Part C 4G-5

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Transmittal

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Date: June 6, 2012

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From: AMEC Environment & Infrastructure, Inc.
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cc: Patrick Wilson,
U.S. EPA Region 9

Project Number: 0106270030.00008.****

Project Name: Former Pechiney Cast Plate, Inc Facility
Vernon, California

Item	Description
1	Response to the City's Comments on the Feasibility Study and Remedial Action Plan

Remarks

Enclosed please find one hard copy of the document mentioned above. Please call (949) 642-0245 if you require anything further.

Sincerely yours,
AMEC Environment & Infrastructure, Inc.

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June 5, 2012

Project 010627003

Mr. Leonard Grossberg
Interim Director/Health Officer
City of Vernon Health & Environmental Control
4305 Santa Fe Avenue
Vernon, California 90058

Re: Response to the City's Comments on the Feasibility Study and Remedial Action Plan for the Former Pechiney Cast Plate Inc., Facility, Vernon, CA 3200 Fruitland Avenue (former Pechiney property)

Dear Mr. Grossberg:

This will serve as AMEC's response to your May 7, 2012 letter regarding the City of Vernon's Environmental Health Department's (EHD) comments to the revised draft Remedial Action Plan (RAP) and Feasibility Study (FS) for the former Pechiney Cast Plate Inc. Facility in Vernon, California (Site) prepared by AMEC, submitted to California Department of Toxic Substances Control (DTSC) on April 23, 2012 and approved by DTSC for public comment on May 9, 2012 (the 2012 FS/RAP).

In your May 7th letter, you raise objections to the proposed remediation of PCB contamination and Stoddard solvent contamination at the Site, as set forth in the 2012 FS/RAP. EHD's current "objections" to conclusions in the 2012 FS/RAP are directly contrary to prior direction from EHD regarding remediation of the Site and EHD's prior approval of less stringent remediation standards. We will address these points in more detail below.

Please be aware that if EHD opposes the previously agreed upon remediation plan and objects to the more stringent remediation goals set by DTSC and United States Environmental Protection Agency (EPA), implementation of the remediation plan cannot be commenced until next year, at the earliest, because of the anticipated adverse weather conditions later this year. Implementation of the FS/RAP must commence on or about July 1, 2012, or the DTSC-ordered remediation at the Site cannot commence in 2012.

Background

As you know, EHD has provided various directives and engaged in numerous communications regarding the proposed remediation plan for the Site, including its October 2008 approval of the July 2008 FS/RAP (the "2008 FS/RAP") that addresses nearly the same scope of remediation now set forth in the 2012 FS/RAP approved by DTSC. The only addition has been the inclusion of remediation of Stoddard solvent contamination. The proposed Stoddard solvent remedy in the 2012 FS/RAP, however, is the same type of remedy EHD previously approved for remediation of volatile organic compounds (VOCs) at the Site and as discussed below, has

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previously been agreed to by the City of Vernon (City) and EHD with regard to the use of soil vapor extraction (SVE) and bioventing to remediate Stoddard solvent.[1]

The City and Pechiney entered into a Standard Offer, Agreement and Escrow Instructions for Purchase of Real Estate, and Addendum thereto, dated March 20, 2006 (the "Purchase Agreement") for the Site as well as a First Amendment to Standard Offer, Agreement and Escrow Instructions for Purchase of Real Estate dated June 15, 2006 (the "Amendment"). In the Amendment, Pechiney and the City acknowledge that remediation at the Site will be required (per applicable laws and regulations) and agreed to work cooperatively to develop a Remediation Work Plan for the Site. The parties further agreed that all Remediation Work (as defined in the Purchase Agreement) "shall be based upon the directive and order of the Health Department." Amendment, ¶ 26.7(b). The scope of the Remediation Work Plan at the time did not include addressing the Stoddard solvent contamination.

After the parties entered into the Purchase Agreement and the Amendment thereto, in July 2006[2] EHD directed Alcoa, Inc. (Alcoa), not Pechiney, to submit a "plan for active remediation of the Stoddard solvent contamination" at the Site. This EHD directive confirms that at the time Pechiney entered into the Purchase Agreement, and the Amendment thereto, it was understood between the City, Pechiney and EHD that EHD would look to Alcoa to remediate Stoddard solvent contamination at the Site.

