

**EPA RESPONSES TO PVSTIEG COMMENTS
ON
DRAFT DATA REPORT FOR THE FALL 2009 SEDIMENT SAMPLING PROGRAM
PALOS VERDES SHELF (OPERABLE UNIT 5 OF THE MONTROSE CHEMICAL CORP. SUPERFUND SITE)
LOS ANGELES COUNTY, CALIFORNIA
JUNE 2013**

No.	Page	Section	Para- graph	Comment	EPA Response
<i>Comments from the Sanitation Districts of Los Angeles County (LACSD), dated 14 June 2013</i>					
1	ES-1	ES	4	Regarding the sentence that reads “The White Point outfalls are operated by the LACSD, and are the recognized sources of DDTs and one of several possible sources of PCBs at PV Shelf”, would it be possible to clarify that the DDT and PCB contamination from the LACSD outfalls was a historical issue that ceased over 40 years ago and that LACSD effluent is not an ongoing source of these contaminants. Insert the word “historical” before the word “sources” stated twice in this sentence.	The word “historical” has been inserted as suggested in the comment. Text has been added to Section 1.1 of the main text to state that DDTs have not been detected in JWPCP effluent since 2002, and PCBs have not been detected in JWPCP effluent since 1985 (Biennial Receiving Water Monitoring Report, LACSD, 2012).
2	ES-2	ES	1	Change the maximum ocean depth of cores collected from 50 m to 150 m.	The correction has been made in the text.
3	ES-2	ES	1	Change the last sentence of the first paragraph on the page to: “Cores were collected using a gravity coring device dropped from LACSD’s ocean monitoring vessel, Ocean Sentinel.”	The last sentence of the first paragraph on page ES-2 has been replaced with the suggested text.
4	2	1.1	2	In the second bullet on the page, PCBs do not need to be defined; they were defined on the previous page.	Text has been corrected and PCBs are not defined in the document except for the time they are first mentioned.
5	3	1.1	1	In the last sentence of Section 1.1, please update the numbers stated to the following: -2.5 million southern California residents -2,300 industries -273 mgd of wastewater treated -Please source (LACSD, 2012)	The text has been edited as suggested. The following report was cited: LACSD, 2012. <i>2010-2011 Joint Water Pollution Control Plant, Biennial Receiving Water Monitoring Report.</i>

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6	3	1.2	1	Please insert “vast majority of the” in front of “EA deposit” in the last sentence of the first paragraph in this section.	This revision has been made to the text in the referenced sentence.
7	4	1.2	1	Regarding the statements made in the first full paragraph on this page, all these chemicals appear to have been detected in PV sediments per the legend in figure 2 (all enclosed in boxes). Is this correct?	The figure has been edited to accurately duplicate the figure from the Eganhouse reference. Four DDT forms have not been detected in samples of PV sediments; they are: p,p'-DDOH, p,p'-DBH; p,p'-DDM; and p,p'-DDA.
8	4	1.2	4	In the last two bullets on the page, remove “Region IX” from the reference to the EPA report for consistency.	“Region IX” has been removed from these references.
9	5	1.3	1	The sub-bullet in the second item in the list of IROD component states that “The interim cleanup level for DDT in surface sediment is 46 mg/kg OC.” How is this interim level different than the "interim" objective for the cap? How does the 23 mg/kg OC final target relate to these interim targets? Consider clarifying. This same value is referred to as a “median concentration” of Total DDTs further down on the page.	These cleanup levels and objectives were presented and described in the IROD. Please refer to IROD Page 3, where the objective of the (interim) cap is first described, and IROD Page 48, where specific RAOs are presented.
10	7	2.1	1	Revise the first sentence in Section 2.1 as follows: “From 16 through 20 October 2009, daily cruises were conducted to collect sediment cores from PV Shelf using LACSD’s monitoring vessel, <i>Ocean Sentinel</i> , crew, and scientists.”	The sentence has been revised as suggested.

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11	7	2.1.1	1	<p>The first paragraph of 2.1.1 states that the core locations were selected by LACSD in the 1960s. Please confirm it was not the 1970s. LACSD sampling history went back to the 1950s. However, the NPDES permit program is authorized by CWA (section 402) in 1972. The earliest permits were issued in the 1970s to focus on POTWs.</p> <p>Also, please redefine NPDES as State of California National Pollutant Discharge Elimination System (not "Pollution").</p>	<p>The text in question has been edited as follows: "...these stations are typically used by LACSD to meet requirements in the State of California National Pollutant Discharge Elimination System (NPDES) permit..."</p>
12	7	2.1.1	2	<p>The last word of the first sentence of this paragraph should be "isobath", not "depth".</p>	<p>The word "depth" is correct in describing the D isobath; a correction to placement of the parentheses has been made.</p>
13	7	2.1.1	3	<p>To clarify the text in the last paragraph of Section 2.1.1, Station 2B was not planned to take two reps originally. When we visited 2B, the first two attempts appeared to be shorter than expected (12 cm and 11 cm) and the 3rd core is 25 cm. But the lab sliced two cores (12 cm and 25 cm) for this station. That is why there are 69 cores shown in the next page. Also, location BA2B is called a replicate in the 3rd paragraph of section 3.1.</p>	<p>Comment noted. No changes to the text have been made.</p>
14	9	2.1.4	1	<p>Add some coring device photos to help clarify what the weighted bar, cutting head, an array of sheet metal "fingers"</p>	<p>Figure 5 shows an adequate level of detail for the purposes of this report.</p>

