



Linda S. Adams
Acting Secretary for
Environmental Protection

Department of Toxic Substances Control



Deborah O. Raphael, Director 9211 Oakdale Avenue Chatsworth, California 91311

Edmund G. Brown Jr.
Governor

MEMORANDUM

TO:

Laura Rainey, P.G.

Senior Engineering Geologist

Brownfields and Environmental Restoration

Cleanup Program, Office of Geology

FROM:

Frank S. Parr, CIH, CSP

Senior Industrial Hygienist

Health and Safety Program (HSP)

DATE:

June 14, 2011

SUBJECT:

Santa Susan Field Laboratory (SSFL), Area IV

Revised Health and Safety Plan (HASP) Addendum Number 32
Installation of Soil Vapor Probes at Former Sodium Disposal Facility

PCA Code: 22120 Site Number: 300381-48-37

BACKGROUND

The Brownfields and Environmental Restoration Program (BERP), Office of Geology in Cypress requested the HSP review the revised MWH Site Specific Health and Safety Plan (HASP) Addendum 32. This Addendum addresses the installation of soil vapor probes at the Former Sodium Disposal Facility Site (FSDF) (herein referred to as the Site).

The FSDF occupies an area of approximately 4.3 acres and is located in the western portion of Area IV. Historically, the FSDF received machinery and equipment contaminated with sodium and sodium\potassium for decontamination. Items slated for decontamination were placed into ponds near the former location of building 886 and immersed in water to react the sodium and potassium. Hydrogen generated during the cleaning operations was combusted. Kerosene, organic solvents, biphenyls, and terphenyls were also disposed of in the former FSDF ponds.

The SSFL comprises approximately 2,700 acres of mountainous terrain ranging from 1,700 to 2,200 feet above sea level. The SSFL is surrounded by Simi Valley to the north, the San Fernando Valley to the east, and Thousand Oaks to the southwest.

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SSFL is divided into four operational areas (areas I, II, III and IV). A wide variety of research and development activities have historically been conducted at the SSFL.

The proposed scope of work as described in the HASP includes the installation of five soil vapor probes and one soil vapor point. Before the soil vapor probes and monitoring point are installed, the U.S. EPA contractor will install soil borings via direct push technology leaving an approximately 3" diameter borehole for the subsequent installation of the soil vapor probes.

DOCUMENT REVIEWED

The HSP reviewed the revised "Health and Safety Addendum Number 32, RCRA Facility Investigation, Santa Susana Field Laboratory, Ventura County, California". The document was prepared by MWH. The document was received by the HSP reviewer on June 10, 2011.

CONCLUSIONS AND RECOMMENDATIONS

The revised HASP addendum adequately addresses the previously outstanding issues identified in the original June 7, 2011 HSP HASP review memorandum.

The HSP is available to discuss this document and related issues. Should questions arise contact Frank Parr at (818) 717-6592.

PEER REVIEW BY:

Shahrzad Nouri, M.S.

Associate Industrial Hygienist





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DOCUMENT REVIEWED

The HSP reviewed the "Health and Safety Addendum Number 32, RCRA Facility Investigation, Santa Susana Field Laboratory, Ventura County, California". The document was prepared by MWH. The document was received by the HSP reviewer on May 31, 2011.

SPECIFIC COMMENTS

- 1) Page 3, Scope of Work. Please specify the action level which will be used for flammable gases detected via a combustible gas indicator.
- 2) Page 5, Radiological Hazards. Please forward the borehole gamma screening data to the DTSC HSP. [8 CCR 5192(c)(6)(A)].
- 3) Page 8, Soil Vapor Probe Installation. Text within this section indicates that no action would be required if vinyl chloride draeger tubes indicate an exposure concentration of less than 10ppm. The Cal-OSHA PEL for Vinyl Chloride is 1 ppm. Please clarify for consistency. [8 CCR 5210].
- 4) Attachment 1, Occupational Health Exposure and Toxicological Properties for Contaminants of Occupational Health Concern.
 - a) Please include the correct Cal-OSHA Permissible Exposure Limit (PEL) for Particulates Not Otherwise Regulated, Total fraction (10 mg/m3).
 - b) Please include the correct Cal-OSHA PEL for Toluene (50 ppm).
 - c) Please include the correct Cal-OSHA PEL for Trichloroethene (25 ppm).
 - d) As vinyl chloride appears to be a potential contaminant of concern (refer to Comment # 2 above), please include data relating to exposure and toxicological properties in the table.

CONCLUSIONS AND RECOMMENDATIONS

The submitted HASP requires additional information and/or clarification. The areas where the HSP has requested additional information and/or clarification must be corrected or clarified and resubmitted for further review.

Future changes in the document should be clearly identified.

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