The City then changed its position and, a year later, demanded that Pechiney address the Stoddard solvent contamination. Pechiney agreed to do so—through SVE and bioventing—if EHD would agree to issue a conditional Certificate of Closure allowing the parties to close the Purchase Agreement while such SVE-bioventing remediation was ongoing. That agreement was confirmed on several occasion, including at a June 28, 2007 meeting between myself, counsel for Pechiney, the City Attorney for Vernon, Jeff Harrison, and Lewis Pozzebon of EHD. Pursuant to that understanding, EHD then directed "Pechiney to include the Stoddard solvent contamination remediation in the closure proposal for the facility" in a July 18, 2007 letter.[3]

Based on the parties' agreement and EHD's July 2007 directive[4], a draft FS/RAP for the Pechiney Site (which at that time was one document) was submitted to EHD in late July 2007. Prior to EHD issuing its comments to that draft FS/RAP, a meeting was held with EHD in October 2007 to discuss the proposed remedy for the Site, which at that time also included the development of risk-based remediation goals for commercial/industrial site reuse, SVE and bioventing for the Stoddard solvent soil impacts, SVE for VOC impacts, leaving soil with PCBs in place at depths greater than 15 feet below grade (bg), and the reuse of concrete containing PCBs at the Site. EHD did not raise any objection to these proposed remedies.

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[1] Prior drafts of the FS/RAP going back to 2007 which were reviewed by EHD included SVE/bioventing as the selected Stoddard solvent remedy, and at no time did EHD comment on or otherwise object to that remedy.

[2] City of Vernon EHD letter to Alcoa, Inc., dated July 18, 2006, re: Stoddard Solvent Contamination, 3200 Fruitland Ave., Vernon.

[3] City of Vernon EHD letter to Pechiney Cast Plate Inc., dated July 18, 2007, re: Hazardous Materials Closure of Pechiney Cast Plate Inc., 3200 Fruitland Avenue, Vernon.

[4] We note, in the July 18, 2007 letter, EHD stated "that discussions with representatives from [AMEC, Geomatrix at the time] on closure activities have progress very well and we appreciate the proactive approach we have experienced with your [Pechiney] company."

Further, while the parties originally contemplated that EHD would have jurisdiction to approve the required remediation at the Site contemplated in the Purchase Agreement, because of the City's proposed use of the Site, to construct a power plant, as well as EHD's lack of Certified Unified Program Agency (CUPA) status[5], other agencies, such as DTSC, became involved in and exercised jurisdiction over approval of the remediation plan.

In early November 2007, a meeting was held with DTSC, EHD, Vernon City Attorney, Pechiney, Pechiney's legal counsel, and AMEC (then known as Geomatrix) to discuss the historical Site background, investigation results, completed above-grade demolition work, proposed FS/RAP, public participation activities, and DTSC oversight. During this meeting the proposed remedy outlined in the July 2007 draft FS/RAP (which was under EHD's review at that time) was discussed, including the use of SVE/Bioventing for Stoddard-solvent impacted soil and SVE for the VOC impacted soil. Again, EHD did not raise any objection to these proposals.

In November 2007, additional comments were received from EHD, and a response to those comments was provided to EHD along with a revised version of the FS/RAP in February 2008. Then, following further discussion with the City Attorney and EHD (and with EHD concurrence) the Stoddard solvent remedy was excluded from the July 2008 revision of the 2008 FS/RAP because the Los Angeles Regional Water Quality Control Board had directed Alcoa to further characterize the Stoddard solvent impacted soil at the Site in March 2008.[6]

Based on additional comments from EHD in April 2008, the 2008 FS/RAP was revised again and submitted to EHD in July 2008 for approval. EHD then approved the 2008 FS/RAP in October 2008[7]. The EHD-approved 2008 FS/RAP did not include the Stoddard solvent remedy, which was another clear acknowledgment by EHD and the City that Alcoa was expected to address the Stoddard solvent contamination. Pechiney advised EHD and the City that if Alcoa failed or refused to remediate the Stoddard solvent contamination it would do so using the SVE/bioventing remedy, conditioned upon EHD's agreement to provide a conditional Certificate of Closure to allow the purchase and sale transaction to close prior to completion of the Stoddard solvent remediation.

