Dante Rodriguez
01/12/2004 09:40 AM
To: RI/FS team
cc: minutes, risk issues
Subject: minutes, risk issues

Dear RI/FS team,

Attached are two documents that will be useful for today's risk conference call - minutes from our December 2003 RI/FS call, and the minutes from our April 2002 risk conference call. The April 02 minutes document our agreements regarding the agencies' comments on the draft risk assessment. The December'03 minutes document the risk questions raised by Ruth that need our attention and resolution before she can proceed.

-Dante Rodriguez, EPA

Attachments:

minutes121603.wpd
minutes040202.wpd
Draft Meeting Minutes
RI/FS Monthly Oversight Conference Call
December 16, 2003
Del Amo Superfund Site, Soil & NAPL Operable Unit

Attendees: EPA - Dante Rodriguez, Stan Smucker
DTSC - Gloria Conti, Kimi Klein
URS - John Dudley, Erich Weaver, Jude Francis
Geosyntec - Ruth Custance
Shell/Dow - Niki Pasvantis, Larry Bone

Remedial Investigation. Erich described the latest findings, with reference to the map provided. There were two exceedances of PRGs, at borings 473 and 474 on the Donnelly property. They exceeded TCE residential and industrial levels respectively. Dante said that EPA believes sufficient data has now been taken and no further step outs are needed. Gloria had not reviewed the data or discussed it with Kimi, so she only tentatively agreed to the data gathering being completed. She will follow-up with Kimi and inform us of DTSC’s opinion shortly via email.

Dudley reported that the vast majority of the data has already been validated. They envision wrapping-up the remaining validation by the next monthly call (January). The data in the next (final) data reporting will be fully validated. This final data submittal will consist of an update to the figure and table that URS has been using all along to report to us. The complete discussion of the data will be included in the full RI Report.

Gloria asked whether Erich planned to do any contouring with the new data. Erich said that he had not planned to do that. Larry asked whether any TCE contouring was done in the pits & trenches area. Erich replied that they had not.

Erich did not have any update to the timing of the complete draft RI report.

Gloria asked Dante to add the year to the dates contained in the 3-Month Look Aheads.

Institutional Controls. Dudley reported that the Shell and Dow attorneys and consultants were writing a response to Dante’s Concept Paper. They were taking longer than expected, and now he hopes to be able to submit it to us by Christmas. He said that they are generally supportive of the concept. Larry said that the attorneys had been concerned about creating and empowering a “joint entity” to provide permit approvals. They were concerned about liability and being responsible for possibly holding up construction projects. Gloria said that DTSC was also concerned about the concept of giving a “joint entity” approval authority, which would mean DTSC would be giving up that authority or delegating it. DTSC was also concerned about who would pay for the joint entity. The State budget is quite lean these days.

DTSC was also concerned about working with the City of LA, where she could envision our project succeeding only for a limited time, until turnover of City staff causes loss of institutional knowledge about our project, and it falls apart.

Larry said that the PRPs would like to have some kind of involvement in the permit
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review and approvals process, but they were not sure how. They are concerned about being too involved and undertaking liability.

**Risk.** Ruth is picking up the risk issues where we left them several years ago. There are several issues that we need to resolve to enable her to perform her calculations. She can get started by incorporating the new data into the database and re-screening the parcels. But then the following issues must be resolved:

1. **Exposure parameters.** Ruth would like to revisit the exposure parameters in question (breathing rate for workers, 20 m$^3$/d per EPA guidance);

2. **Vapor intrusion modeling.** They had done modeling only for parcels with no indoor air data. They had agreed to perform modeling for all parcels.

3. **Modeling assumption.** There was an unresolved issue regarding the assumed thickness of the soil layer that was the contaminant source beneath a building. Ruth had performed some follow-up analysis, as requested, and is ready to present and discuss.

4. **Tier 2 modeling.** Additional analysis had been needed, which is now done.

All the issues are documented in the minutes of our April 2, 2002 conference call, transmitted via email on April 22, 2002. The EPA comment letters on the risk assessment also document EPA’s concerns. They are dated February 11, 2002, from EPA, and March 21, 2002, from EPA (forwarding DTSC comments). Another useful document is Dante’s April 23, 2002 bibliography of risk documents.

Erich asked and Stan replied affirmatively that both indoor air data and the vapor intrusion modeling results will be used in the risk assessment. Erich said that he will therefore include the indoor air data in the RI report.

Stan commented that indoor air sampling may be conducted differently in cases where the sampling objective is to examine long term risk and distinguishing between chemicals that originated within the building versus within the underlying soil. Erich pointed out that we may face the situation where indoor air quality might pose a risk that is unacceptable from Superfund’s perspective but acceptable from OSHA’s perspective. Chemicals originating from current business practices are within OSHA’s jurisdiction, whereas chemicals originating from underlying soil contamination are within Superfund jurisdiction. Ruth said that she will want to compare soil vapor data from buildings’ perimeters to their respective indoor air results.

**Next Meetings.** We agreed to discuss Dante’s’s draft parcel groupings at our January RI/FS call. Upon briefly reviewing Dante’s write-up, Larry expressed surprise that Dante’s group #1 involved SVE remediation. He had envisioned solely additional sampling being prescribed for such situations. Dante replied that additional sampling could be performed during the RD phase, not having to delay the ROD.

The next calls to specifically address risk issues will be 10a on January 12 and February 11. We will discuss and resolve outstanding risk issues, enabling Ruth to proceed with the revised risk assessment. Ruth will be sending us some additional analysis that she performed in support of some of the issues.
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The next RI/FS monthly call will be on January 13, 10a. We will discuss Dante’s draft parcel groupings. Stan noted that we should try to add NAPL areas to the “straw man,” as Dante had done for the vadose soils in his parcel grouping.

The February RI/FS monthly call will be on February 10th at 10a.