Erich et al. - 
Here are EPA's responses to the RI comment items that we discussed on our 2/22/07 call. I discussed the issues with John Lyons and here are the results.

-Dante

H_RIproposedAlt text.doc
March 20, 2007

Erich –

Here are EPA’s responses to your proposed alternatives. I’ve worked this through with Jeff and John Lyons.

-Dante

EPA Comment 1.1

Section 1.1, Purpose and Objectives, last paragraph: Edit the last sentence of the paragraph and add an additional sentence as follows, “The risk assessment findings are subsequently used by USEPA to ascertain where remedial action may be necessary, which will be presented in the Feasibility Study report. The FS report will present and evaluate remedial action alternatives to address surface exposure pathways and the NAPL contamination of groundwater.”

Proposed alternative → ACCEPTED WITH EDIT SHOWN

Leave last sentence in paragraph as originally presented in the report, but add the following sentences at the end of the paragraph to provide the reader with a better understanding of the relationship between the RI, FS, BRA and ROD:

The Feasibility Study (FS), currently under preparation, evaluates remedial options for areas identified in the risk assessment where significant health risks may exist. The FS takes into consideration site conditions and the physical properties of the chemicals present along with judgments regarding the relative effectiveness and implementability (among other factors) of various remedial alternatives. Findings from the RI, Risk Assessment, and FS are then collectively evaluated by EPA before issuing a Record of Decision (ROD), which outlines the selected remedial alternative(s) and the areas over which they will be applied.

EPA Comment 1.2.1, part 1

Section 1.2.1, Location: Delete the first sentence (which begins “Formal boundaries of Superfund Sites ....”). The remainder of the paragraph is accurate in defining the Del Amo Plant boundaries as the boundaries of the study area covered in the RI and should be retained as drafted. It is inappropriate for the RI to attempt to limit the extent of a site as defined under the statute and National Contingency Plan.

RPs Requested Clarification

This item was not included in 2/26/07 email but was discussed in our 2/22/07 telephone call. Upon further internal discussion, EPA decided that the sentence in question can be left in.

EPA Comment 1.2.1, part 2

Section 1.2.1, Location, and report overall: The fourth sentence defines the use of the terms “site” and “plant site.” Due to concerns about consistent use of the term “site” with respect to its NCP definition, we should not use the term when referring solely to the former plant property. Edit the sentence to read, “... conditions within the area formerly occupied by the synthetic rubber plant, hereafter referred to as the ‘site property’ or ‘plant site property’.”
Review the text of the report overall and change the term “site” to “property” throughout. This includes use of the terms “onsite” and “offsite,” which should be changed to “on-property” and “off-property.”

Discussion Item

This item was not included in 2/26/07 email but was discussed in our 2/22/07 telephone call. Upon further internal discussion, EPA decided that the term “former plant site” can be used. Therefore, edit the sentence in question to read, “. . . conditions within the area formerly occupied by the synthetic rubber plant, hereafter referred to as the ‘site’ or ‘former plant site’.”

Review the text of the report overall and change the term “site” to “former plant site” throughout. This includes use of the terms “onsite” and “offsite,” which should be changed to “on the former plant site” and “off the former plant site.”

EPA Comment 2.0

Section 2.0, Site History, last paragraph: EPA has not undertaken to verify the conclusions reached in the RI report concerning the detailed information presented in the site history nor has EPA conducted a comprehensive evaluation and comparison of the detailed information presented in the RI site history with the primary source documents. While EPA believes that the general outlines of the site history are sufficient for the purposes of a remedial investigation report, approval of the RI report does not represent EPA approval of or agreement with any particular factual conclusions made in the RI report regarding site operational history. The RI report appropriately notes some of the major limitations of the Report’s discussion of site history in this paragraph. Add the following additional disclaimer at the end of the paragraph, “EPA may issue subsequent amendments or addenda to the RI site operational history as EPA continues its overall investigation at the Del Amo Site.”

Proposed alternative (done to maintain consistent language with other proposed revisions below): \( \rightarrow \) ACCEPTED WITH EDIT SHOWN

Add the following sentence to end of existing paragraph: EPA may issue future amendments or addenda to this RI report in the event that new information or analysis becomes available.

