

Appendix A
Documents Reviewed

APPENDIX A

Documents Reviewed

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- _____. 2004. Letter; Conditional Approval with Comments on the Pre-Final Work Plan and the Pre-Final QA/QC Plan, North Parcel Excluded Work Third Partial Consent Decree, Operating Industries, Inc. Superfund Site. August.
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- _____. 2004. Fax; OII Update. December.
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Appendix B
Applicable or Relevant and Appropriate
Requirements

TABLE B-1

ARARs from 1988 and 1990 (amended) Gas Migration Control ROD

Third 5-year Review Report for Oil Landfill Superfund Site, Monterey Park, California

Source	Citation	Description	Findings and Comments
Federal Requirements	40 CFR Part 265, Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities Subpart G: Closure and Post-Closure 40 C.F.R. § 265.117 Post Closure Care and Use of Property	Post-closure care requirements must begin after closure of the unit and continue for 30 years after that date. These requirements include (c): post-closure use of the property on or in which hazardous wastes remain after partial or final closure must never be allowed to disturb the integrity of the cover.	Applicable.
Federal Requirements	40 CFR Part 265, Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities Subpart N: Landfills 40 C.F.R. § 265.310 Closure and Post-Closure Care	The final landfill cover must be designed and constructed to: (1) provide long-term minimization of migration of liquids through the closed landfill; (2) function with minimum maintenance; (3) promote drainage and minimize erosion or abrasion of the cover; (4) accommodate settling and subsidence so that the cover's integrity is maintained; and (5) have a permeability less than or equal to any bottom liner system or natural subsoils present. The 30 year post-closure care of the cover must include: (1) maintenance of the integrity and effectiveness of the cover, including repairs to the cover as necessary to correct the effects of settling, subsidence, erosion or other events; (2) prevention of run-on and run-off from eroding or otherwise damaging the cover; and (3) protection and maintenance of surveyed benchmarks.	Applicable.
Federal Requirements	40 CFR Part 264, Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities Subpart O: Incinerators 40 C.F.R. § 264.343- Performance Standards	The thermal destruction facility must be designed, constructed and maintained to meet the following performance standards: (1) the facility must achieve a destruction and removal efficiency of 99.99 percent for each principal organic hazardous constituent in the waste feed; (2) the facility must reduce hydrogen chloride emissions to 1.8 kg/kr or 1 percent of the HC1 in the stack gasses before entering any pollution	Applicable. Must meet performance standards as outlined in the approved Performance Test Plan. Performance tests shall be conducted at least once every five years. The northern-most stack was tested in 2000 and the results were reported in the Performance Test Final Report (January 2001) and deemed to be in compliance by

TABLE B-1

ARARs from 1988 and 1990 (amended) Gas Migration Control ROD

Third 5-year Review Report for Oil Landfill Superfund Site, Monterey Park, California

Source	Citation	Description	Findings and Comments
		control devices; and (3) the facility must not release particulate in excess of 180mg/dscm corrected for the amount of oxygen in stack gas..	USEPA. The south stack testing is currently being conducted.
Federal Requirements	40 CFR Part 264, Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities Subpart O: Incinerators 40 C.F.R. § 264.345-Operating Requirements	The thermal destruction facility will be operated to meet the following requirements of this section: (1) monitoring of various parameters during operation, including, combustion temperature, waste feed rate, an indicator of combustion gas velocity, and carbon monoxide; (2) control of fugitive emissions by (a) keeping the combustion zone totally sealed against fugitive emission, (b) maintaining combustion-zone pressure lower than atmospheric pressure, or (c) controlling via an alternate means to provide fugitive emissions control equivalent to maintenance of combustion zone pressure lower than atmospheric pressure; and (3) utilization of an automatic cutoff system to stop waste feed when operating conditions deviate.	Applicable. Must meet performance standards as outlined in the approved Performance Test Plan. Performance tests shall be conducted at least once every five years. The northern-most stack was tested in 2000 and the results were reported in the Performance Test Final Report (January 2001) and deemed to be in compliance by USEPA. The south stack testing is currently being conducted.
Federal Requirements	Clean Water Act (CWA) 40C.F.R. Part 125-Criteria and Standards for NPDES	Sets forth requirements for permits for the discharge of pollutants from any point source into waters of the United States. Minimization of the off-site transport of materials and debris to meet the substantive portion of the NPDES permit requirements will be addressed during the Remedial Design phase in the development of the landfill cover grading plan and the design of the site stormwater management and drainage structures.	Applicable. Can be attained by implementation of Stormwater Pollution Prevention Plan (SWPPP) and Stormwater Monitoring, Sampling and Reporting Program.
California Air Resources Board	Title 17, Section 70200.5	Applicable standard for ambient concentrations of vinyl chloride not to exceed 10 ppb over a 24-hour period.	Remains applicable. Results of the ambient air sampling activity indicate that this requirement is currently satisfied.
South Coast Air Quality Management District	Regulation IV-Prohibitions, Rule 401-Visible Emissions	Do not discharge any single source of emission for a period of three minutes or more in any one hour that obscures view.	Remains applicable. Compliance will be attained by visual observations.

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ARARs from 1988 and 1990 (amended) Gas Migration Control ROD

Third 5-year Review Report for Oil Landfill Superfund Site, Monterey Park, California

Source	Citation	Description	Findings and Comments
South Coast Air Quality Management District	Regulation IV-Prohibitions, Rule 402-Nuisance	Prohibits the discharge of any material (including odorous compounds) that cause injury, detriment, nuisance, or annoyance to the public, businesses, or property or endangers human health, comfort, repose, or safety.	Remains applicable. All gas control systems should be designed to maintain an inward flux of gas at the landfill surface. Cover defects will be repaired and the control system adjusted as necessary. Appropriate performance testing, monitoring, operations and maintenance are being conducted on the South Parcel. Although, the North Parcel remedy has not been completed, this requirement will apply.
South Coast Air Quality Management District	Regulation IV-Prohibitions, Rule 403-Fugitive Dust	This rule limits onsite activities such that concentrations of fugitive dust at the property line shall not be visible and the downwind particulate concentrations shall not exceed 100 micrograms per cubic meter above upwind concentrations.	Remains applicable. Dust control methods currently include use of vegetated soils and surface roadways on the South Parcel. Similar methods will be applied in the remedy construction on the North Parcel.
South Coast Air Quality Management District	Regulation IV-Prohibitions, Rule 404-Particulate Matter	This rule limits particulate emissions to a range of 0.010 to 0.196 grain per standard cubic foot depending on the volume of total stack gases.	Remains applicable. All gas control systems should be designed to maintain an inward flux of gas at the landfill surface. Cover defects will be repaired and the control system adjusted as necessary. Appropriate performance testing, monitoring, operations and maintenance are being conducted on the South Parcel. Although, the North Parcel remedy has not been completed, this requirement will apply.
South Coast Air Quality Management District	Regulation IV-Prohibitions, Rule 407-Liquid and Gaseous Air Contaminants	This rule limits carbon monoxide emissions to 2,000 ppm and sulfur dioxide emissions to 500 ppm. The sulfur dioxide limit does not apply if the fuel meets the provisions of Rule 431.1.	Applicable. Must meet performance standards as outlined in the approved Performance Test Plan. Performance tests shall be conducted at least once every five years. The northern-most stack was tested in 2000 and the results were reported in the Performance Test Final Report (January 2001) and deemed to be in compliance by USEPA. The south stack testing is currently being conducted.

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ARARs from 1988 and 1990 (amended) Gas Migration Control ROD

Third 5-year Review Report for Oil Landfill Superfund Site, Monterey Park, California

Source	Citation	Description	Findings and Comments
South Coast Air Quality Management District	Regulation IV-Prohibitions, Rule 409-Combustion Contaminants	This rule limits the emission of combustion contaminants to 0.10 grain per standard cubic foot at 12 percent carbon dioxide.	Applicable. Must meet performance standards as outlined in the approved Performance Test Plan. Performance tests shall be conducted at least once every five years. The northern-most stack was tested in 2000 and the results were reported in the Performance Test Final Report (January 2001) and deemed to be in compliance by USEPA. The south stack testing is currently being conducted.
South Coast Air Quality Management District	Regulation IV-Prohibitions, Rule 432.1-Sulfur Content of Gaseous Fuels	This rule limits burning of fuel gas that has greater than 800 ppm hydrogen sulfide unless stack gases are cleaned to below the equivalent concentration.	Applicable. Must meet performance standards as outlined in the approved Performance Test Plan. Performance tests shall be conducted at least once every five years. The northern-most stack was tested in 2000 and the results were reported in the Performance Test Final Report (January 2001) and deemed to be in compliance by USEPA. The south stack testing is currently being conducted.
South Coast Air Quality Management District	Regulation XI-Source Specific Standards, Rule 1150.2-Control of Gaseous Emissions from Inactive Landfills	This rule requires installation of a landfill gas control system and combustion, treatment and sale, or other equivalent method of landfill gas disposal. The rule requires perimeter landfill gas monitoring probes to evaluate offsite migration. It also limits concentration of total organic compounds to 50 ppm over a certain area of the landfill, and limits maximum concentration of organic compounds (measured as methane) to 500 ppm at any point on the surface of the landfill.	Remains applicable. All gas control systems should be designed to maintain an inward flux of gas at the landfill surface. Cover defects will be repaired and the control system adjusted as necessary. Appropriate performance testing, monitoring, operations and maintenance are being conducted on the South Parcel. Although, the North Parcel remedy has not been completed, this requirement will apply.
South Coast Air Quality Management District	Regulation XIII-New Source Review	Regulation 13 requires that whenever a permit is required for a new piece of equipment or modification to an existing piece of equipment at a new facility or site, that emissions be controlled using best available control technology (BACT) and that emissions be offset by other emissions reductions at the same	Applicable. Must meet performance standards as outlined in the approved Performance Test Plan. Performance tests shall be conducted at least once every five years. The northern-most stack was tested in 2000 and the results were reported in the

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 ARARs from 1988 and 1990 (amended) Gas Migration Control ROD
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Source	Citation	Description	Findings and Comments
		<p>facility or other nearby facilities. BACT is a series of emissions limits, process, and equipment specific requirements (see definition at 1301 (E)). The SIP is reviewed by the State Air Resources Board and the EPA for compliance under the federal clean air act. The net allowable cumulative increase in emissions are detailed in SCAQMD rule 1303 and 1306.</p> <p>Under SCAQMD Rule 1304 (B) (2), there is an exemption from the offset requirements at 1303 (B) (2) (C) for a landfill gas control or processing facility. The exemption waives the requirement to find enough criteria emissions offsets if the owner or applicant for the permit has: (1) Provided all required offsets available by modifying sources owned; or (2) Demonstrated to the satisfaction of the SCAQMD executive officer that the owner or applicant neither owns, nor operates other facilities within the district that could be modified to provide such offsets.</p> <p>The State Implementation Plan (SIP) is reviewed by the State Air Resources Board and the EPA for compliance under the Federal Clean Air Act. However, EPA has not approved the exemption from the offset requirement, nor is such an exemption approvable as part of the SIP (40 CFR 51.165). Therefore, the offset requirement as contained in the SIP applies.</p> <p>Moreover, on August 31, 1988 a moratorium on construction or modification of major stationary sources of carbon monoxide and volatile organic compounds went into effect (53 FR 1780; 40 CFR 52.24). A major source is defined as one which emits or has the potential to emit in excess of 100 tons per year of a specified pollutant. Flares may be considered to have the potential to emit in excess of 100 tons of CO per year.</p>	<p>Performance Test Final Report (January 2001) and deemed to be in compliance by USEPA. The south stack testing is currently being conducted.</p>

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ARARs from 1988 and 1990 (amended) Gas Migration Control ROD
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Source	Citation	Description	Findings and Comments
South Coast Air Quality Management District	Regulation IV-Prohibitions, Rule 474-Fuel Burning Equipment Oxides of Nitrogen	This rule limits the concentration of oxides of nitrogen to a range of 125 to 300 ppm for gaseous fuels depending on maximum gross heat input.	May be applicable to the operation of the microturbines resource recovery equipment. Appropriate performance testing, monitoring, operations and maintenance are being conducted.
South Coast Air Quality Management District	Regulation IV-Prohibitions, Rule 476-Boilers	This rule applies to boilers larger than 50 million BTU per hour. Oxides of nitrogen may not exceed 125 ppm, combustion contaminants may not exceed 11 pounds per hour and 0.01 grains per standard cubic foot.	Not applicable.
California Integrated Waste Management Board	Title 14, California Code of Regulations, Division 7, Chapter 3 Minimum Standards of Solid Waste Handling and Disposal, Article 7.8 Disposal Site Closure and Post Closure Section 17705-Gas Control	When decomposition gases are a hazard or nuisance, monitor and take action to control such gases.	This requirement is now found in CCR Title 27, Division 2, Subchapter 4, Article 6, 20919. Remains applicable. All gas control systems should be designed to maintain an inward flux of gas at the landfill surface. Cover defects will be repaired and the control system adjusted as necessary. Appropriate performance testing, monitoring, operations and maintenance are being conducted on the South Parcel. Although, the North Parcel remedy has not been completed, this requirement will apply.
California Integrated Waste Management Board	Title 14, California Code of Regulations, Division 7, Chapter 3 Minimum Standards of Solid Waste Handling and Disposal, Article 7.8 Disposal Site Closure and Post Closure Section 17773-Final Cover	This regulation requires that a minimum thickness and quality of cover be placed over the entire surface of the final lift which meets the standards of Title 23, CCR, Subchapter 15, Section 2581 or that meet the standards set forth for an engineered alternative. The prescriptive standard must be not feasible and the alternative must be consistent with the performance goals of subsection (e) and afford equivalent protection against water quality impairment. Subsection (d) provides the basis for showing compliance with this standard is not feasible. Subsection (e) sets forth the following minimum performance goals for the thickness and quality of cover: (1) a need to limit infiltration of water, to the	This requirement is now found in CCR Title 27, Division 2, Subchapter 5, Article 2, 21140 It remains applicable.

