From:	Raymond Chavira
To:	Joe Kwan
Cc:	Matthew Nelson; Richard Lewis; Elizabeth Brown; Tom.Perina@CH2M.com; Lewis Maldonado; MacNicholl, Peter@DTSC
Subject:	EPA Review of Sampling and Analysis Plan, Groundwater Modeling Plan, Well Installation Plan , and Health and Safety Plan, Shallow Zone South of Puente Creek (SZ-South) Remedy, Puente Valley Operable Unit, July 2, 2012
Date:	07/27/2012 02:28 PM
Attachments:	2012-0702 South RDI SAP Comments_July 27 2012.pdf CH2M HILL Review - Modeling Plan June 25 2012.pdf 2012-0702_RDI_FSP Cmts_Track.docx 2012-0702-Benchmark-Draft WIP - CH2M comments_v2.docx CH2M HILL Review - Draft SZ-South Well Installation Plan (Orion 02 July 2012)_v2.pdf

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Dear Mr. Kwan:

The United States Environmental Protection Agency, Region 9 (EPA) and its consultant CH2M HILL have reviewed the *Draft Field Sampling Plan (FSP), the Draft Groundwater Flow Modeling Plan, the Draft Well Installation Plan, and the Health and Safety Plan, Shallow Zone South of Puente Creek (SZ-South), Puente Valley Operable Unit,* prepared for Northrop Grumman Systems Corporation (Northrop Grumman) by Orion Environmental, Inc. (Orion), dated July 2, 2012. Each component document is part of the Remedial Design Investigation Work Plan, a required deliverable under Administrative Order 2011-14 and Section's IV B1 and IV B7 of the Statement of Work.

Pursuant to Section XIV of the Administrative Order, EPA is disapproving the submission and directing Northrop Grumman to resubmit the document after incorporating EPA's comments including those direct comments highlighted in "track changes" (See Attachment A of CH2M HILL Technical Memorandums) for the SAP and Well Installation Plan and attached as WORD documents in this email for convenience.

The SAP, Groundwater Flow Modeling Plan, and Well Installation Plan must be revised to correct the deficiencies and resubmitted as components of the RDI Work Plan for approval. The RDI Work Plan must be submitted by August 21, 2012 as agreed to in our email of July 26, 2012. If a satisfactory version of the RDI Work Plan is not submitted, EPA will modify the RDI Work Plan documents, and Northrop Grumman shall implement the Remedial Design Investigation as modified or may be deemed in violation of Administrative Order 2011-14.

Regarding the Health and Safety Plan, EPA has suggests the following information be added to the HSP to make it more comprehensive:

- List of subcontractors, their responsible personnel, and phone numbers.
- Biological hazards (e.g. black widows, brown recluse spiders, Africanized bees, snakes, scorpions)
- Material Safety Data Sheets (MSDS) for site contaminants
- Blood-born pathogens
- Driving safety
- Fire prevention
- Traffic control

If you have any questions concerning this matter, please contact me at (415) 947-4218 or your legal counsel may contact Lewis Maldonado at (415) 972-3926.

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Raymond Chavira
Environmental Scientist/Remedial Project Manager
USEPA Region 9, Superfund Division
75 Hawthorne St., SFD-7-3
San Francisco, CA 94105-3901
(415) 947-4218
(415) 947-3528 (Fax)

Attachments