April 2, 2010

Project 10627.003.0

Ms. Carmen D. Santos
Manager
RCRA Corrective Action Office, Waste Management Division
U.S. EPA Region 9
Mail Code WST-4
75 Hawthorne Street
San Francisco, CA 94105

Re: Polychlorinated Biphenyls Notification Plan
Risk-Based Application Amendment 3
Proposed Additional Concrete Sampling Plan for Polychlorinated Biphenyls
Former Pechiney Cast Plate Facility
3200 Fruitland Avenue, Vernon, California

Dear Ms. Santos:

As discussed during the January 29, 2010 conference call, AMEC Geomatrix, Inc. (AMEC), is proposing to conduct additional concrete testing to further support the reuse of concrete containing PCBs below the site-specific remediation goal of 5.3 milligrams per kilogram (mg/kg) at the Pechiney Cast Plate, Inc. facility (facility or site). The site is located at 3200 Fruitland Avenue in Vernon, California. The additional sampling locations will be selected randomly across the existing concrete floor slab and the data will be used to augment the concrete data presented in the Polychlorinated Biphenyls Notification Plan (Plan).[1]

Proposed Concrete Sample Locations

The additional concrete sampling will focus on collecting concrete core samples from randomly selected locations across the site. Given the size of the remaining floor slabs (approximately 590,000 square feet), 40 CFR Part 761, Subpart N (761.265 for porous surfaces) and Subpart O (761.283 and 761.286) were used as a guide to develop a modified sampling approach that would be reasonable for the site conditions. The sampling approach consists of a 40-foot by 40-foot grid spacing overlain across the site, which is approximately synonymous with the spacing of the below grade footings and foundations. This grid was initiated in the northwest corner of the site as shown on Figure 1.

In addition to the modifications to the sampling approach, Subpart O was further consulted to assess the minimum number of samples required for verification sampling. According to Subpart O, the minimum number of samples required would be three for each matrix, with no upper limit specified for the total number of samples required. As noted in the Plan, over 250 concrete characterization samples have been collected and tested for PCBs. The additional

[1] AMEC Geomatrix, Inc., 2009, Polychlorinated Biphenyls Notification Plan, Former Pechiney Cast Plate, Inc., Facility, Vernon, California, July 10.

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sampling proposed in this amendment will be used to augment the existing data by the collection and analysis of 50 randomly selected concrete samples locations from the proposed 40-foot by 40-foot grid.

To determine the random sampling locations, each grid was numbered starting at number 1 in the northwest corner of the site, and ending at number 455 in the southeast corner of the site. Once numbered, a random number generator was used to select random numbers between 1 and 455. As each random number was generated, the sample point was marked at the intersection of grid nodes at the southeast corner of the numbered grid for concrete sampling. Random sample grid numbers were excluded if the grid number either 1) fell within an area proposed for the removal and off-site disposal of concrete containing PCBs at concentrations greater than 5.3 mg/kg; or 2) fell outside the building slab in asphalt covered parking lots and/or driveways.

Using this random selection methodology, 50 random sample locations were identified for testing. These sample locations are shown on Figure 1.

Sampling and Analysis Procedures

Concert cores measuring approximately 1.5 inches in diameter and 3 inches in length (in accordance with 40 CFR Part 761; Subpart O; Section 761.286) will be collected at the proposed concrete sample locations using concrete coring equipment utilized by our subcontractor, Rice General Concrete Cutting Services of Long Beach, California. The concrete cores will be placed individually in resealable plastic bags and stored in an ice-chilled cooler. The core samples will be transported to the analytical laboratory, American Analytics of Chatsworth, California (American Analytics), to be crushed prior to analysis.

Sample documentation, handling, and transport will be conducted in accordance with the site-specific Quality Assurance Project Plan.[2]

Concrete core samples will be analyzed for Aroclors listed under EPA Method 8082 using a reporting limit of 200 micrograms per kilogram, or 0.2 mg/kg.

Decontamination of Concrete Coring Equipment

Concrete coring equipment will be decontaminated prior to use and between sampling locations using a 3-stage wash/rinse. Hexane will be used as a final rinse for the concrete coring equipment.

[2] Geomatrix Consultants, Inc., 2007, Quality Assurance Project Plan, Former Pechiney Cast Plate, Inc. Facility, Vernon, California, July 20.

Waste Containment and Disposal

Decontamination wastewater and concrete slurry generated during concrete coring (investigation derived waste) will be containerized in Department of Transportation-approved 55-gallon drums and properly profiled, manifested, and disposed off-site at a licensed disposal facility.

