

Appendix A

Workplan and Approval Letters



April 20, 2006

Mr. Thomas M. Cota, Chief
Southern California Cleanup Operations Branch – Cypress Office
Attention: Ms. Christine Chiu, Project Manager
Southern California Cleanup Operations Branch, Cypress
Department of Toxic Substance Control
5796 Corporate Avenue
Cypress, California 90630-4732

RE: Groundwater RI/FS Workplan Revision 1.0 Addendum
Further Pit F Groundwater Investigation
Ascon Landfill Site
Huntington Beach, California

Dear Ms. Chiu:

1.0 INTRODUCTION

1.1 Preface

This addendum to the Groundwater Remedial Investigation/Feasibility (RI/FS) Study Workplan-Revision 1.0, dated October 24, 2003, presents the scope for follow-up work that will be conducted as part of the Groundwater RI at the Ascon Landfill Site (Site) located in Huntington Beach, California (Figure 1). This workplan addendum was jointly prepared by GeoSyntec Consultants, Inc. (GeoSyntec) and Project Navigator, Ltd. (PNL), on behalf of the Ascon Landfill Site Responsible Parties (RPs) for submittal to the Department of Toxic Substances Control (DTSC).

This workplan outlines a scope of work that will further delineate the impacts of Pit F waste material on shallow groundwater in the vicinity of Pit F (Figure 2). The workplan was prepared in response to a second comment letter prepared by DTSC (letter

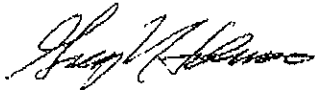


Ms. Tamara Zeier
May 8, 2006
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Based on the proposed schedule in the Workplan for this project of approximately nine weeks, please submit the report with the results of this groundwater investigation by July 7, 2006.

If you have any questions, please contact Ms. Christine Chiu at (714) 484-5470, or me, at (714) 484-5461.

Sincerely,



Greg Holmes
Unit Chief
Southern California Cleanup Operations Branch -- Cypress Office

cc: Mr. Frank Gonzales, CHC
Department of Toxic Substances Control
Geological Services Unit
5796 Corporate Avenue
Cypress, California 90630

dated January 12, 2006)¹, and various e-mail and telephone correspondence with DTSC between January and April 2006². In their comments and correspondence, DTSC requested that shallow groundwater impacts be further delineated in the near vicinity of Pit F using hydropunch groundwater sampling techniques.

1.2 Background and Objectives

Previous investigations at the site, including both soil and groundwater investigations, indicate that known impacts from Pit F materials generally occur in areas directly adjacent to Pit F. Previous soil and groundwater investigations results are summarized in several reports including:

- Phase VIII (Pit F Soil Sampling Program) of Pilot Study No. 3, documented in the Second Feasibility Study (PNL, November 15, 2005)
- Groundwater Remedial Investigation Report, Ascon Landfill (GeoSyntec, February 28, 2005)
- Pit F Offsite Investigation Addendum Letter Report, Pilot Study No. 3, Ascon Landfill (PNL and GeoSyntec, January 31, 2005).

The projected limits of Pit F impacted materials are shown on Figure 3. Soil impacts of Pit F waste are limited to an area approximately 50 feet to 125 feet around the Pit F location. Groundwater results from monitoring wells surrounding the location of Pit F (AW-1, AW-1A, MW-13, MW-18, and GP-12 – see Figure 3) also indicate that Pit F impacts to shallow groundwater are areally limited (GeoSyntec, 2003).³ The objective of the currently proposed study is to further delineate groundwater impacts from Pit F

¹ DTSC originally presented comments on the Groundwater RI in their letter dated June 3, 2005. The RPs submitted a response to DTSC's June 3, 2005 comments in a letter dated June 30, 2005. The January 12, 2006 comment letter was prepared by DTSC in response to the RP's letter dated June 30, 2005.

² Meeting with DTSC and the RPs on January 26, 2006, March 7, 2006 e-mail from DTSC, conference call with DTSC and the RPs on March 8, 2006, conference call with DTSC and the RPs on April 5, 2006.

³ Groundwater Remedial Investigation, GeoSyntec, February 28, 2005.

waste material. The study will focus on impacts to the relatively permeable Semi-Perched Aquifer (SPA) that occurs directly beneath a fine-grained clay/silt zone in the Pit F area.

1.3 Workplan Organization

This workplan has been organized as follows.

- Section 1.0 – “Introduction” -- presents background information and objectives.
- Section 2.0 – “Field Methodology and Analytical Program” -- outlines field methodology and the analytical program.
- Section 3.0 – “Health and Safety” -- outlines health and safety measures.
- Section 4.0- “Quality Assurance and Quality Control (QA/QC)” – presents the field and laboratory activities that will be conducted to maintain data quality.
- Section 5.0 – “Report Preparation” – describes information that will be included in the report documenting the results of the investigation.
- Section 6.0 – “Schedule” – Presents an estimated schedule for performing the investigation and reporting the results.

2.0 FIELD METHODOLOGY AND ANALYTICAL PROGRAM

2.1 Lithologic Logging and Groundwater Sampling

Hydropunch groundwater samples will be collected at 11 locations in the vicinity of Pit F. The proposed sampling locations are shown on Figure 3. The groundwater samples will be collected from the uppermost portion of the SPA that occurs directly beneath the base of a fine-grained silt/clay unit that extends across the site including the Pit F area. In the near vicinity of Pit F, the top of the SPA occurs at a depth ranging from 10 feet to 20 feet below ground surface.

