


Comments on
“Monitored Natural Attenuation Report – Final,
Brown & Bryant Superfund Site, Arvin, California,”
Prepared for US Army Corps of Engineers by
Eco & Associates, Orange, CA, dated August 9, 2012

Comments prepared by
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On September 6, 2012 DTSC announced on its Envirostor website that it had posted the “Monitored Natural Attenuation Report – Final, Brown & Bryant Superfund Site, Arvin, California,” Contract No. W912PP-10-D-0014 Task Order No. 0008, Prepared for US Army Corps of Engineers by Eco & Associates, Orange, CA, dated August 9, 2012 [available at: http://www.envirostor.dtsc.ca.gov/regulators/deliverable_documents/3614948868/120808%20-%20Final%20MNA%20Evaluation%20Report%5B1%5D.pdf]

Presented below are our comments on that report.

Section “1.0 Introduction” states on page 1:

“This report provides the evaluation of the Monitored Natural Attenuation (MNA) for the B-Zone groundwater at the former Brown & Bryant, Inc. (B&B) Superfund Site...”

The report is an update of the draft report, “‘Monitored Natural Attenuation Evaluation Report – Draft, Brown & Bryant Superfund Site,’ Prepared by Eco & Associates, dated June 29, 2012.” Our comments on that draft report and on a meeting to discuss the MNA issue are available as:

Lee, G. F., and Jones-Lee, A., “Comments on ‘Monitored Natural Attenuation Evaluation Report – Draft, Brown & Bryant Superfund Site,’ Prepared by Eco & Associates, dated June 29, 2012,” Comments submitted to CBA by G. Fred Lee & Associates, El Macero, CA, July 21 (2012).

http://www.gfredlee.com/CBA_BBsite/2012/Comments_EcoMNAdraft.pdf

Lee, G. F., and Jones-Lee, A., “Comments on Issues Discussed of US EPA/TAG May 1, 2012 Meeting on the US EPA CBA B&B Superfund Site Devoted to the Plan for Implementation of Monitored Natural Attenuation,” Comments submitted to CBA by G. Fred Lee & Associates, El Macero, CA, May 14 (2012).

http://www.gfredlee.com/CBA_BBsite/2012/Comments_May1_2012_Mtg.pdf

Several sections of the final MNA report are the same as those provided in the draft MNA report; the error made in Table 1 of the draft report that we noted in our comments (the listing of the cleanup level for chloroform as 80 ug/L) was not addressed or corrected in the final version of the report. As we have commented in our previous reports, the cleanup level for chloroform in polluted groundwater is about 1 ug/L, not 80 ug/L.

The minor changes made in the development of the final report from the draft report on which we commented previously, do not change our comments; those comments apply equally to the final version of the report.

As we stated in our comments on the draft report,

“The ECO & Associates June 29, 2012 draft workplan acknowledges that the key to effective implementing the MNA for the B-zone is the control of pollutant input from the A-zone. At this time it is not possible to reliably define the duration of MNA for the B-zone since the potential effectiveness of A-zone pollutant migration to the B-zone is not predictable.

Based on the current information, we support the watchful and judicious use of MNA for cost-effective control of B-zone groundwater pollution. The efficacy and sufficiency of this approach should be closely followed through appropriate monitoring of groundwater pollution until acceptable concentrations are reached; greater attention, however, needs to be paid to reviewing, and keeping current, the list of COCs for presently unrecognized pollutants and pollutant transformation products. The efficacy of the MNA should also be re-evaluated every five or so years to assess the reliability of the initial approaches and conclusions concerning the threat to the Arvin municipal water supply wells posed by pollutants in the B-zone groundwater. If the assessment of this threat changes in the future to reveal a greater threat to water quality than is currently anticipated, more aggressive groundwater pollution remediation approaches, such as pump-and-treat methods, should be expeditiously implemented.”