



County of San Diego

AMY HARBERT
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH AND QUALITY
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June 16, 2021

Mr. Dave Jordan
FirstElement Fuel, Inc.
5281 California Ave., Suite 260
Irvine, CA 92617

Dear Mr. Jordan:

VOLUNTARY ASSISTANCE PROGRAM CASE - DEH2021-LSAM-000656
FIRST ELEMENT FUELS
1832 WASHINGTON ST., SAN DIEGO, CA 92103

Staff of the Department of Environmental Health, Site Assessment and Mitigation Program (SAM) have reviewed the *Soil Management Plan (SMP)* and *Community Health & Safety Plan (CHSP)*, both prepared by SALEM Engineering Group, Inc. (SALEM). The SMP describes the scope of work for the segregation, reuse and disposal of soils to be excavated during a grading project for the installation of two hydrogen dispensers and supporting equipment. Based on the Site history and current use as a gas station, the main contaminants-of-concern (CoCs) would be petroleum hydrocarbons although no COC-impacted soils are anticipated to be encountered within the areas to be excavated. Potential Volatile Organic Compound (VOC) vapors will be measured by a Photo Ionization Detector (PID), visual staining, odors, etc.

If previously unidentified odorous, stained, or discolored soils are encountered, they will be segregated, sampled and managed per protocols. Confirmation samples would be taken at a frequency of one per 400 square feet and sidewall samples at one per every 25 linear feet. Each sample would be analyzed for TPH as gasoline, diesel, and oil using modified EPA method 8015, volatile organic compounds (VOCs) using EPA method 8260B.

The CHSP addresses proposed safeguards for the community. The report describes the proposed methods for the application of water, mist, other barriers, etc., to control dust, or VOC's if PID readings over 25 ppm are noted. In addition, the format of the Public Notification Letters, and means of distribution, is also provided in the report. The SMP and CHSP are *approved*. If you have any questions, please call me at (858) 505-6856.

Sincerely, **Ewan Moffat**
PG, CHg

Digitally signed by Ewan
Moffat PG, CHg
Date: 2021.06.16 14:10:26
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Ewan Moffat, Hydrogeologist
Site Assessment and Mitigation Program

cc: Ms. Shannon Lodge, SALEM Engineering Group, Inc