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ARARs from 1988 and 1990 (amended) Gas Migration Control ROD
 Third 5-year Review Report for Oil Landfill Superfund Site, Monterey Park, California

Source	Citation	Description	Findings and Comments
		greatest extent possible; (2) a need to control landfill gas emissions; (3) the future reuse of the site; and (4) a need to protect the low permeability layer from desiccation, penetration by rodents, and heavy equipment damage.	
	<p>Title 14, California Code of Regulations, Division 7, Chapter 3 Minimum Standards of Solid Waste Handling and Disposal, Article 7.8 Disposal Site Closure and Post Closure</p> <p>Section 17783-Gas Monitoring and Control During Closure and Postclosure</p>	<p>During periods of closure and postclosure maintenance, landfill gases generated at the facility must be controlled as follows: (1) The concentration of methane gas must not exceed 1.25% by volume in air within on-site structures; (2) The concentration of methane gas migrating from the landfill must not exceed 5% by volume in the air at the facility property boundary or an alternative boundary in accordance with Section 17783.5. (3) Trace gases shall be controlled to prevent adverse acute and chronic exposure to toxic and/or carcinogenic compounds.</p> <p>Subsection (b) sets forth the period during which monitoring should continue and subsection (d) provides that the monitoring and control systems shall be modified, during the closure and postclosure maintenance period to reflect changing on-site and adjacent land uses. Postclosure land use at the site shall not interfere with the function of gas monitoring or control systems.</p>	<p>This requirement is now found in CCR Title 27, Division 2, Subchapter 4, Article 6, 20921. It remains applicable.</p>
California Integrated Waste Management Board	<p>Title 14, California Code of Regulations, Division 7, Chapter 3 Minimum Standards of Solid Waste Handling and Disposal, Article 7.8 Disposal Site Closure and Post Closure</p> <p>Section 17783.3-Monitoring</p>	<p>This section requires that the gas monitoring system shall be designed to meet with the specified site characteristics, and potential migration pathways or barriers, including, but not limited to: (1) local soil and rock conditions; (2) hydrogeological conditions at the facility; (3) locations of buildings and structures relative to the waste deposit area; (4) adjacent land use, and inhabitable structures within 1000 feet of the landfill property boundary; (5) man-made pathways, such as underground construction; and (6) the nature and age of waste and its potential to generate landfill gas.</p>	<p>This requirement is now found in CCR Title 27, Division 2, Subchapter 4, Article 6, 20923. It remains applicable.</p>

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ARARs from 1988 and 1990 (amended) Gas Migration Control ROD

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Source	Citation	Description	Findings and Comments
California Integrated Waste Management Board	Title 14, California Code of Regulations, Division 7, Chapter 3 Minimum Standards of Solid Waste Handling and Disposal, Article 7.8 Disposal Site Closure and Post Closure Section 17783.5-Perimeter Monitoring Network	This section sets forth specific requirements for the location (subsection a), spacing (subsection b), depth (subsection c) and construction (subsection d) of the monitoring wells.	This requirement is now found in CCR Title 27, Division 2, Subchapter 4, Article 6, 20925. It remains applicable.
California Integrated Waste Management Board	Title 14, California Code of Regulations, Division 7, Chapter 3 Minimum Standards of Solid Waste Handling and Disposal, Article 7.8 Disposal Site Closure and Post Closure Section 17783.7-Structure Monitoring	This section requires that the design of the monitoring system include provisions for monitoring on-site structures, identifies some methods for monitoring such structures, and requires that structures located on top of the waste deposit area be monitored on a continuous basis.	This requirement is now found in CCR Title 27, Division 2, Subchapter 4, Article 6, 20931. It remains applicable.
California Integrated Waste Management Board	Title 14, California Code of Regulations, Division 7, Chapter 3 Minimum Standards of Solid Waste Handling and Disposal, Article 7.8 Disposal Site Closure and Post Closure Section 17783.90 Monitoring Parameters	This section requires that all monitoring probes and on-site structures be sampled for methane and for specified trace gases, when there is a possibility of acute or chronic exposure due to carcinogenic or toxic compounds.	This requirement is now found in CCR Title 27, Division 2, Subchapter 4, Article 6, 20932. It remains applicable.
California Integrated Waste Management Board	Title 14, California Code of Regulations, Division 7, Chapter 3 Minimum Standards of Solid Waste Handling and Disposal, Article 7.8 Disposal Site Closure and Post Closure Section 17783.11-Monitoring Frequency	This section requires a minimum of quarterly monitoring with more frequent monitoring required if results indicate the landfill gas is migrating or accumulating in structures.	This requirement is now found in CCR Title 27, Division 2, Subchapter 4, Article 6, 20933. It remains applicable.

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ARARs from 1988 and 1990 (amended) Gas Migration Control ROD

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Source	Citation	Description	Findings and Comments
California Integrated Waste Management Board	Title 14, California Code of Regulations, Division 7, Chapter 3 Minimum Standards of Solid Waste Handling and Disposal, Article 7.8 Disposal Site Closure and Post Closure Section 17783.15-Control	<p>Subsection (a) (1) requires that all immediate steps be taken when the results of gas monitoring indicate levels of methane in excess of the compliance levels required by Section 17783 (a).</p> <p>Subsection (b) requires that the gas control system be designed to: (1) prevent methane accumulation in on-site structures; (2) reduce methane concentrations at monitored property boundaries to below compliance levels; (3) reduce trace gas concentrations; (4) provide for the collection and treatment and/or disposal of landfill gas condensate at the surface.</p> <p>Subsection (c) indicates that the gas control systems may include, but are not limited to, the control systems enumerated in subsections (c) (1), (2) and (3).</p> <p>Subsection (d) provides steps to be taken in the event onsite structure methane levels exceed that specified in Section 17783 (a).</p> <p>Subsection (e) requires that the operator provide for system monitoring and adjustment to ensure that the gas control system is operating at optimum efficiency.</p>	This requirement is now found in CCR Title 27, Division 2, Subchapter 4, Article 6, 20937. It remains applicable.
California Integrated Waste Management Board	Title 14, California Code of Regulations, Division 7, Chapter 3 Minimum Standards of Solid Waste Handling and Disposal, Article 7.8 Disposal Site Closure and Post Closure Section 17794-Postclosure Land Use	This regulation sets forth requirements concerning postclosure land use. Subsections (c), (d) and (e) are applicable to this remedial action. Subsection (c) requires that construction improvements on the site shall maintain the integrity of the final cover and the function of the monitoring system(s). Subsection (d) sets forth conditions to be met for construction of structural improvements on top of landfilled areas during the post-closure period. Subsection (e) sets forth building conditions pertaining to on-site structures constructed within 1,000 feet of the waste holding area.	This requirement is now found in CCR Title 27, Division 2, Subchapter 4, Article 6, 20925. It remains applicable.

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ARARs from 1988 and 1990 (amended) Gas Migration Control ROD

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Source	Citation	Description	Findings and Comments
California Integrated Waste Management Board	Title 22, California Code of Regulations Article 18: General Facility Standards Section 67108: Seismic and Precipitation Design Standards	Requires the design of cover systems and drainage control to function without failure when subjected to capacity, hydrostatic and hydrodynamic loads resulting from a 24-hour probable maximum precipitation storm. Additionally, all covers and cover systems which will remain after closure must be designed, constructed and maintained to withstand the maximum credible earthquake without the level of public health and environmental protection afforded by the original design being decreased	This requirement is now found in CCR Title 22, Division 4.5, Article 2, Section 66265.25. It remains applicable.
California Integrated Waste Management Board	Title 22, California Code of Regulations Article 23-Closure and Post-closure for Interim Status and Permitted Facilities Section 67211-Closure Performance Standard	Requires that the facility be closed in a manner which controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, postclosure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to the ground or surface waters or to the atmosphere.	This requirement is now found in CCR Title 22, Division 4.5, Article 7, Section 66265.111(b). It remains applicable.
California Integrated Waste Management Board	Title 22, California Code of Regulations Article 29-Landfills at Both Interim Status and Permitted Facilities Section 67418-Closure and Post-Closure Care of Landfills at Interim Status Landfills	This section requires the design and construction of final cover to meet certain standards which are equivalent to those set forth under RCRA. More stringent, applicable requirements include, subsection (1) which requires the prevention of downward entry of water into the closed landfill throughout a period of at least 100 years, and subsection (5) which requires that the cover be designed and constructed to accommodate lateral and vertical shear forces generated by earthquakes so that the integrity of the cover is maintained.	This requirement is now found in CCR Title 22, Division 4.5, Article 14, Section 66265.310. It remains applicable.
Porter-Cologne Water Quality Control Act California Integrated Waste Management Board	Title 23, California Code of Regulations Chapter 3, State Water Resources Control Board Subchapter 15-Discharges to Land Section 2546-Precipitation and	Subsection (a) requires that the cover shall be designed and constructed to limit, to the greatest extent possible, ponding, infiltration, inundation, erosion, slope failure, washout and overtopping under probable maximum precipitation conditions. Subsection (c) requires diversion and drainage facilities to be designed and constructed to	This requirement is now found in CCR Title 23, Subchapter 2, Article 4, Section 20365. It remains applicable.

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Source	Citation	Description	Findings and Comments
	Drainage Control	<p>accommodate the anticipated volume of precipitation and peak flows from surface run-off under probable maximum precipitation conditions.</p> <p>Subsection (d) requires collection and holding facilities associated with precipitation and drainage control systems to be emptied immediately following each storm or otherwise managed to maintain the design capacity of the system.</p> <p>Subsection (e) requires surface and subsurface drainage from outside of a waste management unit to be diverted from the waste management unit.</p> <p>Subsection (f) requires cover materials to be graded to divert precipitation from the waste unit, to prevent ponding of surface water over wastes, and to resist erosion as a result of precipitation with the return frequency specified in Table 4.1</p>	
Porter-Cologne Water Quality Control Act California Integrated Waste Management Board	Title 23, California Code of Regulations Chapter 3, State Water Resources Control Board Subchapter 15-Discharges to Land Section 2547-Seismic Design	This section requires structures which control surface drainage, erosion or gas shall be designed to withstand the maximum credible earthquake without damage.	This requirement is now found in CCR Title 23, Subchapter 2, Article 4, Section 20370. It remains applicable.
Porter-Cologne Water Quality Control Act California Integrated Waste Management Board	Title 23, California Code of Regulations Chapter 3, State Water Resources Control Board Subchapter 15-Discharges to Land Section 2381-Landfill Closure Requirements	The requirements of subsection (a) for cover are applicable. This section requires at least two feet of appropriate materials, (primarily soil-type materials) as a foundation layer and an additional one foot of soil on top of this foundation layer. These requirements will not be met by the selected remedy, and are being waived pursuant to Section 121 (d) (4) (B), (C) and (D), 42 U.S.C. § 9621 (d) (4) (B), (C) and (D). Due to the configurations of the Oil site, including its steep slopes and direct proximity to both homes and the Pomona Freeway, a cover constructed of soil-type materials and with the thickness required by this subsection would result in a greater risk to	This requirement is now found in CCR Title 23, Subchapter 2, Article 4. It remains applicable.

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Source	Citation	Description	Findings and Comments
		<p>human health and the environment than the selected remedy. Construction for such a cover is technically impracticable from an engineering perspective; far greater flexibility in types of materials and cover design is required by this site. The remedy selected will attain a standard of performance that is equivalent to that required by this section through an alternative approach which provides for a variety of cover materials.</p> <p>The landfill cover component will be designed to attain the requirements of Sections 2581 (b) and (c). Subsection (b) sets forth grading requirements which provide that closed landfills will be graded and maintained to prevent ponding and sets forth conditions specific to the steepness of slopes. Subsection (c) requires that the surface water be monitored in accordance with Articles 5 of this Section.</p>	

TABLE B-2

ARARs from 1996 Final Remedy ROD

Third 5-year Review Report for Oil Landfill Superfund Site, Monterey Park, California

Source	Citation	Description	Findings and Comments
Federal ARARs	40 CFR § 14.1, Subparts B and G	Establishes national primary drinking water standards for public drinking water supply systems (Maximum Contaminant Levels, or "MCLs").	MCLs are relevant and appropriate for groundwater designated as a current or potential source of drinking water where the more stringent maximum contaminant level goals (MCLGs) are not relevant or appropriate. MCLGs are not appropriate due to the complex hydrogeological setting at the Oil Site, the minimal risks of exposure, and the limited potential use of the resource.
	16 U.S.C. § 703 – Migratory Bird Act	Protects species of native birds in the U.S. from unregulated "take", which can include poisoning at hazardous waste site.	Oil provides habitat to protected bird species. All remedial designs will identify any measures necessary to prevent unregulated "take" of protected bird species.
State ARARs	22 CCR § 6626T94 (c)	Requires establishment of groundwater protection standards for waste management units where releases have occurred; concentration limits may be set greater than background up to the MCL. If it is technically or economically infeasible to achieve background and the proposed limit will not pose a substantial hazard to human health or the environment.	USEPA selected MCLs that exceed baseline (or health-based limits where no MCLs are set) as the groundwater protection standard due to the complex hydrogeological setting at the Oil Site, the minimal risks of exposure, and the limited potential use of the resource.
	22 CCR § 64431, 64444	Establishes California primary drinking water standards for public drinking water supply systems (also known as "MCLs").	Specific California MCLs are relevant and appropriate where they are more stringent than federal MCLs.

