From: Manzanilla, Enrique
To: Minor, Dustin
Subject: FW: Proposed Disposal of Effluent
Date: Monday, February 09, 2015 2:38:26 PM

From: Lyons, John
Sent: Monday, February 09, 2015 12:51 PM
To: Barton, Dana; Jolish, Taly; Wetmore, Cynthia; Manzanilla, Enrique
Subject: FW: Proposed Disposal of Effluent

From: Scandura, John@DTSC [mailto:John.Scandura@dtsc.ca.gov]
Sent: Monday, February 09, 2015 12:43 PM
To: Lyons, John
Cc: Lee, Barbara@DTSC; Black, Stewart@DTSC; Hanson, Marilee@DTSC
Subject: Proposed Disposal of Effluent

John,

We learned in a conference call on Friday afternoon, February 6, 2015 that U.S. EPA is seeking our concurrence by noon today to dispose 40,000 gallons of treated effluent. This effluent was generated during test a test of the Montrose Groundwater Treatment System during the week of December 1, 2014 and is currently in a storage tank on the Montrose site. The effluent is proposed to be disposed via injection into wells that are a component of the treatment system.

DTSC is concerned about the potential injection of parachlorobenzene sulfonic acid (pCBSA) into the aquifer at levels that may not be health protective. Although U.S. EPA has informed DTSC that the level of pCBSA in the 40,000 gallons of effluent collected in December is "non-detect," the detection limit for pCBSA is 5,000 parts per billion. Therefore, DTSC senior management would like more time to evaluate your proposal for concurrence with disposal. DTSC is also consulting with the Los Angeles Regional Water Quality Control Board. Therefore DTSC cannot grant concurrence by the requested deadline of noon today.

DTSC asks that this matter be discussed in the conference call that is scheduled between our two agencies at 11:00 a.m. tomorrow (February 10, 2015). If you have any questions, please do not hesitate to call me at (714)484-5440 or my cell phone at (714)920-6268. Thanks.

John