POOR LEGIBILITY

ONE OR MORE PAGES IN THIS DOCUMENT ARE DIFFICULT TO READ
DUE TO THE QUALITY OF THE ORIGINAL
RESPONDENT COMMENTS
EPA REMEDY REVIEW BOARD PRESENTATION

(1) Part A, Page 3, Table 1. While this table accurately reflects the risk-based groups developed by the Respondents and presented in the FS, it is not apparent how these groups were used in EPA’s selection of a preferred remedy. EPA has created its own EAPC grouping scheme, described later in the document, that do not follow this scheme.

(2) Part A, Section 3, page 3. The description of shallow soil and NAPL as “the two risk pathways” is inconsistent with the FS and gives the incorrect impression that both shallow soil and NAPL evaluations were risk-based and conducted together. The Respondents believe that additional introductory text regarding the FS approach would be appropriate prior to discussing the remediation goals to clarify this. Such introductory information is provided in the first two paragraph of section 1.4 of the FS and could be incorporated with minor revisions:

The FS for the Soil and NAPL OU was conducted in two parts: a shallow soils evaluation and a NAPL evaluation. The Soil and NAPL OU includes the surface soil (0-1 feet below ground surface [bgs]) and shallow soil (0 to 15 feet bgs) across the entire 280-acre former plant site (except the Waste Pit Area). It also includes deep soil (>15 feet bgs) at specific locations where NAPL is potentially present or known to be present either in the vadose zone or below the water table. Shallow soil was defined as the top 15 feet of soil, based on the maximum depth at which human contact with soil would be likely to occur during a possible future construction project.

The objective of the shallow soils FS evaluation was to evaluate methods for mitigation of human health risk from direct contact, ingestion, and inhalation exposure pathways. These pathways, collectively referred to as the surface exposure pathways, include ingestion of and dermal contact with shallow soils and inhalation of indoor and outdoor air. The NAPL FS evaluation focused on groundwater protection and the goal of enhancing the effectiveness of the groundwater remedy. Since the evaluation for the surface pathways dealt with receptors at the surface (primarily shallow soils) and the evaluation for the NAPL areas dealt with impacts to groundwater (primarily deep soil and groundwater media), the two evaluations were conducted separately and are presented in different sections of this report.

(3) Part A, Section 4, pages 4 and 5. There is no information presented in this section describing how EPA’s groups and subgroups are defined. As an alternative to providing this description here, discussion of the EAPC groups could be left for the later sections. For this summary section, a map could be developed indicating which EAPCs correspond with the various alternatives. This would simplify the discussion in Section 4 and make it easier for the reader to follow.
(4) Part A, Section 6, page 6. The second sentence indicating that the Respondents do not concur with the active treatment aspect of EPA's preferred alternative is not entirely accurate. The primary aspect of EPA's preferred remedy that the Respondents do not agree with is the selection of ISSH for three of the NAPL areas. The Respondents' preferred remedy incorporated active remediation for NAPL in the form of SVE at Source Area 3.

(5) Part B, Section 1, page 1, 2nd paragraph. This paragraph discusses the waste pits. The Respondents would prefer that the waste pits either not be discussed here, or alternatively, that the reader at least be reminded that they are not part of the soil and NAPL operable unit. It should also be noted that use of all waste pits ceased by the mid 1960s.

(6) Part B, Section 2, Pg 2. Soil and NAPL is listed as OU1 in the first paragraph, but as OU3 in the last paragraph on this page.

(7) Part B, Section 4, page 4, “Known or Suspected Source of Contamination”. The last paragraph on this page refers to “Twelve groundwater source areas.” These should more correctly be referred to as “groundwater contamination source areas.”

(8) Part B, Section 4, page 5, first full paragraph. The 4th sentence of this paragraph indicates “In other areas, the presence of NAPL has been inferred from dissolved concentrations.” This is incorrect; NAPL was never inferred to be present solely based on dissolved concentrations in the RI or FS. For areas where the only evidence of NAPL is dissolved concentrations in excess of 5% of solubility, NAPL is referred to as “potentially present” in the RI and FS. The Respondents believe that NAPL is actually present in only a small portion of the entire area where it is “potentially present.”

(9) Part B, Section 8, page 15. The sixth sentence on this page indicates that “Our investigations only conducted environmental sampling outside the existing buildings.” However, the document subsequently makes multiple references to contamination present beneath buildings (e.g., pg 19, 2nd paragraph, page 20, 3rd paragraph). The text needs to be revised to indicate that for some areas, contamination is inferred to be present under buildings based on data collected adjacent to the buildings and historical rubber plant facilities that are known to have been formerly located within the building footprints.

(10) Part B, page 60, last paragraph. This paragraph, and multiple subsequent paragraphs, indicate that building engineering controls would be needed if “sampling confirms that contaminants are infiltrating the building from underlying soil...”. Regardless of results, the proposed subslab vapor sampling program WILL NOT confirm that contamination is infiltrating a building since the samples will be collected from under the floor slab. The text should be revised to indicate that engineering controls would be needed if subslab sampling indicates a potential for impacts to building occupants through vapor intrusion.”
(11) Part B, page 63, 2nd paragraph. The 2nd sentence states: This remedy would reduce the contamination in the shallow soil to levels that would no longer present an unacceptable hazard to occupants of the property...”. This implies that currently there IS an unacceptable hazard to the property occupants. The Respondents do not believe there is enough data to support this, and request that the sentence be revised to simply indicate that the remedy would provide very good long-term effectiveness.

(12) Part B, Section 12, pg 70. 4th paragraph. The Respondents recently provided EPA with a link to the SCAQMD web page, where information regarding the potential impact of a recent court ruling regarding issuance of “emission reduction credits” was presented. While the ultimate impact of this court ruling remains uncertain, there is a potential for significant increases in costs for active remedies due to the need to purchase emission reduction credits. Given this, it would be appropriate to briefly discuss this subject in this section of the Remedy Review Board document, and perhaps include the full SCAQMD document as an attachment.
Dante:

Per your invitation in our recent monthly conference call, we have prepared the attached document presenting comments on your Remedy Review Board document for your review. Please take these into consideration, and if you have any questions, we would be pleased to discuss them with you further.

regards

Erich Weaver
URS Corporation
130 Robin Hill Rd
Santa Barbara CA 93117
805-964-6010
FAX 805-9640259

This e-mail and any attachments are confidential. If you receive this message in error or are not the intended recipient, you should not retain, distribute, disclose or use any of this information and you should destroy the e-mail and any attachments or copies.