Message

From: Schulman, Michael [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=35D7024F00644B3D8B5DBA4940506834-SCHULMAN, M]
Sent: 2/12/2022 2:38:30 AM
To: Nandi, Joshua [US] (ES) [Joshua.Nandi@ngc.com]
CC: Holbrook, Holly [Holly.Holbrook@aecom.com]; L'Esperance, James [US] (ES) [James.L'Esperance@ngc.com]; Kurt Batsel [batsel@dextra-group.com]; Michael Shannon (Michael.Shannon@ngc.com) [Michael.Shannon@ngc.com]; Poalinelli, Edwin [POALINELLI.EDWIN@EPA.GOV]; Lilian Abreu (abreu.lilian@epa.gov) [abreu.lilian@epa.gov]
Subject: RE: TRW Microwave Site, 825 Stewart Dr: Follow-up on the Aug 19 2021 Site Visit
Attachments: 2016-05-18 TRW EPA sets forth PPA's reasonable steps, 1160217.pdf; 2021-10-07 EPA Letter, Follow up on 825 Steward Site Visit_s.pdf

Hi Josh,

It has been a couple months since your last update and half-a-year since we conducted the site visit to 825 Stewart Ave. Please provide an update on whether NGC's preliminary review of the SSD system is complete and whether an additional site visit was required.

In line with NGC's schedule below, **please submit by March 15, 2022, a complete response to EPA's October 7, 2021, comments**. Include in NGC's response any proposed modifications to the SSD system vent stacks to address potential emissions from being pulled into the building's HVAC. Also include in NGC's response a schedule to implement the proposed SSD system modifications.

Additionally, by **March 31, 2022, please respond** to EPA's October 7, 2021, request to submit a plan that documents the scope of the SSD system's long-term operations and maintenance and a figure showing where the existing sub-slab sampling ports are located. We expect that GI DC Sunnyvale, LLC will cooperate with NGC's efforts consistent with EPA's 2014 prospective purchaser letter (attached).

Thank you in advance for your cooperation to address EPA's comments. If NGC is unable or does not intend to meet this schedule, please contact me immediately so that we can discuss the issue and EPA can evaluate other alternatives for completing this necessary work in a timely manner.

Thank you,

Michael Schulman
Remedial Project Manager
US EPA Region 9
415-972-3064 (o)

From: Nandi, Joshua [US] (ES) <Joshua.Nandi@ngc.com>
Sent: Monday, December 13, 2021 17:25
To: Schulman, Michael <Schulman.Michael@epa.gov>
Cc: Holbrook, Holly <Holly.Holbrook@aecom.com>; L'Esperance, James [US] (ES) <James.L'Esperance@ngc.com>; Kurt Batsel <batsel@dextra-group.com>; Poalinelli, Edwin <POALINELLI.EDWIN@EPA.GOV>
Subject: RE: TRW Microwave Site, 825 Stewart Dr: Follow-up on the Aug 19 2021 Site Visit

Hi Michael,
We'll conduct a preliminary review of the SSD system in the upcoming weeks based on the photos taken during the recent Site visit. If an additional Site visit is needed, we plan on coordinating an inspection in January 2022 and have a draft evaluation of the SSD system ready, as well as the system O&M work plan, by mid-March 2022.

Please let me know if you have any questions.
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: Monday, December 13, 2021 8:19 AM
To: Nandi, Joshua [US] (ES) <Joshua.Nandi@ngc.com>
Cc: Holbrook, Holly <Holly.Holbrook@aecom.com>; L'Esperance, James [US] (ES) <James.L'Esperance@ngc.com>; Kurt Batsel <batsel@dextra-group.com>; Poalinelli, Edwin <POALINELLI.EDWIN@EPA.GOV>
Subject: EXT :RE: TRW Microwave Site, 825 Stewart Dr: Follow-up on the Aug 19 2021 Site Visit

Schulman, Michael has shared a OneDrive for Business file with you. To view it, click the link below.

2021-11-05_TRW Microwave_USEPA Letter RTCs_Final.pdf

Hi Josh,

I'm following up on below and our call last week. Can you give me an update by **this Wednesday** on EPA's comments and RTCs attached? I particularly need to know the specifics for what changes to the roof vents for the SSD system that NGC is recommending for EPA review and what plans NGC has to formalize the SSD system maintenance and inspections.

Feel free to call me if there is anything you want to go over. Thank you,
Michael

Michael Schulman
Remedial Project Manager
US EPA Region 9, Superfund Division
75 Hawthorne St, San Francisco, CA 94105
628-629-2421 (m)

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
75 Hawthorne St, San Francisco, CA 94105
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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

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
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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