Further, considering EHD's current "objections" to the provision of the 2012 FS/RAP relating to PCB remediation, we point out that such "objections" are directly contradicted by EHD's prior approval of the 2008 FS/RAP which included the same type of PCB remediation, only with less stringent remediation standards. As outlined in the EHD-approved 2008 FS/RAP, Alternative #3 was proposed as the remedial alternative for the Site and at that time included excavation and off-site landfill disposal of shallow COC-impacted soil (PCBs and metals) to depths of

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[5] We note, on April 27, 2007, the California Energy Commission ("CEC") issued a status report regarding the Vernon Power Plant project that noted that "the City of Vernon's Environmental and Public Health Department does not possess the required and appropriate Certified Unified Program Agency (CUPA) status required from public entities involved in toxic waste remediation activities."

[6] RWQCB – Los Angeles Region, 2008a, letter to Alcoa, re: Underground Storage Tank Program - Response to Unauthorized Underground Storage Tank s Release – Health and Safety Code Section 25296.10 and Title 23, Chapter 16, California Code of Regulations, Section 2720-2727 – Former Alcoa Facility (Priority A-1 Site), 5151 Alcoa Avenue, Vernon, CA (File No. 900580043), March 28.

[7] City of Vernon HECD letter to Geomatrix Consultants, Inc., dated October 6, 2008, re: Remedial Action Plan for Former Pechiney Site, 3200 Fruitland Ave., Vernon CA

approximately 12 to 15 feet below grade, SVE to address shallow and deep VOC-impacted soil, and the demolition and landfill disposal of PCB-impacted concrete slabs (with PCBs at concentrations greater than 7.6 mg/kg). In addition, non-PCB-impacted concrete would be crushed and reused as Site fill material (with PCBs at concentrations below 7.6 mg/kg), and PCB-impacted soil at depths below 15 feet bgs would remain in place since they would not pose a risk to groundwater or future construction workers. It should be noted that the PCB concrete and soil remediation goals previously approved by EHD were actually less stringent than those recently approved by DTSC and U.S. EPA.[8]

Following EHD's approval of the 2008 FS/RAP, it was then submitted to DTSC for review.

The current 2012 FS/RAP approved by DTSC is entirely consistent with the remediation plans approved by, directed by, and/or developed in concert with EHD. There is no basis for EHD's current "objections" to the remediation plan it already approved for the Site.

Response to EHD's specific comments related to PCB Contamination

Comment: Soils containing PCBs at levels greater than 23 mg/kg are proposed to be left in place at 15 feet below grade and deeper. This may restrict the possible redevelopment of the site, as excavation and compaction of PCB impacted soils may occur and deep footings or piers may be installed.

> **Response:** EHD has already approved this remedy. The 2008 FS/RAP, approved by EHD on October 6, 2008, provided for leaving PCB-impacted soil at a depth below 15 feet in one area of the Site because the presence of PCBs in deeper soil was shown not to be a risk to groundwater (Section 4.3.2 of April 23, 2012 draft FS) and not a potential human health risk to future construction workers. This area corresponds to the proposed soil excavation area 4a/4b along the western side of the Phase IIB area as shown on Figure 7 of the April 23, 2012 draft RAP. The 2008 FS/RAP approved by the EHD and the current 2012 FS/RAP approved by DTSC meet the objectives of a commercial/industrial land use alternative.

Comment: EHD's policy is that once soils or concrete containing contaminants above the established threshold limits (23 mg/kg of PCB's) have been removed from a location, those materials must be properly disposed of and not placed back into the ground. We read the RAP to allow re-use of such materials, to which EHD objects.

> **Response:** EHD's "reading" of the current 2012 FS/RAP with respect to this matter is incorrect. Soil and concrete containing PCB concentrations greater than 23 mg/kg will **not** be reused as fill material at the Site.

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[8] The PCB remediation goals for soil and concrete (0 to 15 feet bg) proposed in the EHD-approved 2008 FS/RAP are as follows:

- Aroclor-1254 – 4.4 mg/kg
- Total PCBs – 7.4 mg/kg for soil that may be left exposed at the surface following redevelopment; 76 mg/kg for soil to be left below pavement or other ground cover that only construction workers may come into contact with during redevelopment
- PCBs in Concrete for Total PCBs – 7.6 mg/kg.

The RAP states that soil from ground surface (0 feet) to a depth of 5 feet bg with PCB concentrations greater than 3.5 mg/kg, and soil from 5 to 15 feet bgs with PCB concentrations greater than 23 mg/kg will be excavated and transported off-site for disposal at an off-site, permitted facility. The RAP also states that concrete with PCB concentrations greater than 3.5 mg/kg will be demolished and transported off site for disposal at an off-site, permitted facility.

