



GROUP DELTA

MEMORANDUM

Project Name: 700 North Sunnyside Avenue Soil Management Plan Review
Sierra Madre, California

Project Number: EN8570

Prepared for: City of Sierra Madre

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Group Delta Consultants, Inc.

Date: February 4, 2026

Subject: Review Comments for the 700 North Sunnyside Avenue Soil Management Plan
Sierra Madre California

On February 3, 2026, Group Delta Consultants, Inc. (Group Delta) received an electronic copy of the Soil Management Plan (SMP) for the site located at 700 North Sunnyside Avenue in Sierra Madre, California (Project). The SMP was prepared by Hillmann Consulting and dated January 27, 2026. Group Delta was retained by the City of Sierra Madre to perform a peer review of the SMP.

Group Delta reviewed the SMP but not the Health and Safety Plan. Based on our review of the SMP, we offer the following comments:

- Were any soil samples analyzed for VOCs in the area of the former 500-gallon UST? Given the prior presence of a leaded gasoline tank and the detection of VOCs in soil vapor, it is important to confirm whether soil samples were collected and analyzed for VOCs within the former UST footprint. This information is needed to determine whether a release may have occurred and whether additional subsurface investigation is warranted. VOC constituents and lead could be present in that area and should be evaluated. 
- The arsenic background screening level is not properly referenced on page one. The California Department of Toxic Substance Control (DTSC) developed the arsenic background concentration for Southern California. 
- Soil sample depths need to be clearly documented, along with the methodology used for compositing the samples. It is important to know whether samples were composited from the same depth interval or from different depths. Because dioxins from ash are most likely to be present at or near the surface, compositing deeper soils with surface soils could dilute surface concentrations. As a result, the extent of the dioxin impact may not be fully delineated. 
- The Soil Monitoring Section (Section 3.1) states “Based on past use of the Property it is possible that volatile contaminants may be present in the soil” I don’t understand why the past use as agricultural land volatile contaminants might be present. This needs further explanation.

- The SMP should state that excavations conducted in contaminated areas should be conducted by qualified personnel with a minimum of 40-hour HAZWOPER Training. 
- The SMP should state that if VOCs are expected at this site a qualified person should be on site monitoring the excavation activities with a photo ionization detector (PID). 
- On Page 2 second to last paragraph says “of however,”. I believe it should say ‘of dioxin; however...
- Section 3.1 identifies arsenic and lead as contaminants of concern. However, none of the samples analyzed exceeded arsenic background levels or lead residential screening levels. Why are these being identified as contaminants of concern? 
- Specific directions need to be provided regarding how the soil stockpiles must be covered. Clear guidance is necessary to ensure that stockpiled soil is properly contained, protected from wind and stormwater, and managed in a manner that prevents the potential spread of contaminants. 
- If VOCs are expected at the site they need to state that if PID readings exceed 50 parts per million the work must stop and South Coast Air Quality Management District 1166 permit will need to be obtained prior to continuing excavation.
- The SMP states that impacted soil stockpiles will be sampled at a frequency of one sample per 250 cubic yards. However, the plan does not specify which analytical parameters these samples will be tested for. The required analyses need to be clearly identified, including hazardous waste characterization parameters to determine whether any stockpiled soil meets the criteria for classification as a hazardous waste. 
- The end of Section 3.1 states that reuse of soil on site must be approved by the applicable regulatory authority. It should be clarified whether this project is under the oversight of a regulatory agency. If it is, the agency responsible should be identified. If not, this statement should be removed. 
- The Soil Sampling Section (Section 3.2) states that if the soil monitoring program identifies impacted soil, the area will be cordoned off. While VOC impacts may be identified in the field through odor or elevated PID readings, other contaminants of concern, such as dioxins, are colorless, odorless, and not detectable through field screening. As a result, dioxin-impacted soil would not be identified during grading without analytical confirmation. If dioxins from the fires are present on Site, additional surface soil samples (no deeper than 0.5 foot) should be collected to delineate the location and extent of impacts and to ensure all affected areas are properly remediated. Samples collected at depths of 1 to 2 feet below ground surface may be too deep to detect surface-deposited dioxins. 
- Removal of Dioxin Impacted Soil at Location FS-2 Section (Section 3.3) states that 100 cubic yards of dioxin-impacted soil will be removed and confirmation samples will be collected; however,  vertical and lateral extent of the planned excavation is not described. The boundaries of the dioxin removal area need to be clearly defined.

- There should be a section that discuss decontamination areas and procedures. Impacted soil should not be tracked off site. Therefore, procedures should be outlined as to how trucks and equipment will be cleaned prior to exiting the site. 
- On page 5 second bullet down it says “Pave, apply water 3 times” I believe Pave was a typo. 