

Comments on
“Post-Closure Site Control Plan Including Operations & Maintenance Requirements,
Brown & Bryant, Arvin Facility Superfund Site, First Operable Unit Remedial Action,
Arvin, California” Prepared by Morrison Knudsen Corporation, Irvine, CA, July (2000)

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The Corps of Engineers has conducted several Five-Year reviews of the B&B Superfund site and in each has found that the maintenance of the site cap, fence, etc. has been inadequate. We have reviewed the 2000 B&B Superfund site O&M manual to examine the site inspection and maintenance procedures that have led to the site maintenance problems reported by the Corps. The sections of the 2000 O&M manual concerned with site inspection are presented in these comments.

Section 1.0 Introduction states on page 1:

“This Post-Closure Site Control Plan including Operations & Maintenance Requirements has been prepared subsequent to the work completed by the Morrison Knudsen Corporation (MK) under Contract Number DACWOS-94-D-0017 to the U.S. Army Corps of Engineers (USACE).”

Section 4.0 Site Inspections and Maintenance states on pages 4–5:

“Inspections, other than those performed during site maintenance activities, will be routine and qualitative in order to evaluate the cap system performance relative to each preceding inspection. Cap inspections and concurrent maintenance activities will be performed at regularly scheduled intervals after issuance of the Notice of Completion by the EPA. Alternatively, site maintenance will be conducted generally on an as needed basis. The cap and cover maintenance will be custodial in nature to limit encroachment or accumulation of undesirable vegetation, ensure the integrity of the caps, ensure site drainage is maintained, and assist in maintaining site security.

The site inspections will be performed and findings recorded on a Site Inspection Form (Attachment A). A map of the site (Figure 2) showing the completed as-built survey in plan view will be attached to each Site Inspection Form. Site conditions which are found to require maintenance or repairs will be investigated and/or corrected within 30 days.

4.1 Site Inspection Schedule

It is anticipated that for the first 2 years, inspections will be conducted every 6 months. Subsequently, the EPA will determine whether annual inspections are appropriate and sufficient to maintain the integrity of the constructed remedies. In the event of a natural disaster, such as an earthquake or area-wide flood, an unscheduled site inspection will be performed.

4.2.1 RCRA and non-RCRA Caps

The caps will be inspected at each visit using a systematic pattern of walking traverses. Walking traverses will be conducted longitudinally and transversely along the full dimensions of the caps and drain areas. Landmarks in the area will be used for aligning the walking traverses so that consistent inspection patterns will be followed. The distance between each traverse will nominally be 10 percent of the longitudinal and transverse cap dimensions. Therefore, the cap will be inspected on a 10 by 10 grid that is approximately 60 feet in the longitudinal north/south direction and 45 feet in the traverse east/west direction.

The basic feature and conditions of the cap will be noted with each inspection on a new site map(s) (Figure 2) and inspection form(s) (Attachment A). A notebook of past inspection reports and maps, site observations, and any other aides will be used to assist with the cap and cover inspection. The cap and cover will be examined to evaluate evidence of activity including:

- The length and depth of surface cracking of the asphaltic concrete*
- The length and depth of tire track marks or indentations in the asphaltic concrete*
- Exposure of subsurface cover layer materials*
- Damage to the asphaltic concrete at the fence lines*
- Damage to the asphaltic concrete at well locations*
- Dried out asphaltic concrete in need of respraying*
- Previously repaired sections in need of respraying*
- Vegetative growth.”*

Section 5.0 Inspection Documentation and Reporting Requirements states on page 10:

“Two copies of the full inspection report will be submitted to the EPA and one to DTSC within 30 calendar days of the site inspection. All reports should reference the EPA Region 9 and DTSC designated agency contacts. Site observations will be plotted carefully on a site map and contained in the field inspection form. The completed site inspection forms transmitted to the EPA that will comprise the full site inspection report will include:

- A one page transmittal letter to the designated agency contact stating the site name and the applicable inspection period*
- A completed field inspection form (Attachment A) with map(s) (Figure 2)*
- Labeled copies of photographs taken during the inspection before and after repairs have been performed*
- A discussion of actions taken to correct deficiencies found on site*
- Actions to be taken if deficiencies could not be corrected at the time of the site inspection.”*

As discussed in our March 2012 comments on the recently revised DTSC B&B Superfund site O&M Manual cited below, the revised DTSC O&M Manual fails to provide a definitive schedule for B&B Superfund site inspections and maintenance. The proposed inspection/maintenance schedule is essentially the same as the original 2000 O&M Manual summarized above. In order to prevent future inspection and maintenance problems of the type that have repeatedly been found, the US EPA/DTSC needs to establish a definitive schedule for rigorous site inspection and follow-up maintenance.

Lee, G. F., and Jones-Lee, A., “Draft Comments on Revised ‘Operation and Maintenance Manual Brown & Bryant, Arvin Facility Superfund Site, First Operable Unit Remedial Action, Arvin, CA,’ prepared for CA DTSC by URS Corp. Issued January 12, 2012,”

Comments submitted to CBA by G. Fred Lee & Associates, El Macero, CA, March 15 (2012). http://www.gfredlee.com/CBA_BBsite/2012/OM_Manual_comments.pdf