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 ARARs from 1996 Final Remedy ROD
Third 5-year Review Report for Oil Landfill Superfund Site, Monterey Park, California

Source	Citation	Description	Findings and Comments
State ARARs	State Water Resources Control Board Resolution 92-49 111.G	Requires cleanup and abatement of discharges to background water quality, or the best water quality which is reasonable if background levels cannot be restored.	Applicable to wastes discharged to waters of the state. USEPA selected MCLs that exceed baseline (or health-based limits where no MCLs are set) as the groundwater protection standard due to the complex hydrogeological setting at the Oil Site, the minimal risks of exposure, and the limited potential use of the resource.
	Porter-Cologne Water Quality Control Act § 13370.5; California Government Code § 54739.	Pursuant to these authorities, the Los Angeles County Sanitation District issues Industrial Wastewater Discharge permits setting discharge limits for concentration of contaminants, temperature and volume.	Permits are required for discharges to the sanitary sewer, because it is an off-site activity.
	22 CCR § 66264.18 (a) – Within 200 feet of a fault displaced in Holocene time	Prohibits construction of new hazardous waste treatment, storage, or disposal facilities.	Several faults have been identified in the area that may have been displaced during the Holocene, indicating recent fault movement.
	22 CCR § 2547-Seismic Zone	Requires waste management units to be designed to withstand the maximum credible earthquake without damage to the foundation or to structures that control Leachate.	Appropriate seismic protection measures are required for existing leachate collection and treatment units at the Oil Landfill. Any new waste management units must be designed to withstand the maximum credible earthquake.
	Landfill Maintenance, Closure and Postclosure 22 CCR § 66265.31	Requires maintenance and operation of facilities to minimize fire, explosion, or release of hazardous substances.	Applicable.

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ARARs from 1996 Final Remedy ROD

Third 5-year Review Report for Oil Landfill Superfund Site, Monterey Park, California

Source	Citation	Description	Findings and Comments
State ARARs	Landfill Maintenance, Closure and Postclosure 22 CCR § 66265.32, 66265.33, 66264.34, 66265.37(a), 66265.55, 66265.56(a)-(c), (e)-(h)	Specifies emergency and communications systems for hazardous waste facilities, testing of equipment, and arrangement for emergency support services.	Applicable.
	Landfill Maintenance, Closure and Postclosure 22 CCR § 66265.14	Requires security measures sufficient to prevent unknowing or unauthorized entry into hazardous waste facilities.	Applicable.
	Landfill Maintenance, Closure and Postclosure 14 CCR § 17767 (c)	Requires security measures to prevent unauthorized access to closed landfills and monitoring, control, and recovery systems.	Relevant and appropriate.
	Landfill Maintenance, Closure and Postclosure 14 CCR § 17701	Requires operation and maintenance of landfills to prevent public nuisance.	Relevant and appropriate.
	Landfill Maintenance, Closure and Postclosure 14 CCR § 17706	Requires operation and maintenance of landfills to minimize dust creation.	Relevant and appropriate.
	Landfill Maintenance, Closure and Postclosure 14 CCR § 17707	Requires operation and maintenance of landfills to control vectors (insects, rodents, etc.).	Relevant and appropriate.
	Landfill Maintenance, Closure and Postclosure 14 CCR § 17713	Requires operation and maintenance of landfills to control odors.	Relevant and appropriate.

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State ARARs	Landfill Maintenance, Closure and Postclosure 22 CCR § 66265.111,	Requires closure to minimize need for further maintenance and to protect human health and the environment from release hazardous substances.	Applicable.
	Landfill Maintenance, Closure and Postclosure 22 CCR § 66265.310 (b) (1), and (b) (3) except references to § 66265.118-120	Requires facility closure to minimize chance of postclosure release of hazardous waste; facilities postclosure maintenance, monitoring and emergency response.	Applicable.
	Landfill Maintenance, Closure and Postclosure 22 CCR § 66265.95	Establishes the point of compliance for groundwater protection standards as a vertical surface located at the hydraulically downgradient limit of the waste management area.	Applicable.
	Landfill Maintenance, Closure and Postclosure 22 CCR § 66265.96	Defines the compliance period for groundwater quality as the number of years equal to the active life of the waste management unit. Requires restarting the compliance period if evaluation monitoring is initiated.	Applicable.
	Landfill Maintenance, Closure and Postclosure 22 CCR § 66264.96 (c)	Extends groundwater quality compliance period until groundwater protection standard has been met for three consecutive years.	Applicable.
	Landfill Maintenance, Closure and Postclosure 22 CCR § 66265.98 (a)	Requires release detection monitoring in areas unaffected by prior releases.	Applicable.

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ARARs from 1996 Final Remedy ROD

Third 5-year Review Report for Oil Landfill Superfund Site, Monterey Park, California

Source	Citation	Description	Findings and Comments
State ARARs	Landfill Maintenance, Closure and Postclosure 22CCR § 66265.99 (a), (b), (e) (1)-(4) and (6) except for reference to surface water	Requires evaluation monitoring to assess the nature and extent of any exceedances of groundwater performance standards.	Applicable.
	Landfill Maintenance, Closure and Postclosure 22 CCR § 66264, 1 00 (d)	Requires water quality monitoring programs to measure effectiveness of remediation.	Applicable.
	Landfill Maintenance, Closure and Postclosure 22 CCR § 66265.117 (b)-(d) except references to 66265.118, 119 and 120	Requires post-closure care for 30 years after completion of closure of the interim status hazardous waste management facilities.	Applicable.
	Landfill Maintenance, Closure and Postclosure Los Angeles Regional Water Quality Control Board Order WDR-906-054 NPDES # CAS614001	Establishes requirements for stormwater discharge from hazardous waste treatment, storage and disposal facilities.	Applicable to on-site discharges, otherwise off-site discharge requirements apply.
	Landfill Liquids Treatment and Disposal 22 CCR § 66264.601	Requires location, design, construction, operation, and maintenance of miscellaneous units that treat hazardous waste to ensure protection of human health and the environment.	Applicable to new units; portions applicable or relevant and appropriate to existing units.

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ARARs from 1996 Final Remedy ROD

Third 5-year Review Report for Oil Landfill Superfund Site, Monterey Park, California

Source	Citation	Description	Findings and Comments
	Landfill Liquids Treatment and Disposal 22 CCR § 66264.192, 66264.193 (c)-(f), 66264.194, 66264.195, 66264.197	Requires construction, operation, and closure of hazardous waste treatment in tanks to comply specified standards, including contaminant, inspection, and operating limits.	Applicable to new units; portions applicable or relevant and appropriate to existing units.
State ARARs	Landfill Liquids Treatment and Disposal 22 CCR § 2581 (c) (2) and (c) (3) except references to surface water	Requires operation of Leachate collection and removal systems as long as Leachate is generated and detected throughout the post-closure care period.	Applicable.
	Landfill Liquids Treatment and Disposal 22 CCR § 66265.310 (e) (2)	Requires maintenance and operation of Leachate collection, removal and treatment system to prevent excess accumulation of leachate during post-closure care period.	Applicable.
	Landfill Liquids Treatment and Disposal 22 CCR § 66264.1050-1063	Sets air emission standards for equipment leaks for units from facilities that contain or contact hazardous wastes with organic concentrations of at least 10 percent by weight.	Applicable.
	Landfill Liquids Treatment and Disposal 22 CCR § 66264.32, 66264.33, 66264.34, 66264, 66265.37 (a), 66265.55, 66265.56 (a)-(c), (c)-(h).	Specifies emergency and communications systems for hazardous waste facilities, testing of equipment, and arrangements for emergency support services.	Applicable.
	Excavation, Construction and Disposal 22 CCR § 66265.114	Requires equipment, structures and soils to be properly disposed of or decontaminated during closure.	Applicable.

TABLE B-2

ARARs from 1996 Final Remedy ROD

Third 5-year Review Report for Oil Landfill Superfund Site, Monterey Park, California

Source	Citation	Description	Findings and Comments
	Excavation, Construction and Disposal 22 CCR 66265.13	Requires analysis of hazardous waste before transfer, treatment, storage or disposal.	Applicable.
	Excavation, Construction and Disposal 22 CCR § 66262.34	Allows storage of hazardous waste onsite in containers for up to 90 days.	Applicable.
State ARARs	Excavation, Construction and Disposal 22 CCR § 66265.171-66264.175, 66264.178	Requires storage of waste in appropriate containers, and appropriate management and closure of containment areas.	Applicable to new units; portions applicable or relevant and appropriate to existing units.
	Excavation, Construction and Disposal 22 CCR § 66264.552 (e) (1)-(4)	Allows redisposal of hazardous waste generated as part of remediation in designated units.	Applicable to new units; portions applicable or relevant and appropriate to existing units.
	Excavation, Construction and Disposal 22 CCR § 66265.553 (b), (c)	Allows establishment of temporary tanks and container storage areas for treatment or storage of remediation wastes.	Applicable to new units; portions applicable or relevant and appropriate to existing units.
	Excavation, Construction and Disposal SCAQMD Rule 402	Limits discharge of any air contaminant or material that causes injury, detriment, nuisance, or annoyance, or that endangers the comfort, repose, or safety of the public, property, or business.	Applicable.
	Excavation, Construction and Disposal SCAQMD Rule 403	Limits downwind concentration of PM-10 from fugitive dust to 100g/m ³ above upwind concentration, averaged over 5 hours.	Applicable.

TABLE B-2
 ARARs from 1996 Final Remedy ROD
Third 5-year Review Report for Oil Landfill Superfund Site, Monterey Park, California

Source	Citation	Description	Findings and Comments
	Excavation, Construction and Disposal SCAQMD Rule 1150	Requires mitigation measures that ensure a nuisance does not occur when buried waste is exposed.	Applicable.

Appendix C
5-year Review Site Inspection Checklist and
Interview Summary Forms

APPENDIX C

5-year Review Site Inspection Checklist and Interview Summary Forms

TABLE C-1

Site Inspection Team Roster, Site Inspection- April 28, 2005
Third 5-year Review Report for Oil Landfill Superfund Site, Monterey Park, California

Name	Title	Affiliation
Shiann-Jang Chern	Remedial Project Manager	United States Environmental Protection Agency Region 9
Eleovardo Robles	Operations Manager	New Cure, Inc.
Albert O'Shaunessy	Oversight Project Manager	United States Army Corps of Engineers
Debbie Seibold	Task Manager	CH2M HILL Bay Area (Oakland) Office
Caroline Ziegler	Project Manager	CH2M HILL Bay Area (Oakland) Office

**Five-Year Review Site Inspection Checklist
OII Superfund Site**

I. SITE INFORMATION	
Site name: Operating Industries, Inc. (OII) Landfill	Date of inspection: April 28, 2005
Location and Region: Monterey Park, CA, Region IX	EPA ID: CAT080012024
Agency, office, or company leading the five-year review: EPA Region IX	Weather/temperature: Sunny and Clear Skies. Approximately 75 degrees Farenheit
Remedy Includes: (Check all that apply) <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Landfill cover/containment <input checked="" type="checkbox"/> Access controls <input checked="" type="checkbox"/> Institutional controls <input checked="" type="checkbox"/> Groundwater pump and treatment <input checked="" type="checkbox"/> Surface water collection and treatment <input checked="" type="checkbox"/> Other - Micro turbines for electricity generation using landfill gas 	
Attachments: <input checked="" type="checkbox"/> Inspection team roster attached <input checked="" type="checkbox"/> Site map attached [in report]	
II. INTERVIEWS (Check all that apply)	
1. O&M site manager	
Name Eleovardo Robles Title Operations Manager Date 4/28/2005	
Interviewed 4/28/2005 Phone No <u>(323) 720-9775</u>	
Problems; suggestions: See attached interview summary form.	
NOTE: All referenced attachments can be found in Five-Year Review Report.	
2. O&M staff	
Name Title Date	
Interviewed Phone No.	
Problems, suggestions	

3. **Local regulatory authorities and responsible agencies** (i.e., State and Tribal offices, emergency response office, police department, office of public health or environmental health, zoning office, recorder of deeds, or other city and county offices, etc.) Fill in all that apply.

Agency

Contact	Name	Title	Date	Phone No.
Problems; suggestions				

Agency

Contact	Name	Title	Date	Phone No.
Problems; suggestions				

4. **Other interviews** (optional)

Former President of New Cure
 Name Les LaFountain Title Former President of New Cure Date 4/28/2005

Interviewed 4/28/2005
 Problems; suggestions: See attached interview summary form.

III. ONSITE DOCUMENTS AND RECORDS VERIFIED (Check all that apply)

1.	O&M Documents O&M manual As-built drawings Maintenance logs Remarks	<input checked="" type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	
		<input checked="" type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	
		<input checked="" type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	
2.	Site-Specific Health and Safety Plan Contingency plan/emergency response plan Remarks _____	<input checked="" type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	
		<input checked="" type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	
3.	O&M and OSHA Training Records Remarks	<input checked="" type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	N/A

4.	Permits and Service Agreements Air discharge permit Effluent discharge Waste disposal, POTW Other permits <u>Stormwater Discharge</u> Remarks	Readily available Readily available Readily available Readily available	Up to date Up to date Up to date Up to date	N/A N/A N/A N/A
5.	Gas Generation Records Remarks	Readily available	Up to date	N/A
6.	Settlement Monument Records Remarks	Readily available	Up to date	N/A
7.	Groundwater Monitoring Records Remarks	Readily available	Up to date	N/A
8.	Leachate Extraction Records Remarks	Readily available	Up to date	N/A
9.	Discharge Compliance Records Air Water (effluent) Remarks	Readily available Readily available	Up to date Up to date	N/A N/A
10.	Daily Access/Security Logs Remarks	Readily available	Up to date	
IV. O&M COSTS				
1.	O&M Organization State in-house PRP in-house Other	Contractor for State Contractor for PRP		

2.	O&M Cost Records			
	Readily available		Up to date	
	Funding mechanism/agreement in place		NA	
	Original O&M cost estimate	See main report text		Breakdown attached
	Total annual cost by year for review period if available			
	Date	Date	Total cost	
	From _____	To _____	See main report text	Breakdown attached
	Date	Date	Total cost	
	From _____	To _____		Breakdown attached
	Date	Date	Total cost	
3.	Unanticipated or Unusually High O&M Costs During Review Period	No unanticipated or unusually high costs.		

