FYI - for those who have not yet seen a copy of the draft IC/Permit Review Pilot Test Workplan, and the draft ZIMAS flag wording.

-Dante

All,

Attached is the Word file of the text proposed for the City of Los Angeles ZIMAS system (the hard copies were distributed at the meeting). This can help you submit your comments as markups to the electronic file. I have also attached a copy of the IC pilot workplan document which you had also received in an earlier email. Please review and comment on these documents as soon you can.

Thanks.

Jude

(See attached file: ZIMAS-PCIS flag language_Permit Review IC_5-31-06.doc)
(See attached file: Del Amo_draft IC Pilot Workplan_ 5-26-06.doc)

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"PERMIT REVIEW" IC PILOT PROGRAM WITH THE CITY OF LOS ANGELES
DEL AMO SUPERFUND SITE

(Draft text for PCIS flag for Del Amo “Permit Review” parcels, that serves as instructions to the
LADBS for processing of Building and Excavation/Grading permits)

GENERAL INFORMATION
This parcel is located within the Del Amo Superfund site. The U.S. Environmental Protection Agency
(USEPA) has determined that additional environmental controls or sampling may need to be implemented
during construction activities. Depending on sampling results, further mitigation measures may be
necessary. A permit applicant seeking a Building Permit or Excavation/Grading Permit for work on this
parcel that involves soil-invasive activities, such as grading, excavation, trenching, soil boring, or ground-
level demolition work, needs to obtain an “environmental clearance” from the USEPA prior to obtaining
the permit.

SPECIFIC INSTRUCTION FOR ENVIRONMENTAL REVIEW
When a permit application for this parcel is received that involves soil invasive activity (see notes below),
the City of Los Angeles Department of Building and Safety (LADBS) is instructed to contact the
USEPA’s Del Amo Superfund Site Environmental Review Team (Del Amo ERT) to obtain
environmental clearance. The contact information for the Del Amo ERT is provided below:

Del Amo Superfund Site
Environmental Review Team
(800) XXX-XXXX or (310) XXX-XXXX
www.delamosuperfund.com

Notes:
• If the construction activity involves no excavation of subsurface soils, then no environmental
clearance from the USEPA is necessary.
• If the construction activity involves only shallow excavation (i.e., less than 1.5 feet below ground
surface (bgs)), then no environmental clearance from the USEPA is necessary. However, the LADBS
should provide an electronic notification of permit issuance (along with a brief explanation of the
project) to the Del Amo ERT.
• The “express” permit program (e-permit) (no plan check required) must be limited in scope for the
Del Amo parcels because some of the activities covered by the e-permit program may include
evacuation deeper than 1.5 feet bgs. http://www.ladbs.org/permits/obtain_permit.htm
(Information available to the public found on querying ZIMAS system)

**DRAFT INSERT INTO ZIMAS TEXT FIELD**
**FOR ALL PARCELS IDENTIFIED BY EPA AS REQUIRING SUPPLEMENTAL ENVIRONMENTAL REVIEW DURING THE CITY DEPARTMENT OF BUILDING AND SAFETY’S PERMITTING PROCESS FOR BUILDING AND GRADE/EXCAVATION PERMITS:**

The subject parcel is located on the Del Amo superfund site. A supplemental environmental review process will be performed by the USEPA concurrently with the Department’s standard review of applications for Grading/Excavation or Building Permits. This environmental review process will be completed before the Department issues approved Building or Excavation/Grading Permits to permit applicants. Applicants will be provided with contact information to initiate this environmental review. The environmental review process will involve a review of the Applicant’s planned development activities in the context of what is known about past industrial operations on the property and any associated residual contamination that may be present in soil at the property. The purpose of the review is to protect human health and the environment by:

1) Identifying environmental concerns associated with known or suspected residual soil contamination that may be present in areas of proposed excavations, grading or construction, and,

2) Where appropriate, developing workable mitigating measures to address those concerns.

The primary activity of concern would be excavation of soils deeper than 1.5 feet below ground surface. For any applications that involve no excavation or very shallow excavation, no environmental clearance by the USEPA will be necessary. Likewise, where development activities are situated in locations where previous sampling and risk analysis has concluded that no adverse health impacts exist, prompt clearance by USEPA is anticipated. For parcels where development activities coincide with possible residual contamination, additional soil sampling may be required. If soil sampling indicates presence of contamination above risk based levels, remedial action may be required prior to initiation of construction.
DRAFT FOR DISCUSSION

WORKPLAN FOR PILOT PROJECT
PERMIT PROCESS AND SUPPLEMENTAL ENVIRONMENTAL REVIEW

May 26, 2006

Applicants for Building or Excavation/Grading Permits
From the City of Los Angeles Department of Building and Safety
Del Amo Superfund Site

Start: Applicant files the Permit Application(s) and appropriate Plans and Specifications with the City of Los Angeles Department of Building and Safety (DBS) for construction on a parcel that has been identified by EPA as a property requiring supplemental environmental review during the DBS permitting process. This includes building permits and "grading" permits, both issued by DBS. "Grading" permits cover any excavation or grading activities on private properties (not in public right-of-way). There is another type of "excavation" permit that is issued by the City of Los Angeles Department of Public Works for any excavation in the public right-of-way. We will be following up with the City to pursue an IC to cover that issue separately.

I. Initial Pre-screening and Notification Performed by the City of Los Angeles, Department of Building and Safety (DBS)

A. Pre-screening at DBS for Projects Without Invasive Activity

1. If project does not involve invasive activity (i.e., does not include excavation or trenching, grading, soil borings, cutting through slabs or other ground floor demolition work), the Applicant is informed by DBS that this parcel is part of the Del Amo Superfund site but does not require supplemental environmental review.

