| | |
|---|---|
| **From:** | Chavira, Raymond |
| **To:** | Bradley A Barquest (bradley.barquest@utc.com); Parsons, Scott |
| **Cc:** | Tom Perina; Maldonado, Lewis; Kerang Sun (Ksun@ch2m.com); Lee, Don |
| **Subject:** | FW: Draft ARARs Analysis - PVOU Reinjection of Treated Water in Shallow Zone Aquifer - Request for Board Review and Concurrence |
| **Date:** | Monday, December 23, 2013 2:27:00 PM |
| **Attachments:** | Puente Valley Operable Unit_Potential Applicable_2013-12-19.pdf |

Brad and Scott,

The attached letter from the Water Board provides assurance to proceed with the reinjection pilot test and lays out their proposed Monitoring and Reporting Program (baseline, one and four weeks post reinjection pilot test) as substantive requirements. Baseline sampling is currently being conducted.

Please identify and propose reasonable approach(s) to allay the Water Board's concern regarding movement of contamination as a result of reinjection if your team feels the monitoring program is excessive.

We can have a call after the new year to discuss.

Ray

Raymond Chavira
Environmental Scientist/Remedial Project Manager
EPA Region IX
75 Hawthorne Street, SFD-7-3
San Francisco, CA 94105-3901
(415) 947-4218
(415) 947-3528 fax

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**From:** Wu, Eric@Waterboards [mailto:Eric.Wu@waterboards.ca.gov]
**Sent:** Friday, December 20, 2013 9:05 AM
**To:** Chavira, Raymond; Tom.Perina@CH2M.com
**Cc:** Hu, Jeffrey@Waterboards; Chang, Ann@Waterboards; Heath, Arthur@Waterboards; Chou, Rebecca@Waterboards
**Subject:** RE: Draft ARARs Analysis - PVOU Reinjection of Treated Water in Shallow Zone Aquifer - Request for Board Review and Concurrence

Hi all,

Attached please find comments from Regional Board staff regarding injection of potable water at Puente Valley Operable Unit Superfund Site. Please feel free to call Dr. Ann Chang or me with questions.

Eric Wu, Ph.D., P.E.

Chief of Groundwater Permitting Unit
Regional Water Quality Control Board, Los Angeles
320 W. 4th Street
Los Angeles, CA 90013
(213) 576-6683
(213) 576-5777 fax

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**From:** Chavira, Raymond [mailto:Chavira.Raymond@epa.gov]
**Sent:** Thursday, December 19, 2013 5:29 PM
**To:** Wu, Eric@Waterboards; Chou, Rebecca@Waterboards; Tom.Perina@CH2M.com
**Cc:** Hu, Jeffrey@Waterboards; Chang, Ann@Waterboards; Heath, Arthur@Waterboards
**Subject:** RE: Draft ARARs Analysis - PVOU Reinjection of Treated Water in Shallow Zone Aquifer - Request for Board Review and Concurrence

Eric,

We appreciate any comments at this time. We plan to take stakeholder comments on the draft discharge options study for the IZ remedy whereby reinjection will be one of the alternatives evaluated and the Water Board will have another opportunity to comment on the ARARs.

Thanks and have a happy holiday!

Ray

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**From:** Wu, Eric@Waterboards [mailto:Eric.Wu@waterboards.ca.gov]
**Sent:** Thursday, December 19, 2013 8:46 AM
**To:** Chavira, Raymond; Chou, Rebecca@Waterboards; Tom.Perina@CH2M.com
**Cc:** Hu, Jeffrey@Waterboards; Chang, Ann@Waterboards; Heath, Arthur@Waterboards
**Subject:** RE: Draft ARARs Analysis - PVOU Reinjection of Treated Water in Shallow Zone Aquifer - Request for Board Review and Concurrence

Hi Ray,

We should have our comment ready for you today.

Eric Wu, Ph.D., P.E.
Chief of Groundwater Permitting Unit
Regional Water Quality Control Board, Los Angeles
320 W. 4th Street
Los Angeles, CA 90013
(213) 576-6683
(213) 576-5777 fax

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**From:** Chavira, Raymond [mailto:Chavira.Raymond@epa.gov]
**Sent:** Wednesday, December 18, 2013 3:47 PM
**To:** Chou, Rebecca@Waterboards; Tom.Perina@CH2M.com
**Cc:** Hu, Jeffrey@Waterboards; Wu, Eric@Waterboards; Chang, Ann@Waterboards; Heath, Arthur@Waterboards

**Subject:** RE: Draft ARARs Analysis - PVOU Reinjection of Treated Water in Shallow Zone Aquifer - Request for Board Review and Concurrence

Water Board Colleagues,

We have not received any comments on draft ARARs sent on 6 Nov, our draft Discharge Options Report is planned for release on Dec 20. We plan to move finalize our ARARs for injection to groundwater.