V. ACCESS AND INSTITUTIONAL CONTROLS		Applicable
A. Fencing		
1.	Fencing	N/A
	Location shown on site map	Gates secured
Remarks: The facility fencing inspection and maintenance is governed in SOP 159 of the Site Operations Plan.		
B. Other Access Restrictions		
1.	Signs and other security measures	N/A
	Remarks- 24- hour surveillance	

C. Institutional Controls			
1.	Implementation and enforcement		
	Site conditions imply ICs not properly implemented	Yes	<input checked="" type="radio"/> No N/A
	Site conditions imply ICs not being fully enforced	Yes	<input checked="" type="radio"/> No N/A
	Type of monitoring (e.g., self-reporting, drive by) Self-reporting		
	Frequency <u>Annual</u>		
	Responsible party/agency <u>New Cure Inc. (NCI)</u>		
	Contact		
	Name Eleovardo Robles	Title Operations Manager	Date July 29, 2005 Phone No. (323) 720-9905
	Reporting is up-to-date	Yes	<input checked="" type="radio"/> No N/A
	Reports are verified by the lead agency	Yes	<input checked="" type="radio"/> No N/A
	Specific requirements in deed or decision documents have been met	Yes	<input checked="" type="radio"/> No N/A
	Violations have been reported	Yes	<input checked="" type="radio"/> No N/A
	Other problems or suggestions: Report attached		
2.	Adequacy	ICs are adequate	<input checked="" type="radio"/> ICs are inadequate N/A
	Remarks		
D. General			
1.	Vandalism/trespassing	Location shown on site map	<input checked="" type="radio"/> No vandalism evident
	Remarks		
2.	Land use changes onsite		<input checked="" type="radio"/> N/A
	Remarks		
3.	Land use changes offsite		<input checked="" type="radio"/> N/A
	Remarks		
VI. GENERAL SITE CONDITIONS Applicable			
A. Roads			
1.	Roads	<input checked="" type="radio"/> Location shown on site map	<input checked="" type="radio"/> Roads adequate N/A
	Remarks	Some cracks exist in the roads on the landfill. See photos in Appendix C.	
B. Other Site Conditions			
	Remarks		
VII. LANDFILL COVERS Applicable			
A. Landfill Surface			

1.	Settlement (Low spots) Areal extent _____ Depth _____ Remarks <u>Some settlement does exist. An annual settlement survey is conducted.</u>	Location shown on site map	Settlement not evident
2.	Cracks Lengths _____ Widths _____ Depth _____ Remarks <u>Slope instability/erosion/cracking along the landfill is controlled with protective coverings. See Photos in Appendix C.</u>	Location shown on site map	Cracking not evident
3.	Erosion Areal extent _____ Depth _____ Remarks <u>Slope instability/erosion along the landfill is controlled with protective coverings. See Photos in Appendix C.</u>	Location shown on site map	Erosion not evident
4.	Holes Areal extent _____ Depth _____ Remarks _____	Location shown on site map	Holes not evident
5.	Vegetative Cover Trees/Shrubs (indicate size and locations on a diagram) Remarks _____	Grass cover properly established	No signs of stress
6.	Alternative Cover (armored rock, concrete, etc.) Remarks _____	N/A	
7.	Bulges Areal extent _____ Height _____ Remarks _____	Location shown on site map	Bulges not evident
8.	Wet Area/Water Damage Wet areas _____ Ponding _____ Seeps _____ Soft subgrade _____ Remarks <u>Some previous ponding occurred in the V-drainage system which at the time of the inspection was wet. A temporary solution has been put in place and a permanent solution is scheduled for summer 2005.</u>	Wet areas/water damage not evident Location shown on site map Location shown on site map Location shown on site map Location shown on site map	Areal extent Areal extent Areal extent Areal extent
9.	Slope Instability Slides Areal extent _____ Remarks <u>Some slope instability was evident but protective covering are in place to prevent erosion. See photos in Appendix C.</u>	Location shown on site map	No evidence of slope instability

B. Benches <u>Applicable</u> N/A		
(Horizontally constructed mounds of earth placed across a steep landfill side slope to interrupt the slope in order to slow down the velocity of surface runoff and intercept and convey the runoff to a lined channel.)		
1.	Flows Bypass Bench Remarks	Location shown on site map N/A or <u>okay</u>
2.	Bench Breached Remarks	Location shown on site map N/A or <u>okay</u>
3.	Bench Overtopped Remarks	Location shown on site map N/A or <u>okay</u>
C. Letdown Channels <u>Applicable</u> N/A		
(Channel lined with erosion control mats, riprap, grout bags, or gabions that descend down the steep side slope of the cover and will allow the runoff water collected by the benches to move off of the landfill cover without creating erosion gullies.)		
1.	Settlement Areal extent _____ Depth _____ Remarks _____	Location shown on site map <u>No evidence of settlement</u>
2.	Material Degradation Material type _____ Areal extent _____ Remarks _____	Location shown on site map <u>No evidence of degradation</u>
3.	Erosion Areal extent _____ Depth _____ Remarks _____	Location shown on site map <u>No evidence of erosion</u>
4.	Undercutting Areal extent _____ Depth _____ Remarks _____	Location shown on site map <u>No evidence of undercutting</u>

5.	Obstruction	Type _____	<u>No obstruction</u>	
	Location shown on site map	Areal extent		
	Size			
	Remarks			
6.	Excessive Vegetative Growth	Type		
	<u>No evidence of excessive growth</u>			
	Vegetation in channels does not obstruct flow			
	Location shown on site map	Areal extent		
	Remarks			
D. Cover Penetrations		<u>Applicable</u>	N/A	
1.	Gas Vents	Active	Passive	
	Properly secured/located	Functioning	Routinely sampled	Good condition
	Evidence of leakage at penetration			
	Remarks			
2.	Gas Monitoring Probes			
	<u>Properly secured/located</u>	<u>Functioning</u>	<u>Routinely sampled</u>	<u>Good condition</u>
	Evidence of leakage at penetration			
	Remarks			
3.	Monitoring Wells (within surface area of landfill)			
	<u>Properly secured/located</u>	<u>Functioning</u>	<u>Routinely sampled</u>	<u>Good condition</u>
	Evidence of leakage at penetration			
	Remarks			
4.	Leachate Extraction Wells			
	<u>Properly secured/located</u>	<u>Functioning</u>	<u>Routinely sampled</u>	<u>Good condition</u>
	Evidence of leakage at penetration	Needs O&M		N/A
	Remarks			
5.	Settlement Monuments	Located	<u>Routinely surveyed</u>	N/A
	Remarks	Once per year.		
E. Gas Collection and Treatment		<u>Applicable</u>	N/A	

1.	Gas Treatment Facilities Flaring <u>Thermal destruction</u> <u>Collection for reuse</u> <u>Good condition</u> Needs O&M Remarks <u>Some of the collected gas is used in making electricity to run on-site operations with 6 microturbines, unusable gas is thermal destructed in the thermal oxidizer units, TO-101 and TO-151.</u>		
2.	Gas Collection Wells, Manifolds and Piping <u>Good condition</u> Needs O&M Remarks		
3.	Gas Treatment Facilities (e.g., gas monitoring of adjacent homes or buildings) <u>Good condition</u> Needs O&M N/A Remarks <u>As required under the Compliance Testing Plan (CTP) and per SOP 703 methane monitoring in on-site structures is conducted continuously, a "snapshot" of the data is recorded once every 90 days. All gas treatment facilities from adjacent homes were removed after it was determined that methane levels were no longer a threat.</u>		
F. Cover Drainage Layer		Applicable	<u>N/A</u>
1.	Outlet Pipes Inspected Remarks	Functioning	N/A
2.	Outlet Rock Inspected Remarks	Functioning	N/A
G. Detention/Sedimentation Ponds		<u>Applicable</u>	N/A
1.	Siltation Areal extent _____ Depth _____ <u>Siltation not evident</u> Remarks		N/A
2.	Erosion Areal extent _____ Depth _____ <u>Erosion not evident</u> Remarks		
3.	Outlet Works Remarks	Functioning	<u>N/A</u>
4.	Dam Remarks	Functioning	<u>N/A</u>

H. Retaining Walls		Applicable	N/A
1.	Deformations Horizontal displacement _____ Rotational displacement _____ Remarks	Location shown on site map	Deformation not evident Vertical displacement
2.	Degradation Remarks	Location shown on site map	Degradation not evident
I. Perimeter Ditches/Off-Site Discharge		Applicable	N/A
1.	Siltation Areal extent _____ Remarks	Location shown on site map Depth	Siltation not evident
2.	Vegetative Growth Areal extent _____ Remarks	Location shown on site map Vegetation does not impede flow Type	N/A
3.	Erosion Areal extent _____ Remarks	Location shown on site map Depth	Erosion not evident
4.	Discharge Structure Remarks	Functioning	N/A

VIII. VERTICAL BARRIER WALLS		Not Applicable	
1.	Settlement Location shown on site map Areal extent _____ Depth Remarks	Settlement not evident	
2.	Performance Monitoring Performance not monitored Frequency _____ Head differential Remarks	Type of monitoring Evidence of breaching	
IX. GROUNDWATER/SURFACE WATER REMEDIES		Applicable	
A. Groundwater Extraction Wells, Pumps, and Pipelines		Applicable	
1.	Pumps, Wellhead Plumbing, and Electrical <u>Good condition</u> Remarks	All required wells located	Needs O&M N/A
2.	Extraction System Pipelines, Valves, Valve Boxes, and Other Appurtenances <u>Good condition</u> Remarks	Needs O&M	
3.	Spare Parts and Equipment <u>Readily available</u> Remarks	<u>Good condition</u>	Requires upgrade Needs to be provided
B. Surface Water Collection Structures, Pumps, and Pipelines		Applicable	
1.	Collection Structures, Pumps, and Electrical <u>Good condition</u> Remarks	Needs O&M	
2.	Surface Water Collection System Pipelines, Valves, Valve Boxes, and Other Appurtenances <u>Good condition</u> Remarks	Needs O&M	
3.	Spare Parts and Equipment <u>Readily available</u> Remarks	<u>Good condition</u>	Requires upgrade Needs to be provided

C. Treatment System		Applicable	There are two treatment systems, one for landfill gas and one for leachate and other liquids.
1.	Treatment Train (Check components that apply) <input type="checkbox"/> Metals removal <input type="checkbox"/> Oil/water separation <input checked="" type="checkbox"/> Air stripping <input checked="" type="checkbox"/> Carbon adsorbers <input checked="" type="checkbox"/> Sand Filters Additive (e.g., chelation agent, flocculent) <input checked="" type="checkbox"/> Good condition Needs O&M <input checked="" type="checkbox"/> Sampling ports properly marked and functional <input checked="" type="checkbox"/> Sampling/maintenance log displayed and up to date <input checked="" type="checkbox"/> Equipment properly identified Remarks: The leachate/liquids are batch treated mostly operated under Mode 5 which includes the sequence batch reactors used as an air stripper, sand filtration and granular activated carbon (only when pesticides are detected).		Bioremediation
2.	Electrical Enclosures and Panels (properly rated and functional) N/A Remarks	Good condition	Needs O&M
3.	Tanks, Vaults, Storage Vessels N/A Remarks	Good condition	Needs O&M
4.	Discharge Structure and Appurtenances <input checked="" type="checkbox"/> Good condition Remarks		Needs O&M
5.	Treatment Building(s) – support building N/A <input checked="" type="checkbox"/> Chemicals and equipment properly stored Remarks	Good condition	Needs repair
6.	Monitoring Wells (pump and treatment remedy) <input checked="" type="checkbox"/> Properly secured/locked <input checked="" type="checkbox"/> Functioning <input checked="" type="checkbox"/> Routinely sampled All required wells located Needs O&M Remarks		Good condition N/A
D. Monitored Natural Attenuation		Applicable	
1.	Monitoring Wells (natural attenuation remedy) <input checked="" type="checkbox"/> Properly secured/locked <input checked="" type="checkbox"/> Functioning <input checked="" type="checkbox"/> Routinely sampled All required wells located Needs O&M Remarks		Good condition

X. OTHER REMEDIES

If there are remedies applied at the site which are not covered above, attach an inspection sheet describing the physical nature and condition of any facility associated with the remedy. An example would be soil vapor extraction.

Micro turbines for landfill gas

The landfill gas is piped to the micro turbines where it produces 2/3 of the electricity used for landfill operations. The landfill gas is treated with carbon and silicon gel treatment before it enters the turbines.

XI. OVERALL OBSERVATIONS

A. Implementation of the Remedy

Describe issues and observations relating to whether the remedy is effective and functioning as designed. Begin with a brief statement of what the remedy is to accomplish (i.e., to contain contaminant plume, minimize infiltration and gas emission, etc.).

The main objectives for the landfill gas migration and cover operable unit is to limit gas emissions, to minimize oxygen and liquids infiltration into the landfill, improve odor and aesthetics and to initiate resource recovery, if possible. The objectives of the final remedy are to control liquids migration off site at the landfill perimeter, to monitor for natural attenuation of constituents of concern in groundwater that has migrated off site, to establish institutional controls and to continue to properly operate and maintain the site facilities.

The review of the documents, ARARs, results of the site inspection, and site interviews indicates that the remedy is generally functioning as intended by the RODs. For the remedial actions that have been implemented relating to cover, leachate, LFG, and surface water on the South Parcel, remedial action performance, O&M, optimization, early indicators of potential issues and implementation of institutional controls are being met.

There are, however, some outstanding remedial action items that require completion. These are construction of a landfill cap and associated LFG control wells on the North Parcel and implementation of Perimeter Liquids Controls (PLCs), as necessary. Until these remedial activities are completed, the remedy is not fully functioning as intended by the RODs. In addition, implementation of institutional controls are in question. Although NCI has prepared a Final Access and Institutional Controls Work Plan, which was submitted to USEPA in March 2003 and approved in May 2003, the five-year review results showed that this work has not been fully implemented based upon limited available documentation relating to current status of the institutional controls. NCI was to take the lead in obtaining the covenants for land on which OII-related monitoring wells existed in 2003 or where the wells might be placed in the future. NCI was not able to produce covenant agreement documentation for review and evaluation. In addition, the plan is to be updated every 2 years, in accordance with the eighth partial Consent Decree. Although NCI indicated that the plan is currently undergoing revision, it had not completed at the time of the five-year review.

