**To:** Conlan, Linda[linda.conlan@amecfw.com]
**From:** Dadap, Nathan C.
**Sent:** Fri 10/9/2015 6:36:39 PM
**Subject:** RE: Pechiney - Revised Soil Management Plan (SMP)

Hi Linda,

Good to speak with you yesterday. Following up on our call, I'm writing to clarify our previous comment regarding requirements for a cap in 40 CFR 761.61(a)(7) and (a)(8):

Since future occupants at the site would not be exposed to PCB contaminated soils if a cap were installed, there would be no need to apply the "Low Occupancy Area" designation noted in 40 CFR 761.61(a)(8)(i)(A)(1). On a related note, the certification in 761.61(a)(8)(i)(B) would also be unnecessary, as it refers to a Low Occupancy Area designation. The Restrictive Covenant (or Land Use Covenant) required under EPA's 2010 Cleanup Approval will still need to limit reuse to industrial/commercial redevelopment.

Please let me know if you'd like to discuss further. Happy Friday!

Nathan

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Nathan Dadap
U.S. EPA Region 9
Land Division, RCRA Branch
75 Hawthorne Street
San Francisco, CA 94105

Phone: (415) 972-3654

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**From:** Dadap, Nathan C.
**Sent:** Tuesday, October 06, 2015 6:27 PM
**To:** Conlan, Linda <linda.conlan@amecfw.com>; Sultana, Chand@DTSC <Chand.Sultana@dtsc.ca.gov>
**Cc:** Santos, Carmen <Santos.Carmen@epa.gov>; Garbaccio, Bruce@DTSC <Bruce.Garbaccio@dtsc.ca.gov>; Gerald Pepper <gerald.pepper@gmail.com>; Holland, Kim <kim.holland@amecfw.com>
**Subject:** Re: Pechiney - Revised Soil Management Plan (SMP)

Hi Linda,

Thanks for the opportunity to review the revised Soil Management Plan at Pechiney. Please see our comments attached and let me know if you would like to discuss further -- we can setup a call. We look forward to assisting you in finalizing the SMP and land use covenant at the site.

Thanks,
Nathan

415-972-3654

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**From:** Conlan, Linda <linda.conlan@amecfw.com>
**Sent:** Monday, September 21, 2015 5:28 PM
**To:** Dadap, Nathan C.; Sultana, Chand@DTSC
**Cc:** Santos, Carmen; Garbaccio, Bruce@DTSC; Gerald Pepper; Holland, Kim
**Subject:** Pechiney - Revised Soil Management Plan (SMP)

Hi Nathan and Chand,

Please find attached the revised Soil Management Plan (SMP) for the Pechiney site. The SMP was revised based on initial comments provided by EPA regarding the PCB elements of the SMP and figures have been added. Please let us know if you all have any additional comments, or

if you all would like a redline version of the text noting the sections that have been revised. Also, to help expedite the review process, we can setup a call to discuss any comments or questions, any time.

Thank you, Linda

**Linda Conlan, PG**
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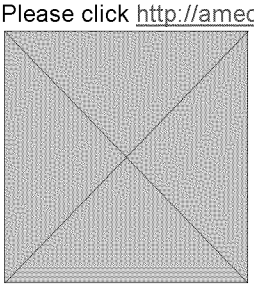

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