Message

Sent: 1/3/2022 4:30:40 PM
To: Poalinelli, Edwin [POALINELLI.EDWIN@EPA.GOV]; Rebekah Reynolds [Reynolds.Rebekah@epa.gov]
CC: Mathew Plate [Plate.Mathew@epa.gov]
Subject: FW: DRAFT/Deliberative Comments RE: TRW Microwave Site, 825 Stewart Dr: Follow-up on the Aug 19 2021 Site Visit
Attachments: DRAFT_SEMD_TRW_VI_RTC_comments.doc; RE: TRW Microwave Site, 825 Stewart Dr: Follow-up on the Aug 19 2021 Site Visit ; 1992-09-28 TRW ACO Docket 92-25.pdf; 2016-05-18 TRW EPA sets forth PPA's reasonable steps, 1160217.pdf; 2014-05-01 Ltr Prospective purchaser - TRW Microwave 825 Stewart Dr, 1147069.pdf

Hi Chip and Rebekah,

Attached is QA's review of the 2015 HVAC test and balance report and TRW's timeline to address EPA site visit follow-up comments provided in an October 7 letter. I will respond to TRW next week stating that their proposed timeline to provide a draft evaluation of the SSD system by mid-March 2022 is inadequate. I'll send you a draft first to get your feedback before I send my response. I'll also meet with Matt and go over his comments and if any additional evaluation is needed to evaluate vapor intrusion potential.

I expect that NGC will work proactively and quickly to address any EPA concerns or potential VI mitigation or O&M issues.

Or existing order with NGC does not address VI, , we do not have one with Apple. However, we do have a BFPA with the current owner (but not Apple), which specifies to maintain BFPA status, the current owner is prohibited from conducting building construction, renovation, or other modifications activities that may affect the integrity of the VI mitigation system.

If, hypothetically, there NGC timely cooperation will result in the quickest response If we find that the SDS mitigation system needs to be modified or that indoor air sampling is warranted,

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From: Plate, Mathew <Plate.Mathew@epa.gov>
Sent: Monday, December 27, 2021 12:11 PM
To: Johnson, AudreyL <Johnson.AudreyL@epa.gov>; Schulman, Michael <Schulman.Michael@epa.gov>
Cc: Poalinelli, Edwin <POALINELLI.EDWIN@EPA.GOV>
Subject: DRAFT/Deliberative Comments RE: TRW Microwave Site, 825 Stewart Dr: Follow-up on the Aug 19 2021 Site Visit

Attached is my draft review of the TRW RTC and the attached test and balance report. There was insufficient information on the building layout (room and zone sizes), building exhaust, and operations to make many conclusions from the test and balance report. Also since the building layout/operation has been modified since this test and balance I am not sure how accurately it reflects current operations. It did seem odd to me that the environmental chambers were not on dedicated ventilation systems. Maybe it is a reflection of how the chambers are being used? Not sure if it would have any impact on VI, but more information on the HVAC system could be helpful.

Thanks
matt

From: Johnson, AudreyL <Johnson.AudreyL@epa.gov>
Sent: Monday, December 6, 2021 12:59 PM
To: Schulman, Michael <Schulman.Michael@epa.gov>

Cc: Plate, Mathew <Plate.Mathew@epa.gov>; Poalinelli, Edwin <POALINELLI.EDWIN@EPA.GOV>
Subject: RE: TRW Microwave Site, 825 Stewart Dr: Follow-up on the Aug 19 2021 Site Visit

Okay. Thank you.

Audrey L. Johnson
Manager, Quality Assurance Branch
US EPA Region 9, Lab Services and Applied Science Division (LSS-3)
75 Hawthorne Street
San Francisco, CA 94105
PHONE: 415.972.3431

From: Schulman, Michael <Schulman.Michael@epa.gov>
Sent: Monday, December 6, 2021 12:53 PM
To: Johnson, AudreyL <Johnson.AudreyL@epa.gov>
Cc: Plate, Mathew <Plate.Mathew@epa.gov>; Poalinelli, Edwin <POALINELLI.EDWIN@EPA.GOV>
Subject: Re: TRW Microwave Site, 825 Stewart Dr: Follow-up on the Aug 19 2021 Site Visit

Bumping up means to move up as a reminder (I think the phase origin means to move something from down deep in the emails back up to the top). Nothing else is being requested by me. I think Chip has what he needs right now, but just wanted to send the reminder.

