finalized. HERO recommends performing a screening level risk evaluation of the contaminants left in place of OU-1 to provide a rationale for the land use restrictions.
3. No Further Investigation for OU-1 and OU-2:
  - a. OU-1: If the OU-1 land use will be restricted to commercial/industrial, there will be no need for further investigation in this unit because hexavalent chromium concentrations in soil are below applicable screening levels.
  - b. OU-2:
    - If the EPCs from Comment #1 are less than the residential screening levels for hexavalent chromium in soil, HERO agrees there is no further investigation needed for OU-2.
    - Additionally, the soil sampling locations in OU-2 which contain hexavalent chromium exceeding the residential screening level, will be covered in pavement or landscaping material after the redevelopment plan, mitigating the direct exposure pathway.
4. Additional Characterization of OU-3: HERO agrees that additional characterization of OU-3 is warranted and recommends submitting a workplan for hexavalent chromium characterization in OU-3.
5. Edits to Exhibit 2: HERO recommends including sampling locations ACCB7b (also known as B-7) and B-29 in Exhibit 2.

## **DELIVERABLES**

Please address each of the comments and recommendations in a revised document. All documents shall be provided to DTSC without password protection, in a file size no more than 400 megabytes. Signature pages must be included and have either an original or electronic signature.

The following items should be submitted to DTSC:

1. A clean, unmarked, unlocked revised electronic copy of the revised document (Adobe Acrobat PDF format);
2. A redline/strikeout markup of the revised document in Word Document format (DOCX); and
3. An electronic copy of the response to comments (RTC) in table form.
  - a. The RTC table should restate each comment and provide the associated response and specify where associated changes were made in the revised document. This file should be in Word Document format (DOCX).
  - b. The RTC table shall also be included in the appendix of the revised document. Please update the revised document and the table of contents to reflect the added appendix.

An electronic copy of the revised/final document will be posted to DTSC's [EnviroStor database public access website](#).

## **CLOSING**

If you have any questions, please contact me at (916) 255-6523 or via email at [Lisa.Holcomb@dtsc.ca.gov](mailto:Lisa.Holcomb@dtsc.ca.gov).

Sincerely,



Lisa Holcomb  
Project Manager  
Northern California Schools Unit  
Site Mitigation and Restoration Program  
Department of Toxic Substances Control

**DTSC REVIEWER SIGNATURE PAGE**

Reviewers:

Geologist

N/A

X

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Toxicology

Melissa Bolotaolo, PhD  
Staff Toxicologist  
Human and Ecological Risk Office  
Department of Toxic Substances Control

X



Engineering

N/A

X

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cc: (via email)

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