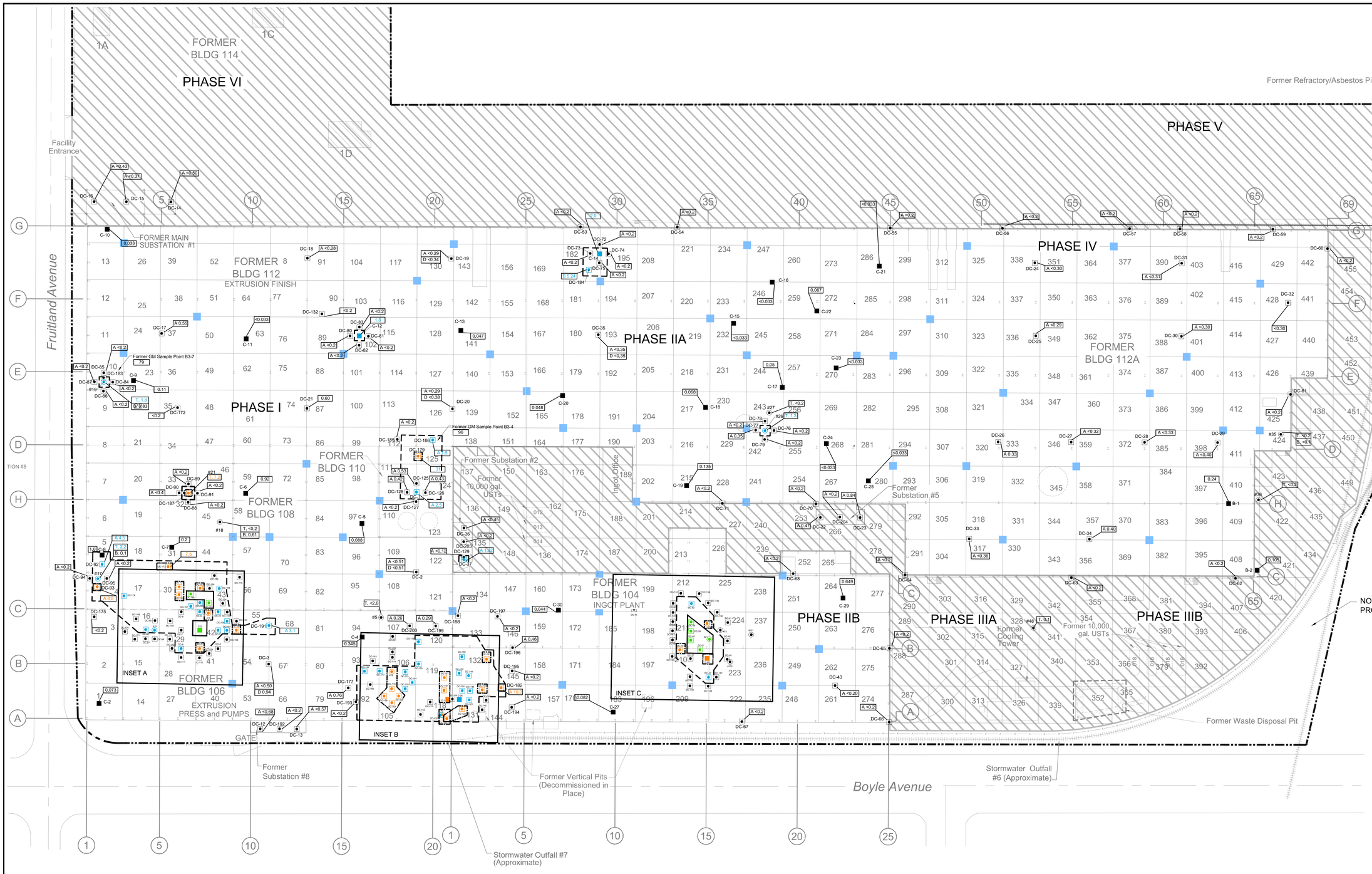
Sincerely yours,
AMEC Geomatrix, Inc.