<p>B. Adequacy of O&M</p>
<p>Describe issues and observations related to the implementation and scope of O&M procedures. In particular, discuss their relationship to the current and long-term protectiveness of the remedy.</p> <p>Portions of the required remedial actions that are still incomplete include capping and LFG control at the North Parcel and implementation of required PLC systems. In addition, implementation of institutional controls have not yet been completely fulfilled. As these remedial activities are completed to the satisfaction of USEPA and with continued groundwater monitoring/evaluation, a projection on the number of years required to achieve the cleanup goals can be predicted. In the interim, exposure pathways that could result in unacceptable risks are being controlled, and startup of implementation of institutional controls will prevent exposure to, or the ingestion of, contaminated water. Many of the threats at the site have been addressed through capping and capture/treatment of both LFG and leachate. Continued operations/maintenance activities and implementation of site security measures will result in further reduction of these threats.</p> <p>Long-term protectiveness of the implemented remedies will be verified by obtaining additional liquids samples to fully evaluate potential migration of the constituent plume downgradient/radially and vertically from the landfill. Current data indicate the plume remains relatively stable, and areas where a problem may be evolving are undergoing further investigation and remedial actions</p>
<p>C. Early Indicators of Potential Remedy Failure</p>
<p>Describe issues and observations such as unexpected changes in the cost or scope of O&M or a high frequency of .unscheduled repairs, that suggest that the protectiveness of the remedy may be compromised in the future.</p> <p>Current O&M costs are generally below the estimated projections found in the site RODs. It should be noted, however, that the PLC systems are not fully operational; therefore, there is very little or no information for maintenance associated with PLC. It is anticipated that annual O&M costs will increase as the treatment and conveyance systems age.</p>
<p>D. Opportunities for Optimization</p>
<p>Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy.</p> <p>The analytical program is generally adequate to satisfy the requirements of detection, compliance and performance monitoring. However, as noted above, quarterly sampling will continue at well OI-35A and other wells in the vicinity as part of the evaluation of 1,4-dioxane exceedances.</p> <p>Downgradient well OI-75A, located in Subarea D to the northeast, has shown verified exceedances of VOCs including benzene, cis-1,2-DCE, PCE, TCE, and vinyl chloride. NCI has recommended that a new monitoring well be installed in the vicinity of OI-75A to further characterize the hydrogeology in this area (specifically, the groundwater flow direction).</p>
<p>An ongoing program to evaluate the potential source of elevated nickel concentrations continues in</p>

Subarea C. The source of the elevated nickel present throughout Subarea C has not been agreed upon by NCI and USEPA. NCI and its consultant believe that nickel originated from the stainless-steel well casings within the monitoring wells. However, USEPA concluded that a landfill source for nickel could not be dismissed based on available data. To resolve the issue, USEPA has requested that a well constructed of polyvinyl chloride casing be installed adjacent to a stainless-steel casing well that has shown high nickel concentrations. If the subsequent sampling and analysis of groundwater collected from the polyvinyl chloride well did not show elevated nickel concentrations, USEPA would concur that stainless-steel casings are the primary source for elevated nickel in Subarea C. The new well has been installed adjacent to well OI-38A in accordance with the USEPA-approved supplemental nickel evaluation proposal prepared by NCI.

The only active PLC system is the SWEAP system, located around the western/southwestern perimeter of the landfill. The SWEAP system addresses both landfill gas and liquids at the POC. However, NCI has not yet demonstrated that the operating SWEAP system fully complies with the performance criteria required of a PLC.

To date, no other PLC systems have been implemented; however, ongoing investigations have been conducted to assess where and whether they are needed. The First Area Specific Evaluation identified four areas of the site where it was recommended that additional information be collected to design appropriate PLCs. One area is at the northwestern perimeter, two areas are at the north central perimeter (one shallow, one deep), and one area is located at the northeastern perimeter. In October 2004, NCI prepared a Pre-Final Preliminary Design Report that addresses the initial phase of PLC actions needed to address the north central and northeastern areas. NCI is in the process of implementing the PD work, then commence a second phase that will include evaluation of the data collected in the first phase and a description of the design of the remaining portion of the north central area PLC. NCI is anticipating that the northeastern area may require additional time for data collection; therefore, a separate Phase 2 preliminary design will be performed for that area.

The initial preliminary design work associated with the north-central area included installation of extraction and monitoring wells adjacent to OI-73A. OI-73A is a perimeter well that has shown exceedances of VOCs, including 1,1-DCA, 1,2-DCA, 1,4-dichlorobenzene, 1,4-dioxane, benzene, cis-1,2-DCE, TCE, and vinyl chloride. The new wells will be tested and sampled quarterly to provide data necessary for system design. At the time of this five-year review, no data were available for review relating to this activity.

Five-Year Review Interview Record		<i>Interviewee:</i> Norma Lopez-Reid City of Montebello, Councilwoman			
Site Name		EPA ID No.		Date of Interview	Interview Method via
Operating Industries, Inc. (OII) Landfill Monterey Park, CA		CAT080012024		April 27, 2005	Phone <input type="checkbox"/> Fax/email <input type="checkbox"/> In person <input checked="" type="checkbox"/>
Interview Contacts	Organization	Phone	Email	Address	
Vicki Rosen	US EPA, Region 9	(415) 972-3244	Rosen.vicki@epa.gov	75 Hawthorne Street Mail Code SFD-3 San Francisco, CA 94105	
Caroline Ziegler	CH2M HILL/SFO, as rep of EPA	(510) 587-7704	cziegler@ch2m.com	155 Grand Ave, Suite 1000 Oakland, CA 94612	
Interview Questions					
<p>1. What is your overall impression of the work conducted at the site?</p> <p>Response: Outstanding. When I think back to what the landfill was like before the cleanup, the change has been dramatic. It has also been beneficial, not only to the health of the residents but also to the look of the community. New people that move in don't even notice. I helped in the fight for closure of the landfill and overall I am very pleased with the results.</p>					
<p>2. What effects have site operations had on the surrounding community?</p> <p>Response: At the beginning of the closure activities and since then, the odors and noise have been mitigated. I think this has had positive physiological effects on the community because they felt like someone cared. There has really been a tremendous difference since the closure. The current operations and maintenance do not seem too intrusive, however, some neighbors do notice activities going on at the landfill. Overall the community has a feeling of security and confidence. I generally do not get many questions about the landfill from the community. They seem to know that things are going well.</p>					
<p>3. Are you aware of any community concerns regarding the site, its operations or administration?</p> <p>Response: No, I am not. Every now and again, I might get questions about what is happening, but nothing major.</p>					

4. Are you aware of any events, incidents or activities at the site, such as vandalism, trespassing or emergency response from local authorities?

Response:

I am not aware of any recent occurrences. I recall an incident about two years ago where there was a little smoke. The fire department was called, but it turned out to be nothing.

5. Do you feel well informed about the site's activities and progress?

Response:

Yes. The community has been provided good information and updates, including newsletters and fact sheets. I would say that the community feels like they know who to call if they have questions about the landfill.

6. Do you have any expectations or concerns regarding future land use or development of the site?

Response:

I want to ask EPA when they think the site (North Parcel) will be ready for redevelopment. I realize that there will likely be no public access anticipated for the South Parcel ever. Is this true?

7. Do you have any comments, suggestions or recommendations regarding site operations or management?

Response:

I am thankful for EPA. I feel like EPA was strong in standing by their findings despite pushback during the early stages of site cleanup. I would tend to agree with EPA that the controls on the landfill have been very successful.

Five-Year Review Interview Record		Interviewee: Ben "Frank" Venti Mayor Pro Tem of the City of Monterey Park			
Site Name		EPA ID No.		Date of Interview	Interview Method via
Operating Industries, Inc. (OII) Landfill Monterey Park, CA		CAT080012024		April 27 th , 2005	Phone <input type="checkbox"/> Fax/email <input type="checkbox"/> In person <input checked="" type="checkbox"/>
Interview Contacts	Organization	Phone	Email	Address	
Vicki Rosen	US EPA, Region 9	(415) 972-3244	Rosen.vicki@epa.gov	75 Hawthorne Street Mail Code SFD-3 San Francisco, CA 94105	
Caroline Ziegler	CH2M HILL/SFO, as rep of EPA	(510) 587-7704	ctieglar@ch2m.com	155 Grand Ave, Suite 1000 Oakland, CA 94612	
Interview Questions					
1. What is your overall impression of the work conducted at the site?					
Response: I know the history of the site. I've taken the tour. They've done an excellent job – a lot of great effort in getting it right. There were a couple of rain issues but that is normal in hillside development. There have been no complaints in the last 5 years whereas it used to be called an eyesore and there was an odor problem.					
2. What effects have site operations had on the surrounding community?					
Response: None on the Monterey Park side. The cemetery nearby has not been disturbed. There is no dust from the remedial actions.					
3. Are you aware of any community concerns regarding the site, its operations or administration?					
Response: There haven't been any administration or site concerns lately. The community should be happy with the state that it is in now. Some community members used to come in with concerns, but no one has come lately.					

4. Are you aware of events, incidents or activities at the site such as vandalism, trespassing or emergency response from local authorities?

Response:

No problems.

5. Do you feel well informed about the site's activities and progress?

Response:

There are tours given for the community which really helps- it eliminates the unknown. The city's engineering department goes out and inspects the landfill. There are visual inspections during the rainy season.

6. Do you have any expectations or concerns regarding future land use or development of the site?

Response:

We have a newsletter that has to deal with the north part of the landfill, development issues. The community feels they are well informed about the south side. The citizens are very excited to get the shopping center on the north side of the landfill.

7. Do you have any comments, suggestions or recommendations regarding site operations or management?

Response:

I would like EPA to take a more aggressive approach because it has taken more time than I would like to get developed. The trust itself has an interest in not seeing it developed. New Cure is afraid of future lawsuits (liabilities) but should be convinced that it is not an issue because brownfields in other places like Portland, Or (I spoke to the ex-mayor of Portland) had success with projects like this.

No small businesses feel threatened by the new development because it is an ethnic neighborhood with specialized shops. The proposed development will not compete for the specialized business (e.g. Vietnamese restaurants). It will bring people to the area and therefore increase business.

Five-Year Review Interview Record		Interviewee: Resident-City of Montebello			
Site Name		EPA ID No.		Date of Interview	Interview Method via
Operating Industries, Inc. (OII) Landfill Monterey Park, CA		CAT080012024		April 27, 2005	Phone <input type="checkbox"/> Fax/email <input type="checkbox"/> In person <input checked="" type="checkbox"/>
Interview Contacts	Organization	Phone	Email	Address	
Vicki Rosen	US EPA, Region 9	(415) 972-3244	Rosen.vicki@epa.gov	75 Hawthorne Street Mail Code SFD-3 San Francisco, CA 94105	
Caroline Ziegler	CH2M HILL/SFO, as rep of EPA	(510) 587-7704	ctieglar@ch2m.com	155 Grand Ave, Suite 1000 Oakland, CA 94612	
Interview Questions					
1. What is your overall impression of the work conducted at the site?					
Response: Right now (April), it is alright, but in the summer it is too dry. It seems like there are other landfills that I have seen that are more green. I am worried about the dust.					
2. What effects have site operations had on the surrounding community?					
Response: Thanks to EPA things are much better and more quiet. I generally do not notice anything that is inconvenient or noisy at the landfill or in the surrounding community.					
3. Are you aware of any community concerns regarding the site, its operations or administration?					
Response: My neighbors on the other side (backing up to the landfill) on Ashiya Street say they are worried about the fire hazard from dry grass on the landfill.					
4. Are you aware of any events, incidents or activities at the site, such as vandalism, trespassing or emergency response from local authorities?					
Response: No. Kids used to go into the landfill area and it was dangerous. Now they can't get in because of the fencing.					

5. Do you feel well informed about the site's activities and progress?

Response:

Yes. I am very happy. I think good changes have been made.

6. Do you have any expectations or concerns regarding future land use or development of the site?

Response:

I don't really know anything about it. I have no concerns about redevelopment plans [at the North Parcel].

7. Do you have any comments, suggestions or recommendations regarding site operations or management?

Response:

I am concerned about this fine yellow dust that collects on my patio. I don't know what it is and sometimes it covers the whole patio. Also there are times when there are lots of mosquitoes.

Five-Year Review Interview Record		Interviewee: Residents-City of Monterey Park			
Site Name		EPA ID No.		Date of Interview	Interview Method via
Operating Industries, Inc. (OII) Landfill Monterey Park, CA		CAT080012024		April 27, 2005	Phone <input type="checkbox"/> Fax/email <input type="checkbox"/> In person <input checked="" type="checkbox"/>
Interview Contacts	Organization	Phone	Email	Address	
Vicki Rosen	US EPA, Region 9	(415) 972-3244	Rosen.vicki@epa.gov	75 Hawthorne Street Mail Code SFD-3 San Francisco, CA 94105	
Caroline Ziegler	CH2M HILL/SFO, as rep of EPA	(510) 587-7704	ctieglar@ch2m.com	155 Grand Ave, Suite 1000 Oakland, CA 94612	
Interview Questions					
1. What is your overall impression of the work conducted at the site?					
Response: We thought it went well as far as the cleanup. We saw it at its worst and there is definitely an improvement. The landfill is now closed and there is growth on the hillside. This is all a plus.					
2. What effects have site operations had on the surrounding community?					
Response: We have not observed any. No odors, air pollution or traffic problems have been noticed.					
3. Are you aware of any community concerns regarding the site, its operations or administration?					
Response: No.					
4. Are you aware of any events, incidents or activities at the site, such as vandalism, trespassing or emergency response from local authorities?					
Response: Not since the landfill has been closed.					

5. Do you feel well informed about the site's activities and progress?

Response:

We don't know what is going on with the hold-up of redevelopment [at the North Parcel]. Regarding the North Parcel redevelopment, we find that we get different answers depending on who we talk to. This can be confusing to us and the other community residents. We would like to know who has the "correct" story.

6. Do you have any expectations or concerns regarding future land use or development of the site?

Response:

We would like to see the site developed. But we don't understand why it is taking so long. Is it legal issues relating to the Brownfields developer, New Cure, Inc. and "the Trust"? Or, are there issues associated with the Edison right-of-way? We also were wondering how much decontamination will be required before development.

7. Do you have any comments, suggestions or recommendations regarding site operations or management?

Response:

We think that EPA might want to invest in some air sampling stations.