EPA Comment 2.3.3.5

Section 2.3.3.5, Administration, Shops and Laboratory subsection, last paragraph: Add the following sentence to the end of the paragraph, “However, the preceding analysis and conclusions represent the views of Shell and not of US EPA. EPA’s investigation of chlorinated solvent use at the Site is ongoing and continuing.”

Proposed alternative \( \rightarrow \) USE THE FOLLOWING WORDING

Add the following paragraph to existing report text (immediately precedes “Other 500 Area Facilities”):

Investigation of chlorinated solvents at the former plant site and vicinity is ongoing as part of current Groundwater Remedial Design activities. EPA may issue future amendments or
addenda to this RI report in the event that new information becomes available indicating that TCE and PCE were used or stored as part of rubber plant operations.

"However, the preceding analysis and conclusions represent the best of Shell's knowledge to date. These conclusions represent the views of Shell and not necessarily of EPA. EPA's investigation of chlorinated solvent use at the former plant site is ongoing and continuing. EPA may issue future amendments or addenda to this RI report in the event that new information becomes available."

This response is the same as for comments 6.1.3 and 7.2.1.

EPA Comment 8.1.2

Section 8.1.2, Pits and Trenches, 6th paragraph, last sentence: Edit as follows, "While attributable to offsite sources, the area has been identified as a groundwater contamination source area since TCE and PCE impacted shallow soil extends into the rubber plant site. However, the preceding analysis and conclusions represent the views of Shell and not of US EPA. EPA's investigation of chlorinated solvent use at the Site is ongoing and continuing."

The sentence must be deleted for two reasons. First, it addresses groundwater conditions which are outside the scope of this RI. Secondly, EPA's investigation as part of the remedial design process of chlorinated solvent sources is continuing and ongoing. The Plant Pits and Trenches remain under EPA investigation as a potential source of TCE contamination to groundwater.

Proposed alternative ⇒ EDIT PROPOSED ALTERNATIVE AS SHOWN

Replace the last two sentences in the existing paragraph with the following to retain identification of area as a groundwater contamination source area:

The area has been identified as a groundwater contamination source area since TCE and PCE-impacted shallow soil extends onto the rubber plant is present and water table groundwater data indicate these compounds are present at concentrations in excess of drinking water MCLs. EPA's investigation of chlorinated solvents at the former plant site and vicinity is ongoing.

EPA Comment 14.1.1

Section 14.1.1, VOCs, 1st paragraph, 3rd sentence: Delete the sentence, "An additional area of PCE and TCE contamination is present in the southwestern corner of the copolymer plant at the "pits and trenches" feature; however, there is no known history of use of these compounds at the former rubber plant." EPA disagrees with this sentence. The RI report states on page 79 that the pits and trenches appear on aerial photographs of the site but acknowledges that no other documentation "indicating their use is known." With such limited information about the use of these pits and trenches (and given the limitations of delineation efforts discussed on page 81), EPA does not believe that it is appropriate to suggest, as this sentence does, that the TCE/PCE soil concentrations found where the pits and trenches were located could not have originated from releases within the Synthetic Rubber Plant boundaries.

Proposed Alternative: ⇒ EDIT PROPOSED ALTERNATIVE AS SHOWN

Replace the sentence of concern with the following:
An additional area of PCE and TCE contamination is present in the southwestern corner of the copolymer plancor in the vicinity of the "pits and trenches" feature. The former use of the pits and trenches is unknown, and there is no documentation indicating that TCE or PCE were or were not used or stored as part of former rubber plant operations. The area of TCE and PCE contamination lies adjacent to known offsite sources of these compounds. TCE and PCE are present in groundwater in this area as well as in groundwater beneath adjacent properties lying to the west of the former plant site. Investigation of chlorinated solvents is continuing as part of current Groundwater Remedial Design activities and EPA may issue future amendments or addenda to this RI report in the event that new information becomes available indicating that TCE and PCE were used or stored as part of rubber plant operations. EPA's investigation of chlorinated solvent use at the Site is ongoing and continuing. EPA may issue future amendments or addenda to this RI report in the event that new information becomes available."