Message

From: Woo, Cynthia [cynthia.woo@aptim.com]
Sent: 7/1/2022 4:23:50 PM
To: Abreu, Lilian [abreu.lilian@epa.gov]
Subject: FW: [CUI] Triple Site Offsite Operable Unit - NFA BSERs, CERCLIS Site ID CAN000900265 [CUI]
Attachments: RES114 Survey Form 2015-1117.pdf; RES114 Resample .pdf; CONFIDENTIAL_PII_RES 114_Sampling Results Letter_Mar 2016.pdf

Hi Lilian,
In reviewing my records, I realized that Rose and I already conducted a cursory (not in-depth) of one of the NFA BSERs (for RES114). This was done back in March 2022. Michael requested that we look specifically for the bulleted items he outlined below and our responses are in RED. Let's discuss together in a future call if you would like a more comprehensive review from APTIM.

Thank you,
Cynthia

CYNTHIA WOO
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From: Woo, Cynthia
Sent: Wednesday, March 9, 2022 12:12 PM
To: Schulman, Michael <Schulman.Michael@epa.gov>
Cc: Abreu, Lilian <abreu.lilian@epa.gov>; Condit, Rose <rose.condit@aptim.com>
Subject: RE: [CUI] Triple Site Offsite Operable Unit - NFA BSERs, CERCLIS Site ID CAN000900265 [CUI]

Hi Michael,
The following are APTIM's comments on your bulleted list of things to check. We reviewed the recent NFA BSER submittal for RES114.

- That the plain language changes noted in past EPA comments are incorporated in the BSER. While the BSERs are inherently technical documents, they do also get sent to the residents. You don't need to document in a checklist to me that the past EPA comments were incorporated, I just want see that they were when I do my review of the BSER. For you review, I want to be judicious in providing any new comments to PSI given we've had multiple iterations of EPA comments that PSI has addressed and EPA has already agreed that the templates are generally acceptable. But with that said, I am not categorically opposed to new comments on the wording of the BSER, only that any new comments be material in nature. As Lilian comes up to speed she may identify different things that she'll ask be addressed.
- The language is simple and understandable for a layperson. No changes required.

- I particularly want EPA's comments on risk language that had EPA risk assessor input to be reflected in the BSERs.
- EPA's risk language was reflected in the BSER and matches previously approved BSERs. No changes required.

- The data tables need to be complete incorporating all past sampling results. As well, EPA's comment on the phrasing of data such as "rejected" needs to be reviewed. As well, the BSER needs to qualify where the OUT(door) samples were collected 0.5 miles away, such as from the Signetics Site.
- The data tables are complete and correct. Confirmed that the OUT samples were collected on the 2 sampling days nearby (11/17/15 at RES115 and RES119; 1/19/18 at SMES).

- The building layout maps needs to be correct.
- The layout is correct but is hand drawn. EPA can decide if a digital layout should be presented in the BSER instead of the hand drawn version.

- The past sampling locations need to be clear and correct. This applies to the language, for example, a sample at the "Kitchen Sink" could mean under the sink, above it, or something else.
- The only description of sampling location is depicted on the hand drawn apartment layout. According to APTIM's notes in the RES survey, the sampler was hung on a cabinet door in the living room. These details should be added in the text (Section 7.1).

- The past indoor air building surveys need to be a complete record. This should include APTIM's bldg surveys where they exist.
- APTIM's RES surveys are missing, and Locus did not provide the "resampling" RES survey for the 2nd sampling event. APTIM has both the RES survey and "resampling" survey in our records (see attached)

- The past communications record needs to be "complete". As a reminder, EPA agreed that the BSER did not need to incorporate every communication (e.g., the same letter may have been sent 4+ times on different dates). But, the appendix does need to include the significant records to understand the site history and the EPA and PSI steps taken.
- The record is missing the March 2016 sampling results letter to the owner (see the attached). Everything else is complete.

Let me know if you would like APTIM to continue reviewing the other NFA BSER's. It should take 1-2 hours to review each one (following your bullets above).

