

August 10, 2015

Paul Cho, P.G.

Water Resources Control Engineer
California Regional Water Quality Control Board, Site Cleanup Unit IV
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Subject: Phase 2 Stockpiles and Excavations Confirmation Sampling Report and Request for Soil Reuse
Defense Fuel Support Point Norwalk
15306 Norwalk Boulevard, Norwalk, California
(SCP NO. 0286A, Site ID NO. 16638)

Dear Mr. Cho:

On June 26, 2015, a meeting was held at the Department of Logistics Agency-Energy (DLA Energy) Site located at 15306 Norwalk Boulevard, Norwalk, California with Regional Water Quality Control Board (RWQCB) staff (Paul Cho) and The Source Group, Inc. (SGI). The purpose of the meeting was to discuss, on behalf of DLA Energy, the on-going implementation of the November 30, 2014, Soil Remedial Action Plan (RAP) conditionally approved by RWQCB on January 7, 2015. Following that meeting, an Acknowledgement Letter was sent on June 30, 2015, by SGI to the RWQCB that described plans for the Phase 1 documentation of confirmation sampling of excavations and stockpiles. Phase 1 was implemented, and this letter accompanies the *Phase 2 Stockpiles and Excavations Confirmation Sampling Report and Request for Soil Reuse* (Phase 2 report) prepared by SGI to document confirmation sampling of two overburden soil piles, four treated soil stockpiles and three excavations. The enclosed tables, adapted from the Phase 2 report, summarize the excavations details and stockpiles volumes and sample summary.

The confirmation sampling data documented in the Phase 2 report (and listed in enclosed tables B-3 and B-1) indicate that the confirmation samples collected from excavation #1, #2 and #8, and from clean soil stockpiles CS-11-E19-SP-01 and CS-13-EX16-SP01 do not contain concentrations of hydrocarbons above site cleanup goals and that the stockpiled soil is suitable for unrestricted re-use on the project site.

The confirmation sampling data documented in the Phase 2 report (and listed in enclosed Table B-2) indicate that four treated soil piles Powerine A-01 to D-01, containing 815 to 984 cubic yards, were each tested by 35 confirmation samples. The data indicate that 95 sections (68% of treated soil volume) of the stockpiles contain hydrocarbon concentrations below cleanup goals for unrestricted soil reuse, that 39 sections (28% of treated soil volume) contain hydrocarbon concentrations acceptable for shallow soil reuse, and that 5 sections (4% of treated soil volume) should be separated out for re-treatment. The Phase 2 report includes maps of sampling locations and a description of sections to be separated for shallow, deep soil reuse or soil re-treatment.

1962 Freeman Avenue
Signal Hill, California 90755

Telephone: (562) 597-1055
Facsimile: (562) 597-1070

Based on these findings, SGI and DLA Energy request that the RWQCB authorize soil reuse of the two overburden soil stockpile, reuse or re-treatment of segregated soil from four treated stockpiles, and backfilling of excavations #1, #2 and #8.

If there are any questions regarding the information provided please call me at (562) 597-1055.

Sincerely,

A handwritten signature in blue ink that reads "Paul Parmentier". The signature is written in a cursive style with a large initial "P".

Paul Parmentier
Principal Hydrogeologist
The Source Group, Inc

Ec: Mr. Nick Carros, DLA Energy
Mr. Kenneth Wall, SGI
File: DFSP Norwalk – 04-NDLA-007

Enclosure: *Tables B-1 to B-3: documentation of Phase 2 Stockpiles and Excavation Sampling*

**TABLE B-1
SUMMARY OF PHASE 2 CLEAN SOIL STOCKPILE**

Stockpile Number	Initial Volume (yds³)	Number of Confirmation Samples	Backfill Status
C-CS-11-EX19-SP01	1,850	31	Back filling approval pending
C-CS-13-EX16-SP01	1,130	29	Back filling approval pending
Total	2,980	60	

Notes:

yds³ = cubic yards

**TABLE B-2
SITE-WIDE SUMMARY OF TREATED SOIL STOCKPILE**

Stockpile Number	Stockpile Volume (yds³)	Confirmation Sampling Status	Unrestricted Soil Reuse	Shallow Soil Reuse	Comments
Powerine-A-01	984	35 samples 7-30-2015: 34 sections under deep cleanup goals; 1 section under shallow cleanup goals	956	28	1 section selectively separated for shallow backfilling
Powerine-B-01	918	35 samples 7-30-2015: 31 sections under deep cleanup goals; 4 sections under shallow cleanup goals	813	105	4 sections selectively separated for shallow backfilling
Powerine-C-01	855	35 Samples 7-16-2015; 4 sections above cleanup goals; 9 sections under deep cleanup goals; remaining sections under shallow cleanup goals	0	757	4 sections separated for re-treatment, conservatively assign all remaining pile for shallow backfill only.
Powerine-D-01	815	35 Samples 7-15-2015: 31 sections under deep cleanup goals; 4 sections under shallow cleanup goals; 1 section with VOCs above cleanup goals	699	93	4 sections selectively separated for shallow backfilling, northern section of pile marked for re-treatment
Total Volume	3,572		2,468	983	

Notes:

yds³ = cubic yards

**TABLE B-3
SITE-WIDE SUMMARY OF EXCAVATIONS**

Excavation Number	Excavation Volumes (yds³)	Number of Side Wall Confirmation Samples	Number of Floor Confirmation Samples	Total Number of Confirmation Samples	Status (July 23, 2015)	Comments
Phase 2						
Excavation #1	556	36	6	42	Backfill approval pending	
Excavation #2	1,095	30	10	40	Backfill approval pending	
Excavation #8	1,303	51	8	59	Backfill approval pending	
Phase 1						
Excavation #3	1,042	24	6	30	Backfill approved - in progress	Excavations #3, #4, and #14 combined
Excavation #4	1,845	50	15	65	Backfill approved - in progress	Excavations #3, #4, and #14 combined
Excavation #14	2,112	82	12	94	Backfill approved - in progress	Excavations #3, #4, and #14 combined
Excavation #5	340	28	4	32	Backfill approved - in progress	
Total	7,953	301	61	362		

Notes:

yds³ = cubic yards