Message

From: Tasnif-abbasi, Maryam@DTSC [Maryam.Tasnif-abbasi@dtsc.ca.gov]
Sent: 8/19/2015 4:19:28 PM
To: ZIFF, SARA [ZIFF.SARA@EPA.GOV]
Subject: RE: Draft Sampling Strategy - Confidential

Thanks Sara, we will work all these changes in and start the planning dialogue with the developer.

Thanks!
Maryam

Ex. 6 Personal Privacy (PP)

From: ZIFF, SARA [mailto:ZIFF.SARA@EPA.GOV]
Sent: Wednesday, August 19, 2015 9:18 AM
To: Tasnif-abbasi, Maryam@DTSC; Alasti, Isabella@DTSC
Cc: Armann, Steve; Lofstrom, Dot@DTSC; Neal, Greg@DTSC; Jeng, Cy@DTSC
Subject: RE: Draft Sampling Strategy - Confidential

Hi Maryam,

EPA has the following comments on the sampling approach, which looks good overall.

- Consider filtering groundwater samples prior to analysis, to ensure that any PCBs detected are in the water rather than soil particles.
- Under Groundwater Sampling, item 2: The plan is to definitely install two new wells, right? The word "may" is confusing.
- Under Groundwater Sampling, item 8: The two new wells will definitely be sampled quarterly for at least one year, right? The first sentence gives the impression that sampling may cease before four quarters have been completed. Please clarify.
- Under EPA's Role, item 2: EPA will review and provide comments to DTSC about the work plan, but we won't approve it.
- Kathy Baylor is available to conduct EPA's split sampling the week of August 31st.

I'm following up on the question you raised of whether EPA should be listed as a contact on the work notice. I'll get back to you soon.

Please let me know if you have any questions.

Thanks,
Sara

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From: Tasnif-abbasi, Maryam@DTSC [mailto:Maryam.Tasnif-abbasi@dtsc.ca.gov]
Sent: Tuesday, August 18, 2015 9:26 AM
To: ZIFF, SARA; Alasti, Isabella@DTSC
Cc: Armann, Steve; Lofstrom, Dot@DTSC; Neal, Greg@DTSC; Jeng, Cy@DTSC
Subject: Draft Sampling Strategy - Confidential

Objective
To reconfirm that the Riverside Ag Park was cleaned up adequately and to ensure that the site continues to remain safe.

Soil Sampling

1. 250 foot grid samples (n=39);
2. Samples will be collected from a depth of 0-3 inches;
3. EPA/developer may collect co-located samples;
4. Samples will be collected using a disposable trowel (trowels will not be re-used);
5. Sample location may be recorded using a handheld GPS device or other technology;
6. Samples will be packaged, sealed, and provided to an ELAP certified laboratory's courier for delivery;
7. Samples will be analyzed for PCBs; and,
8. Laboratory will be instructed to ensure that the method detection limits are set at or below 0.23 mg/kg.

Groundwater Sampling

1. Two new groundwater monitoring well installations will be installed in the vicinity of the former groundwater monitoring wells MW-6 and MW-7 which exhibited the historically highest PCB results;
2. The new wells may be installed by first installing a conductor casing to an approximate depth of 2 feet above first encountered groundwater and sealed in place. Groundwater monitoring well construction should be completed through the annulus of the conductor casing to the total depth of the well;
3. Appropriate well construction design should be utilized to ensure the highest quality groundwater samples are collected. Well screen slots and filter pack sand should be designed based on the encountered grain size of the formation screened by the well. Appropriate well screen design should facilitate proper well development resulting in the lowest sample turbidity achievable;
4. The new groundwater wells should be purged and sampled utilizing "Low Flow" purge and sampling technique as described in USEPA guidance;
5. Groundwater samples will be analyzed for PCBs by an ELAP certified laboratory;
6. EPA/developer may collect duplicate samples;
7. Laboratory will be instructed to ensure that the method detection limits are set at the lowest level achievable by the method; and,
8. Groundwater samples may be collected quarterly up to one year, based on sampling analytical results. Additional sampling may be warranted, based on concentrations of PCBs detected in groundwater.

CCAEJ Role

1. Provide feedback on sampling strategy.

EPA's Role

1. Collaborate with DTSC on sampling strategy;
2. Review and approve work plan for field activities;
3. Provide field oversight as determined necessary by EPA;
4. Collect co-located/duplicate samples as determined necessary by EPA; and,
5. Collaborate with DTSC on data transmittal.

DTSC's Role

1. Provide recommendation on contractor to be used for sampling effort;
2. Set up agreement with developer for reimbursement of costs associated with sampling effort;
3. Develop sampling strategy for EPA collaborative review;
4. Review and approve work plan for field activities;

5. Coordinate with selected contractor for implementation of field activities;
6. Collect all soil and groundwater samples for PCB analysis;
7. Provide co-located/duplicate samples as requested;
8. Pack, seal and hand-off all soil and groundwater samples to the laboratory;
9. Confirm with laboratory that samples were received with chain-of-custody and custody seals in-tact;
10. Share data with EPA as it becomes available;
11. Review laboratory data package;
12. Develop data transmittal;
13. Collaborate with EPA on data transmittal; and,
14. Post completed data transmittal and raw data packages on EnviroStor.

Developer's Role

1. Retain consultant as recommended by DTSC;
2. Reimburse DTSC for costs associated with sampling effort; and,
3. Provide access to the Riverside Ag Park property.

Contractor's Role

1. Develop work plan for soil and groundwater sampling based on DTSC and EPA recommendations, and submit to DTSC and EPA for review, comment, comment resolution, and approval;
2. Provide logistical support for soil sampling and analysis, including procurement of sampling equipment, sample containers, location devices, etc.;
3. Coordinate the permitting and installation of groundwater monitoring wells and provide support needed for collection of groundwater samples; and,
4. Provide support as requested by DTSC on final data transmittal.

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