TECHNICAL COORDINATION RECORD

The purpose of this form is to document Technical Coordination between EPA and RAC2 contractors.

<table>
<thead>
<tr>
<th>Date Record Prepared:</th>
<th>April 1, 2010</th>
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<tbody>
<tr>
<td>Prepared by:</td>
<td>Dante Rodriguez</td>
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<tr>
<td>Date of Communication:</td>
<td>NA</td>
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<td>Participants:</td>
<td>NA</td>
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**TASK 13 – POST RI/FS REPORT**

1. **Providing technical assistance in the preparation of the Proposed Plan**
   - Evaluate information from site documents
   - Senior technical review
   - General technical assistance
   - The contractor will assist EPA in the preparation of the Proposed Plan by following up on comments made by EPA Headquarters, the State, and the PRPs, as assigned by EPA (see attachment). Follow-up requires some evaluation of information from site documents, and it may involve some senior technical review. The task also fits within the category of general technical assistance. The task involves drafting edits to the Proposed Plan to address the comments assigned and checking facts against the FS and Risk Assessment.
   - The deliverable will consist of (1) an email describing the fact check findings and describing where edits in response to the comments were made within the Proposed Plan document; and (2) edited version of Proposed Plan document, showing changes made in “track changes” mode, in MS Word format.
   - I would like to receive the deliverables preferably by the end of April 9 or at latest early the week of April 12. Let me know if there are any problems with this schedule.

2. Attending technical meetings, public meetings, briefings, public hearings

3. Providing technical assistance in the preparation of the Record of Decision

4. Providing technical assistance in the preparation of the Responsiveness Summary

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_Dante Rodriguez_

PREPARER'S SIGNATURE

ATTACHMENTS:

2. draft Proposed Plan "EPA Requests Comments on Proposed Soil and NAPL Cleanup Plan," filename: 4_Proposed Plan 021610.doc
COMMENTS for Hill to Respond

1.3) (21) Page 5, last paragraph, 1st sentence: [HILL, EPA RESPOND] The Respondents disagree that shallow soil contamination was found on all parcels across the site. The Respondents suggest that the sentence be revised to simply indicate that shallow soil contamination at seven properties was found to be significant enough to warrant remedial action. (PRP) [CLOSELY CONSIDER. HILL CHECK WHETHER CONTAMS FOUND ON ALL PARCELS. THEN EPA CONSIDER EDIT.]

7.) [HILL RESPOND] On page 5, we refer to one of COCs as “benzo(b)fluorant.” This should be benzo(b)fluoranthene. This also happens on page 7. [CHECK]

7.1) (20) Page 5, 3rd paragraph: [HILL RESPOND] The text refers to “benzo(b)fluorant”. This should be corrected to “benzo(b)fluoranthene”. (PRP) [OK, CHECK.]

10.) # of IC areas - [EPA,HILL RESPOND] In our “Preferred Alternative” section (1)(c), we indicate that there are 25 areas where unrestricted residential use is undesirable. I am having trouble following the numbers. Here it is 25, on page 9 it is 7 areas that warrant clean-up action and 17 other areas where COCs would cause an unacceptable risk to residents, and in Table 2, we are placing a restrictive covenant on 27 areas. [CHECK. I THINK URS CAUGHT THAT TOO, 24 V. 25, AND THE GW RESTRICTION AREAS (2 OR 3) RAISE NUMBER TO 27, ALTHOUGH THAT IS SEPARATE ISSUE].

10.2) # of soil areas – [EPA,HILL RESPOND] 4: Page 8, a total of nine soil areas have been identified as contaminated with one or more chemicals of concern above a level of concern. However, in the text under the section of “Basis for Action in the pages 8 & 9”, it states that only seven impacted areas from shallow soil contaminations were identified. (DTSC) [CHECK. HAVE HILL CHECK, BUT ME GO OVER IT TOO. THAT WILL BE GOOD DOUBLE-CHECK].