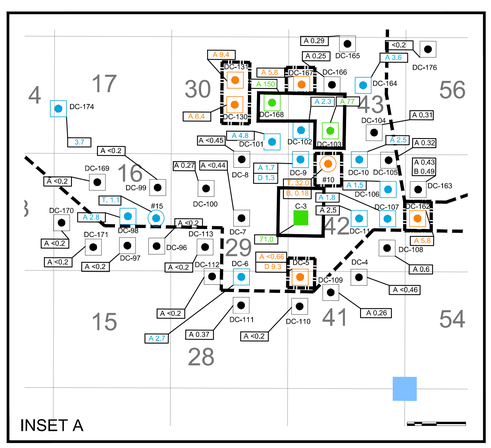
Linda Conlan, PG #6943
Senior Geologist

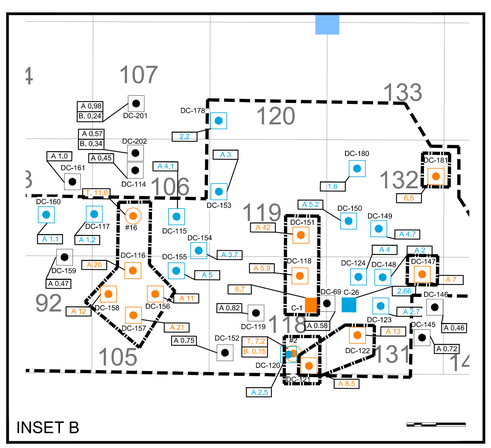
Calvin H. Hardcastle, PE #C44751
Principal Engineer

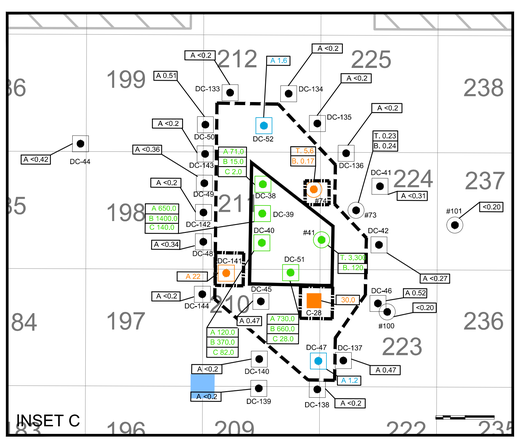
Enclosure: Figure 1 - Proposed Grid Sample Locations

cc: John F. Cermak, Baker & Hostetler LLP









Explanation

- DC-01 Concrete core sample (Geomatrix, 2006a, b, c, and d)
- #1 Soil boring with concrete core sample
- C-30 Concrete core sample (MFG, 1998)
- WS021 Concrete floor wipe sample (Aurora, 2005)
- Site boundary
- Railroad track (on grade)
- Railroad track (buried)
- Chain link fence
- Building wall and columns
- PCBs Total polychlorinated biphenyls
- BLDG Building
- <0.2 Sample results less than the reporting limit shown in milligrams per kilogram (mg/kg)
- T. Top of concrete sample
- B. Bottom of concrete sample
- A Surface to depth of 0.25 inch
- B Depth of 0.25 inch to 1.5 inches
- C Depth of 1.5 inches to 3.0 inches
- D Second slab of concrete
- PCB Concentration > 1 mg/kg and ≤ 5.3 mg/kg
- PCB Concentration ≥ 5.3 mg/kg and < 50 mg/kg
- PCB Concentration ≥ 50 mg/kg
- PCB-impacted concrete ≥ 1 mg/kg
- PCB-impacted concrete ≥ 5.3 mg/kg
- PCB-impacted concrete ≥ 50 mg/kg
- 40x40 grid sample square location
- Pavement area

Notes:

1. All locations are approximate.
2. All samples are bulk samples unless noted otherwise.
3. Samples analyzed using EPA method 8082; refer to Table 2 for a summary of test methods and analytical results.
4. Bulk sample results reported in milligrams per kilogram (mg/kg).
5. References:

Geomatrix Consultants, Inc. (Geomatrix), 2006, Phase II Environmental Site Assessment Report, Pechiney Cast Plate Facility, Vernon, California, March 9.

Geomatrix, 2006, PCB Notification Plan, Pechiney Cast Plate, Inc. Facility, Vernon, California, September 27.

Geomatrix, 2006, Supplemental Phase II Environmental Site Assessment Report, Pechiney Cast Plate Facility, Vernon, California, December 19.

Geomatrix, 2006, Above Grade Demolition Completion Report, Pechiney Cast Plate, Inc. Facility, Vernon, California, December 26.

McCulley, Frick & Gilman (MFG), 1998, Limited Phase II Environmental Investigation, Alcoa Cast Plate, 5151/5401 Alcoa Avenue, Vernon, California, September 15.

Geraghty and Miller, Inc., 1990, Final Report, Phase III Environmental Assessment for Alcoa - Vernon Plant, Vernon, California, September 6.

Note: Figure shall be produced in color to maintain information.

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