From:	Lyons, John
To:	Mayer, Kevin
Cc:	Barton, Dana; Wetmore, Cynthia; MARTINEZ, YARISSA
Subject:	RE: Montrose Pilot test - Approval letters from EPA
Date:	Friday, January 02, 2015 1:32:32 PM

Thanks Kevin – this is very useful.

From: Mayer, Kevin
Sent: Friday, January 02, 2015 1:15 PM
To: Lyons, John
Subject: Montrose Pilot test - Approval letters from EPA

Before I have the pilot test Work Plans and preliminary results for you, I am sending these approval letters from EPA. DTSC gave us their concurrence.

1) The first letter (2013) mentions VI as a concern that would be mitigated by an effective control of the water table plume. The water table here is in the UBA which stands for Upper Bellflower Aquitard - not aquifer! It is notoriously challenging to deal with contamination in an aquitard, and we needed location-specific information that can only come from a pilot test like this. As an aside, I will mention that GW modeling must always be used cautiously, and particularly in such complex discontinuous systems.
2) Both approvals require compliance with all applicable regulations. The principle regulation EPA meant was obtaining and compliance with an NPDES permit for discharge of the treated water. Although the treated contains CBSA, the RWQCB did not put any limitations on CBSA discharge to the storm drain.

For record control, please distribute or use this email at your discretion.

Kevin Mayer
U.S. Environmental Protection Agency
Region 9, SFD-7-2
75 Hawthorne Street
San Francisco, CA 94105-3901
(415) 972-3176
mayer.kevin@epa.gov