The only PCB-impacted material planned for on-site reuse is concrete containing PCB concentrations greater than 1 mg/kg but less than the U.S. EPA approved, health-risk based remediation goal of 3.5 mg/kg. This low-concentration PCB-impacted concrete will be used as "restricted fill" and will be placed at one location and covered with a minimum of 5 feet of "clean" crushed concrete[9] as requested by City of Vernon Community Services & Water Department (Community Services) in its September 14, 2011 letter.

Further, as noted above, on October 6, 2008 EHD already approved reuse of PCB-impacted concrete as backfill material at the Site in the 2008 FS/RAP. At that time, EHD approved the reuse of concrete containing PCB concentrations less than 7.6 mg/kg. Subsequent to EHD's approval, the remediation goal was decreased to 3.5 mg/kg to obtain approval by U.S. EPA. The U.S. EPA approved remediation goal of 3.5 mg/kg is based on protection of human heath assuming commercial/industrial land use and construction worker exposure and is more restrictive than the EHD approved remediation goal of 7.6 mg/kg for reuse of crushed concrete as backfill material.

Comment: We understand that Pechiney plans to re use material and native soils with PCB concentrations greater than 1.0 mg/kg but less than 3.5 mg/kg throughout the site at depths ranging from zero to five feet below grade, and to cover the same with a one foot "interim clean cap." EHD believes that the use of such contaminated materials at shallow depths is not adequately protective of health and the environment, especially since construction at the property likely will expose constructions workers during grading, trenching, and excavating work. We prefer a five foot interim clean cap to not expose workers during re-development.

Response: The 1.0 mg/kg PCB threshold only applies to PCB--impacted concrete—not native soil. Restricted fill consisting of crushed concrete containing PCB concentrations greater than 1.0 mg/kg but less than 3.5 mg/kg will only be used as backfill material at one location, as described above. This restricted fill will be covered with a minimum of 5 feet of crushed non-PCB impacted concrete classified as unrestricted fill containing PCB concentrations less or equal to 1.0 mg/kg. Restricted fill will not be placed in the depth interval ranging from 0 to 5 feet.

However, native soil containing PCB concentrations less than 3.5 mg/kg may remain in place within the 0 to 5 feet depth interval. The PCB concentration of 3.5 mg/kg was approved by the DTSC and U.S. EPA as being sufficiently protective of human health

[9] Non-PCB impacted concrete, defined as PCB concentrations less than or equal to 1.0 mg/kg, will be crushed and reused on site as unrestricted fill material.

based on potential worker exposure during construction or use of the Site for commercial/industrial purposes.

Further, the 3.5 mg/kg remediation goal is based on DTSC-recommended reasonable maximum exposure (RME) assumptions, current Cal/EPA toxicity criteria for PCBs, and 10^{-5} as an acceptable target cancer risk, which was established as an acceptable level for commercial/industrial re-use of the Pechiney Site by the DTSC (with the issuance of a land use deed covenant), and set in coordination with the U.S. EPA risk management team responsible for approval of the risk-based application for PCBs. The 10^{-5} risk level for commercial/industrial re-use of the Site is consistent with the level which was approved by EHD in 2008. In fact, the 3.5 mg/kg remediation goal for PCBs in shallow soil is actually lower than the 7.4 mg/kg PCB remediation goal that was previously approved by EHD.

Response to EHD's specific comments related to Stoddard Solvent Contamination

Comment: EHD objects that the Revised RAP and FS propose to leave Stoddard solvents in deep soil and to attempt to remediate them over a long period of time using SVE and bioventing. This approach is known as "Alternative 3" in the Revised RAP and FS. EHD objects to Pechiney's proposal because the time frames for completing Alternative 3 and the effectiveness of the plan are uncertain and the end point criteria for DTSC to issue a No Further Action Letter ("NFA letter") are not set forth. Alternative 2, which EHD prefers, would address the Stoddard solvent issue in a more certain and timely way by excavating and removing deep soils impacted with those solvents (and other COCs).