Field activities including field preparation work, field instrument calibration, borehole logging, groundwater sample handling and labeling, decontamination procedures, and waste handling will be conducted in general accordance with the Groundwater RI/FS Workplan Revision 1.0 dated October 24, 2003, prepared by GeoSyntec. The workplan was conditionally approved by DTSC in their letter dated February 3, 2004. In addition, proposed Hydropunch groundwater sampling procedures will be conducted in general accordance with the Task 11 - Groundwater Assessment Workplan (Revision 1.0) dated May 3, 2002, and the Task 11 - Groundwater Assessment Workplan (Revision 1.0) Addendum dated May 17, 2002, prepared by PNL. The workplan was conditionally approved by DTSC in their letter dated June 7, 2002.

At each of the eleven proposed sampling locations, the top of the SPA will be identified by completing a continuously cored borehole. The boreholes will be completed using a hydraulic push drill rig operated by Gregg Drilling of Signal Hill, California. The borings will be continuously cored using a macro-core continuous sampling system. Soil samples will be collected in 1 3/4-inch diameter by 4-foot long acetate liners. Soils will be screened with a Photoionization Detector (PID) for organic vapors and will be visually inspected and logged by a field geologist working under the supervision of a California Professional Geologist. The field geologist will complete a borehole log and will identify the depth of the top portion of the SPA.

Once the depth of the top portion of the SPA is identified, a groundwater sample will be collected at approximately a 2-foot radial distance from the initial borehole using a Hydropunch groundwater sampling unit. The groundwater sampler will be operated by advancing a 1 3/4 -inch hollow push rod with a steel cone tip and an encased stainless steel screen to approximately three feet past the top of the SPA. Once this depth is achieved, the push rods will be retracted exposing a three-foot section of screen (i.e., the top section of the screen will be located adjacent to the top of the SPA).

When the Hydropunch screen is exposed, groundwater from the formation will infiltrate the screened casing. Depth to water and total depth measurements will be collected prior to sampling, to verify that there is ample water in the screened section for sampling and to verify the depth of the screen. Once sufficient volumes of groundwater have infiltrated the screen section the water will be sampled using a 1/2-inch or 3/4-inch diameter clean stainless steel bailer by slowly lowering the bailer into the temporary well. When the bailer is full, it will be retrieved and the sample containers will be filled. Approximately 2.1 liters of sample are required to perform the desired analyses, thus the bailer will be deployed multiple times. No purging will take place prior to sample collection.

The groundwater samples will be collected in appropriate sample bottles supplied by the laboratory (see section 2.2). Analytical information, container type, and preservative information are as follows:

Analytical Procedure (EPA Method No.)	Type of Container	Preservative
VOCs (8260B-low levels)	2-40 mL VOA Vials	HCl
SVOCs(8270C-low levels)	1 L Amber	None

Labels shall be affixed to a clean and dry surface of the sample bottles and double-checked for completeness. The labels will include site identification, sample

location ID, date and time of sample, test method, type of preservative, and sampler's initials. The field sampling personnel shall complete the information on the sample label at the time of sampling using indelible ink.

Sampling containers shall be stored properly in an ice chest or cooler to reduce the potential for breakage, spillage, or label deterioration. Sample containers shall be stored in ice chests immediately following sampling. The samples shall be maintained in the cooler with wet ice between the time the samples are collected and the time the samples are delivered to the laboratory.

Prior to drilling and groundwater sampling, all locations will be marked and underground utilities will be cleared by USA Dig Alert. The small amount of drill cuttings generated will be contained in DOT-approved drums and properly stored. After groundwater sampling is completed the boreholes will be backfilled with a cement bentonite grout.

2.2 Analytical Program

Groundwater samples collected during this investigation will be shipped to Del Mar Analytical in Irvine, California, for laboratory analyses. Del Mar Analytical is a State of California certified laboratory. The samples will be analyzed for Volatile Organic Compounds (VOCs) using EPA Method 8260B and Semi-Volatile Organic Compounds (SVOCs) using EPA Method (8270C). Del Mar Analytical's low level methodology will be used to obtain lower reporting limits. The laboratory's method detection and reporting limits for the above analyses are presented in Attachment A. These method detection and reporting limits may not be obtainable if matrix interference problems or high contaminant concentrations are encountered. Del Mar Analytical's laboratory certificates are presented in the Groundwater RI/FS Workplan-Revision 1.0.

Duplicate sample, trip blanks, equipment blanks, and field blank samples collected during the investigation will also be analyzed using EPA Method 8260B (see Section 4.0 for further description of QA/QC samples).

3.0 HEALTH AND SAFETY

All field Activities will be performed by individuals with appropriate training (CFR 1910.120) in accordance with the site-specific Health and Safety Plan (HASP) presented in the Groundwater RI/FS Workplan-Revision 1.0. Before field activities commence, the site-specific HASP shall be reviewed and signed by the sampling personnel. The HASP shall contain information pertaining to site conditions, potential hazards, hazard control, monitoring procedures, personal protective equipment, emergency procedures, and hospital location. The HASP shall be available in the field for the sampling personnel to review in the event of a potentially hazardous situation occurs. Unless specified otherwise in the HASP, field sampling personnel shall generally work in modified Level D personal protective equipment as described in the site H&S plan.

