



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

DEC 18 1997

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: National Remedy Review Board Recommendations on the San Gabriel Valley Superfund Site, Puente Valley Operable Unit

FROM: Bruce K. Means, Chair 
National Remedy Review Board

TO: Keith Takata, Director
Superfund Division
EPA Region 9

Purpose

The National Remedy Review Board (NRRB) has completed its review of the proposed remedial action for the San Gabriel Valley, California, Superfund site, Puente Valley Operable Unit. This memorandum documents the NRRB's advisory recommendations.

Context for NRRB Review

As you recall, the Administrator announced the NRRB as one of the October 1995 Superfund Administrative Reforms to help control remedy costs and promote consistent and cost-effective decisions. The NRRB furthers these goals by providing a cross-regional, management-level, "real time" review of high cost proposed response actions. The Board will review all proposed cleanup actions where: (1) the estimated cost of the preferred alternative exceeds \$30 million, or (2) the preferred alternative costs more than \$10 million and is 50% more expensive than the least-costly, protective, ARAR-compliant alternative.

The NRRB review evaluates the proposed actions for consistency with the National Contingency Plan and relevant Superfund policy and guidance. It focuses on the nature and complexity of the site; health and environmental risks; the range of alternatives that address site risks; the quality and reasonableness of the cost estimates for alternatives; Regional, State/tribal, and other stakeholder opinions on the proposed actions (to the extent they are known at the time of review); and any other relevant factors.

Generally, the NRRB makes "advisory recommendations" to the appropriate Regional decision maker before the Region issues the proposed plan. The Region will then include these recommendations in the Administrative Record for the site. While the Region is expected to give the Board's recommendations substantial weight, other important factors, such as subsequent public comment or technical analyses of remedial options, may influence the final Regional decision. It is important to remember that the NRRB does not change the Agency's current delegations or alter in any way the public's role in site decisions.

NRRB Advisory Recommendations

The NRRB reviewed the informational package for the site and discussed related issues with EPA's Eugenia Chow and Elizabeth Adams, and John Bishop from the Los Angeles Regional Water Quality Control Board (RWQCB). Based on this review and discussion, the NRRB supports the Region's preferred alternative (alternative 3) and offers the following recommendations.

- The Board strongly supports efforts to obtain a waiver from state discharge requirements to treat for total dissolved solids and/or nitrates. Less costly alternatives for managing discharge water should be pursued if a waiver is not granted.
- In addition to the implementation of Alternative 3, continued aggressive action to require PRPs to address facility-specific contamination sources in the Puente Valley area should be pursued. Such action is important to minimize continued aquifer degradation and reduce the potential for future groundwater remediation efforts.
- The Remedial Design should include an evaluation of whether in-situ technologies (e.g., NoVOCs, Unterdruck-Verdampfer-Brunnen technology) can help reduce the amount of water that needs to be extracted while achieving Alternative 3's containment objectives.
- In order to augment Alternative 3, in-situ bioremediation should be evaluated to determine if it can reduce hot spot contaminant mass in the shallow and intermediate regional ground water plumes.

The NRRB appreciates the Region's efforts to work closely with the State and community to identify the current proposed remedy. The Board members also express their appreciation to both the Region and the State of California for their participation in the review process. We encourage Region 9 management and staff to work with their Regional NRRB representative and the Region 1/9 Accelerated Response Center at Headquarters to discuss appropriate follow-up actions.

Please do not hesitate to give me a call if you have any questions at 703-603-8815.

cc: S. Luftig
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