Five-Year Review Interview Record		Interviewee: Les LaFountain, Ph.D.			
Site Name OII		EPA ID No.		Date of Interview	Interview Method via
Operating Industries, Inc.		CAT080012024		April 28, 2005	Phone <input type="checkbox"/> Fax/email <input type="checkbox"/> In person <input checked="" type="checkbox"/>
Interview Contacts	Organization	Phone	Email	Address	
Shiann-Jang Chern	US EPA Region 9	(415)972-3268	chern.shiann-jang@epa.gov	75 Hawthorne Street San Francisco, CA 94105	
Caroline Ziegler	CH2M HILL / SFO, as rep of EPA	(510) 587-7704	ctiegl@ch2m.com	155 Grand Ave, Suite 1000 Oakland, CA 94612	
Interview Questions					
<p>1. What is your current role as it relates to the site? What is your overall impression of the work conducted at the site to date? (general sentiment)</p> <p>Response: I started here in 1994. I was the site manager, CD-3 design manager, and owner's construction oversight representative for CD-3 construction. I am the retired President of New Cure and was in charge of New Cure's daily operations. Currently, Ian Webster is in charge as interim President.</p> <p>The PRPs created and own New Cure and it functions as an operating company. The operation, monitoring, and maintenance is performed by New Cure on behalf of the PRPs under the direction of the EPA. Several consultants are hired for specialized jobs.</p> <p>The work here is proactive. The cover, storm water, and landfill gas systems are similar to any landfill but the monocover is unique and innovative. It is the first monocover permitted at a hazardous waste landfill in California. It is an evapotranspirative cover.</p>					
<p>2. What is the current status of construction? Have any problems or difficulties been encountered that have impacted construction progress or implementability?</p> <p>Response: The requirements set forth in the 3rd Partial Consent Decree have been completed, except for the North Parcel remediation.</p> <p>Subject: North Parcel Remediation The North Parcel will be developed commercially after remediation of approximately 25% of the area is completed. The work plan has been completed and pre-design sampling activities have been performed. New Cure's design contractor is Entact and the design work will be performed as a design-built project with 30%, 60% and 100%/as-built reports.</p> <p>Below are some descriptions of the current status of for the South Parcel construction:</p>					

Monocover:

The vegetation on the top of the monocover is designed such that the roots go down into the cover and pull the moisture out. It's a solar pumping cover. There are four moisture monitoring points and a north and south meteorological station to measure cover performance.

Seismic Stability:

The seismic stability was intensively studied. The North Slope is very steep and adjacent to the freeway. GeoSyntec designed the cover based on testing of waste samples to determine seismic properties of the North Slope and found that the refuse is very stable. Geogrids, were used in the North Slope cover construction for additional seismic slope stability. Each year the landfill slope cover is examined and repairs are made during the summer, as necessary, and vegetation is re-established prior to the rainy season. There is also a "catchment" fence along Firebreak Road to provide additional seismic stability.

Gas Wells:

There are approximately 400 gas wells and associated conveyance, condensate and leachate piping.

Storm Water:

Storm water is conveyed through a system of primarily concrete V-ditches which are designed to crack and break with time as the landfill settles. They are designed for 50-year and 100-year floods. There are two detention basins that control storm water release.

Leachate Treatment Plant:

This plant was designed to accommodate a wide range of leachate characteristics. There are two 110 thousand gallon sequencing batch reactors (SBRs), but they are not used as such. Rather, the SBRs perform air-stripping with optional GAC, sand filtration and metals precipitation. For operational and logistic reason, the PRPs believe that the entire treatment plant should be moved to the south side of the freeway. A pre-treatment Remote Oil Separation Facility was constructed on the South Parcel to remove oil in the leachate but was decommissioned due to leachate characteristics.

Landfill Gas Destruction Equipment:

Two high efficiency thermal oxidizers are used to destroy landfill gas. During the year 2000 performance testing, the unit achieved a 99.999% removal efficiency. Because it is a Superfund site, the units are not permitted by the South Coast Air Quality Management District (SCAQMD) but were intended to substantively comply with SCAQMD requirements. The units burn approximately 5,000 cubic feet/minute of landfill gas at 1800 degrees Fahrenheit. A booster blower augments the field vacuum and is located in the southwestern corner of the South Parcel.

In order to capture a portion of the available energy, six, 0.4 megawatt microturbines were installed. They burn higher methane concentration gas from the western side of the landfill. The electricity produced is used to provide a 1/2 to 2/3 reduction in the electrical costs of the leachate treatment and flare station. It cost about 1 to 1.2 million dollars to get it running and 500 thousand dollars were reimbursed by the PUC. Ingersol Rand maintains the turbines under a maintenance contract and has experienced significant maintenance issues resulting from the early-production-run nature of the units.

3. Have there been routine communications or activities (site visits, inspections,

reporting activities, etc) conducted by your office regarding the site? If so please give purpose and results.

Response:

In coordination with EPA, tours are provided for representatives of the PRPs and other industry groups. In addition, tours have been provided for the public during open house events. Residents who call with questions are invited to come to the landfill office and, as appropriate, see and learn about the site operations and safety.

4. What does the monitoring data show? Are there any trends that show contaminant levels are decreasing? Have any new or emerging COCs been identified? If so, have they impacted the effectiveness of the remedy?

Response:

Landfill gas quantities and concentrations are decreasing as is typically seen at landfills. Groundwater monitored natural attenuation is discussed in an annual report which indicates that attenuation is occurring as expected. Some constituents have confirmed exceedances. Two of the last 3 sampling rounds have shown an exceedance. There is a new exceedance in the south corner and 1,4-dioxane exceedance at the west side. It was reported in the annual report and an investigation program was proposed.

5. Would you say that O&M and/or sampling efforts have been optimized? Please describe how improved efficiency has or has not occurred.

Response:

The leachate treatment system has been optimized by using significantly less treatment of the treatment rain than originally designed due to the actual characteristics of leachate experienced.

General OM&M monitoring frequencies for the cover, gas and stormwater have remained at the same level over the last 3 years. There are opportunities to optimize the frequency of monitoring and therefore we need to propose that to the EPA.

6. Are you aware of any institutional controls, site access controls, new ordinances in place, changes in actual or projected land use, complaints being filed or unusual activities at the site? If so, please describe in detail.

Response:

ICs:

We are in contact with water control agencies every year or so because we need to make sure that no one is drilling a well which would affect the groundwater. The residents above the groundwater plumes are provided with EPA fact sheets. As called for in CD-8, we generated an information flyer and sent it out. There is also a mailing list. EPA's community liaison, Vicki Rosen, is listed on the fact sheet and a phone number is provided. There is also a phone number on our OM&M vehicles that people can call.

The entrance gates and heavy equipment area are monitored with closed circuit cameras utilizing a display in the New Cure on-site office. There are two security guards on-site during all unoccupied hours and one guard patrols while the other monitors the cameras and is available to answer the office phone.

Unusual activities:

There have been grass fires generated along the freeway which advance through the freeway right of way and affect the landfill vegetation. These are extinguished either by New Cure staff in cooperation with the Monterey Park Fire Department, if required.

7. Have any problems been encountered which required, or will require changes to this remedial design or ROD?

Response:

No, the only potential change would be the monitored natural attenuation of groundwater but it is going ok.

8. Do you have any comments, suggestions, or recommendations regarding the site?

Response:

It's going well. There is a high cost, but things are becoming more regular.

Current costs: \$5-7 million/year

O&M costs: 2-3 million/year mostly for CD-3 and CD-7.

The PRPs would like to see the treatment plant and gas destruction facility moved to the other side of the freeway.

Five-Year Review Interview Record		Interviewee: Eleovardo "Ed" Robles			
Site Name		EPA ID No.		Date of Interview	Interview Method via
Operating Industries, Inc.		CAT080012024		April 28 th , 2005	Phone <input type="checkbox"/> Fax/email <input type="checkbox"/> In person <input checked="" type="checkbox"/>
Interview Contacts	Organization	Phone	Email	Address	
Shiann-Jang Chern	US EPA Region 9	(415)972-3268	chern.shiann-jang@epa.gov	75 Hawthorne Street San Francisco, CA 94105	
Caroline Ziegler	CH2M HILL / SFO, as rep of EPA	(510) 587-7704	ctieglar@ch2m.com	155 Grand Ave, Suite 1000 Oakland, CA 94612	
Interview Questions					
<p>1. What is your current role as it relates to the site? What is your overall impression of the work conducted at the site to date? (general sentiment)</p> <p>Response: Operations Manager Our system is one of the best in southern California. The research, development and design are all well done. The vegetative cover was designed to be seasonal therefore the landfill cover is green in the winter and dry in the summer.</p>					
<p>2. What is the current status of construction? Have any problems or difficulties been encountered that have impacted construction progress or implementability?</p> <p>Response: No current construction activities, just O&M. On the North parcel, designing and sampling is underway. 6 new wells have been drilled partly for the RDI.</p>					
<p>3. Have there been routine communications or activities (site visits, inspections, reporting activities, etc) conducted by your office regarding the site? If so please give purpose and results.</p> <p>Response: Yes, there are many activities conducted daily, weekly, and monthly. Communications and meetings are held with EPA and the Army Core of Engineers frequently. Reporting activities are done for the monitoring conveyance gas system, storm water, and LFG treatment facilities. We report to the following agencies: EPA, DTSC, LARWQCB, the City of Montebello and the City of Monterey Park. There are 2 separate permits for storm water. New Cure oversees the construction NPDES for the north parcel.</p>					

4. What does the monitoring data show? Are there any trends that show contaminant levels are decreasing? Have any new or emerging COCs been identified? If so, have they impacted the effectiveness of the remedy?

Response:

Storm water-stable, plans to reduce the frequency annual report

Groundwater-some exceed the CPS (chemical performance standards) per our Long Term Groundwater sampling plans, procedures and reporting requirements.

Landfill Gas-decrease in methane generation

Leachate-less volume. No new COC's in the leachate.

5. Would you say that O&M and/or sampling efforts have been optimized? Please describe how improved efficiency has or has not occurred.

Response:

Yes, O&M and sampling has been optimized so far, but reducing the frequency of monitoring would optimize it further.

6. Are you aware of any institutional controls, site access controls, new ordinances in place, changes in actual or projected land use, complaints being filed or unusual activities at the site? If so, please describe in detail.

Response:

No, but there are procedures for everything we do and schedules that we adhere to.

7. Have any problems been encountered which required, or will require changes to this remedial design or ROD?

Response:

No.

8. Do you have any comments, suggestions, or recommendations regarding the site?

Response:

I live in Montebello and there have been many improvements since I first started here in 1989. All the systems have been automated. For example the LFGTS, LTP and Booster Blowers are all tied into an auto-dialer system, which calls out staff members in the event of system failures and pre-warning alarms.

Five-Year Review Interview Record		Interviewee: Joe Peel – CDM Federal Programs Corporation 100 Pringle Ave. Suite 300 Walnut Creek, CA 94596			
Site Name		EPA ID No.		Date of Interview	Interview Method via
Operating Industries, Inc.		CAT080012024		May 31, 2005	Phone <input type="checkbox"/> Fax/email <input checked="" type="checkbox"/> In person <input type="checkbox"/>
Interview Contacts	Organization	Phone	Email	Address	
Shiann-Jang Chem	US EPA Region 9	(415)972-3268	chern.shiann-jang@epa.gov	75 Hawthorne Street San Francisco, CA 94105	
Caroline Ziegler	CH2M HILL / SFO, as rep of EPA	(510) 587-7704	ctieglar@ch2m.com	155 Grand Ave, Suite 1000 Oakland, CA 94612	
Interview Questions					
<p>1. What is your current role as it relates to the site? What is your overall impression of the work conducted at the site to date? (general sentiment)</p> <p>Response: I am a member of EPA's Tiger Team involved with the oversight of North Parcel Remedial activities that are being undertaken by NCI as CD-3 Excluded Work. Prior to this work, I have assisted EPA in oversight of CD-1 Work (performed by CURE, Inc.). In general, the work in the field provided by the Work Defendants has been good. However, dealing with the Work Defendants for review of CD-required deliverables has been frustrating from time to time. The Work Defendant staff (all parts including administrative, technical, and field personnel) has been very competent, in my opinion.</p>					
<p>2. What is the current status of construction? Have any problems or difficulties been encountered that have impacted construction progress or implementability?</p> <p>Response: The initial start of construction of the North Parcel RA ceased when the developer failed to buy the property. Various legal problems have apparently challenged to the restart of the project. Many issues need resolution before we will see meaningful work in the field. Otherwise regarding work under CD-1 and CD-3, construction seemed to be very competent.</p>					

3. Have there been routine communications or activities (site visits, inspections, reporting activities, etc) conducted by your office regarding the site? If so please give purpose and results.

Response: CDM Federal is not currently performing inspection or monitoring work at the Site. However, past activities performed during the 1990s were extensive and included site monitoring and security. CDM Federal provided a field representative that was assigned to the Site on a full time basis. In addition, CDM Federal performed seismic and geotechnical monitoring, meteorological monitoring, and groundwater monitoring before these activities were assigned to the Work Defendants. Results were useful during EPA's oversight and review of Work Defendant's CD deliverables including remedial design documents.

4. What does the monitoring data show? Are there any trends that show contaminant levels are decreasing? Have any new or emerging COCs been identified? If so, have they impacted the effectiveness of the remedy?

Response: Results observed were generally consistent with findings of the remedial investigations for the site.

5. Would you say that O&M and/or sampling efforts have been optimized? Please describe how improved efficiency has or has not occurred.

Response: Operation of the Leachate Treatment Plant has been efficient and has resulted in cost savings while achieving performance standards for discharge to the public sewer system. Various operating alternatives were identified during the O&M startup phase. As leachate quality changed, the Work Defendants were able to modify the treatment process accordingly. Health and safety issues have been minimal, I believe.

6. Are you aware of any institutional controls, site access controls, new ordinances in place, changes in actual or projected land use, complaints being filed or unusual activities at the site? If so, please describe in detail.