Thank you
Michael

On Dec 6, 2021, at 12:47 PM, Johnson, AudreyL <Johnson.AudreyL@epa.gov> wrote:

Greetings Michael,
Matt mentioned this to me, however, I am curious as to what "bumping up" means. Are you asking us to reprioritize other work? This gets very difficult to do as much of the QA Branch will be leaving for use or lose beginning next week and will not be around until after the new year. Matt is also gone in the field some days this week and next to accomplish other priority work. Let us know how we can support you given our time constraints and upcoming leave schedules.

Thanks,

Audrey L. Johnson
Manager, Quality Assurance Branch
US EPA Region 9, Lab Services and Applied Science Division (LSS-3)
75 Hawthorne Street
San Francisco, CA 94105
PHONE: 415.972.3431

From: Schulman, Michael <Schulman.Michael@epa.gov>
Sent: Monday, December 6, 2021 12:33 PM
To: Plate, Mathew <Plate.Mathew@epa.gov>; Poalinelli, Edwin <POALINELLI.EDWIN@EPA.GOV>
Cc: Johnson, AudreyL <Johnson.AudreyL@epa.gov>
Subject: RE: TRW Microwave Site, 825 Stewart Dr: Follow-up on the Aug 19 2021 Site Visit

Just bumping the Apple HVAC test and balance information up as a reminder to Chip and the pending review given he is currently following up with an OSHA and press inquiry from the Independent.uk on TRW

From: Schulman, Michael
Sent: Wednesday, November 17, 2021 9:10 AM
To: Plate, Mathew <Plate.Mathew@epa.gov>
Cc: Poalinelli, Edwin <POALINELLI.EDWIN@EPA.GOV>; Johnson, AudreyL <Johnson.AudreyL@epa.gov>
Subject: RE: TRW Microwave Site, 825 Stewart Dr: Follow-up on the Aug 19 2021 Site Visit

I can wait until after Christmas as POU is a more acute need. Thanks!

Michael

From: Plate, Mathew <Plate.Mathew@epa.gov>
Sent: Wednesday, November 17, 2021 9:08 AM
To: Schulman, Michael <Schulman.Michael@epa.gov>
Cc: Poalinelli, Edwin <POALINELLI.EDWIN@EPA.GOV>; Johnson, AudreyL <Johnson.AudreyL@epa.gov>
Subject: RE: TRW Microwave Site, 825 Stewart Dr: Follow-up on the Aug 19 2021 Site Visit

My schedule is fairly full until after Christmas. But it's possible if I don't end up going to Pollock I might have some time.

-matt

From: Schulman, Michael <Schulman.Michael@epa.gov>
Sent: Wednesday, November 17, 2021 8:59 AM
To: Plate, Mathew <Plate.Mathew@epa.gov>
Cc: Poalinelli, Edwin <POALINELLI.EDWIN@EPA.GOV>
Subject: FW: TRW Microwave Site, 825 Stewart Dr: Follow-up on the Aug 19 2021 Site Visit

Hi Mat,

AECOM / Northrop Grumman responded to my letter requesting additional SSDS and building information. Their response included HVAC test and balance information, is this something you can review in the next few weeks to month?

I also need to follow up with AECOM asking them to provide a timeline to address the additional items.

Thank you,
Michael

From: Nandi, Joshua [US] (ES) <Joshua.Nandi@ngc.com>
Sent: Friday, November 5, 2021 1:01 PM
To: Schulman, Michael <Schulman.Michael@epa.gov>
Cc: Holbrook, Holly <Holly.Holbrook@aecom.com>; Kurt Batsel <batsel@dextra-group.com>; L'Esperance, James [US] (ES) <James.L'Esperance@ngc.com>
Subject: RE: TRW Microwave Site, 825 Stewart Dr: Follow-up on the Aug 19 2021 Site Visit

Hi Michael,
Please find NGC's response to the EPA's comments regarding the 19 August 2021 Site visit attached.
Thank you,
Josh

JOSHUA NANDI | Project Manager, Environmental Remediation
Northrop Grumman | Enterprise Services
C: 310-912-8307 | joshua.nandi@ngc.com

From: Schulman, Michael <Schulman.Michael@epa.gov>
Sent: Thursday, October 7, 2021 6:44 PM
To: Kurt Batsel <batsel@dextra-group.com>; Nandi, Joshua [US] (ES) <Joshua.Nandi@ngc.com>
Subject: EXT :TRW Microwave Site, 825 Stewart Dr: Follow-up on the Aug 19 2021 Site Visit

Hi Kurt and Josh,

Please find attached in a letter EPA's follow up comments on the August 19, 2021 site visit of the 825 Stewart Drive building. EPA requests that NGC provide a written response to EPA's comments in the next 30-days. Please feel free to contact me anytime if you have any questions or there is anything you want to go over.