A PID will be used to monitor air quality in the vicinity of the hydraulic push rig including worker air spaces and areas at the edge of the exclusion zone. Monitoring logs will be maintained. Dust monitoring will not be implemented based on the fact that the boreholes completed will only be 1½ to 2 inches in diameter and very few cuttings will be generated.

4.0 QUALITY ASSURANCE AND QUALITY CONTROL

The QA/QC Plan presented in the Groundwater RI/FS Workplan-Revision 1.0 will be implemented for this project. Key elements of the QA/QC program are:

- Field activities will be documented with borehole (lithologic) logs, daily field note logs, groundwater sampling logs, and chain-of-custody forms. Calibration records will be recorded on daily field logs.
- All field instruments will be calibrated on a daily basis.
- Groundwater QA/QC samples will be collected in the field and analyzed for VOCs by EPA Method 8260B. The QA/QC samples will include:
 - one duplicate sample
 - daily trip blank samples
 - daily equipment blank samples
 - one field blank sample.
- Level II data validation will be performed on all the laboratory reports following guidance in *USEPA National Functional Guidelines for Organic and Inorganic Data Review, EPA SW846 and Standard Methods*.

5.0 REPORT PREPARATION

A report will be prepared and submitted to DTSC. The report will include a description of the field procedures, a figure presenting sample locations, and a table presenting laboratory results. The report will also present a discussion of the laboratory

results including pertinent QA/QC information. Laboratory reports and boring logs will be presented in Appendices.

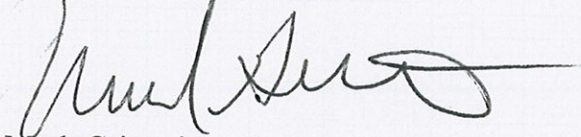
6.0 SCHEDULE

The proposed fieldwork will be scheduled approximately two weeks after approval of this workplan addendum, contingent on weather, driller availability, and permitting. It is anticipated that the field work will take 2 to 3 days to complete. Laboratory work, data analysis, and report preparation will be completed 6 weeks following completion of field activities, provided that the laboratory is able to perform the analyses within standard turnaround times. The total estimated project duration is, therefore, approximately 9 weeks. If DTSC approves the workplan by May 1, 2006, then the report should be submitted by July 7, 2006, contingent on scheduling of the fieldwork and receipt of the laboratory results within the standard turnaround times.

If you have any questions or comments please call Tamara Zeier of PNL at 714-388-1804.

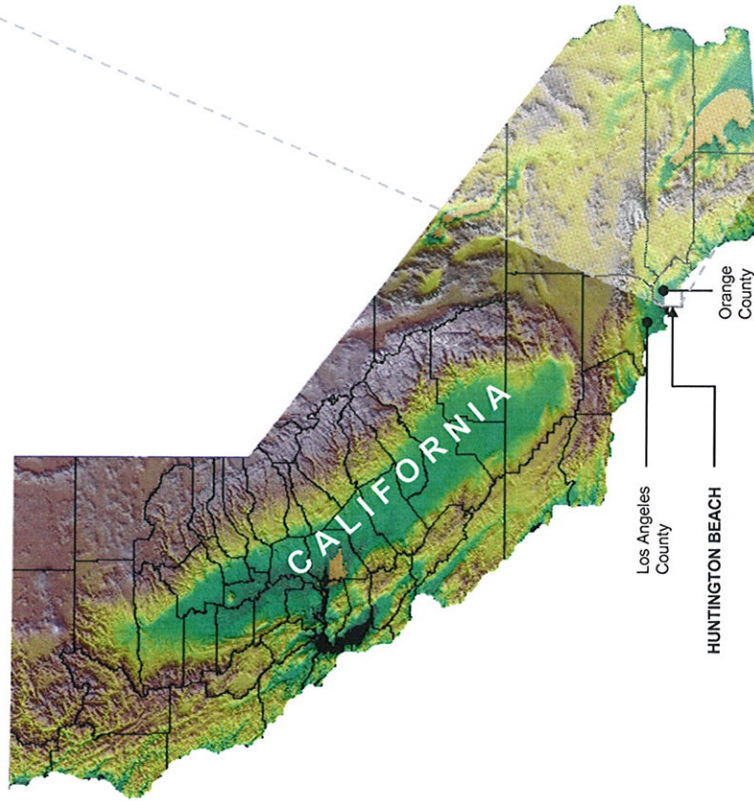
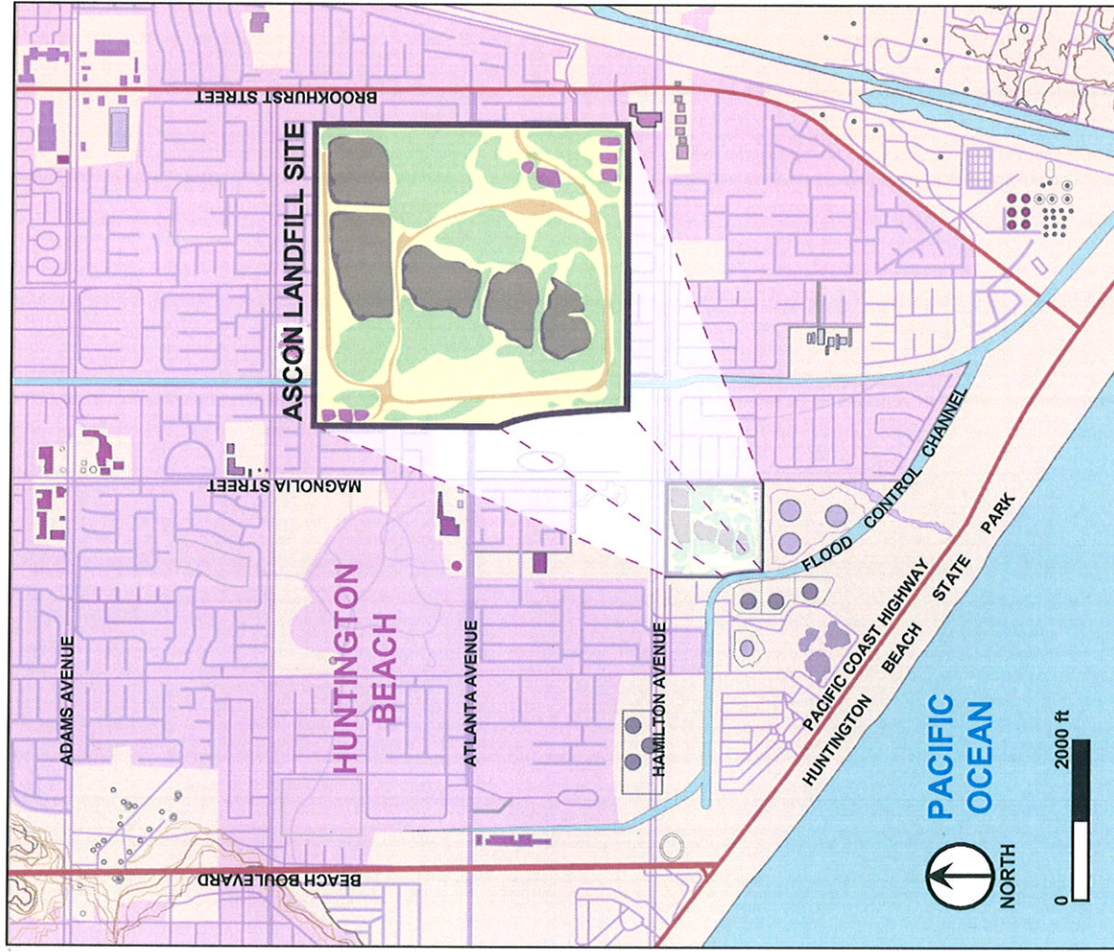
Sincerely,

