From: Cynthia Babich
To: Wetmore, Cynthia
Cc: Florence Gharibian; Miranda Maupin; pemodog@sbcglobal.net; LEONIDO-JOHN, STEVEN; Barton, Dana; Sanchez, Yolanda; Yogi, David; Senga, Robert@DTSC; James Wells; Willard.Garrett@dtsc.ca.gov
Subject: Re: Additional Phase I testing
Date: Friday, April 10, 2015 6:28:11 PM

The new number by the State is 3 ppm and we have concerns a uncertainty factor was left out. We are working on this with Amy Kyle. No of PCBSA

Sent from my iPhone

On Apr 10, 2015, at 3:08 PM, "Wetmore, Cynthia" <Wetmore.Cynthia@epa.gov> wrote:

Hi Cynthia & Florence,

Attached is the plan for the next step in the functional testing, which is to basically re-run the Phase I test, but with some adjustments to the HiPOx system. As you may recall, the purpose of Phase I is to demonstrate that the HiPOx system can achieve the full range of ozone production, which it did not achieve during the first run of Phase I.

Montrose talked to the manufacturer of the HiPOx system who said that 60 minutes was insufficient time to warm-up the HiPOx system to allow maximum ozone production. The manufacturer recommended to warm-up the HiPOx system by recycling water over and over again through the HiPOx system until the 27.3 mg/L maximum ozone level is achieved.

Once the 27.3 mg/L ozone level is achieved, Montrose will re-run the Phase I test two times. The first test will be the same as the previous Phase I tests. However, the second test will be run with a changed groundwater pumping rates. In my email last week about the recent extraction well sampling, the pCBSA concentration in one of the extraction wells is significantly higher than expected. For the second Phase I test, Montrose will change their groundwater pumping rates (i.e. lower the extraction rate in the high pCBSA concentration well, and raise the extraction rate in the lower pCBSA concentration wells) to result in an overall lower pCBSA concentration into the treatment plant. This influent groundwater concentration is closer to the influent pCBSA concentrations used in the design.

EPA has also requested a sample between the GAC units to see where we are with the pCBSA break-through GAC. So far, the samples from the tank after both GAC units have been non-detect for pCBSA, but I don't think that will last for very long. I may get a better handle on how much longer pCBSA may continue to be treated to non-detect after seeing the results from that mid-GAC sample.

We expect the on-site storage tank to be full after these two Phase I tests. Montrose will hold the treated water in the on-site storage tank to test it for contaminants. EPA will approve that the treated water will be re-injected, only if the levels are below or

meet the reinjection standards identified in the Record of Decision (ROD).

-Cynthia W.

<image002.png>

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<HiPOx Equipment Testing Plan_4-7-15 Rev.pdf>