Response: Pechiney's agreement to address the Stoddard solvent contamination in the first instance—an obligation not contemplated by the parties when the Purchase Agreement was entered into—was conditioned on EHD's representation that a conditional Certificate of Closure would be issued to allow for the closing of the purchase and sale transaction and that SVE and SVE/bioventing remediation would be used to address the VOC and Stoddard solvent contamination. This agreement—conditional closure approach for the short-term actions (below-grade demolition and shallow soil removal work) followed by the continuation of the long-term SVE and SVE/bioventing—was confirmed in a meeting with the City Attorney and EHD in June 2008.

In addition, the approach to address the Stoddard solvent soil impacts set forth in "Alternative 3" of the current 2012 FS/RAP was discussed with EHD on several occasions in 2007 and 2008 during preparation of the draft of the 2008 FS/RAP. No objection was raised by EHD on those occasions.

Furthermore Community Services also acknowledged its understanding of the proposed Stoddard solvent remedy for the Site by stating in its comments[10] to below-grade demolition plan "that the slab in this area [referring to the Phase IV area] will be removed

[10] City of Vernon Community Services & Water Department letter to Geomatrix, dated September 25, 2007, re: 3200 Fruitland Avenue, Vernon.

upon completion of the remediation of the Stoddard solvent impacted soil." Such remediation was contemplated to be consistent with Alternative # 3, as contaminated soil otherwise cannot be cleaned up with a concrete slab in place.

As noted repeatedly above, EHD approved the 2008 FS/RAP on October 6, 2008 with Alternative #3 as the proposed remedy, including the SVE remedy for the VOC-impacted soil located in the northwestern portion of the Site. The use of SVE in the northwestern portion of the Site for VOCs is consistent with the proposed remedy for the Stoddard solvent area (SVE/bioventing) and is inconsistent with EHD's current "preference" for Alternative 2 in the 2012 FS/RAP which includes the excavation and removal of shallow and deep VOC and Stoddard solvent contaminated soil.

SVE is a U.S. EPA-defined presumptive remedy to mitigate the presence of petroleum hydrocarbon compounds such as Stoddard solvent. SVE removes the volatile and generally more toxic constituents in the petroleum hydrocarbon compounds for exposed portions of soil and the volatile compound-laden soil vapor is then treated to either physically remove or chemically destroy the volatile compounds. The volatile constituents comprise only a portion of the Stoddard solvent. Bioventing, or in simple terms, aeration of the underlying soil, provides oxygen to indigenous hydrocarbon degrading bacteria which are ubiquitous in the environment to promote the growth of bacteria populations capable of degrading petroleum hydrocarbons. Thus the fraction of petroleum hydrocarbon compounds treated using SVE/bioventing combined is greater than the fraction treated using SVE only. SVE and bioventing are well-proven technologies for remediation of petroleum hydrocarbon compounds, such as Stoddard solvent.

In addition, as you know, subsequent to EHD's October 6, 2008 approval, the 2008 FS/RAP was submitted to DTSC for review and approval of the proposed remedy. Based on comments by DTSC, a discussion of the Stoddard solvent-impacted area was included in the 2009 FS/RAP, and subsequent iterations of the FS/RAP including the 2012 FS/RAP. In 2009, EHD was aware that the proposed remedy consisted of SVE/bioventing to mitigate Stoddard solvent impacts to soil and the combined SVE/bioventing approach was presented in the revised draft of the FS/RAP in September 2009. At no time did EHD object to the combined SVE/bioventing approach or timing, let alone selection of Alternative #3 as the proposed Site remedy.

Comment: As you know, DTSC has made findings of potential risks to health and the environment in its Imminent and Substantial Endangerment Order ("Order"). Especially in light of this Order and these findings, EHD will require that Pechiney obtain an NFA Letter from DTSC with respect to the Facility. In this connection we note that the Order provides that Pechiney must conduct a review of the status of the remediation five years after the system has started up, and every five years thereafter to determine whether the remediation continues to be protective of human health and the environment. DTSC apparently may impose additional requirements in the future if required to address such risks.

Response: As EHD is fully aware, EHD and the City have agreed, on numerous occasions, that EHD would be providing a conditional Certificate of Closure that would allow Pechiney and the City to close the purchase and sale transaction while SVE and SVE/bioventing remediation was ongoing. In fact, such an agreement was a condition upon which Pechiney agreed to address the Stoddard solvent contamination in the first instance, as it was not part of the scope of remediation work contemplated by the parties when the Purchase Agreement was entered into.

