To: Holland, Kim[kim.holland@amecfw.com]; Conlan, Linda[linda.conlan@amecfw.com]
From: Dadap, Nathan C.
Sent: Tue 10/6/2015 7:01:00 PM
Subject: RE: Pechiney Call Follow-up and Figure comments - Response to Comments

Kim,

Good to speak with you just now. After reviewing the site data table, my September 10 comment for Phase II grid areas 275, 290, and 305 seems to contain incorrect PCB concentration values, (perhaps due to an Excel sorting error):

"Samples in this area and depth interval (8-13 ft bgs) appear to have consistently elevated concentrations: #1273 – 20 ppm, #1274 – 18.9 ppm, #1275 – 20 ppm, #1277 – 40.9 ppm, #1279 – 30.8 ppm, #1280 – 17.3 ppm, #1283 – 50.4 ppm, etc."

Could you verify the sampling data for these borings at all depths?

Thanks,
Nathan

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

Phone: (415) 972-3654

From: Holland, Kim [mailto:kim.holland@amecfw.com]
Sent: Wednesday, September 30, 2015 5:16 PM
To: Dadap, Nathan C.
Cc: Gerald Pepper (gerald.pepper@gmail.com); Santos, Carmen; Conlan, Linda
Subject: RE: Pechiney Call Follow-up and Figure comments - Response to Comments

Hi Nathan,

Attached are responses/information to address EPA's additional Comments/Questions on the Completion Reports/Figures. Please let us know if you need any additional information or if you need the attached response as a word file.

Kim

From: Dadap, Nathan C. [mailto:DADAP.NATHAN@EPA.GOV]
Sent: Thursday, September 10, 2015 5:54 PM
To: Conlan, Linda <Linda.Conlan@amec.com>
Cc: Gerald Pepper (gerald.pepper@gmail.com) <gerald.pepper@gmail.com>; Santos, Carmen <Santos.Carmen@epa.gov>; Holland, Kim <Kim.Holland@amec.com>
Subject: RE: Pechiney Call Follow-up and Figure comments - Response to Comments

Linda,

Thanks for your quick response to comments. We appreciate your working closely with us to resolve these few remaining issues at the site. Please see my comments below and let me know when you would like to discuss next steps.

Phase I, Grid areas 111 and 133

Comment: EPA does not consider samples beyond the extent of an excavation to be "verification samples." However, due to the close proximity of samples #962 and #919 (approximately less than 10 feet away), and excavation extending south to 750-SS-004, we believe the extent of contamination has been sufficiently defined to the East, West, and South of the excavated sample SS-1. **A**

verification sample is still needed to the North of this excavation, as the current boundary of the excavation does not extend the ~20 feet to sample 750-SS-005.

Phase I, Grid area 136

Comment: As mentioned in the previous comment, EPA does not consider samples beyond the extent of an excavation to be "verification samples." However, with the PCB concentration of the noted sample (87-SS-010) very close to the cleanup level (3.67 ppm), and no other noted elevated concentrations in the area, **we agree with the conclusion that additional sampling is unnecessary in this area.**

Phase II, Grid area 308

Comment: The previous EPA comment on this area noted that "No confirmation samples were taken around Soil removal area 15." **This comment incorrectly referred to soil removal area 15.** Instead, this comment should read: "No sidewall confirmation samples seem to have been taken on the northeast corner of the excavation boundary encompassing Soil Removal Areas 5a, 5b, and 5c. These would be in the vicinity of samples #740 and #778." **Please clarify the circumstances or rationale for the lack of sidewall samples in this excavation area.**

Phase II, Grid areas 274 and 275

Comment: As mentioned above, EPA does not consider samples beyond the extent of an excavation to be "verification samples." However, as this material is below 20 feet and disturbance of the soil will be managed with a "Concrete cover with orange underground warning barrier," **EPA does not believe that any further sampling is needed in this area**

Phase II, Grid area 245

Comment: As mentioned above, EPA does not consider samples beyond the extent of an excavation to be "verification samples." In your response to comments, you mention that there was "no soil remaining to the north, west and south" of the excavation. **Please clarify why this soil was removed and the extent of removal.** A rough figure or photograph of this area may be helpful. Verification samples may still be necessary at the true boundary of the excavation.