GeoSyntec Consultants, Inc.



Mark Grivetti

Principal Hydrogeologist, P.G. # 4272, C.Hg. # 211



Site Location Map

Figure 1

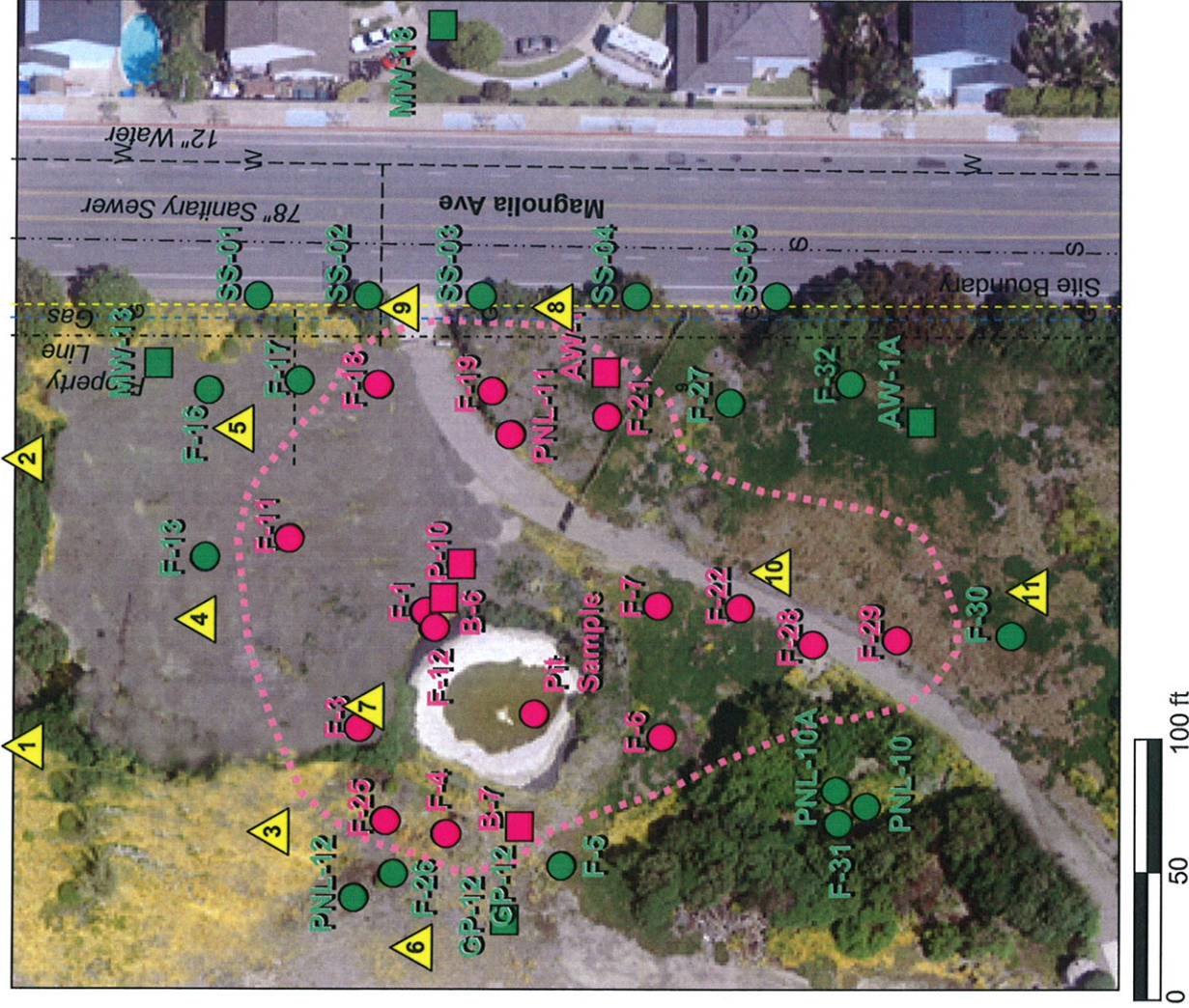
Base Map Source: PNL, Second Feasibility Study
Ascon Landfill Site, Huntington Beach, California

