Message

From: Ross, Steve@DTSC [Steve.Ross@dtsc.ca.gov]
Sent: 10/28/2015 12:48:58 AM
To: Fennessy, Christopher [christopher.fennessy@Rocket.com]; MacDonald, Alex@Waterboards [Alex.MacDonald@waterboards.ca.gov]; Keller, Lynn [Keller.Lynn@epa.gov]; Santiago-Ocasio, Carmen [Santiago-Ocasio.Carmen@epa.gov]
Subject: RE: 2015 PPMR Update

Hi Chris,

Thanks. From your initial thoughts....

Narrative – okay.
Item 1 – okay.
Item 2 – okay.
Item 3 & 4 – thinking x 2 is okay.
Item 5 – others may like numeric, but RODs may tend to group by management areas. So either is okay.
Item 6 – No interest one way or the other. Please disregard the comment.

Steve.

From: Fennessy, Christopher [mailto:christopher.fennessy@Rocket.com]
Sent: Tuesday, October 27, 2015 4:05 PM
To: Ross, Steve@DTSC; MacDonald, Alex@Waterboards; Keller, Lynn; Santiago-Ocasio, Carmen (Santiago-Ocasio.Carmen@epa.gov)
Subject: RE: 2015 PPMR Update

Thanks Steve! I have to digest these a bit and will likely have some clarifying questions. See below for initial thoughts.

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From: Ross, Steve@DTSC [mailto:Steve.Ross@dtsc.ca.gov]
Sent: Tuesday, October 27, 2015 3:42 PM
To: Fennessy, Christopher; MacDonald, Alex@Waterboards; Keller, Lynn; Santiago-Ocasio, Carmen (Santiago-Ocasio.Carmen@epa.gov)
Subject: [EXTERNAL] RE: 2015 PPMR Update

Hi Chris,

I also agree to adding to Table 2-1 at the bottom of the listing as indicated in your response to Alex I would envision this PPMR Table 2-1 would include entries from the BOU ROD where EPA listed dashes under the Remedial Action Area Designation column of Table 2-11 on the last column

whereby the entry was intended to identify the sources were evaluated but determined to be of no concern. However, these dashed areas with no active remediation proposed at a minimum will have LUCs outlining groundwater use restrictions similar to those recorded for carve-out and those planned for OU-5 lands that are located on top of contaminated groundwater. I believe Table 2-1 has captured your thoughts regarding BOU ROD Original Source Areas that have dashes under the Remedial Action Area Designation. For example, for source area 50D, Table 2-1 says "LUC Only" under Status column and "BOU ROD – 8/4/15" under Governing Document. There are no source areas that have "No action". Eventually, when PGOU LUCs are recorded and we receive Remedial Action Complete letter from EPA, the PGOU source areas that only require LUCs will be changed to "Remedial Action Complete".

1. As I have heard no activity regarding Area 40 transfer, I suspect their probably will be no change to the PPMR on this item. So my review on the table from the 2014 PPMR are below. Ok.

2. For Section 1.2, Our understanding is EPA was intending 1) to develop a cost recovery CD for post PCD activities for all OUs; 2) an administrative order for the detailed work starting with the BOU; 3) administrative orders for detailed work post PCD after each OU ROD. Not exactly sure how orders/agreements will be issued/made, so we left it general in the PPMR. We believe there will be a consent decree for cost recovery and administrative orders to implement the work in the RODs.

3. For Table 1-1: It may be useful to include BOU ROD description for the Source area to address column. For instance, a) RCRA-Y. 20025 Storage – Any discovered contamination addressed in BOU ROD; b) RCRA-W, 20018 Storage and Treatment Tank – Any discovered contamination addressed in BOU ROD; c) Underground Injection Wells – Post-closure monitoring under RCRA and referenced in BOU ROD. Need to think about this a bit.