Thank you,
Michael

Michael Schulman
Remedial Project Manager
U.S. EPA Superfund and Emergency Response Division
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415-972-3064 (o)
628-629-2421 (m)

From: Kurt Batsel <batsel@dextra-group.com>
Sent: Tuesday, August 10, 2021 2:58 PM
To: Schulman, Michael <Schulman.Michael@epa.gov>
Subject: Re: Site visit: TRW Microwave Site 825 Stewart Drive building

Ok - Sounds good. We'll plan to meet you there a little before 8:00 am.

Sent from my mobile

> On Aug 10, 2021, at 5:04 PM, Schulman, Michael <Schulman.Michael@epa.gov> wrote:
>
> Hi Kurt, thanks. we'll start at 08:00 then. I'll get to the site around 07:30 to 07:45. I have a briefing I need to give from 1-2 pm, so we'll either be done by then or Matt will fill in for me.
>
> Regarding the NDA the EPA site attorney spoke to an Apple attorney and EPA is not going to sign the Apple NDA. Apple will send a letter to EPA saying that everything we create during the Site Walk (e.g., field notes, photos) is being claimed by Apple as CBI

and we will treat it as such under our CBI regulations at 40 CFR Part 2. After the visit, we will send Apple back everything we created so they can then substantiate their claim. We will want to work with the Apple representative while onsite to minimize any creation of CBI. So, for example, if it's possible to take a photo at an angle that wouldn't be claimed as CBI that is probably what we'd want to do. Let me know if you have any questions.

Thank you,
Michael

From: Kurt Batsel <batsel@dextra-group.com>
Sent: Tuesday, August 10, 2021 11:51 AM
To: Schulman, Michael <Schulman.Michael@epa.gov>
Subject: RE: Site visit: TRW Microwave Site 825 Stewart Drive building

Michael – I heard back from Apple that the earliest that can get us in the building is 8:00 AM.

From: Kurt Batsel
Sent: Monday, August 9, 2021 2:45 PM
To: Schulman, Michael <Schulman.Michael@epa.gov>
Subject: RE: Site visit: TRW Microwave Site 825 Stewart Drive building

Michael – Just came to mind that although my team can start whenever, I'm not sure if Apple would have constraints as they will want to escort us. If you let me know when you want to start, I will reach out and confirm it with them.

From: Schulman, Michael <Schulman.Michael@epa.gov>
Sent: Monday, August 9, 2021 2:08 PM
To: Kurt Batsel <batsel@dextra-group.com>
Subject: RE: Site visit: TRW Microwave Site 825 Stewart Drive building

Hi Kurt,

Do you have a start time restriction? With traffic it is better for me to have an early morning start. Thanks, Michael

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From: Kurt Batsel <batsel@dextra-group.com>
Sent: Monday, August 2, 2021 7:57 AM
To: Schulman, Michael <Schulman.Michael@epa.gov>
Subject: RE: Site visit: TRW Microwave Site 825 Stewart Drive building

Michael – Thanks for the confirmation.

From: Schulman, Michael <Schulman.Michael@epa.gov>
Sent: Friday, July 30, 2021 7:27 PM
To: Kurt Batsel <batsel@dextra-group.com>
Subject: RE: Site visit: TRW Microwave Site 825 Stewart Drive building

Hi Kurt,

EPA management has approved the site visit. Have a good weekend.

Michael

From: Kurt Batsel <batsel@dextra-group.com>
Sent: Friday, July 30, 2021 12:06 PM
To: Schulman, Michael <Schulman.Michael@epa.gov>
Subject: RE: Site visit: TRW Microwave Site 825 Stewart Drive building

Michael - GI Partners did not indicate any plans to attend.

From: Schulman, Michael <Schulman.Michael@epa.gov>
Sent: Friday, July 30, 2021 3:04 PM
To: Kurt Batsel <batsel@dextra-group.com>
Subject: RE: Site visit: TRW Microwave Site 825 Stewart Drive building

Thanks, I need to document the number of people for COVID. Do you think the building manager will want to be present?

From: Kurt Batsel <batsel@dextra-group.com>
Sent: Friday, July 30, 2021 11:54 AM
To: Schulman, Michael <Schulman.Michael@epa.gov>
Subject: RE: Site visit: TRW Microwave Site 825 Stewart Drive building

Hi, Michael – We will have the following people attend:

- Michael Shannon – Northrop Grumman's Corporate Manager, Environmental Remediation.
- Holly Holbrook – AECOM's Project Manager
- Myself – Northrop Grumman's Project Manager

I am expecting we will also have an escort from Apple but I have not yet been able to confirm who that will be. I'll let you know as soon as I hear back from Apple.