Response: Regarding the North parcel remediation, technical issues pertaining to the remediation (and development) have not changed. Seemingly, other non-technical issues appear to be more challenging at this time. EPA's assigning of North Parcel RA to the Work Defendants as CD-3 Excluded Work was a good idea, in my opinion.

7. Have any problems been encountered which required, or will require changes to this remedial design or ROD?

Response: EPA may wish to consider relocation of the existing Leachate Treatment Plant and the Thermal Destruction Facility if such action will enhance value of the North Parcel and in turn, facilitate North Parcel remediation and redevelopment.

8. Do you have any comments, suggestions, or recommendations regarding the site?

Response: In general, the Site looks well maintained technically, and the remedial actions to date appear to be protective. Efforts to foster communication between EPA and the PRPs need to be sustained in order to facilitate continued OII site RA and O&M for the long-term.

Five-Year Review Interview Record		Interviewee: Richard Magruder-United States Army Corps of Engineers			
Site Name		EPA ID No.		Date of Interview	Interview Method via
Operating Industries, Inc.		CAT080012024		May 15, 2005	Phone <input type="checkbox"/> Fax/email <input checked="" type="checkbox"/> In person <input type="checkbox"/>
Interview Contacts	Organization	Phone	Email	Address	
Shiann-Jang Chern	US EPA Region 9	(415)972-3268	chern.shiann-jang@epa.gov	75 Hawthorne Street San Francisco, CA 94105	
Caroline Ziegler	CH2M HILL / SFO, as rep of EPA	(510) 587-7704	ctiegl@ch2m.com	155 Grand Ave, Suite 1000 Oakland, CA 94612	
Interview Questions					
<p>1. What is your current role as it relates to the site? What is your overall impression of the work conducted at the site to date? (general sentiment)</p> <p>Response: Aug 1997 to November 2001 working for the Los Angeles District Corps of Engineers I was the EPA onsite representative. From Nov 2001 to December 2002 working for the Sacramento District Corps of Engineers I was PM for a contract with the EPA for oversight of OII. I retired in December 2002. February 2003 to February 2005 I had a small contract with the Sacramento District Corps of Engineers for technical support of the OII site.</p>					
<p>2. What is the current status of construction? Have any problems or difficulties been encountered that have impacted construction progress or implementability?</p> <p>Response: Construction is complete for CD-3 work on the South Parcel. Not sure of the status of the North Parcel. There is some trash on the North Parcel, mostly construction debris, and which CalTrans says they removed all trash under the SR-60 Freeway excavation following the edge of refuse found trash, again mostly construction debris, at the edge of or under the freeway just west of the Greenwood Avenue over crossing.</p> <p>Technical, financial and political issues have delayed the cleanup and development of the North Parcel and I am not aware of the status, the EPA and/or PRP's are far better sources of information on this than I am.</p>					

3. Have there been routine communications or activities (site visits, inspections, reporting activities, etc) conducted by your office regarding the site? If so please give purpose and results.

Response: As onsite representative I filed many daily and monthly reports and there were many email communications all of which should be in the EPA repository.

As Contract PM there were many communications including comments on deliverables from NCI and again all of these should be in the EPA repository.

For my individual contract I reviewed some deliverables including daily reports and all communication was via email all of which should be in the EPA repository.

4. What does the monitoring data show? Are there any trends that show contaminant levels are decreasing? Have any new or emerging COCs been identified? If so, have they impacted the effectiveness of the remedy?

Response: The remedies include: Containing the trash mass which with some concern for heat release (which is calculated from the above and is readily available from the constant emissions monitoring (CEM) computer). The addition of the Micro Turbines impacts the heat release information since the gas diverted to them is not included in the volume of LFG or heat release and needs to be added by a separate calculation. The "typical" heat release for each month should be presented in the NCI monthly report and an evaluation of LFG generation and/or collection and heat release should be included in the annual report. Thru most of 2004 the heat release was in the high 50's MMBTUH about 10% less than it had been running previously Then NCI reported that they had found a large crack in a main gas header at the intersection at the top of the Main Haul Road, after this repair the heat release increased about 10% to the low 60's MMBTUH which indicates to me that NCI was not collecting all LFG (about 10% not collected) in most of 2004. A graph of LFG generation is included in CD-3 and a report was prepared by Michael Murphy of CDM-Federal Programs Corporation updating the LFG generation curve, this report should be in the EPA repository, additionally there should be a copy in CDM-Federal Programs Corporation repository in Fairfax Virginia.

Surface water infiltration. The use of a moncover for the prevention of surface water infiltration was tentatively approved subject to the installation of four Time Domain Reflectometers (TDR's) to monitor the moisture content of the soil at 1' incremental depths. There are four stations (North, South, East and West) and three locations for each station. It was generally agreed that we would look at the moisture content of the soil at the monitored depths expecting the moisture content near the surface would vary from wet season to dry season while expecting the moisture content at 4' to 5' to be constant over seasons. So far as I know the government has not received a comprehensive report including all of the data for the TDR's verifying the performance of the moncover. The North Parcel which is not yet officially contained and that under the SR-60 freeway (see item 2 above) is being accomplished. Containing/controlling contaminated ground water by natural attenuation and if necessary additional pumping, which I have been only incidentally involved with. Capturing and burning the landfill gas (LFG). Excluding precipitation and other surface water from the trash mass and appropriately treating if necessary and discharging. Groundwater (leachate)

pumping is conducted within the trash mass to keep the screens in gas collection wells clear, this leachate is treated, sampled and released to a POTW (LA County Sanitation District). LFG is collected from a number of gas collection wells (about 150) on site and routed thru gas collection piping to the landfill gas treatment facility (LFGTS) where it is burned at 1800°F to achieve a 99.99% DRE. Control of LFG is monitored by a compliance plane of gas monitoring probes and by a surface emissions monitoring survey performed semiannually. Four of the probes (GP-4, GP-5, GP-6 and GP-7) at the west side of the site (between OII and the gas storage facility to the west) were out of compliance until a makeshift air dike was instituted which brought these probes into compliance. There is some information that suggests that this gas is from an old abandoned oil field well (or wells) "capped" under the location of these probes. Another method of following the control/ collection of the LFG would be to track the volume of LFG collected at LFGTS by following the flow of LFG and percent methane.

Settlement: Annual reports are supposed to comply with State of California Regulations included in the State regulations is a requirement for monitoring settlement. At the completion of construction about June 2000 NCI agreed to perform annual settlement monitoring and the method agreed to was aerial photogrammetry. A baseline survey was performed in 2000 and the one year survey was performed in 2001. For whatever reason NCI and their consultants were unable to correlate the 2000 and 2001 surveys and were uncooperative in providing the government the "raw data" for analysis. Then NCI chose not to perform a survey in 2002 when a report was not provided with that annual report NCI acknowledged that they had never been able to correlate 2000 and 2001 and had not performed a 2002. The government agreed to allow the omission of the 2002 survey provided that a 2003 survey would be done. NCI also requested the use of conventional surveying methods which the government agreed with. I would point out that while conventional surveys provide high accuracy and precision in landfill settlement one is not looking for 1/10th's or 1/100th's of a foot and the conventional survey provides a limited number of points where photogrammetry (if properly done) provides accuracy and precision of say 1/2' for an essentially infinite number of points. NCI failed to get their plan together in time for an approval to perform a 2003 survey, so that has also been lost. I understand that a 2004 survey was performed and included in the 2004 annual report submitted in February 2005. I would suggest that NCI should have seen to it that a 2003 survey would have been done even if without an approval from the EPA to have something of record.

5. Would you say that O&M and/or sampling efforts have been optimized? Please describe how improved efficiency has or has not occurred.

Response: There are a number of off site probes, i.e. outside the compliance plane. These probes should be reviewed for abandonment, continued monitoring or replacement. The probes in Iguala Street between GP-13 and GP-14 have historically had high LFG readings. Compliance probe GP-13 has never had a "hit" while GP-14 required a lot of attention to bring it into compliance. One might consider it reasonable to install an additional GP probe between GP-13 and GP-14 and or to continue monitoring the Iguala Street Probes that have had high LFG readings.

6. Are you aware of any institutional controls, site access controls, new ordinances in place, changes in actual or projected land use, complaints being filed or unusual activities at the site? If so, please describe in detail.

Response: Site Security: The fence at the west side of the site, near probes GP-3 to GP-5, is between OII and the gas storage facility has an emergency escape "person" gate (approximately 4' wide) for gas storage personnel to escape to OII in case this had an emergency. Since this facility is no longer in operations (or is soon to be closed) this gate should be sealed off. The north end of this gate dies into a cliff but there is sufficient space for an individual to enter the site from the west, this should be closed off. This whole length of fence may not be up to the typical standards for an OII security fence since it was an old fence between the gas storage facility and OII.

7. Have any problems been encountered which required, or will require changes to this remedial design or ROD?

Response: Not to the remedy or ROD but NCI should be more accurately responsive to questions from the government and heat release should be added to the reporting data to supplement surface emissions monitoring.

In 2003 the government agreed to use a 2003 settlement survey and allow the omission of the 2002 settlement survey and not correlate with the 2000 and 2001 settlement surveys. Since NCI did not perform a 2003 settlement survey they should construct an end of construction settlement survey based on final construction surveys and any other surveys performed in 2000 and the 2001 aerial survey.

8. Do you have any comments, suggestions, or recommendations regarding the site?

Response: Review the site vegetation for compliance with the predesign documents. The site was to use native plants and control nonnative invasive plants such as mustard and eucalyptus which has not been well done. A Corps of Engineers Landscape Architect (Mike Evasovich), experienced in native plant restoration visited the site and made recommendations in a report in 2000 or 2001. NCI was not interested in any of his recommendations or conclusions.

Criteria to be considered include evapotranspiration (including root structure and leaves for transpiration), erosion, fire control (combustibility), ability to inspect the cover soil, invasiveness of plants and as much as possible native plants. The top deck is not of concern since it is a prescriptive cover (not evapotranspiration) and it is mowed twice a year.

Settlement is also an aesthetic consideration as citizens in Monterey Park had a view to the ocean prior to the operation of OII and as the trash mass decays and the landfill settles the view may be restored to some houses. During operation there were agreements on the top deck elevation, I am not sure where the site is with respect to the highest elevation agreed to.

Documentation of repairs to the monocover should be carefully kept. Settlement cracking has been repaired by grouting cracks areas repaired and volume of grout injected should be kept. Settlement depressions especially along the 480 North and 540 North bench roads have both been extensively repaired for settlement. Some locations may have been repaired more than once and there should be surveys before and after each repair. Some of this has been done but the historic record of how many repairs have been done and the amount of filling each time may not be available as well as how much grout has been injected at any one location.

The surface water management system is functioning well as long as NCI maintains the slope of the drainage ditches over trash. They have allowed settlement to produce "sags" in the drainage allowing ponding and a reduced flow capacity. There are areas in the north slope that have settled two to four feet that have been repaired and then settled again and repaired again without adequate surveys, at least that have been presented to the government. (see comment

on settlement in item 4 above)

Because of pollution from traffic on the Pomona Freeway (SR-60) which is combusted in the LFGTS its exhaust is cleaner than the ambient air.

What is the status of underground trash fires or enhanced oxidation? At least three gas collection wells have "burned off" and been abandoned, One GP probe was "burned" off and the typical pvc casing was replaced with Stainless Steel. The South East near the end of the Toe Buttress Road has had a continuing problem with fire with excavation into the trash and efforts to extinguish the fire, the last time grout was injected and red hot embers were visible thru the grout holes prior to initiating grouting.

The LFGTS is noisy but the noise from the traffic on the Pomona Freeway is louder so when close to the facility one can hear it but as one moves away the freeway noise overshadows the LFGTS. The gas flowing in the piping is audible at the homes on Iguala Street and Ashyia Street, the noise probably is not audible inside and out side one can talk over it but it is there. Occasionally conditions will develop so that gas flowing thru well heads will create a loud noise (whistle), this is a maintenance item which NCI responds to quickly when observed.

There is a parcel of property to the south west, near the intersection of Howard and Jefferson, that has monitoring wells and GP probes (GP-8 and GP-9). I think this is about one acre and it has a gas line easement (may be abandoned with the gas storage facility) and a water line easement so it is not very usable. The last change of ownership was a tax sale and this may become an option again and NCI should consider picking it up so that it is completely under their control. The SWM system original design had a storm drain connecting to a city of Montebello storm drain at the intersection of Howard and Jefferson due to inability to gain an easement the storm water flow is offsite onto the gas storage company property as it has historically. It might be suggested to the City of Montebello that they take this property by eminent domain with the intention of making it into a park immediately as a non access park like Iguala Park is along Iguala Street.

Five-Year Review Interview Record		Interviewee: John Erwin-United States Army Corps of Engineers			
Site Name		EPA ID No.		Date of Interview	Interview Method via
Operating Industries, Inc.		CAT080012024		May 15, 2005	Phone <input type="checkbox"/> Fax/email <input checked="" type="checkbox"/> In person <input type="checkbox"/>
Interview Contacts	Organization	Phone	Email	Address	
Shiann-Jang Chern	US EPA Region 9	(415)972-3268	chern.shiann-jang@epa.gov	75 Hawthorne Street San Francisco, CA 94105	
Caroline Ziegler	CH2M HILL / SFO, as rep of EPA	(510) 587-7704	cziegler@ch2m.com	155 Grand Ave, Suite 1000 Oakland, CA 94612	
Interview Questions					
<p>1. What is your current role as it relates to the site? What is your overall impression of the work conducted at the site to date? (general sentiment)</p> <p>Response: I provide Project Management, contracting support and some civil engineer technical oversight for USACE support to the EPA. My general impression is that the sight is successful in controlling toxic releases, but communication has been inconsistent or combative. With the retirement on Dr. LeFountain, it will be interesting to see if communication gets more productive.</p>					
<p>2. What is the current status of construction? Have any problems or difficulties been encountered that have impacted construction progress or implementability?</p> <p>Response: Construction of the Landfill Cap, Gas Collection, Storm Water control, leachate treatment and gas treatment is complete.</p> <p>The north parcel cap and perimeter leachate control has not started yet. RD are in various early stages.</p>					

3. Have there been routine communications or activities (site visits, inspections, reporting activities, etc) conducted by your office regarding the site? If so please give purpose and results.

