From: Yogi, David
To: MOGHARABI, NAHAL; Harris-Bishop, Rusty
Subject: FW: Phase 1 Functional Test Memo
Date: Wednesday, February 25, 2015 5:28:00 PM
Attachments: 15-02-1023.pdf

FYI

From: Yogi, David
Sent: Wednesday, February 25, 2015 2:37 PM
To: 'Cynthia Babich'; Lyons, John; LEONIDO-JOHN, STEVEN; Barton, Dana
Cc: dcapjane@aol.com; Personal/Private Information Florence Gharibian; MARTINEZ, YARISSA; Sanchez, Yolanda; DIAZ, ALEJANDRO; Wetmore, Cynthia
Subject: RE: Phase 1 Functional Test Memo

Hi Cynthia,
I hear your concerns and would like to propose we schedule a follow-up meeting next week when Dana is back in the office to discuss this matter further. While I realize this doesn't address all your concerns, as matter of clarification, on Page 3, while Montrose references discharging existing water that "meets the injection standard for pCBSA (less than 25,000 ug/L)", sampling results (attached) found this water to be non-detect for pCBSA.

I will have to confirm with Dana the following available times when she is back in the office next week, but tentatively we have the following dates/times available:

Monday, March 2: 3:30-5 p.m.
Tuesday, March 3: 9-10 a.m., 1-2 p.m., 3-5 p.m.
Wednesday, March 4: 11 a.m.-12 p.m., 3-5 p.m.
Thursday, March 5: 11 a.m.-12 p.m., 2-5 p.m.
Friday, March 6: 9-10 a.m., 1-5 p.m.

Thanks,
David

David Yogi
Manager, Community Involvement Section
Superfund Division
U.S. Environmental Protection Agency
Phone: 415-972-3350
Mobile: 415-760-5419
Email: yogi.david@epa.gov

From: Cynthia Babich [mailto:delamoactioncommittee@gmail.com]
Sent: Wednesday, February 25, 2015 12:15 PM
To: Lyons, John; LEONIDO-JOHN, STEVEN; Barton, Dana; Yogi, David
Cc: dcapjane@aol.com; Personal/Private Information; Florence Gharibian; MARTINEZ, YARISSA; Sanchez, Yolanda; DIAZ, ALEJANDRO; Wetmore, Cynthia
Subject: Re: Phase 1 Functional Test Memo

This is not reflective of our conversations. See quotes from the document below.

Page 1 Sentence 1: The objective of this short-term test is to demonstrate that the TGRS system is capable of reducing dissolved para-chlorobenzene sulfonic acid (pCBSA) concentrations to below the reinjection standard under the Record of Decision (25 milligrams per liter [mg/L]) exclusive of any benefit offered by the new carbon in the liquid-phase granular activated carbon (LGAC) vessels.

Page 2 Second sentence: If the laboratory results demonstrate that the pCBSA concentration meets the 25 mg/L injection standard and with concurrence by EPA, Montrose will discharge the treated water from the Phase 1 testing via the injection wells.

Page 3 entirely: Page 3 of 3
Discharge of Existing Water
The effluent and utility tanks are currently holding approximately 40,000 gallons of treated groundwater generated during the second functional test conducted on December 15, 2014. That groundwater meets the injection standard for pCBSA (less than 25,000 ug/L) and only two volatile organic compounds (VOCs) were detected (12 ug/L tert-butyl-alcohol [TBA] and 3.9J ug/L acetone). There is no state or federal maximum contaminant level (MCL) for TBA or acetone, but there is a state action level of 12 ug/L for TBA. Prior to conducting the Phase 1 functional test, a verification sample of the treated groundwater from the second functional test will be collected and analyzed for pCBSA. Laboratory results will be submitted simultaneously to EPA and the State. If the verification sample confirms that pCBSA is below the injection standard and with concurrence from EPA, the treated groundwater will be pumped to the TGRS injection wells.
Schedule and Reporting
Following EPA and State approval, the Phase 1 functional testing will be scheduled. All field activities can be completed in a single day, and only one to two days of advance planning will be required to coordinate resources and sampling supplies. Once established, EPA and the State will be notified at least 24 hours in advance of the Phase 1 functional testing schedule.
Laboratory analysis of the Phase 1 functional testing samples will take approximately five business days. Upon receipt, the laboratory results and associated field parameters will be tabulated. Following review by Montrose, the results table and laboratory report will be submitted to EPA and the State. Given the limited nature of the Phase 1 functional testing, no additional reporting is required for this test.

VERY SHORT NOTICE!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!
Cynthia B

Cynthia Babich
Founder and Director, Del Amo Action Committee
Coordinator, Los Angeles Environmental Justice Network
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If the Earth were only a few feet in diameter -Hummmmm!

On Wed, Feb 25, 2015 at 11:45 AM, Yogi, David <Yogi.David@epa.gov> wrote:

Hi Cynthia,
Per our conversation last week, please find attached the Phase 1 Functional Test (*i.e.*, 30-60 minute test) memo. The test has been schedule to happen tomorrow, February 26. As mentioned in Attachment 2 of the February 17 agenda, we will be providing test results to DAAC within 7-10 days of receipt by EPA. It is now anticipated these results will be delivered to EPA within 1-3 weeks after completion of the test. If you have any questions, please feel free to contact me.

Thanks,
David

David Yogi
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