10.3) (5) Page 10, Item 1b, line i: [EPA,HILL RESPOND] The Respondents assume that the reference to property #28 should be to property 16. Is this correct? (PRP) [CHECK]

10.4) Groundwater ICs. (8) Page 11, 3rd paragraph; [EPA,HILL RESPOND] page 16, 2nd paragraph; page 17, 3rd paragraph; page 18 3rd paragraph: Based on a previous EPA discussions (Dante Rodriguez, 4/30/08 discussion, Groundwater ICs on EPA Quickr site), it was the Respondents’ understanding that groundwater ICs would apply only to those properties that both overlie groundwater contamination and that have restrictive covenants regarding soil/NAPL conditions. Properties 10, 12, 13, 18, 21 and 30 are proposed for groundwater covenants on page 16 of the proposed plan but were not considered for this in the FS. Properties 4, 29 and 34 were considered for groundwater covenants in the FS but were not listed on page 16. It is not clear to the Respondents if these differences were intentional or inadvertent. The Respondents recognize that the omission of properties 29 and 34 may be due to EPA’s intention to defer the remedy for these two properties to the Montrose Superfund project. (PRP) [CHECK]

16.) Exit Strategy – [EPA HILL RESPOND] The Region has deferred presenting this information to the draft ROD, however, the Proposed Plan should include PRGs. (RRB) [* GET CLARIFICATION FROM AMY, INCLUDE AS REQUESTED. CLARIFY? DO YOU MEAN GENERAL GOALS FOR NAPL REMEDIATION? OR PRELIMINARY GOALS? “PRG’S” USUALLY REFERS TO THE SOIL RISK VALUE. POSSIBLY HAVE HILL FOLLOWUP AFTER CLARIFIED].

18.) Pg 7, HH Risk – [HILL RESPOND] the COCs in the first paragraph are a subset of those listed in Table 1. The text should indicate such and refer to Table 1. (RRB) [CHECK]

18.1) (22) Page 7, 2nd to last paragraph. [HILL RESPOND] The list of chemicals of concern for shallow soil in this paragraph is inconsistent with the list provided in the preceding Table 1. (PRP) [CHECK. I HAD GOTTEN THE CHEMICALS FROM THE FS AND RISK ASSESSMENT DOCUMENTS.]
23.) **Short-term Effectiveness** – [HILL RESPOND] Pg 30 – discuss safety aspect of SVE vs. ISSH in short term effectiveness section. (RRB) [OK. WORK IN SOME BRIEF WORDING INTO THAT SECTION.]

27.) **Groundwater Designation** – [HILL RESPOND] 5: Page 9, Section of Deep Soil and NAPL. It needs to explicitly state that the groundwater in this area is not only classified by the State of California as having a potential municipal supply beneficial use but also that the groundwater in deep aquifers is currently used by the Water Replenishment District of Southern California (WRD) to supply drinking water usage for a service area of a total of 3.8 million people in southern California. Also, groundwater risk assessment conducted in 1997 by EPA clearly demonstrates that the groundwater would pose an extreme risk if used. As a result, EPA concludes that the groundwater and the principal threats from deep soil and NAPL contamination are both to be actionable. (DTSC) [OK. WORK THIS WORDING INTO THIS LOCATION AS SMOOTHLY AS POSSIBLE.]

30.) **Confirmatory Sampling in RD.** (2) [HILL RESPOND] The Respondents would also like to reaffirm that there continues to be strong evidence that intrinsic biodegradation of benzene is actively occurring at the site, as evidenced by trends of declining benzene concentrations over time in many groundwater monitoring wells. Furthermore, much of the soils data collected during the RI for the Soil and NAPL OU are now 15 or more years old. Consequently, and as emphasized throughout the Final FS Report, dated January 15, 2010, wherever EPA's final remedy incorporates an active remedial response, additional confirmatory sampling will be necessary during the remedial design phase. The objectives of this confirmatory sampling will be to verify that contaminant concentrations warranting application of an active remedy are still present in the soil, and to better define the horizontal and vertical extent of the treatment zones. (PRP) [FIND A PLACE TO INSERT STATEMENT THAT CONFIRMATORY SAMPLING TO IDENTIFY EXACT EXTENT OF ACTIVE REMEDIAL MEASURES WILL BE UNDERTAKEN DURING DESIGN PROCESS].
Randy -
Here is a Technical Coordination Record for the Proposed Plan assistance task I mentioned to you yesterday. Let me know if you have any questions.

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