April 2006



Figure 2

Site Vicinity and Features Map



EXPLANATION	
	Borehole
	Well Borehole/Monitoring well
	No Observable Detection of Pit F Waste in Borehole
	Observable Detection of Pit F Impacted Material in Borehole
	Projected limit of Pit F Impacted Material in Subsurface Based on Visual Indications and PID Readings.
	Site Boundary/Fenceline
	Site Property Line
	Proposed Hydropunch Location

Area Location



Extent of Pit F Waste Material

Figure 3

ATTACHMENT A

Analytical Method Information

Analyte	MDL	Reporting Limit	Surrogate %R	Duplicate RPD	Matrix Spike %R	Blank Spike / LCS %R	RPD
8260B-Low Level in Water (EPA 8260B)							
Prep Method: EPA 5030B GCMS		Preservation: 4 C, HCL					
Container: 40 ml Voa Vial		Amount Required: 3 VOA		Hold Time: 14 days			
Benzene	0.28	0.50 ug/l			60 - 125	20	65 - 120
Bromobenzene	0.27	1.0 ug/l			65 - 125	20	70 - 120
Bromochloromethane	0.32	1.0 ug/l			60 - 135	25	65 - 130
Bromodichloromethane	0.30	1.0 ug/l			65 - 135	20	65 - 135
Bromoform	0.32	1.0 ug/l			50 - 135	25	50 - 130
Bromomethane	0.42	1.0 ug/l			50 - 145	25	60 - 140
n-Butylbenzene	0.37	1.0 ug/l			65 - 135	20	70 - 125
sec-Butylbenzene	0.25	1.0 ug/l			65 - 125	20	70 - 125
tert-Butylbenzene	0.22	1.0 ug/l			65 - 130	20	70 - 125
Carbon tetrachloride	0.28	0.50 ug/l			65 - 140	25	65 - 140
Chlorobenzene	0.36	1.0 ug/l			70 - 125	20	70 - 125
Chloroethane	0.40	1.0 ug/l			50 - 140	25	55 - 140
Chloroform	0.33	1.0 ug/l			65 - 135	20	65 - 130
Chloromethane	0.30	1.0 ug/l			35 - 140	25	40 - 140
2-Chlorotoluene	0.28	1.0 ug/l			65 - 135	20	70 - 125
4-Chlorotoluene	0.29	1.0 ug/l			65 - 135	20	70 - 125
Dibromochloromethane	0.28	1.0 ug/l			60 - 140	25	65 - 140
1,2-Dibromo-3-chloropropane	0.92	5.0 ug/l			40 - 150	30	45 - 135
1,2-Dibromomethane (EDB)	0.32	1.0 ug/l			65 - 130	25	70 - 125
Dibromomethane	0.36	1.0 ug/l			60 - 135	25	65 - 130
1,2-Dichlorobenzene	0.32	1.0 ug/l			70 - 125	20	70 - 120
1,3-Dichlorobenzene	0.35	1.0 ug/l			70 - 125	20	70 - 125
1,4-Dichlorobenzene	0.37	1.0 ug/l			70 - 125	20	70 - 125
Dichlorodifluoromethane	0.79	5.0 ug/l			15 - 155	30	25 - 155
1,1-Dichloroethane	0.27	1.0 ug/l			60 - 130	20	65 - 130
1,2-Dichloroethane	0.28	0.50 ug/l			60 - 140	20	60 - 140
1,1-Dichloroethene	0.42	1.0 ug/l			60 - 135	20	70 - 130
cis-1,2-Dichloroethene	0.32	1.0 ug/l			60 - 130	20	65 - 125
trans-1,2-Dichloroethene	0.27	1.0 ug/l			60 - 135	20	65 - 130
1,2-Dichloropropane	0.35	1.0 ug/l			60 - 125	20	65 - 125
1,3-Dichloropropane	0.32	1.0 ug/l			60 - 135	25	65 - 125
2,2-Dichloropropane	0.34	1.0 ug/l			60 - 145	25	60 - 145
1,1-Dichloropropene	0.28	1.0 ug/l			65 - 135	20	70 - 130
cis-1,3-Dichloropropene	0.22	0.50 ug/l			65 - 135	20	70 - 130
trans-1,3-Dichloropropene	0.32	0.50 ug/l			65 - 140	25	65 - 130
Ethylbenzene	0.25	1.0 ug/l			65 - 130	20	70 - 125
Hexachlorobutadiene	0.38	1.0 ug/l			60 - 135	20	60 - 135
Isopropylbenzene	0.25	1.0 ug/l			65 - 130	20	70 - 125
p-Isopropyltoluene	0.28	1.0 ug/l			65 - 125	20	70 - 125
Methylene chloride	0.70	10 ug/l			55 - 130	20	60 - 130
Naphthalene	0.41	1.0 ug/l			45 - 145	30	50 - 140
n-Propylbenzene	0.27	1.0 ug/l			65 - 130	20	70 - 125
Styrene	0.16	1.0 ug/l			45 - 145	30	70 - 130
1,1,1,2-Tetrachloroethane	0.27	1.0 ug/l			65 - 140	20	70 - 135
1,1,1,2,2-Tetrachloroethane	0.24	1.0 ug/l			55 - 140	30	55 - 130
Tetrachloroethene	0.32	1.0 ug/l			60 - 130	20	65 - 125