Response: Routine communications and activities have been conducted by my office. These include:

- a. Reviews of documents
- b. Reviews of issues in the field
- c. General Project management and contract administration.
- d. Contract administration and support for enforcement support activities.
- e. Coordination of technical support resources (chemical engineering, chemistry, and occasionally geology
- f. review to update SOPs

4. What does the monitoring data show? Are there any trends that show contaminant levels are decreasing? Have any new or emerging COCs been identified? If so, have they impacted the effectiveness of the remedy?

Response: Monitoring data shows

- a. gas collection system is working within performance parameters except along Baker Tank Rd and near the Montecello water tank. The system was modified to create an air dike. The design and effectiveness of the air dike is not documented. There is an off site source of methane gas not associated with the landfill making compliance with performance parameters difficult due to existence of five abandoned oil wells.
- b. gas treatment system is working within design parameters. The estimated methane gas generation curve for the site is very inaccurate and does not predict changes in methane flow.
- c. settlement is generally within predicted parameters.
- d. leachate treatment is within predicted parameters.

5. Would you say that O&M and/or sampling efforts have been optimized? Please describe how improved efficiency has or has not occurred.

Response: O&M for:

- a. leachate collection appears to be optimized
- b. gas collection is near optimal with problems from off site sources, infiltration of out side air at the toe buttress wall, and failure of the methane generation model.
- c. settlement maintenance is near optimal. Problems exist with excessive settlement in some areas of the North Slope, toe buttress wall. Healthy vegetation makes inspection for surface cracks difficult.
- d. vegetation is good. Original ROD called for establishing native species, but this hasn't happened. Irrigation which was originally planned to be ended has had to continue due to repairs of rapid settlement areas. Heavy vegetation makes maintenance of gas collection system difficult.
- e. fire protection is fair. The risk from high winds fanning fires in heavy vegetation does not appear to be well documented. There may or may not be adequate mitigations for fire.

6. Are you aware of any institutional controls, site access controls, new ordinances in place, changes in actual or projected land use, complaints being filed or unusual activities at the site? If so, please describe in detail.

Response:

- a. fences are in good condition
- b. discharges to POWTS are in compliance
- c. NPDES controls are in place
- d. Air discharges are in compliance.
- e. Proposed reuse of North Parcel is being planned and appears to be reasonable.
- f. Relocation of treatment systems to the south parcel has technical advantages and political disadvantages.

7. Have any problems been encountered which required, or will require changes to this remedial design or ROD?

Response: Problems include:

- a. Inconsistent performance standards for Baker Tank Rd.
- b. Design for vegetation may not be appropriate
- c. Seismic hazards to have treatment system for South Parcel on the North Parcel has not been fully considered.

8. Do you have any comments, suggestions, or recommendations regarding the site?

Response: I see no other urgent issues for the site other than improving communications. But this may be improving now.

Five-Year Review Interview Record		Interviewee: David Towell/CH2M HILL			
Site Name		EPA ID No.		Date of Interview	Interview Method via
Operating Industries, Inc.		CAT080012024		August 11, 2005	Phone <input type="checkbox"/> Fax/email <input checked="" type="checkbox"/> In person <input type="checkbox"/>
Interview Contacts	Organization	Phone	Email	Address	
Shiann-Jang Chern	US EPA Region 9	(415)972-3268	chern.shiann-jang@epa.gov	75 Hawthorne Street San Francisco, CA 94105	
Caroline Ziegler	CH2M HILL / SFO, as rep of EPA	(510) 587-7704	ctieglar@ch2m.com	155 Grand Ave, Suite 1000 Oakland, CA 94612	
Interview Questions					
<p>1. What is your current role as it relates to the site? What is your overall impression of the work conducted at the site to date? (general sentiment)</p> <p>Response:</p> <p>1) Lead technical reviewer for the perimeter liquids control (PLC) and groundwater components of CD-8.</p> <p>2) The technical quality of the work is acceptable; the RD process being followed will result in implementation of an appropriate PLC system; and a solid framework has been established for evaluating natural attenuation of groundwater contamination. However, progress on implementing the PLC systems and completing planned technical evaluations has slowed considerably over the last year or so.</p>					
<p>2. What is the current status of construction? Have any problems or difficulties been encountered that have impacted construction progress or implementability?</p> <p>Response:</p> <p>1) Data are being collected that will allow for completion of the PLC RD. However, the formal RD process has not started. Construction will follow approval of the final design. It should be noted that the existing gas control system installed around portions of the western/southwestern perimeter of the South Parcel also includes extraction of liquids at the landfill perimeter. This extraction appears to fulfill a major portion of the PLC required in this area.</p> <p>No specific problems have been encountered to impact progress towards implementation of the PLC actions. However, as is noted above, the schedule has slowed and the reason for this is not clear.</p>					

3. Have there been routine communications or activities (site visits, inspections, reporting activities, etc) conducted by your office regarding the site? If so please give purpose and results.

Response:

I participate in periodic technical exchange meetings to discuss ongoing data collection and evaluation activities related to the PLC and groundwater actions. These technical exchange meetings often result in consensus on how outstanding issues will be resolved or what type of additional data evaluation may be necessary.

In addition, at EPA's request I review all deliverables produced by NCI related to the PLC and groundwater components of the remedy. These technical reviews are documented and submitted to EPA for transmittal to NCI. Ultimately, the comments are addressed before documents get final EPA approval.

4. What does the monitoring data show? Are there any trends that show contaminant levels are decreasing? Have any new or emerging COCs been identified? If so, have they impacted the effectiveness of the remedy?

Response:

- 1) The groundwater monitoring data continue to confirm exceedances of performance standards the point of compliance (POC) around several portions of the landfill perimeter. These exceedances highlight the need to implement PLC actions to contain liquids. Contaminant concentrations in groundwater downgradient of the POC are generally consistent with the levels present during the RI/FS that lead EPA to select monitored natural attenuation as the appropriate groundwater remedy.
- 2) There are a few locations along the landfill perimeter and in downgradient groundwater where contaminant concentrations are decreasing. However, nothing has been observed to change the current approach to PLC implementation and groundwater monitoring.
- 3) No new or emerging COCs have been identified to date. However, it should be noted that supplemental monitoring for some of the so-called "emerging chemicals" has not been conducted at the site.
- 4) The remedy has not been implemented yet, so none of the water quality data impact remedy effectiveness. However, increasing levels of VOCs in groundwater at the northeast corner of the South Parcel and of 1,4-dioxane in groundwater west of the South Parcel highlight the need to get effective PLC systems installed ASAP in all areas of the landfill perimeter where exceedances of performance standards have been confirmed at the POC.

5. Would you say that O&M and/or sampling efforts have been optimized? Please describe how improved efficiency has or has not occurred.

Response:

The current groundwater monitoring program has been optimized to provide the data needed to implement, then monitor the effectiveness of, the PLC and groundwater actions. The monitoring program is described in the Long-Term Groundwater Monitoring Plan for OII Landfill, dated April 2002. Until the PLC actions are fully implemented and in compliance, there will not be any opportunities to further optimize or improve the efficiency of the monitoring program.

6. Are you aware of any institutional controls, site access controls, new ordinances in place, changes in actual or projected land use, complaints being filed or unusual activities at the site? If so, please describe in detail.

Response:

I am not aware of any issues with regard to the topics listed above, as long as the development on the North Parcel leaves adequate space to implement the PLC action along the northwestern boundary of the parcel, including transport and treatment of the extracted liquids.

7. Have any problems been encountered which required, or will require changes to this remedial design or ROD?

Response:

Not yet. As is noted above there are some recent groundwater quality data that indicate increasing concentrations. These data need to be carefully reviewed to make sure the PLC RD provide adequate control of liquids in all areas of the landfill perimeter requiring containment.

8. Do you have any comments, suggestions, or recommendations regarding the site?

Response:

EPA should encourage NCI to accelerate design and implementation of the PLC actions, reducing the time until all offsite migration of contaminated liquids is achieved.

Appendix E
Notice to Owners/Occupants, Properties Near the
Operating Industries Superfund Site

New Cure, Inc.
2550 Greenwood Avenue
Monterey Park, CA 91016

ATTENTION: Les LaFountain

INSIDE:

Notice regarding groundwater remedy and use restrictions at the Operating Industries Inc. Superfund Site.



New Cure, Inc.
Operating Industries Inc. Superfund Site

Notice to Owners / Occupants
Properties Near the Operating Industries Superfund Site

Introduction

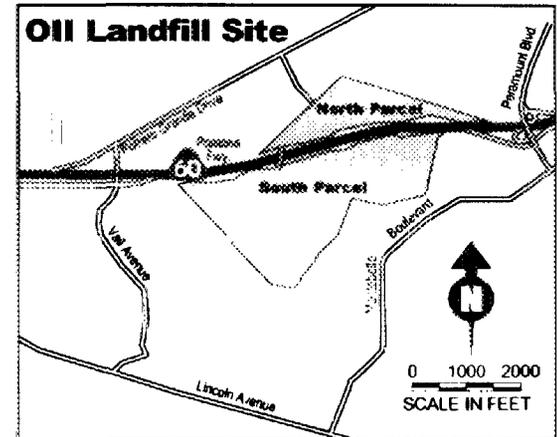
You are receiving this notice because property you own or occupy is located above groundwater which is, or may become, contaminated from the Operating Industries, Inc. (OII) Landfill Superfund site. The OII site is a former landfill located at 2550 Greenwood Avenue in the City of Monterey Park, approximately 10 miles east of downtown Los Angeles (see map). Since being listed as a Superfund site in 1986, OII has been the subject of extensive investigation and remediation, or cleanup, as well as extensive enforcement efforts.

Because of possible groundwater contamination from the OII site, there are certain restrictions and prohibitions on well drilling and groundwater extraction on your property. PLEASE BE ASSURED that the groundwater under your property is deep beneath the surface, and it is highly unlikely you would come into contact with it. Also, your drinking water does NOT come from this groundwater source. Please read this entire notice for more detailed information about why it has been sent to you and what the applicable restrictions and prohibitions are. *The bottom line is that you cannot drill a well into this groundwater source until the groundwater has been cleaned to specific standards.*

The cleanup of the Site is being performed by New Cure, Inc. under the oversight of the U.S. Environmental Protection Agency (EPA). New Cure was hired by a group of potentially responsible parties who agreed to perform the cleanup (the Work Parties). As part of the groundwater cleanup, the Work Parties must annually send a notice to all property owners and

September 2004

residents who currently do, or may in the future, have groundwater beneath their property that exceeds the cleanup standards specified by EPA.



Natural Attenuation Remedy for Groundwater at OII

EPA thoroughly considered the various groundwater cleanup alternatives and selected "monitored natural attenuation" of contaminated groundwater outside of the Site perimeter to achieve the appropriate groundwater cleanup standards. Monitored natural attenuation involves two elements: natural attenuation and monitoring. Natural attenuation is a cleanup approach that relies on natural processes to reduce the levels of hazardous constituents in groundwater to acceptable levels over time and

distance as they break down and disperse. This process is regularly monitored to track progress toward achieving cleanup levels.

Restrictions and Prohibitions on Well-Drilling and Installation

Current State of California statutory requirements related to the construction, alteration, destruction or abandonment of wells are codified in Division 7, Chapter 10, Sections 13750.5 - 13755, of the California Water Code. The Department of Water Resources (DWR) has prepared a booklet entitled "California Laws for Water Wells, Monitoring Wells, Cathodic Protection Wells and Geothermal Heat Exchange Wells" which collects, in one place, statutory provisions that relate directly to the construction, alteration, maintenance and destruction of the aforementioned types of wells. The booklet is available on-line at:

http://www.dpla2.water.ca.gov/publications/groundwater/ca_water_laws_2003.pdf

or by contacting the California Department of Water Resources, Bulletins & Reports, P.O. Box 942836, Sacramento, CA 94236-0001, (916) 653-1097.

Current State technical standards and regulations applicable to the construction, alteration, destruction or abandonment of a water well, cathodic protection well, groundwater monitoring well or geothermal heat exchange well may be found in DWR Bulletin 74-81 and Bulletin 74-90 (it is necessary to have both bulletins to have a complete set of applicable water well standards). The contents of Bulletins 74-81 and 74-90 may be found in a combined and integrated format on the web site of the Department of Water Resources' Southern District at:

http://www.dpla.water.ca.gov/sd/groundwater/california_well_standards/well_standards.html

Groundwater Extraction and Use is Subject to Watermaster Jurisdiction

The Main San Gabriel Basin and Central Basin Watermasters serve as the governing body for the management of water resources in the Los Angeles area. Watermaster approval is required for constructing or modifying a well. More information about groundwater management in California can be obtained from the DWR. The DWR currently is updating a publication known as "Bulletin 118" and titled "California's Groundwater: Update 2003". The most recent draft of this document made available for public comment may be viewed and downloaded at:

<http://www.groundwater.water.ca.gov/bulletin118/index.cfm>

EPA Prohibits the Installation of Groundwater Extraction Wells on Your Property

Following its mission to protect human health and the environment, EPA prohibits the installation of wells on your property until it is safe to do so. The Agency must certify that all the components of the selected remedy have fully performed and all applicable cleanup standards have been achieved.

For More Information

Contact:

Les LaFountain
New Cure, Inc.
2550 Greenwood Avenue
Monterey Park, CA 91016
323-720-9775

Public information about the site is at:

Bruggemeyer Memorial Library
318 South Ramona Avenue
Monterey Park, CA 91754
(626) 307-1333

The official EPA site is:

Superfund Records Center
95 Hawthorne Street, Room 403
San Francisco, CA 94105
(415) 536-2000

Additional contacts are as follows:

Lance Richman
EPA's Oil Project Coordinator
Phone: (415) 972-3022 or (800) 231-3075
E-mail: richman.lance@epa.gov

[EPA Community Involvement Coordinator:](#)

Vicki Rosen
Phone: (415) 972-3244 or (800) 231-3075
E-mail: rosen.vicki@epa.gov