
Los Angeles Regional Water Quality Control Board

January 7, 2015

Mr. Everett Bole
DLA Installation Support - Energy
8725 John J. Klingman Road
Fort Belvoir, VA 22060

SUBJECT: REVIEW OF SOIL REMEDIAL ACTION PLAN AND SOIL MANAGEMENT PLAN

SITE/CASE: DEFENSE FUEL SUPPORT POINT NORWALK, 15306 NORWALK BOULEVARD, NORWALK, CALIFORNIA (SCP NO. 0286A, SITE ID NO. 16638)

Dear Mr. Bole:

The California Regional Water Quality Control Board (Regional Board) received the technical documents titled *Revised Soil Management Plan: Treatment Cell Operation and Site Excavation (SMP)*, dated November 5, 2014, *Soil Remedial Action Plan (RAP)*, dated November 30, 2014, and *Addendum to Soil Remedial Action Plan*, dated December 10, 2014. These technical documents, prepared by The Source Group, Inc., on your behalf, for the above referenced site (Site) include excavating shallow contaminated soil less than 10 feet below grade surface and localized deeper soil, conducting the biotreatment onsite, and reusing the treated soil for backfill.

Based on the information provided in the technical documents, you may implement the proposed work with the following additions:

1. It is stated that in order to maintain soil moisture at 40 to 85 percent of field capacity within the treatment stockpiles, soaker hoses will be placed to maintain the moisture content of the soil. A tensiometer or equivalent monitoring device will be used to monitor moisture. Water will be added if the soil moisture falls below the range. Submit the following information to the Regional Board by **February 15, 2015**:
 - a. Discuss how soil moisture will be measured in the treatment stockpile that holds approximately 1,700 cubic yards of contaminated soil that is covered with 10 to 20 thousands of an inch plastic.
 - b. Discuss how water will be distributed evenly using the soaker hoses to maintain the soil moisture.

2. It is proposed that untreated clean soil, which concentrations are below the Regional Board's July 12, 2012 soil cleanup goals, will be reused onsite. Soil, up to 2,000 cubic yards, will be stockpiled proximal to the originating excavation. Therefore, follow the April 10, 2012, Regional Board's letter for the protocol for the minimum number of samples:

Stockpile Size Unit = cubic yards (cy)	Number of Samples
< 500	1 sample every 25 cy (e.g., 20 samples for a 500 cy stockpile)
500 to < 1,000	20 samples plus 1 sample for every 100 cy in excess of the initial 500 cy (e.g., 25 samples for a 1,000 cy stockpile)
1,000 to 10,000	25 samples plus 1 sample for every 500 cy in excess of the initial 1,000 cy (e.g., 43 samples for a 10,000 cy stockpile)
> 10,000	43 samples plus 1 sample for every 5,000 cy in excess of the initial 10,000 cy (e.g., 61 samples for a 100,000 cy stockpile)

- a. Provide a detailed sampling strategy to meet the above guidance for each untreated soil stockpile by **February 15, 2015**.
 - b. Submit the data of each untreated soil stockpile to the Regional Board for review and approval before reuse.
 - c. Submit a map showing areas of where untreated soil for each stockpile has been applied **15 days after** the backfill is complete.
3. It is proposed that 27 samples per treatment stockpile of 17,000 cubic yards will be collected to evaluate if the concentrations of treated soil meet the site specific cleanup goals. The Regional Board staff disagrees to apply the number of soil samples using the same protocol stated in the Regional Board's April 10, 2012 letter. The treated soil should be collected 2 samples per 25 cubic yards, at a minimum, from each treatment stockpile to verify that treated soil meets the site specific cleanup goals.
- a. Provide a detailed sampling strategy by **February 15, 2015**.
 - b. Submit the data of each treatment stockpile to the Regional Board for review and approval before reuse.
 - c. Submit a map showing areas of where treated soil for each stockpile has been applied **15 days after** the backfill is complete.
4. For the treatment cell site closure, additional soil sampling around the bottom liner before its removal is recommended due to condensation or excess water runoff. Submit a soil sampling workplan for the treatment cell site closure by **March 1, 2015**.

5. Discuss how surface runoff after rainfall will be handled to prevent any ponding within the treatment cell site by **March 1, 2015**.
6. When backfill is complete throughout the Site, soil gas samples should be collected for top 10 feet below grade surface for human health risk assessment. Submit the sampling and analysis workplan by **March 1, 2015**.
7. It is stated that DLA Energy is currently developing a pilot test workplan for enhancing the recovery of light non-aqueous phase liquid. Submit the workplan to the Regional Board by **June 30, 2015**.
8. Less than 1 to 2 percent of the total soil mass is proposed for an offsite disposal. Any offsite soil disposal should be submitted to a permitted facility. Submit all manifests in the report to the Regional Board.

If you have any questions, please contact Mr. Paul Cho at (213) 576-6721 (pcho@waterboards.ca.gov).

Sincerely,



Paul Cho, P.G.
Site Cleanup Unit III

cc: See Mail List

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