Analytical Method Information

Analyte	MDL	Reporting	Surrogate	Duplicate	Matrix Spike		Blank Spike / LCS	
		Limit	%R	RPD	%R	RPD	%R	RPD
Toluene	0.36	1.0 ug/l			65 - 125	20	70 - 125	20
1,2,3-Trichlorobenzene	0.45	1.0 ug/l			55 - 135	20	60 - 130	20
1,2,4-Trichlorobenzene	0.48	1.0 ug/l			60 - 135	20	65 - 135	20
1,1,1-Trichloroethane	0.30	1.0 ug/l			65 - 140	20	65 - 135	20
1,1,2-Trichloroethane	0.30	1.0 ug/l			60 - 130	25	65 - 125	20
Trichloroethene	0.26	1.0 ug/l			60 - 125	20	70 - 125	20
Trichlorofluoromethane	0.34	1.0 ug/l			55 - 145	25	60 - 140	20
1,2,3-Trichloropropane	0.40	1.0 ug/l			50 - 135	30	55 - 130	20
1,2,4-Trimethylbenzene	0.23	1.0 ug/l			55 - 130	25	70 - 125	20
1,3,5-Trimethylbenzene	0.26	1.0 ug/l			65 - 130	20	70 - 125	20
Vinyl chloride	0.26	0.50 ug/l			40 - 135	30	50 - 130	30
o-Xylene	0.30	1.0 ug/l			60 - 125	20	70 - 125	20
m,p-Xylenes	0.60	1.0 ug/l			60 - 130	25	70 - 125	20
surr: Dibromofluoromethane			80 - 120					
surr: Toluene-d8			80 - 120					
surr: 4-Bromofluorobenzene			80 - 120					