From: Schulman, Michael <Schulman.Michael@epa.gov>
Sent: Friday, July 30, 2021 11:43 AM
To: Kurt Batsel <batsel@dextra-group.com>
Subject: Re: Site visit: TRW Microwave Site 825 Stewart Drive building

Hi Kurt, excluding the EPA, how many people will be on the site walk?

Thanks!

> On Jul 30, 2021, at 7:17 AM, Kurt Batsel <batsel@dextra-group.com> wrote:

Hi, Michael – Sounds good. I confirmed with GI Partners also. The Apple contact is on vacation this week, but I will talk to her about logistics first thing next week.

From: Schulman, Michael <Schulman.Michael@epa.gov>
Sent: Friday, July 30, 2021 12:34 AM
To: Kurt Batsel <batsel@dextra-group.com>
Subject: RE: Site visit: TRW Microwave Site 825 Stewart Drive building

Hi Kurt,

Myself and Matt Plate will be able to visit the site on Thursday 8/19. The only caveat is that we both need final approvals for field work considering the current high COVID-19 transmission rates; however, this should not be an issue.

Thank you,
Michael

From: Schulman, Michael
Sent: Wednesday, July 28, 2021 11:41 AM
To: Kurt Batsel <batsel@dextra-group.com>
Subject: RE: Site visit: TRW Microwave Site 825 Stewart Drive building

Thanks, the date is OK for me and looks OK on Matt's calendar, but I'm confirming.

From: Kurt Batsel <batsel@dextra-group.com>
Sent: Wednesday, July 28, 2021 10:46 AM
To: Schulman, Michael <Schulman.Michael@epa.gov>
Subject: RE: Site visit: TRW Microwave Site 825 Stewart Drive building

Hi, Michael – We are available on Thursday 8/19. I am still waiting for confirmation from GI Partners and Apple, but I would not expect there to be any issues with them. I will give you final confirmation on it by the end of the week, but I wanted to go ahead and let you know that 8/19 is looking the best for us. We will plan to arrive the evening before so could start as early as you would like in the AM.

From: Schulman, Michael <Schulman.Michael@epa.gov>
Sent: Monday, July 26, 2021 2:47 PM
To: Kurt Batsel <batsel@dextra-group.com>
Subject: Site visit: TRW Microwave Site 825 Stewart Drive building

Hi Kurt,

EPA requests a site walk and inspection visit of the TRW Microwave Site 825 Stewart Drive building. Can you arrange for EPA access to the building from the current property owner, which I believe is GI DC

Sunnyvale LLC? Myself and Matt Plate with EPA request reasonable access to visit the items addressed in the attached annual inspection memo and the 2014-2015 building mitigation measures that addressed the potential for vapor intrusion into the building, which included:

- The sub-slab depressurization system that was installed underneath the site building to vent vapors to the atmosphere.
- The building's concrete slab and cracks that where sealed to prevent vapor intrusion. As well as any building concrete slab penetrations (e.g., from pipes or seams in the building).
- Past indoor air sampling locations.
- The location where contaminated soil was excavated from underneath the building.
- The spaces between the walls of the three sections of the buildings that were sealed in 2014-2015.
- The emulsified vegetable oil in-situ bioremediation system.
- The location of groundwater monitoring wells.

EPA also wants to review any post 2014-2015 building modifications or changes to the building.

Can you get back to me this week with some dates for a site visit in August? Northrup Grumman and your consultant are also invited to attend, understanding that there may be COVID-19 related restrictions in how many people can visit the building or congregate. I am available for a site visit any week, except for August 9-11 and the week of August 23-27 and Matt Plate typically has limited availability on Fridays.

Feel free to call me to go over,
Thank you,

Michael Schulman
Remedial Project Manager
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628-629-2421 (m)

From: Kurt Batsel <batsel@dextra-group.com>
Sent: Tuesday, May 25, 2021 2:03 PM
To: Schulman, Michael <Schulman.Michael@epa.gov>
Cc: TWright@gesonline.com; Holbrook, Holly <Holly.Holbrook@aecom.com>
Subject: TRW Microwave - 2020 SSD Inspection Memo

Hi, Michael – As you requested during our last discussion on TRW Microwave, attached is a technical memorandum prepared by GES that summarizes the 2020 SSD system inspection conducted at the onsite building currently leased by Apple. Please let me know if you have any questions or need any additional info.

Kurt R. Batsel, P.E. | The Dextra Group, Inc.

T: 770.578.9696 | batsel@dextra-group.com