



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

December 30, 1997

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

To: Bruce Means, Chair
National Remedy Review Board

From: Keith Takata, Director
Superfund Division *Keith Takata*
EPA Region 9

We have reviewed and considered the National Remedy Review Board (NRRB) Recommendations on the San Gabriel Superfund Site, Puente Valley Operable Unit, dated December 18, 1997. We are placing the recommendations and this response in the Administrative Record for our Proposed Plan. The public comment period on the Proposed Plan is scheduled to begin in January, 1998.

The NRRB's December 18, 1997 memorandum documents the NRRB's support for Region 9's preferred alternative (Alternative 3). Additionally, the NRRB provided four recommendations. For reference, each of these recommendations has been included below in bold type. A discussion of Region 9's response to these recommendations follows. Please note that as the public comment period on the proposed plan has not yet occurred, we will be taking into account all public comments that we receive before selecting a remedial alternative. The following responses to the NRRB's recommendations assume that Alternative 3, which is supported by both the NRRB and Region 9, will be the selected alternative. If, after reviewing public comments, we decide to reconsider our preferred alternative, we will consult further with you.

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.

Region 9 strongly agrees with this recommendation, and supports efforts by the PRPs to obtain a waiver from state discharge requirements for total dissolved solids and/or nitrates. In fact, the Los Angeles Regional Water Quality Control Board (RWQCB) has scheduled a meeting in

January, 1998 to discuss this specific issue. Based on discussions with RWQCB staff, it is our understanding that a technical rationale can be developed for such a waiver. Since discharge requirements are under the purview of the RWQCB, the PRPs will need to apply for the waiver directly from the RWQCB.

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.

Region 9 strongly agrees that, in order to augment implementation of Alternative 3, continued aggressive action to require PRPs to address facility-specific contamination sources in the Puente Valley area should be pursued. Since facility-specific cleanups are under the purview of the RWQCB, Region 9 will continue to encourage the RWQCB to aggressively pursue facility-specific cleanups where doing so will eliminate continued contamination sources that continue to threaten the regional ground water.

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.

Region 9 intends to incorporate the NRRB's recommendation for an evaluation of the referenced in-situ technologies into our scope of work for the Puente Valley Operable Unit Remedial Design, in order to determine whether these technologies can augment implementation of Alternative 3.

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.

Region 9 intends to incorporate the NRRB's recommendation for an evaluation of in-situ bioremediation into our scope of work for the Puente Valley Operable Unit Remedial Design, in order to determine whether this technology can augment implementation of Alternative 3.

Region 9 appreciates the NRRB's support for our preferred alternative and suggestions for ways to improve remedy implementation. We look forward to working with the Region 1/9 Accelerated Response Center in EPA-Headquarters as we proceed through remedy selection and the Remedial Design/Remedial Action.

cc: Murray Newton, Region 1/9 Center