Analytical Method Information

Analyte	MDL	Reporting Limit	Surrogate %R	Duplicate RPD	Matrix Spike %R	Blank Spike / LCS %R	RPD
8270C+NDMA-Low Level in Water (EPA 8270C)							
Prep Method: EPA 3520C		Preservation: 4 C, Cool					
Container: 1 L Amber		Amount Required: 2000 ml		Hold Time: 7 days			
Acenaphthene	0.10	0.50 ug/l			55 - 120	25	55 - 120
Acenaphthylene	0.10	0.50 ug/l			55 - 120	25	55 - 120
Aniline	2.9	10 ug/l			35 - 120	25	35 - 120
Anthracene	0.083	0.50 ug/l			55 - 120	25	55 - 120
Benzidine	2.4	5.0 ug/l			20 - 160	35	20 - 160
Benzoic acid	3.7	20 ug/l			35 - 120	30	35 - 120
Benzo(a)anthracene	0.038	5.0 ug/l			60 - 120	20	60 - 120
Benzo(a)pyrene	0.14	2.0 ug/l			55 - 125	25	55 - 120
Benzo(b)fluoranthene	0.050	2.0 ug/l			50 - 120	25	50 - 120
Benzo(g,h,i)perylene	0.059	5.0 ug/l			40 - 125	25	40 - 125
Benzo(k)fluoranthene	0.053	0.50 ug/l			50 - 120	25	50 - 120
Benzyl alcohol	0.21	5.0 ug/l			45 - 120	25	45 - 120
Bis(2-chloroethoxy)methane	0.072	0.50 ug/l			55 - 120	20	55 - 120
Bis(2-chloroethyl)ether	0.084	0.50 ug/l			50 - 120	25	50 - 120
Bis(2-chloroisopropyl)ether	0.11	0.50 ug/l			45 - 120	25	45 - 120
Bis(2-ethylhexyl)phthalate	1.1	5.0 ug/l			60 - 130	20	60 - 130
4-Bromophenyl phenyl ether	0.12	1.0 ug/l			50 - 120	25	50 - 120
Butyl benzyl phthalate	0.34	5.0 ug/l			55 - 125	25	55 - 125
4-Chloroaniline	0.20	2.0 ug/l			50 - 120	25	50 - 120
2-Chloronaphthalene	0.059	0.50 ug/l			55 - 120	20	55 - 120
4-Chloro-3-methylphenol	0.34	2.0 ug/l			60 - 120	25	60 - 120
4-Chlorophenyl phenyl ether	0.056	0.50 ug/l			55 - 120	25	55 - 120
2-Chlorophenol	0.12	1.0 ug/l			45 - 120	25	45 - 120
Chrysene	0.072	0.50 ug/l			60 - 120	20	60 - 120
Dibenz(a,h)anthracene	0.083	0.50 ug/l			45 - 130	25	45 - 130
Dibenzofuran	0.075	0.50 ug/l			60 - 120	25	60 - 120
Di-n-butyl phthalate	0.26	2.0 ug/l			55 - 125	20	55 - 125
1,2-Dichlorobenzene	0.11	0.50 ug/l			35 - 120	25	35 - 120
1,3-Dichlorobenzene	0.13	0.50 ug/l			35 - 120	25	35 - 120
1,4-Dichlorobenzene	0.050	0.50 ug/l			35 - 120	25	35 - 120
3,3-Dichlorobenzidine	0.93	5.0 ug/l			45 - 130	25	45 - 130
2,4-Dichlorophenol	0.21	2.0 ug/l			55 - 120	25	55 - 120
Diethyl phthalate	0.12	1.0 ug/l			55 - 120	25	55 - 120
2,4-Dimethylphenol	0.31	2.0 ug/l			30 - 120	25	30 - 120
Dimethyl phthalate	0.081	0.50 ug/l			30 - 120	20	30 - 120
4,6-Dinitro-2-methylphenol	0.38	5.0 ug/l			50 - 120	25	50 - 120
2,4-Dinitrophenol	2.7	5.0 ug/l			40 - 120	25	40 - 120
2,4-Dinitrotoluene	0.23	5.0 ug/l			60 - 120	25	60 - 120
2,6-Dinitrotoluene	0.24	5.0 ug/l			60 - 120	20	60 - 120
Di-n-octyl phthalate	0.17	5.0 ug/l			60 - 130	20	60 - 130
1,2-Diphenylhydrazine/Azobenzene	0.087	1.0 ug/l			60 - 120	25	60 - 120
Fluoranthene	0.089	0.50 ug/l			55 - 120	20	55 - 120
Fluorene	0.075	0.50 ug/l			60 - 120	20	60 - 120
Hexachlorobenzene	0.13	1.0 ug/l			45 - 125	20	50 - 120
Hexachlorobutadiene	0.38	2.0 ug/l			40 - 120	25	40 - 120
Hexachlorocyclopentadiene	1.8	5.0 ug/l			15 - 120	30	15 - 120

Analytical Method Information

Analyte	MDL	Reporting Limit	Surrogate %R	Duplicate RPD	Matrix Spike		Blank Spike / LCS	
					%R	RPD	%R	RPD
Hexachloroethane	0.51	3.0 ug/l			35 - 120	25	35 - 120	25
Indeno(1,2,3-cd)pyrene	0.19	2.0 ug/l			40 - 130	25	40 - 130	25
Isophorone	0.059	1.0 ug/l			50 - 120	20	50 - 120	20
2-Methylnaphthalene	0.13	1.0 ug/l			50 - 120	20	50 - 120	20
2-Methylphenol	0.28	2.0 ug/l			45 - 120	25	45 - 120	20
4-Methylphenol	0.20	5.0 ug/l			45 - 120	25	45 - 120	20
Naphthalene	0.13	1.0 ug/l			50 - 120	20	50 - 120	20
2-Nitroaniline	0.18	5.0 ug/l			60 - 120	25	60 - 120	20
3-Nitroaniline	0.35	5.0 ug/l			55 - 120	25	55 - 120	25
4-Nitroaniline	0.49	5.0 ug/l			50 - 125	25	50 - 125	20
Nitrobenzene	0.10	1.0 ug/l			50 - 120	25	50 - 120	25
2-Nitrophenol	0.23	2.0 ug/l			55 - 120	25	55 - 120	25
4-Nitrophenol	0.73	5.0 ug/l			45 - 120	25	45 - 120	25
N-Nitrosodimethylamine	0.22	2.0 ug/l			40 - 120	20	40 - 120	20
N-Nitroso-di-n-propylamine	0.18	2.0 ug/l			45 - 120	25	45 - 120	20
N-Nitrosodiphenylamine	0.077	1.0 ug/l			55 - 120	20	55 - 120	20
Pentachlorophenol	0.78	2.0 ug/l			45 - 130	25	50 - 120	25
Phenanthrene	0.071	0.50 ug/l			55 - 120	20	55 - 120	20
Phenol	0.14	1.0 ug/l			40 - 120	25	45 - 120	25
Pyrene	0.059	0.50 ug/l			50 - 120	20	50 - 120	25
1,2,4-Trichlorobenzene	0.10	1.0 ug/l			45 - 120	20	45 - 120	20
2,4,5-Trichlorophenol	0.075	2.0 ug/l			60 - 120	20	60 - 120	20
2,4,6-Trichlorophenol	0.10	1.0 ug/l			60 - 120	20	60 - 120	20
surr: 2-Fluorophenol			30 - 120					
surr: Phenol-d6			35 - 120					
surr: 2,4,6-Tribromophenol			45 - 120					
surr: Nitrobenzene-d5			45 - 120					
surr: 2-Fluorobiphenyl			45 - 120					
surr: Terphenyl-d14			45 - 120					



