Message

From: MacNicholl, Peter@DTSC [Peter.MacNicholl@dtsc.ca.gov]
Sent: 8/10/2017 5:49:53 PM
To: Fennessy, Christopher [christopher.fennessy@Rocket.com]
CC: MacDonald, Alex@Waterboards [Alex.MacDonald@waterboards.ca.gov]; Keller, Lynn [Keller.Lynn@epa.gov]
Subject: RE: Area 40 - Requested Information Review Update

I met with Dan Gallagher this morning and he is developing his proposed sampling locations for soil, soil gas, and GW. Dan identified the middle of next week for his action item.

From: Fennessy, Christopher [mailto:christopher.fennessy@Rocket.com]
Sent: Thursday, August 10, 2017 9:36 AM
To: MacNicholl, Peter@DTSC
Cc: MacDonald, Alex@Waterboards; Keller, Lynn (Keller.Lynn@epa.gov)
Subject: RE: Area 40 - Requested Information Review Update

Hi Peter – I am working with Lynn and EPA on how we can proceed with the finalization of the HHERA and FS prior to the collection of the temporal ambient air data. The only need to delay remedy (eg wait until temporal data is gathered) is to gather data that will better define the remedy. My understanding of the purpose of the ambient air data and temporal soil vapor data is to evaluate the current effect the sources have on ambient air and soil vapor. If data suggests there is a risk posed by ambient air data and/or soil vapor (beyond what we currently know), then remedy of the sources would be required prior to allowing reuse. It is possible that the temporal data could indicate that the risk is higher than we believe today; however, the remedy would remain the same (eg cleanup the sources and monitor pathways until risk is at or below acceptable levels). The FS and RAP will include a Land Use Restriction that requires confirmation sampling following remedial action for any pathway that posed an unacceptable risk prior to implementation of the remedial action.

Am I misunderstanding the purpose of ambient air monitoring and temporal soil gas monitoring? How would this data change the remedies identified in the FS?

Chris

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From: MacNicholl, Peter@DTSC [mailto:Peter.MacNicholl@dtsc.ca.gov]
Sent: Thursday, August 10, 2017 9:19 AM
To: Fennessy, Christopher
Cc: MacDonald, Alex@Waterboards; Keller, Lynn (Keller.Lynn@epa.gov)
Subject: [EXTERNAL] RE: Area 40 - Requested Information Review Update

Hi Chris,

I will be talking with management on the planned pathway forward and the contingent land uses that are proposed to be presented in the RAP/ROD, including any LUC activities. I believe I heard from USEPA that the HHRA, not HHERA, will not be finalized in the FS until the ambient air samples are collected and evaluated. This still does not address DTSC's concerns with the current vadose zone soil gas/soil characterization data and related remedial alternatives for active soil vapor remediation which are part of the FS. As such the reality is April 2018 is probably the likely time that the temporal data from both ambient air and vadose zone will be available to incorporate into the FS for agency finalization.

Sincerely,

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From: Fennessy, Christopher [mailto:christopher.fennessy@Rocket.com]
Sent: Wednesday, August 09, 2017 4:33 PM
To: MacNicholl, Peter@DTSC
Cc: MacDonald, Alex@Waterboards; Keller, Lynn (Keller.Lynn@epa.gov)
Subject: RE: Area 40 - Requested Information Review Update

Hi Peter - Following our discussion on July 19, we all concluded that the ambient air sampling would not have an effect on the remedial action decisions (since the remedy would not change regardless of whether the ambient air results showed there was an unacceptable risk or not). As such, we discussed including a land use covenant that precludes future reuses until ambient air data is collected that indicates the ambient air risks are acceptable for that future use (this may be by April 2018 following initial ambient air sampling, in which case the LUC is satisfied, or this will be following remedial action and confirmation sampling). The same can be said for temporal soil gas sampling. The remedy will not change if we determine that concentrations in the dilute soil gas plume change an order of magnitude or not. It may preclude certain land uses until the soil gas concentrations are below certain thresholds, but it will not change the remedy (eg the sources need to be cleaned up). Therefore, the ambient air data and temporal soil gas data are not needed to finish the HHERA, FS, or RAP. The RAP just needs to include a LUC that says reuses are precluded until ambient air and soil gas data indicate the risk is acceptable for that reuse. I believe the only data outstanding to complete these documents is the additional data collection to resolve DTSC's understanding of the sources.

