To: Conlan, Linda[Linda.Conlan@amec.com]
From: Santos, Carmen
Sent: Thur 1/30/2014 7:12:30 PM
Subject: PCBs - Pechiney - Proposed Changes to the Conditional Approvals - Please reply soon.

Hello Linda:

Thank you.

This message is regarding the 23 mg/kg total PCBs in soils between 5 to 15 feet below ground surface (native grade). If soils beneath 15 feet are contaminated above 23 mg/kg total PCBs, soils from 0 to beyond 15 feet would need to be excavated to remove high levels of contamination. This approach would need to be taken to install the underground barrier. If this is what has been implemented recently, then all excavated soils, unless properly segregated (soils with total PCBs below 50 mg/kg segregated from soils with total PCB levels equal to or greater than 50 mg/kg), would have to be disposed offsite at the highest in-situ PCB concentration found in soils.

Because a PCB cleanup level was not developed for soils below 15 feet below ground surface, an underground barrier would be installed to serve as warning for deeper soils contaminated above 23 mg/kg. That barrier would need to be installed at the floor of the 5 to 15 feet below ground surface depth interval regardless of a gap that may exist between 15 feet bgs and the actual location of contaminated soils deeper than 15 feet.

Your thoughts on the above should help complete my revisions to the letter. My manager is back today. I hope the letter can be signed today or tomorrow Friday.

Thank you for your courtesies.

Sincerely,
Carmen

Carmen D. Santos
PCB Coordinator
USEPA Region 9 (WST-5)
Waste Management Division
75 Hawthorne Street
San Francisco, CA 94105
Voice: 415.972.3360
santos.carmen@epa.gov

"Think left and think right and think low and think high. Oh, the thinks you can think up if only you try!" Dr. Seuss

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From: Conlan, Linda [mailto:Linda.Conlan@amec.com]
Sent: Thursday, January 30, 2014 7:47 AM
To: Santos, Carmen
Subject: RE: PCBs - Pechiney - Proposed Changes to the Conditional Approvals

That is correct.

Linda Conlan, PG
Principal Geologist

From: Santos, Carmen [mailto:Santos.Carmen@epa.gov]
Sent: Wednesday, January 29, 2014 1:15 PM
To: Conlan, Linda
Subject: PCBs - Pechiney - Proposed Changes to the Conditional Approvals

Greetings Linda:

As I review the draft letter with modifications to the July 2, 2010 and July 1, 2011 EPA Approvals issued to Pechiney, my understanding is that concrete with PCBs above 1 mg/kg will not be used at any location within the Pechiney site (meaning the City of Vernon and Rio Tinto's portions combined). Please clarify my understanding is correct.

Thank you.

Sincerely,
Carmen

Carmen D. Santos
PCB Coordinator
USEPA Region 9 (WST-5)
Waste Management Division
75 Hawthorne Street
San Francisco, CA 94105
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From: Santos, Carmen
Sent: Wednesday, January 29, 2014 12:18 PM
To: 'Conlan, Linda'
Subject: RE: PCBs - Pechiney - Proposed Changes to the Conditional Approvals

Hello Linda:

This is regarding proposed modifications to the PCB approvals that EPA has issued for the Pechiney site in Vernon, California.

We met on January 23, 2014 to go over the recent finding of new PCB-contaminated soils during the below-ground demolition. We discussed the possibility of a "blanket approval" for these situations. However, in reviewing the language in Conditions C.7.c. and C.7.e. in EPA's July 2, 2010 conditional approval, cover the finding of PCB contaminated soils during demolition of below ground structures and management of PCB-contaminated soils during below-ground demolition, respectively. From EPA's standpoint, those Conditions are what EPA intended to be the approach to follow when new contamination is found during the below-ground demolition. Except for the 2-day time frame to notify EPA under Condition C.7.c. that Condition of approval will remain as established in the approval.

In reference to PCB-impacted soils at depths below 15 feet, please verify the basis for the 73.6 mg/kg total PCB concentration. Is this based on one sample collected from the excavation after removal of soils containing higher PCB concentrations? Or is the 73.6

an average concentration based on several discrete in situ soil removal verification samples? Please send the analytical results for Area C excavation. Please also verify if backfilling of the Area C excavation is still occurring this week of January 27, 2014.

My manager is still ill and I am revising the draft letter today.

Thank you for your courtesies.

From: Conlan, Linda [mailto:Linda.Conlan@amec.com]
Sent: Tuesday, January 28, 2014 1:52 PM
To: Santos, Carmen
Subject: RE: PCBs - Pechiney - Proposed Changes to the Conditional Approvals

Thank you for the update!

Linda Conlan, PG
Principal Geologist
AMEC Environment & Infrastructure, Inc.

From: Santos, Carmen [mailto:Santos.Carmen@epa.gov]
Sent: Tuesday, January 28, 2014 1:50 PM
To: Conlan, Linda
Subject: RE: PCBs - Pechiney - Proposed Changes to the Conditional Approvals

Hello Linda:

Hope your day is going well.

My manager is out sick. I plan on having the letter ready for his signature on January 29, 2014.

Thank you.

Sincerely,
Carmen

Carmen D. Santos
PCB Coordinator
USEPA Region 9 (WST-5)
Waste Management Division
75 Hawthorne Street
San Francisco, CA 94105
Voice: 415.972.3360
santos.carmen@epa.gov

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From: Conlan, Linda [mailto:Linda.Conlan@amec.com]
Sent: Friday, January 24, 2014 4:49 PM
To: Santos, Carmen
Subject: RE: PCBs - Pechiney - Proposed Changes to the Conditional Approvals

Hi Carmen, Bill Adams' contact information is below.