Dan Skopec
Acting Secretary
Cal/EPA

Department of Toxic Substances Control

Maureen F. Gorsen, Director
5796 Corporate Avenue
Cypress, California 90630



Arnold Schwarzenegger
Governor

May 8, 2006

Ms. Tamara Zeier
Project Navigator, Ltd.
One Pointe Drive, Suite 320
Brea, California 92821

CONDITIONAL APPROVAL OF WORKPLAN REGARDING FURTHER PIT F GROUNDWATER INVESTIGATION FOR THE ASCON LANDFILL SITE

The Department of Toxic Substances Control (DTSC) reviewed the "Groundwater RI/FS Workplan Revision 1.0 Addendum, Further Pit F Groundwater Investigation," dated April 20, 2006 (Workplan), for the Ascon Landfill site (Site). Basically, the Workplan proposes the collection of groundwater samples using hydropunch sampling techniques from eleven locations in the vicinity of the Pit F area and analysis for volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs).

DTSC approves the Workplan provided the following actions are implemented:

1. The field methodology should include measuring depth to water in nearby monitoring wells (i.e., MW-13, AW-1, AW-1A, and B-7) prior to the start of soil or groundwater sampling. This would provide the field team with a preliminary indication of the depth to groundwater for sampling purposes.
2. The groundwater sample for volatile organic compounds should be collected first. This allows for collection of the most volatile constituents before multiple deployments of the sampling tool and collection of higher volume samples.
3. The initial borehole used for soil sampling should be backfilled prior to beginning the borehole for collecting the groundwater sample. This would prevent ambient air in the initial borehole from entering the groundwater surface during groundwater sampling.
4. A duplicate QA/QC groundwater sample should be collected and analyzed for SVOCs by EPA Method 8270C.
5. Provide DTSC advance notification (at least five days) of the scheduled time(s) for demarcation of the groundwater sampling locations and commencement of fieldwork.



May 16, 2006

Project No. 01-114

Mr. Thomas Cota, Chief
Southern California Cleanup Operations Branch – Cypress Office
Attention: Ms. Christine Chiu
Southern California Cleanup Operations Branch, Cypress
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, CA 90630-4732

Groundwater Remedial Investigation Workplan Revision 1.0 Addendum
Ascon Landfill Site
Huntington Beach, California

Dear Ms. Chiu:

We received DTSC's letter dated May 8, 2006 providing conditional approval for the further groundwater investigation around Pit F at the Ascon Landfill Site (Site) in Huntington Beach, California. This letter presents the Responsible Parties' response to DTSC's conditional approval letter of the Groundwater Remedial Investigation Workplan Revision 1.0 Addendum, dated April 20, 2006. The sampling identified in the Groundwater Remedial Investigation Workplan Revision 1.0 Addendum is scheduled for May 23 through May 25, 2006 (see number 5 below).

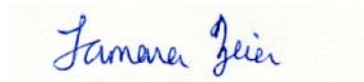
The response to the conditions outlined in DTSC's conditional approval letter of the Groundwater Remedial Investigation Workplan Revision 1.0 Addendum is provided below:

1. Groundwater levels at nearby wells (MW-13, AW-1, AW-1A, and B-7) will be recorded prior to fieldwork. The results will provide evidence as to changes in the level since the last monitoring (December 2004). However, as specified in the workplan and discussed with Frank Gonzales, the groundwater samples will be collected at a depth immediately below the clay/sand interface regardless of any changes in groundwater levels.
2. We agree. The groundwater sample for VOC analysis will be collected in each hole before the SVOC samples are collected in accordance with procedures outlined in the Groundwater Remedial Investigation/Feasibility Study Workplan-Revision 1.0 dated October 24, 2003. This is important not only to maintain the integrity of the VOC sample, but to ensure that there is sufficient sample for VOC analyses (i.e., SVOC analysis requires much more sample).
3. We agree. The initial borehole that is drilled adjacent to the sampling hole for determining lithology and the saturated zone will be backfilled prior to drilling the borehole for collecting the groundwater sample.
4. We agree. Every attempt will be made to collect a duplicate groundwater sample for SVOC analysis. As noted above, and in the workplan, SVOC analyses require much more volume of sample, especially with the low detection limits we are trying to attain. Collection of this additional sample might be difficult due to low groundwater yields from these hydropunch holes.
5. We intend to mark the groundwater sampling locations in the field on May 16, 2006. Drilling and groundwater sampling work is scheduled for May 23 through May 25, 2006.

The results of this investigation near Pit F will be documented in a letter report addendum to the Groundwater Remedial Investigation Report (GW RI). This letter report will be submitted to DTSC by July 14, 2006. Also, as decided in the conference call with DTSC on April 5, 2006, the additional discussion held during the January 26, 2006 meeting with DTSC regarding historic groundwater levels, flow directions, and gradients in the southeastern corner of the Site will be documented in this letter report. We expect that approval of this addendum to the GW RI will provide sufficient documentation for approval of the GW RI report.

If you have any questions or comments, please contact me at (714) 388-1804 or tzeier@projectnavigator.com.

Sincerely,

A handwritten signature in blue ink that reads "Tamara Zeier". The signature is written in a cursive style and is positioned above the printed name and title.

Tamara Zeier, P.E.
Project Coordinator

TZ:tz

cc: Ascon Responsible Parties
Mark Grivetti, GeoSyntec Consultants