Ray

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**From:** Chou, Rebecca@Waterboards [mailto:Rebecca.Chou@waterboards.ca.gov]
**Sent:** Wednesday, November 27, 2013 11:16 AM
**To:** Chavira, Raymond; Tom.Perina@CH2M.com
**Cc:** Hu, Jeffrey@Waterboards; Wu, Eric@Waterboards; Chang, Ann@Waterboards
**Subject:** RE: Draft ARARs Analysis - PVOU Reinjection of Treated Water in Shallow Zone Aquifer - Request for Board Review and Concurrence

Hi, Raymond and Tom

I will be on vacation for two week. I asked Groundwater Permitting project manager, Dr. Ann Chang, and Unit Chief of Groundwater Permitting, Dr. Eric Wu, to follow up with you next Monday, 12/2/13 regarding ARARs and sampling plan . You can also reach them at 213-620-6122 for Dr. Chang or 213-576-6683 for Dr. Wu. Thanks!

Rebecca

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**From:** Chavira, Raymond [mailto:Chavira.Raymond@epa.gov]
**Sent:** Tuesday, November 19, 2013 9:13 PM
**To:** Chou, Rebecca@Waterboards
**Cc:** Hu, Jeffrey@Waterboards; Wu, Eric@Waterboards
**Subject:** FW: Draft ARARs Analysis - PVOU Reinjection of Treated Water in Shallow Zone Aquifer - Request for Board Review and Concurrence

Rebecca,

Any feedback? I am meeting with UTC/Carrier Wed morning at 9:30 am. I would like to let them know the Water Board is comfortable with ARARs for reinjection.

Ray

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**From:** Chavira, Raymond
**Sent:** Wednesday, November 06, 2013 11:06 AM
**To:** 'Chou, Rebecca@Waterboards'
**Cc:** Wu, Eric@Waterboards
**Subject:** RE: Draft ARARs Analysis - PVOU Reinjection of Treated Water in Shallow Zone Aquifer - Request for Board Review and Concurrence

Rebecca,

My goal is to confirm these requirements with UTC/Carrier at a technical meeting on Nov 20th. By then I would like to provide a "notice to proceed" with testing, monitoring, design, and substantial capital investment for the phase one remedial system (350 gpm).

It would great if you can comment by November 19th, if not maybe we can get your initial feedback.

Ray

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**From:** Chou, Rebecca@Waterboards [mailto:Rebecca.Chou@waterboards.ca.gov]
**Sent:** Wednesday, November 06, 2013 10:56 AM
**To:** Chavira, Raymond
**Cc:** Wu, Eric@Waterboards
**Subject:** RE: Draft ARARs Analysis - PVOU Reinjection of Treated Water in Shallow Zone Aquifer - Request for Board Review and Concurrence

HI, Raymond

Thanks! How soon do you need our comments on ARARs?

Rebecca Chou, Ph.D., P.E.
Section Chief of Groundwater Permitting and Land Disposal
Regional Water Quality Control Board – Los Angeles Region
California Environmental Protection Agency
320 W. 4th Street, Suite 200
Los Angeles, CA 90013
Phone: 213-576-6618
Fax: 213-576-5777
Email: Rebecca.Chou@waterboards.ca.gov

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**From:** Chavira, Raymond [mailto:Chavira.Raymond@epa.gov]
**Sent:** Wednesday, November 06, 2013 10:44 AM
**To:** Chou, Rebecca@Waterboards
**Subject:** FW: Draft ARARs Analysis - PVOU Reinjection of Treated Water in Shallow Zone Aquifer - Request for Board Review and Concurrence

Rebecca,

I am resending. Thanks. Ray

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**From:** Chavira, Raymond
**Sent:** Wednesday, November 06, 2013 10:41 AM

**To:** 'rchou@waterborads.ca.gov'; 'Hu, Jeffrey@Waterboards'; 'luz.rabelo@waterboards.ca.gov'
**Cc:** Heath, Arthur@Waterboards; Tom.Perina@CH2M.com; Hiett, Richard; 'Burger, Kate@DTSC'; 'Barquest, Bradley A UTCHQ'; 'Parsons, Scott'; Maldonado, Lewis
**Subject:** Draft ARARs Analysis - PVOU Reinjection of Treated Water in Shallow Zone Aquifer - Request for Board Review and Concurrence

Water Board Colleagues,

Thanks for meeting with Tom Perina and I on October 30th to clarify reinjection requirements and initiate a coordination process between EPA and the Regional Water Board to allow reinjection as part of the PVOU Shallow Zone North Interim Remedy.

Attached please find our draft ARAR's Analysis (PVOU Draft ARARS Reinjection_4_12_12.pdf) for your review. Included is an email attachment relaying these requirements and other correspondence to UTC/Carrier and their consultant Tetra Tech on April 12, 2012 ( see Draft ARARS for Discharge to Groundwater (Reinjection).

Upon review by the Water Board, EPA will include these ARARs as part of our Explanation of Significant Differences or ESD planned for mid-2014 which will in part provide for additional discharge options for the PVOU interim remedy (see EPA Letter UTC).

We will proceed with our pilot reinjection test over the next two months per the approved work plan (provided in separate email due to size) and conduct additional baseline groundwater sampling to better characterize background constituents in the extracted and proposed injection areas.

Please feel free to contact me with any questions.

Ray

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Raymond Chavira
Environmental Scientist/Remedial Project Manager
EPA Region IX
75 Hawthorne Street, SFD-7-3
San Francisco, CA 94105-3901
(415) 947-4218
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