

Sunday, January 8, 2012

email (as updated)

to: Alejandro Diaz, US EPA B&B Superfund Site Community Involvement Coordinator
Diaz.Alejandro@epamail.epa.gov

from: G. Fred Lee, PhD, TAG Advisor

RE: Issues for review during the January 13 B&B Site Visit

Alejandro Diaz:

Thank you for sending the third five-year report for the B&B Superfund site. I have gone through it and have found that it provides some background information that will be useful during our site visit on January 13. I will be providing more detailed comments on that report shortly, but wish to raise a number of the issues that I feel need to be addressed during the January 13 site visit. These are summarized below. It would be useful if the US EPA would address these issues during the discussions it will be having with CBA and us, and as appropriate during its presentation at the CBA community meeting.

Site Cap Maintenance

There continue to be significant problems with maintenance of the asphaltic cap over the contaminated soil; cracks continue to appear and are not sealed within a short period of time. I would like to understand who is responsible for the periodic site inspection and repair of the asphaltic cap. The cover over the polluted soils requires ongoing fairly frequent, thorough inspection and prompt maintenance/repair. How frequently is the cap supposed to be inspected and how quickly are repairs supposed to be made once problems are detected? What can be done to achieve at least quarterly site inspection and maintenance for as long as the A zone soils contain pollutants that are a threat to migrate to B zone groundwaters, which could be many decades? Is there assured funding for proper inspection/maintenance/repair of the cap for as long as the pollutants in the A zone soil remain a threat to pollute the B zone groundwater?

Slow Rate of Progress

In the "Interviews" section of the third five-year report, CBA expressed concern about the very slow rate at which site remediation has been conducted during in the most recent five-year period. What has been the primary barrier to the US EPA making significant progress in site remediation? What is the priority given this site for attention, funding, staff time, etc.?

City Well Replacement

There appears to be general consensus that it has taken far too long to get the city well replaced. What has been the primary barrier or barriers to making significant progress in replacement of the city well? How can these barriers be addressed in the immediate future to get this well replaced?

Development of Institutional Controls for the Site

What needs to be done to make significant progress in the development and implementation of institutional controls for the site?

Communication between the US EPA, DTSC,
CBA and Other Interested Parties

In the site visit interview section of the report, several individuals were reported to have expressed the view that better communication needs to be established between the US EPA and others concerned about site remediation. Where are the weakness in communication and how can better communication be established between the US EPA and the others concerned with the site investigation/remediation?

Schedule of OU-2 Remediation Activities

It would be useful to discuss a tentative timetable for the implementation of each of the components of the OU-2 ROD.

Site Reports

I have attached a list of the site reports listed in the third five-year report that I would like to examine.

If you have questions on these issues please contact me.

Laura and Sal may also have issues that they would like to see addressed during the site visit.

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Attachment:

Reports listed in 3rd five-year report that G. Fred Lee would like to see:

- Closure Report Brown and Bryant Arvin Facility Superfund Site, First Operable Unit Remedial Action, Arvin, California, Morrison Knudsen Corporation, July 2000
- Closure Report Brown and Bryant Arvin Facility Superfund Site, First Operable Unit Remedial Action, Arvin, California, Morrison Knudsen Corporation, July 2000
- Soil Vapor Report, Brown and Bryant Superfund Site, Arvin, California, Panacea, Inc., March 2007
- August 2007 Groundwater Monitoring Report, Brown and Bryant Superfund Site, Arvin, California, Eco and Associates, Inc., October 2009
- April 2009 Groundwater Monitoring Report, Brown and Bryant Superfund Site, Arvin, California, Eco and Associates, Inc., November 2010
- Monitoring Wells Review, Brown and Bryant Superfund Site, Arvin California, Eco and Associates, Inc., November 2010

- Monitoring Wells Installation Report (Four Wells: PWB-13A, PWB-14, PWB-15, and PWB-16), Brown and Bryant Superfund Site, Arvin California, Eco and Associates, Inc., November 2010
- Well PWB-13 Groundwater Sampling Report, Brown and Bryant Superfund Site, Arvin, California, Eco and Associates, Inc., November 2010
- There will be several earlier reports on this site that I will want to see once a list of site documents is made available for review.