



California Regional Water Quality Control Board

Santa Ana Region



Terry Tamminen
Secretary for
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Protection

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Arnold Schwarzenegger
Governor

July 16, 2004

Mr. Richard A. Dongell
Dongell Lawrence Finney LLP
707 Wilshire Boulevard, Twenty-Seventh Floor
Los Angeles, CA 90071

COMMENTS ON PROPOSED WORK PLAN FOR PERCHLORATE INVESTIGATION AT LOTS 5 & 6, 2298 WEST STONEHURST DRIVE, CITY OF RIALTO, SAN BERNARDINO COUNTY

Dear Mr. Dongell:

Board staff has reviewed the June 25, 2004 submittal entitled "Alternate Work Plan for Site Investigation" for San Bernardino County Assessor Parcel Nos. 1133-071-05 and 1133-071-06 (Lots 5 and 6), 2298 West Stonehurst Drive (site), Rialto, California. Geomatrix Consultants, Inc. (Geomatrix) submitted the work plan on behalf of your client, Whittaker Corporation, in compliance with Cleanup and Abatement Order (CAO) No. R8-2004-0042. The CAO was adopted by the Regional Board on April 30, 2004, for investigation and cleanup of perchlorate at the five-acre parcel by Whittaker, Thomas O. Peters and the Peters Trust, and Pyro Spectaculars, Inc. I approve the proposed work plan, provided that the site inspection and additional chemical analyses and sampling modifications described below are incorporated into the plan.

The objective of the proposed investigation is to assess the lateral and vertical extent of perchlorate in the soil in areas where prior operations have occurred at the site. Specifically, soil samples will be collected around the various buildings and structures located on Lots 5 and 6 and analyzed for perchlorate. The proposed field work consists of a total of 14 exploratory trench excavations (at locations shown in Figure 4 of the work plan). According to Geomatrix, the proposed locations described in the work plan may be modified based on site conditions. Specifically, the proposed work plan will include trench excavations at the following locations:

- Buildings 14 and 15 - two trench excavations will be placed in accessible areas adjacent to these structures.
- Buildings 16 and 17 - four trench excavations will be placed in accessible areas adjacent to these structures.
- Buildings 18 and 19 - two trench excavations will be placed in accessible areas adjacent to these structures.

- Buildings 20 and 21 - three trench excavations will be placed in accessible areas adjacent to these structures and the concrete pad located between the buildings.
- Buildings 22, 24, and 25 - three trench excavations will be placed in accessible areas adjacent to these structures.

Two soil samples are proposed to be collected from each trench excavation. The first sample is proposed to be collected from a depth of 1 to 2 feet in undisturbed sediments. The second soil sample is proposed to be collected at the bottom of each trench excavation from a depth of 5 feet. Soil samples are to be collected using a hand-trowel, thus minimizing the potential for large pebbles or rocks being present in the sample matrix. The samples from the 5-foot depth zones in each trench will be collected from the backhoe bucket. After the soil samples are collected, each trench excavation is to be backfilled, and the disturbed areas will be re-compacted utilizing the backhoe. All soil samples collected from the shallow 1- to 2-foot depth intervals will be submitted for perchlorate analysis, using U.S. EPA Method 314.0. Soil samples from the 5-foot depth intervals are proposed to be placed on hold pending results from the analyses of the shallower samples. At locations where perchlorate is detected at concentrations above the reporting limit (0.02 milligrams per kilogram), the soil sample from the 5-foot depth interval is proposed to be taken off "hold" status, and will be analyzed for perchlorate.

According to Geomatrix, in the event that perchlorate is detected in the soil samples from the 1- to 2-foot and 5-foot depth intervals, soil samples from deeper zones will be required (Phase II) to reach depths up to 20 feet below ground surface (bgs). Where practical, initial trench locations will be used and additional samples collected at depths of 10, 15, and 20 feet bgs. However, some trench excavations may not be accessible due to the large space requirements for soil excavation and stockpile management. Soil samples collected from the 10- and 15-foot depths would be analyzed for perchlorate and the soil samples collected from the 20-foot depth interval would be placed on hold, pending receipt of analytical results from the shallower soil samples. Because Phase II sampling methodologies are the same (with the exception of equipment type), it is not anticipated that a new work plan would need to be submitted. However, Geomatrix will provide shallow depth sample results and proposed Phase II locations to Board staff for concurrence prior to commencement of the Phase II field activities.

Based on Board staff's recent inspection of the 2298 West Stonehurst site (July 8, 2004), it appears that some of the proposed sampling points are either outside of the visual berms surrounding the targeted buildings or structures, or their distance and their orientations are irrelevant to probable areas that may have been impacted by waste discharges from past activities outside of those buildings. For the above reasons, Board staff believes that a site inspection must be scheduled between representatives of Geomatrix, Pyro Spectaculars Inc., and Board staff in order to revisit the proposed trench excavation areas, and select the appropriate locations and required number of trench excavations for the this investigation. In addition, I request that all 5-foot soil samples, regardless of the final sampling locations and the number of samples obtained, should be submitted with the 1- to 2-foot samples for

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perchlorate analyses as well as volatile organic compounds, using U.S. EPA Method 8260, and metals, using U.S. EPA Methods 6010B and 6020.

Please contact Mr. Gary Brown with Pyro Spectaculars, Inc, to schedule an inspection of the site. The inspection shall be conducted no later than July 30, 2004. Once our joint inspection of the site has been completed and revised sampling locations have been agreed upon, you should submit a revision to this work plan to include the new sampling locations and additional chemical analyses described earlier in this letter. In addition, a schedule for completion of the field work and submittal of the final report should be included in your revised work plan. The revised work plan and schedule must be submitted to Board staff by August 16, 2004.

Please be aware that the need for additional site investigation of the soil and groundwater will be evaluated once this phase of investigation has been completed and Board staff has reviewed and evaluated the soil sampling results.

Please notify the following individuals at least 24 hours prior to all field work to allow for inspection and oversight as needed: Kamron Saremi, RWQCB, (909) 782-4303 and Wendy Arano, DTSC, (714) 484-5480

If you have any questions, please contact me at (909) 782-3284, or Robert Holub, Division Chief, at (909) 782-3298.

Sincerely,



Kurt V. Berchtold
Assistant Executive Officer

cc: Jorge Leon, SWRCB, Office of Chief Counsel
Duane Paul, Geomatrix
John Van Vlear, Voss Cook & Thel LLP
Peter Nyquist, Weston Benshoof Rochefort Rubalcava MacCuish LLP
Inland Empire Perchlorate Regulatory Task Force (mailing list attached)

KS: Rialto perchlorate/CAOR8-2004-0042/Whittakerworkplan