Further, the DTSC Order has been known to EHD and the City for years and EHD has never raised any objection previously, let alone attempted to require Pechiney to obtain a NFA Letter. In fact, any attempt to impose such a requirement would be contrary to EHD's prior agreement to issue a conditional Certificate of Closure, as set forth above. The effective date of the Order is almost two years old (July 2010). In addition, the City was provided with drafts of the Order, starting back in July 2008, when counsel for Pechiney provided a copy of the draft Order to the Vernon City Attorney. Finally, EHD has known since 2007 that DTSC had jurisdiction in this matter and that the Order was pending. In fact, EHD participated in a November 2007 meeting with DTSC and Pechiney in which the SVE/bioventing remedy for the Stoddard solvent contamination was discussed with no objection from EHD or the City Attorney.

As such, EHD has already agreed to provide a conditional Certificate of Closure and, cannot now attempt to require Pechiney to obtain a NFA letter prior to close of the sale of the Site, let alone raise some objection to DTSC's prerogative to require 5-year reviews.

Comment: In addition to addressing EHD's comments and concerns above, Pechiney should revise its RAP to address expected timeframes for completion of the remediation, alternatives for remediation if the proposed remediation alternative chosen does not adequately remediate the contamination, and its agreement to seek and obtain an NFA letter from DTSC, with an estimated date for accomplishing this goal.

Response: The 2012 FS/RAP can be updated to include a projected timeframe for the remedy. The FS cost estimates assumes three years for the SVE and SVE/bioventing, similar to the timing estimates that were provided in the EHD-approved 2008 FS/RAP.[11] Further, as noted above, the SVE/bioventing method is a presumptive remedy to address petroleum hydrocarbons in soil. As such, while alternative remediation has been identified, the chosen remediation is a proven, effective, and approved remedy.

Further, while the current plan[12] for implementing SVE/bioventing considers routing vent piping above ground to provide a versatile remediation approach, if required under future

[11] Estimation of the three year period is based on observation of petroleum hydrocarbon degradation rates observed by Alcoa in the Stoddard solvent area between 1996 and 2005 using their passive approach. This time frame may vary contingent on the response of the subsurface soil; but the combined active SVE-bioventing approach is expected to be effective toward the goal of mitigating the presence of Stoddard solvent impacts.

[12] This plan was initially developed when the City was considering redeveloping the Site as a power plant. Use of above ground piping allows piping to be easily moved or removed to facilitate future activities at the Site.

Site redevelopment plans, the piping may be installed below ground in a manner or timing that reduces potential obstructions or conflicts with future site development or features.

Comment: EHD notes that the types of objections raised above have been made previously by EHD, and/or City of Vernon since 2006, when Pechiney started demolition work at the Facility. On many occasions EHD and City of Vernon have stated their views that contaminated soil, concrete and other building materials must be removed from the site and that all COCs must be remediated and the work done so in a comprehensive and timely way. In our view the Revised FS and RAP continue to be inadequate.

Response: We must respectfully disagree with this comment. As documented and set forth above, the provisions of the current 2012 FS/RAP to which EHD now claims to "object" were actually agreed upon and/or directed by EHD in the past. The 2008 FS/RAP was developed and revised based on direction and input from EHD and based upon the City's redevelopment plans. EHD then approved the 2008 FS/RAP in October 2008. As discussed above, the only changes of substance to the 2012 FS/RAP compared to the 2008 FS/RAP, except for the Stoddard solvent remediation separately approved by EHD, have been in response to comments or requirements imposed by U.S. EPA and DTSC leading to *more restrictive* remediation goals (3.5 mg/kg and 23 mg/kg) for PCBs compared to the previous EHD-approved PCB remediation goals (7.4 mg/kg, 7.6 mg/kg and 76 mg/kg). Thus not only has EHD already approved the remedial approach set forth in the 2012 FS/RAP, but the changes imposed by DTSC and U.S. EPA have only worked to make the remediation more stringent.

In summary, the remediation goals and approach for the Site are protective of human health and more protective than the plan previously approved by EHD.

Please call me at (949) 642-0245 if you have any questions or if you would like any additional information.

Sincerely yours,
AMEC

Linda Conlan

Linda Conlan, PG
Principal Geologist

cc: Michel Iskarous, Project Manager, DTSC, Chatsworth
Allan Plaza, Unit Chief, DTSC, Chatsworth
Kevin Wilson, City of Vernon Director of Community Services
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