OCT 2 6 2016

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX – PACIFIC SOUTHWEST REGION
75 Hawthorne Street
San Francisco, CA 94105-3901

Via Certified Mail No. **7016 1370 0000 2235 0674**
Return Receipt Requested

Melisa Cohen
SHEC Director, West Region
Sims Metal Management
600 South 4th Street
Richmond, CA 94804

Dear Ms. Cohen,

We received from your contractor, Terraphase Engineering Inc., via email on August 31, 2016, the Interim Sediment Investigation Results and Proposed Additional Sediment Sampling for Sims Group USA Corporation, Redwood City, CA, hereafter referred to as "the Interim Sample Results." Thank you for submitting the document to us in a timely manner.

The interim sample results stem from sediment sampling conducted at Sims' Redwood City facility ("Sims") between June 6 and June 15, 2016 and were done in accordance with the Sediment Sampling and Analysis Plan ("SSAP") EPA had conditionally approved on April 25, 2016. The SSAP was required pursuant to the December 1, 2014 Consent Decree between EPA and Sims, Section V, Paragraphs 12 – 14. EPA appreciates the work that Sims and Terraphase did in developing the SSAP, implementing it, summarizing the interim sample results, and sending us the results per the Consent Decree requirements. We also appreciate that Sims included proposed additional sampling along with the interim sample results.

EPA has examined the interim sediment sample results and Sims' proposed additional sampling. While we appreciate and agree with Sims' proposed locations within the project area for 8 additional sediment core and 5 surface sediment samples (see Figure 17 of Sims' August 31, 2016 submittal), to further describe the nature and the extent of the contamination, we believe that Sims should add 8 more core locations and one surface sample as described below:

PROJECT AREA SAMPLING

Add 8 Core Locations for lateral distribution: The transect core locations proposed by Sims to the south of Wharf 3 (locations 7, 8, 9, 40) should also include core samples at locations 39 and 38. In addition, the transect core locations proposed by Sims to the north of Wharf 3 (locations 47, 48, 49, 50) should also include location 52. Lastly, in addition to the core samples for locations 5 and 41 proposed by Sims, EPA believes core samples should also be taken at locations 6, 4, 2, 43 and 44.

Core Depths for vertical distribution: Sims has proposed advancing the target depth to 5 feet bss. In order to adequately characterize the nature and extent of the vertical contamination, Sims may have to go deeper than 5 feet bss. Along with analyzing samples down to 5 feet bss, Sims should at least take contingency samples as deep as equipment refusal.

Surface Samples: Sims has proposed taking 5 more surface samples within the project area (3 locations approximately 25 feet south of locations 32, 35, and 38, and 2 locations north of locations 51 and 52). We agree with those 5 locations, but believe that Sims should also take at least one other surface sample south of location 19.

BACKGROUND AREA SAMPLING

Surface Samples: Sims has proposed taking 6 additional surface samples at each of the 3 background areas (Figures 18a, b, and c). In general, we agree with taking those samples, but for comparison, we believe they should be at elevations that are in line with the riprap surface sediments that were taken in the project area. Based on the aerial photos provided in its report, the locations Sims has proposed in the background areas seem closer to the mean high water line than the surface riprap samples within the project area. Please add a mean high water line to Figures 18a, 18b, and 18c and evaluate if the background sample locations need to be adjusted to match the elevation of similar grab samples in the project area.

SSAP/QAPP: Except for the additional sample locations, we expect the same techniques, procedures and protocol will be followed as was in the conditionally approved SSAP/QAPP with modifications outlined in the email from Juliet Hannafin to Melissa Cohen and Peter Zawislanski on June 9, 2016.

Please provide your revised SSAP to us by November 23, 2016. If you have questions about our comments, please contact Juliet Hannafin at (415) 972-3094. She is out of the office until November 7, so if you have questions before then, please contact David Wampler at 415-972-3975 or wampler.david@epa.gov. For legal questions, please contact Rich Campbell at 415-972-3870.

Sincerely,

Thanne Berg, Acting Assistant Director
Water and Pesticides Branch
Enforcement Division

cc: Christine Boschen, SFRWQCB