



MEMORANDUM

Date: 15 August 2019 **Job No.:** 19307-00.02663

To: Benjamin Fu, Director of Community Development, City of Cupertino

From: Cem Atabek, Bruce Abelli-Amen, and Judith Malamut

Subject: **Peer Review of Workplan for Former Vallco Shopping Mall, Delineation of Extent of PCB Impact to Soil**

Baseline has performed a peer review of the Workplan for Former Vallco Shopping Mall, Delineation of Extent of PCB Impact to Soil (Workplan) prepared by WSP USA, Inc. for the Former Vallco Shopping Mall located at 10123 North Wolfe Road in Cupertino, California (Site), dated August 6, 2019. Comments from Baseline's peer review of the Workplan are presented below. Recommendations for actions are provided in **bold text**.

COMMENTS

Regarding the Investigation Approach section, the soil sample previously collected from 5 feet below ground surface (bgs) in boring E-5 did not contain PCBs; however soil between 1 and 5 feet below ground surface (bgs) in boring E-5 was not previously tested for PCBs, therefore it is possible that elevated concentrations of PCBs could be present in the 1 to 5 foot zone. **Soil samples should therefore be collected from depths of 1, 3, and 5 feet bgs in each boring, rather than just from 1 and 5 feet. Samples from 3 feet bgs should be included because this depth zone has not been previously evaluated. The sample collected from 3 feet bgs in the boring advanced adjacent to boring E-5 should be analyzed for PCBs (and not placed on hold) based on the previous detection of elevated PCBs at 1 foot bgs at this location. If PCBs exceeding residential screening levels are detected in any samples collected from 3 feet bgs, all samples collected from 3 feet bgs and the sample from 5 feet in that particular boring should be analyze for PCBs, regardless of the PCBs results of the samples collected from 1 foot bgs.**