Thanks, Cynthia

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From: Schulman, Michael <Schulman.Michael@epa.gov>
Sent: Friday, March 4, 2022 4:27 PM
To: Woo, Cynthia <cynthia.woo@aptim.com>
Cc: Abreu, Lilian <abreu.lilian@epa.gov>
Subject: RE: [CUI] Triple Site Offsite Operable Unit - NFA BSERs, CERCLIS Site ID CAN000900265

EXTERNAL SENDER

Hi Cynthia,

I'd like APTIM to initially review just one of the NFA letters. They NFA BSERs are all the same template. If there is a RES that you know to be relatively more complicated than the others, choose that one to review. The NFA's are around 8-10 pages and I don't think they'll take more than 2-4 hours to review the first one, but let me know if it takes longer. Do a general review based on your judgement, but the items I specifically want reviewed are:

- That the plain language changes noted in past EPA comments are incorporated in the BSER. While the BSERs are inherently technical documents, they do also get sent to the residents. You don't need to document in a checklist to me that the past EPA comments were incorporated, I just want see that they were when I do my review of the BSER. For you review, I want to be judicious in providing any new comments to PSI given we've had multiple iterations of EPA comments that PSI has addressed and EPA has already agreed that the templates are generally acceptable. But with that said, I am not categorically opposed to new comments on the wording of the BSER, only that any new comments be material in nature. As Lilian comes up to speed she may identify different things that she'll ask be addressed.
- I particularly want EPA's comments on risk language that had EPA risk assessor input to be reflected in the BSERs.
- The data tables need to be complete incorporating all past sampling results. As well, EPA's comment on the phrasing of data such as "rejected" needs to be reviewed. As well, the BSER needs to qualify where the OUT(door) samples were collected 0.5 miles away, such as from the Signetics Site.
- The building layout maps needs to be correct.
- The past sampling locations need to be clear and correct. This applies to the language, for example, a sample at the "Kitchen Sink" could mean under the sink, above it, or something else.
- The past indoor air building surveys need to be a complete record. This should include APTIM's bldg surveys where they exist.
- The past communications record needs to be "complete". As a reminder, EPA agreed that the BSER did not need to incorporate every communication (e.g., the same letter may have been sent 4+ times on different dates). But, the appendix does need to include the significant records to understand the site history and the EPA and PSI steps taken.

If it helps, here is a folder with all the NFA BSERs I downloaded: NFAs

Thank you,
Michael

From: Woo, Cynthia <cynthia.woo@aptim.com>
Sent: Wednesday, March 2, 2022 07:46
To: Schulman, Michael <Schulman.Michael@epa.gov>
Subject: FW: [CUI] Triple Site Offsite Operable Unit - NFA BSERs, CERCLIS Site ID CAN000900265

Hi Michael,
Let me know if you would like APTIM to proceed with any of the BSER reviews, particularly the NFA ones which we have not yet reviewed.

If these are lower on the priority, that is fine as I'm just checking in. I just returned from some personal time and getting caught up.

Best, Cynthia

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From: J. Wesley Hawthorne <hawthornej@locustec.com>
Sent: Friday, February 25, 2022 1:11 PM
To: Schulman, Michael <Schulman.Michael@epa.gov>
Cc: Nancy-Jeanne LeFevre <LeFevren@locustec.com>; Barker, Shau-Luen <shauluen.barker@philips.com>; Abreu, Lilian <abreu.lilian@epa.gov>; Woo, Cynthia <cynthia.woo@aptim.com>
Subject: [CUI] Triple Site Offsite Operable Unit - NFA BSERs, CERCLIS Site ID CAN000900265

EXTERNAL SENDER

Michael:

In accordance with EPA's 28 September 2021 approval of the Final Building-Specific Evaluation of Indoor Air Report (BSER) for RES020 (no further investigation recommended) and subsequent EPA general comments on BSERs, additional residential BSERs for no further investigation have been prepared. In accordance with the Triple Site OOU Updated Removal Work Plan, all residential BSERs for no further investigation are due to EPA six months from 28 September 2021. Therefore, by 28 March 2021, you will be in receipt of all of the BSERs for the residential properties identified for no further investigation in Table 3 of the Removal Work Plan (over 80 BSERs). We are delivering these incrementally through the final deadline. Upon EPA approval of individual BSERs, Locus will prepare cover letters for EPA signature and mail them to property owners.

This delivery is the fifth batch of NFA BSERs.

The following BSERs can be downloaded here:
https://locustec-my.sharepoint.com/:f:/p/lefevren/EqRC-A_TxYBJpWtHqbHneT4BgCNDUpQd4qOdfgtmTbemhQ?e=zbvCha

Building RES number	Street Address Number	Street Name
RES128	629	San Miguel
RES012	630	San Miguel
RES178	636	San Miguel

RES127	642	San Miguel
RES023	890/892	San Junipero
RES050	884/886	San Junipero
RES196/205	738	Carmel
RES184/185/187	739	Carmel

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