Message

**From**: MacDonald, Alex@Waterboards [Alex.MacDonald@waterboards.ca.gov]
**Sent**: 6/2/2017 9:21:42 PM
**To**: Fennessy, Christopher [christopher.fennessy@Rocket.com]; Keller, Lynn [Keller.Lynn@epa.gov]; MacNicholl, Peter@DTSC [Peter.MacNicholl@dtsc.ca.gov]
**CC**: sforbess@Geosyntec.com; Kraemer, Sue (Sue.Kraemer@cbi.com) [Sue.Kraemer@cbi.com]; (Tom.Lae@ch2m.com) [Tom.Lae@ch2m.com]
**Subject**: RE: Area 40 Remedial Action Objectives

Chris: Thanks for putting this together – the table made it easier to review.

Initial Regional Board Comments on new RAO table:

1. Comments at this point in time do not include review of the adequacy of listed specific remedial areas or COCs.
2. Functional Objective LUC 1. This LUC also needs to prohibit any buildings in Open Space area.
3. Functional Objective Soil Non-Volatile 3. The LUC listed under the Park area requiring a soils management plan also needs to be included in the Open Space area as not all the perchlorate impacted soils will be removed. For the Residential/Commercial Area I recommend changing the sentence to read "Non-volatiles have not been detected in these areas at concentrations that exceed unacceptable exposure values.
4. Functional Objective Subsurface (soil/groundwater) Volatile Chemicals – Ambient Air 5. There is an LUC for the Open Space area preventing access for human receptors other than construction workers. Could have maintenance workers if there is a remedial system in the source area within the Open Space area. Is this LUC potentially impacted by the results of the outdoor air sampling?
5. Functional Objective Subsurface (soil/groundwater) Volatile Chemicals – Ambient Air 7. The LUC for the Park area needs to include prohibition of any open space that could be used for burrowing animal habitat in the area of potential adverse impacts to those burrowing critters due to off-gas from the subsurface.
6. Functional Objective Mass Removal of COCs in Groundwater 11. The listed remedial options that could potentially be applied in the Open Space and Park areas are actions that do not remove mass from the groundwater, they prevent mass from getting to groundwater as they remove it from the vadose zone. These actions help protect groundwater (RAO 10) and reduce the time required to restore groundwater (RAO 12). Mass removal from the groundwater would be via the iron filing wall options and the ISCO in source areas 36B and 37B.
7. Functional Objective Restore Groundwater 12. Restoration is also enhanced by application of ISCO or similar in-situ remedy.

Alex

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**From:** Fennessy, Christopher [mailto:christopher.fennessy@Rocket.com]
**Sent:** Friday, June 02, 2017 7:40 AM
**To:** Keller, Lynn (Keller.Lynn@epa.gov); MacDonald, Alex@Waterboards; MacNicholl, Peter@DTSC
**Cc:** sforbess@Geosyntec.com; Kraemer, Sue (Sue.Kraemer@cbi.com); (Tom.Lae@ch2m.com)
**Subject:** Area 40 Remedial Action Objectives

Hi Everyone – Attached is an updated version of the RAOs we discussed on Wednesday. Please review and come to the meeting on June 8 prepared to discuss edits. Thanks! Chris

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