Please confirm your understanding of this approach. Thanks, Chris

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From: MacNicholl, Peter@DTSC [mailto:Peter.MacNicholl@dtsc.ca.gov]
Sent: Wednesday, August 09, 2017 4:11 PM
To: Fennessy, Christopher
Cc: MacDonald, Alex@Waterboards; Keller, Lynn (Keller.Lynn@epa.gov)
Subject: [EXTERNAL] RE: Area 40 - Requested Information Review Update

Hi Chris,

A lot of those previously mentioned items are looking down the road some distance but nonetheless will keep momentum once those stages are reached (OPEA and OLC). I cannot state the implications of the RAD comments because the review is ongoing and I do not have the final memo just verbal feedback from the reviewer. Depending on the data gaps and extent of issues more fieldwork and analysis may be required. Let's see what the written comments say.

Obviously we cannot move forward on the RAP/ROD until the FS is complete. This will require the results of the Ambient Air Sampling to be finished to support the USEPA HHRA, including any additional sub-surface soil vapor sampling DTSC & the Agencies require to support land use planning/remedies. Realistically we cannot finalize the FS until next Spring (April 2018?) when the final seasonal events have been completed and analyzed. Correct?

DTSC committed to today (8/9) for additional Site characterization data unfortunately I do not have any documentation from GSU so this is an outstanding action item. I will advise when I have an update from support staff.

Thank you for your understanding.

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From: Fennessy, Christopher [mailto:christopher.fennessy@Rocket.com]
Sent: Wednesday, August 09, 2017 3:47 PM
To: MacNicholl, Peter@DTSC
Cc: MacDonald, Alex@Waterboards; Keller, Lynn (Keller.Lynn@epa.gov)
Subject: RE: Area 40 - Requested Information Review Update

Hi Pete - I'm sorry, I'm not sure I follow. I could interpret this two ways:

1. This is good news stating that you are almost finished with your review and you are progressing toward a RAP. Your reviews with OPEA and EPA and OLC and Program management are all to inform them that we are almost done and, following a bit of additional investigation data, are ready to prepare the RAP?

2. This is bad news stating you are not done with your review, there are significant issues with anomalies not previously identified and RAD investigation, there is now a feeling that ambient air data is needed to make remedy decisions and you now need to talk to Program Management to figure out path forward.

Please clarify.

Regarding DQOs for Ambient Air Sampling and sub-surface soil vapor sampling. AR has agreed to provide the ambient air sampling plan by today and we plan to honor that commitment. AR has not agreed to provide any information regarding soil vapor sampling because we feel we have sufficient soil vapor data to progress the site to remedy. DTSC had agreed to provide their evaluation of site characterization to AR so we could develop a SAP to close any remaining DTSC data gaps. When will DTSC provide this evaluation?

Chris

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From: MacNicholl, Peter@DTSC [mailto:Peter.MacNicholl@dtsc.ca.gov]
Sent: Wednesday, August 09, 2017 3:20 PM
To: Fennessy, Christopher
Cc: MacDonald, Alex@Waterboards; Keller, Lynn (Keller.Lynn@epa.gov)
Subject: [EXTERNAL] Area 40 - Requested Information Review Update

Hi Chris,

I wanted to provide a review/progress update on the sub-surface soil gas/soil/GW characterization data; aerial photos; RAD Review; CEQA; Interagency Agreement; and, RAP/ROD pathway forward:

- Soil Gas/Soil & GW Data assessment by Dan Gallagher is continuing. I will meet with Dan tomorrow to determine the readiness of his comments/feedback on the data gaps.
- Aerial Photo Reviews have determined some anomalies in potential operational areas not depicted in the current Site extents and will be summarized to AR by the end of the this week.
- RAD review has determined some discrepancies in the Dec. 2014 RAD Survey and potentially unaddressed USEPA comments with fieldwork implementation. Written comments on both the 2014 RAD Survey and 2015 RI Supplement may be available for distribution by next week depending of the availability of the HERO staff memo.
- Program met with OPEA staff today to introduce the project details, objectives, and status of previously submitted environmental impact reports. Planning to go over the related historical activities with Steve Ross to ensure complete understanding and identify action items.
- Corresponded with Lynn Keller and tentatively identified Aug. 18th as submittal date of draft interagency agreement. Setup meeting with DTSC OLC on Aug. 28th to go over project deliverables and language in both Draft Interagency Agreement and PSA.
- Plan to meet with Program management this week to go over the planned pathway forward in light of the most recent Ambient Air Sampling data and revised objectives provided by AR. Will determine the appropriateness of proposed remedy in RAP/ROD and contingent future uses for land once data is available.

- Chris – Based on the July 19th meeting action items DTSC was awaiting the DQOs for Ambient Air Sampling; and, sub-surface soil vapor sampling from AR. Please provide at your earliest convenience. Thank you.

Sincerely,

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