4. For Table 1-2: Comparing this table from 2014 PPMR to the BOU ROD reveals the septic tank listing differs for Septic Tank A20-ST05-1 and A20-ST05-2. They are identified as in Source Area 3D but the ROD in Table 2-11 identifies Source Area 4D. Also, BOU ROD does not mention A20-ST14 in Source Area 11D but it is identified in 2014 PPMR. Need to think about this a bit

5. For Table 3-1: a) 11D is part of the cleanup for Perimeter ROD with the possible exception of septic tank A20-ST22; b) 4D is in Boundary ROD but listed under Perimeter; c) CP-207 and CP-208 are referenced in the BOU ROD as CP2-07 and CP2-08; d) might be beneficial to break this listing for Island, Central, and Eastern by Management Area as this may be simpler for agencies to review each year during remedial investigations. A bit confusing, but only portions of 11D and 4D are included in PGOU. The remaining portions are in BOU. Breaking by Management Area would be fine, however, source areas for the OU would no longer be in numeric/alpha order for the entire OU. Please confirm this is what you would like to see.

6. For Figure 2-1: Maybe the holdback area for Area 40 should be identified somehow. I don't think it is appropriate to include areas that are outside of the superfund designation. What is your interest in including the holdback area?

Thank you for the opportunity to review and comment.

Steve.

From: Fennessy, Christopher [mailto:christopher.fennessy@Rocket.com]
Sent: Monday, October 26, 2015 4:06 PM
To: MacDonald, Alex@Waterboards; Keller, Lynn; Santiago-Ocasio, Carmen (Santiago-Ocasio.Carmen@epa.gov); Ross, Steve@DTSC
Subject: RE: 2015 PPMR Update

Thanks Alex! There is a section at the bottom of Table 2-1 that includes sites that were not in the PCD, but were identified during Stage 1 sampling. I could add the PGOU sites there. I don't want to add areas that were investigated, but analysis of samples from area did not result in concentrations that pose unacceptable risk. I don't want to create more sites to track if they are not really sources. It should be noted that the OU-6 ROD table does identify remedial areas that do not have an original source area designation. Not sure what to do about these areas.

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From: MacDonald, Alex@Waterboards [mailto:Alex.MacDonald@waterboards.ca.gov]
Sent: Monday, October 26, 2015 3:54 PM
To: Fennessy, Christopher; Keller, Lynn; Santiago-Ocasio, Carmen (Santiago-Ocasio.Carmen@epa.gov); Ross, Steve@DTSC
Subject: [EXTERNAL] RE: 2015 PPMR Update

Chris – Attached is the redline-strikeout version of the PPMR you provided with some minor proposed edits and questions. These appear in red in my version (with blue being your proposed revisions).

One additional item – how do we track the additional sites such as C4 and C41 that have gone through cleanup and will have LUCs attached to them? These sites were added during the Carve-out process. The same can be said for sites such as the bare areas investigated in Area 40, in addition to the 5 sites that are listed in the PCD for Area 40. This is similar to the open space sites investigated in OU5 and OU6. None of these categories of sites is found on Table 2-1. I am including them in GeoTracker – though not all have been added at this time.

I really appreciate the status column that was added to Table 2-1.
Alex

From: Fennessy, Christopher [mailto:christopher.fennessy@Rocket.com]
Sent: Monday, October 26, 2015 12:31 PM
To: Keller, Lynn; Santiago-Ocasio, Carmen (Santiago-Ocasio.Carmen@epa.gov); MacDonald, Alex@Waterboards; Ross, Steve@DTSC
Subject: 2015 PPMR Update

Hi Everyone – Attached is the Draft 2015 PPMR Update. Significant items include:

- Documentation of OU-6 ROD
- Inclusion of status column for each source area in Table 2-1

Update is provided in track changes mode so you can see where the changes occurred. The only change to Table 5-1 was the submittal date of the final IOU RI. Pending EPA's acceptance, this date may change. Also, pending EPA and State decision on Area 40 and new OU, we may need to modify Tables 2-1, 3-1, 5-1 and add some clarifying text.

Please let me know if you have any suggested improvements or modifications. I'd like to send final out December 18, so please try to have improvements/comments in by December 4.

Thanks, Chris

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