2. If project involves only very limited shallow excavation (e.g., less than 1.5 feet to install a landscape sprinkler system), the Applicant is informed by DBS that this parcel is part of the Del Amo Superfund site but does not require supplemental environmental review. DBS issues a notification by email to the Lead Agency with copy to the Del Amo Environmental Review Team (ERT), made up of designated representatives from EPA, DTSC and the Respondents.

B. Applicant Notification for Projects Involving Invasive Activity

1. The applicant is informed by DBS that this parcel is part of the Del Amo Superfund site and that an environmental review of the project must be performed during the DBS review of the Applicant’s permit application(s). DBS notifies the Lead Agency with copy to ERT that an Applicant is being referred to them.
2. DBS provides the Applicant with a digital link to obtain site-specific information, contact information for the Lead Agency and ERT, and instructions for initiating the environmental review. The site-specific information link will provide the Applicant with a pre-prepared summary of the history, remedial investigation, and risk assessment. The Lead Agency and ERT contact information will provide the Applicant with contact names and numbers for the lead agency and ERT. The environmental review instructions will direct the Applicant on how to initiate the environmental review.

II. Supplemental Environmental Review Process

A. Initial Environmental Screening

1.0. The Lead Agency directs the Applicant to an initial meeting or teleconference with the ERT to obtain basic information about the Applicant's project, including location and depth of excavations and other invasive activities, basic design, location and planned end-use of improvements.

2.0. The planned project and existing environmental information are reviewed by the ERT, under the Lead Agency's guidance. The review will examine the following:

a. Calculated risks to commercial/industrial and construction work receptors (from Baseline Risk Assessment) at the project location;
b. Institutional and engineering controls applicable to the project location;
c. Proximity of existing environmental data sampling locations to the sites of planned excavations and construction work; and,
d. Proximity of any presently un-sampled former Rubber Plant facilities to planned excavations and construction work;

3.0. A Screening Evaluation Summary Report (SESR) is compiled by the ERT in a standard check list type format with recommendations. The SESR will include:

a. A brief narrative description of the proposed project with construction drawings (as provided by the Applicant), and narrative summary of existing environmental information;
b. Parcel map showing planned excavations and improvements overlaid on site historical base map of former Rubber Plant facilities with existing environmental data sampling locations;
e. Tables presenting detected compounds in existing environmental data, keyed to the above map;
f. Summary statement of applicable institutional and engineering controls;
g. Preliminary recommendations for follow-up actions that may include (A check box type list would provide a very concise standard-format response from the ERT review):
   - no further action;
• preparation of a Soil Management Plan and recommendation for using HAZWOPER-trained contractors for construction;
• additional targeted sampling and laboratory testing;
• possible removal action or implementing an engineering control;
• possible relocation of a planned improvement; or,
• other recommendations.

4-0. Submit SESR to the Lead Agency for critical review.

B. Critical Review of SESR and Determination of Necessary Response Actions
1. Review of SESR by Lead Agency for completeness, and to identify critical issues, questions and concerns;
2. Meeting(s) with the Applicant and Respondents as necessary to discuss and resolve the identified environmental issues, specific actions to be taken, and areas of responsibility;
3. Adjustment of recommendations in SESR as warranted;
4. A letter from the Lead Agency to the Applicant specifying follow-up actions that are warranted or necessary to protect human health and the environment. The letter will also identify party(ies) (Implementing Party(ies)) responsible for implementing follow-up actions. DBS will be copied on the letter to keep them abreast of environmental review status.

5-0. If no response actions are warranted, the Lead Agency issues a clearance letter to DBS with recommendations for appropriate safety procedures.

III. Pre-Construction Response Actions
A. Implementation of Any Required Pre-Construction Response Actions (Possible Examples):

4-0. Implementing Party(ies) to conduct the actions below that are specified by the Lead Agency:

a. Prepare and submit a Sampling and Analysis Plan for Lead Agency review/approval,
   i. Implement sampling and analysis
   ii. Presentation of new data/reporting
   iii. Assessment of risk based on new data
   iv. Recommend adjustment or modification to project plans
b. Prepare and submit Soil Management Plan and/or Site Specific Health and Safety Plan for Lead Agency review/approval:

c. Design and submit plans for engineering controls for Lead Agency review/approval; and/or,
Design and submit plans for reconfigured or relocated project based on existing or new environmental data.

B. Review of Results of Preconstruction Response Actions; Clearance Letter to DBS

1. The Lead Agency reviews the results of preconstruction response actions and consults with the Applicant and/or Respondents as appropriate regarding any follow-up response actions.

2. Once pre-construction response actions are satisfactorily completed or addressed, the Lead Agency issues a clearance letter to DBS stating the permit(s) may be issued to the Applicant and specifying any additional permit requirements and conditions that must be imposed.

IV. Construction Response Actions

A. ERT monitors the implementation of any plans or other activities required by the Lead Agency during construction, and provides compliance/non-compliance reporting to the Lead Agency with copies to the Implementing Party(ies).

B. In the event that unexpected conditions (not otherwise addressed in an approved Soil Management Plan or Health and Safety Plan) are encountered in soils during the construction work, then the Applicant’s contractors will notify the Lead Agency and the ERT.

1. The ERT will inspect the soils in question and prepare response recommendations for review by the Lead Agency that may include:
   a. Additional sampling, laboratory testing and risk analysis.
   b. Revisions to Soil Management and/or Health and Safety Plans.
   c. Additional remedial response actions.

2. Lead Agency reviews ERT recommendations and determines any construction responses actions that are needed, if any.

3. Lead Agency issues letter to Applicant, specifying any further construction response actions required, and specifying the Implementing Party(ies).

4. ERT monitors any further construction response actions for compliance for the Lead Agency.