William Adams
President of Pechiney Cast Plate Inc.
4700 Daybreak Parkway
South Jordan, Utah 84095

Thank you,

Linda Conlan, PG
Principal Geologist
AMEC Environment & Infrastructure, Inc.

From: Santos, Carmen [mailto:Santos.Carmen@epa.gov]
Sent: Friday, January 24, 2014 4:13 PM
To: Conlan, Linda
Subject: RE: PCBs - Pechiney - Proposed Changes to the Conditional Approvals

Hello Linda:

I thank you, Calvin, and Gerald for meeting with me regarding the Pechiney site and specifically concerning Rio Tinto and AMEC's proposed changes to EPA's conditional approval of the TSCA PCB cleanup and sampling plans.

I have received your message with the proposed changes, which we discussed on January 23, 2014.

Please send me the contact at Rio Tinto and Pechiney to whom we may address our letter responding to your request attached below.

Thank you for your courtesies.

Sincerely,
Carmen

Carmen D. Santos
PCB Coordinator
USEPA Region 9 (WST-5)
Waste Management Division
75 Hawthorne Street
San Francisco, CA 94105
Voice: 415.972.3360
santos.carmen@epa.gov

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From: Conlan, Linda [mailto:Linda.Conlan@amec.com]
Sent: Friday, January 24, 2014 12:32 PM
To: Santos, Carmen
Cc: Gerald Pepper (gerald.pepper@gmail.com); Hardcastle, Calvin
Subject: PCBs - Pechiney - Proposed Changes to the Conditional Approvals
Importance: High

Hi Carmen,

Thank you for meeting with us yesterday regarding the ongoing work at the Pechiney site and the status of activities. As a follow-up to our discussion, we are proposing the following changes to USEPA Conditional Approvals under 40 CFR 761.61(c):

1) **Modification to Use of Restricted Fill (Section A.1.a – Cleanup Level C-1; July 1, 2011 Conditional Approval Letter).** This condition allows crushed concrete containing PCBs at concentrations greater than 1 mg/kg but less than 3.5 mg/kg as backfill material. This material was proposed as backfill for the 4a/4b soil excavation. Our proposed modification includes eliminating the use of restricted fill as backfill in the 4a/4b excavation. Instead, concrete containing PCBs at concentrations greater than 1 mg/kg (including concrete containing less than 3.5 mg/kg) will be transported off site for disposal at a permitted land disposal facility.

2) **PCB impacts indentified during Demolition**. Based on data collected by Alcoa and by AMEC as described in the application, several areas of PCB-impacted soil and concrete were identified and remediation associated with these impacts are in progress. However, as the demolition and soil removal work continues at the site, the extent of areas containing PCB-impacted soil and/or concrete that require removal and offsite disposal has expanded. The proposed modification to the approval is to apply a "blanket approval" to remediate the PCB-impacted soil and/or concrete as the work progresses; and such work would be conducted in accordance with the current approvals and remediation goals described in the Application and Approvals.

3) **PCB impacted soil at depths below 15 feet.** PCB-impacted soil at depths greater than 15 feet (below native grade) has been encountered in the soil removal area 5a/5b/5c areas (also referred to the Area C in our Application and the 2012 RAP). In this area, the existing concrete slab is about 4 feet above native site grade. The base of the deeper portion of the soil removal area (shown in blue on the attached figure) is currently at about 21 to 30 feet below the slab (or about 17 to 26 feet below native grade) depending on the location on the excavation floor. In the southern portion of the deeper excavation, soil containing PCBs at concentrations exceeding 23 mg/kg (actual measured concentration at this location is 73.6 mg/kg) is proposed to be left in place at an approximate depth of 26 feet below native grade. These site conditions are similar to the site conditions as specified in the Conditional Approval (refer to Section C.3.b.6; July 2, 2010 Conditional Approval letter and site grading plan) for the proposed 4a/4b soil removal area.

   The proposed modification to the Approval includes placing a physical barrier consisting of a minimum of 6 inches of concrete or cement slurry over the PCB-impacted soil at depth of greater than 15 feet below native grade. This modification will be applied to any areas where soil containing PCBs at concentrations greater than 23 mg/kg at depths greater than 15 feet below native grade with conditions consistent with the Approval for the proposed 4a/4b soil removal area. At this time, this modification is only expected to be applied to the 5a/5b/5c (Area C) excavation. For Area C, a cement-slurry in lieu of the concrete may be used based on worker safety conditions which do not allow direct placement of concrete and pumping of cement-slurry may be required to place the cover. Based on the depth and location of the soil that will remain in place and the physical barrier, disturbance of the PCB-impacted soil at depths greater than 15 feet below native grade is not anticipated during future site grading.

   Additional sampling is in progress pursuant to Section 2.3 [Soil Verification Sampling (PCBs) in the July 2010 Concrete and Soil Sampling and Analysis Plan (SAP)]. But because the Area C soil excavation is becoming unstable, backfill of Area C is expected to occur during the week of January 27, 2014. Based on the results of the verification samples, the area of the excavation where PCBs in soil may be left in place at a depth of 15 feet below native grade will be covered with a minimum

of 6 inches cement slurry or concrete, which will be overlain with an orange mesh geotextile layer. The base of the excavation and concrete layer will be surveyed to document the depth and location of this feature. The remainder of the excavation will be backfilled with crushed concrete (defined as unrestricted site fill material).

Please let us know if the above proposed changes are approved.

Thank you,
Linda

Linda Conlan, PG
Principal Geologist
AMEC Environment & Infrastructure, Inc.
121 Innovation Drive, Suite 200, Irvine, CA 92617
Main: 949.642.0245 **|** **Direct:** 949.574.7083 **|** **Cell:** 949.355.3631| **Fax:** 949.642.4474
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