Phase II, Grid area 275, 290, and 305

Comment: Samples in this area and depth interval (8-13 ft bgs) appear to have consistently elevated concentrations: #1273 – 20 ppm, #1274 – 18.9 ppm, #1275 – 20 ppm, #1277 – 40.9 ppm, #1279 – 30.8 ppm, #1280 – 17.3 ppm, #1283 – 50.4 ppm, etc. In addition, these locations do not seem to be denoted on Figure 4 as being above the 23 ppm cleanup goal. **Please clarify how this area was addressed through excavation and/or sampling. Additional verification sampling may be necessary to the East of these existing samples at the same depth as those samples where the highest concentrations were previously found.** Although this area was used as a ramp, our assumption is that the ramp was sloping downwards to the West, as that was an area of soil removal. If that assumption is correct, then there is soil adjacent and to the east of this line of samples that can be sampled further.

Phase III, IV, and VI, Grid area 532

Comment: Thank you for the clarification. No further sampling is needed in this area.

Thank you,
Nathan

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

San Francisco, CA 94105

Phone: (415) 972-3654

From: Dadap, Nathan C.
Sent: Friday, September 04, 2015 10:28 AM
To: 'Conlan, Linda'
Cc: Gerald Pepper (gerald.pepper@gmail.com); Santos, Carmen; Holland, Kim
Subject: RE: Pechiney Call Follow-up and Figure comments - Response to Comments

Linda,

Great, thank you. The PDF should suffice. I plan to review these responses by early next week and get back to you with any comments if necessary.

By the way, we are waiting to review the draft LUC until after you provide a version with the revisions you mentioned in your last email. If it turns out that you don't have any changes to add, just let me know and we can go ahead with review on the current version.

Hope you have a nice holiday weekend.

Thanks,
Nathan

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

Phone: (415) 972-3654

From: Conlan, Linda [mailto:linda.conlan@amecfw.com]
Sent: Friday, September 04, 2015 10:17 AM
To: Dadap, Nathan C.
Cc: Gerald Pepper (gerald.pepper@gmail.com); Santos, Carmen; Holland, Kim
Subject: RE: Pechiney Call Follow-up and Figure comments - Response to Comments

Hi Nathan,

Attached are responses/information to address EPA's Comments/Questions on the Completion Reports/Figures. Please let us know if you need any additional information or if you need the attached response as a word file.

Thank you, Linda

Linda Conlan, PG
Principal Geologist
Amec Foster Wheeler
Environment & Infrastructure, Inc.

From: Conlan, Linda
Sent: Sunday, August 30, 2015 8:42 PM
To: 'Dadap, Nathan C.'
Cc: Gerald Pepper (gerald.pepper@gmail.com); Santos, Carmen; Holland, Kim
Subject: RE: Pechiney Call Follow-up and Figure comments

Hi Nathan,

Thank you for your comments on the completion reports/figures and preliminary review comments on the SMP, and the follow-up. The SMP is under revision, based on our call and your initial comments.

Also, as requested, attached are the draft copies of the LUC that were provided for review. I'm working to revise these based on our call on Thursday and elements that may apply from the Tyco LUC.

Thank you, Linda

Linda Conlan, PG
Principal Geologist
Amec Foster Wheeler
Environment & Infrastructure, Inc.

From: Dadap, Nathan C. [mailto:DADAP.NATHAN@EPA.GOV]
Sent: Friday, August 28, 2015 5:19 PM
To: Conlan, Linda
Cc: Gerald Pepper (gerald.pepper@gmail.com); Santos, Carmen
Subject: Pechiney Call Follow-up and Figure comments

Linda,

It was good to speak with you and Gerry (and Carmen) yesterday afternoon. I vaguely recall someone else on the call, but I don't remember who it was – I apologize if I'm omitting someone from this email. We appreciate the updates and look forward to closing out this project.

Please find attached comments on the Completion Reports/Figures and the Soil Management Plan. Once you and Gerry have had a chance to look them over, let me know when you'd like to have another phone call to discuss any final actions before we issue a close-out letter, as well as revisions to the SMP. Hopefully by then I will have an answer from our attorneys regarding the LUC / start of redevelopment activities questions that were brought up.

Additional items:

- Could you send us another copy of the draft LUC?
- Thank you for sending the Revised assessor parcel map.
- When it is finished, please also send us the map of the additional samples being taken along the Union Pacific Railroad (if I'm not mistaken, adjacent to Soil Removal Areas 14 and 6a/6b)

Please call me if you have any questions/issues.

Thanks and have a nice weekend,
Nathan

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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