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15	9	2.1.4	2	The 2nd paragraph in this section states that the lined corer was dropped to the ocean floor. The coring device was actually lowered to near the seafloor, maybe 10 meters above the bottom, and allowed to stabilize in a vertical position before being allowed to free fall into the sediment. Chi-Li to confirm details. After checking with Bill, we no longer allow the corer to free fall into seafloor because we use high speed winch. Also, only the winch is used to reverse the corer back to surface.	The text has been revised and reflects the approach used for collecting sediment core samples accurately.
16	9	2.1.4	3	The criteria listed here are not the only criteria when determining whether a retrieved core is successful or not. Checking my field worksheet, we ever hit areas with rocky bottom (BA7BC and BA10DC) and damage the cutting head.	The following two bullets have been added to this list of criteria for core acceptance: <ul style="list-style-type: none"> • Rocky conditions at the ocean floor ; or • Damage to the coring device possibly due to a rocky ocean floor.
17	15	3.1	1	The 25 cm core length described here, that was retrieved on the third drop at location BA2B does not match what is reported in Table 4. Other data look suspect in Table 4 and may require a double-check.	The sentence describing BA2B has been revised as follows to clarify that two cores were taken at this location – BA2B which was 12 cm, and BA2BR which was 24 cm: “Core retrieval was difficult at location BA2B on the 150-m isobath, where two drops of the coring device resulted in lack of recovery (likely due to rocky substrate); a satisfactory core 25 cm in length was retrieved on the third drop and was processed as a replicate core (BA2BR), with one of the 12 cm deep cores as the BA2B parent sample.” Table 4 has been QCed and corrected and is believed to be accurate. Please see Note 1 at the bottom of the table stipulating that core lengths indicated are based on the

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					lengths of cores used to generate samples during core cutting events. These lengths may differ from measurements made on-board at the time of core collection, due to: different measuring conditions; possible deformation during handling; and the discarding of core bottom portions.
18	15	3.1	3	Here is more information about the statements made in the first sentence on the last paragraph on this page: both BA4C and OA22 are located along the 60-m isobath. OA22 is near station 9C where surface sediment mean grain size is ~ 4.6 phi.	Comment noted.
19	17	3.2.2	1	Any reason similar average values were not listed for specific gravity in the last sentence of this section?	Values have been added.
20	17	3.3.1	1	Location OA05 is near 7C. Isn't the 13% TOC found in the 36-40 cm interval of core OA05 way too high? The average TOC at OA05 is 5.8% but is still questionable. Table 5 needs to add the standard derivation or range.	<p>The 13% TOC value for the 36-40 cm interval at OA05 is relatively high in comparison with the rest of the core. TOC values for this location will be carefully re-examined during the 2013 sampling event.</p> <p>Standard deviations were considered for this report but not included, as spatial variability of sediment characteristics across PV Shelf is expected, i.e., values of standard deviation applied over the shelf would not affect the overall conclusions.</p>
21	17	3.3.1	2	In response to the second paragraph of section 3.3.1: based upon my review of Appendix I, I do not see how you can get a perfect R-squared value of 1.0 even with a 3rd order polynomial. Suggest rerunning the stats. Also, what is the basis for using a 3rd order polynomial rather	Upon further examination of the data used, EPA agrees that polynomial trendlines should not be used. The statistics were rerun using linear models. The resulting R ² values of 0.76 for TOC vs. DDTs and 0.78 for TOC vs. PCBs, implying correlations in both instances. It should

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				than a linear fit?	<p>be noted that data set used in this analysis from the core collected at location BA8C had higher concentrations of TOC and DDTs/PCBs than the rest of the data being analyzed, and may have skewed the R² value to be higher (i.e. skewing the strength of the correlation).</p> <p>During the upcoming sediment sampling event (planned for 2013), a replicate sediment sample will be collected at location BA8C near the outfalls, the location where outlier data was reported.</p>
22	21	4.1.1	3	The unique procedure by which Calscience prepared DDT samples described in this paragraph is an additional process that may impact the results. Would like to know more detail but can't find any info from appendix. Is the analyte from PVS sediment or surrogates ? The main concern is that surrogates only provide information about recovery and not extraction efficiency. Additional supporting information from this procedure should be included.	Please refer to Appendix H.5 Attachment 2 for a full description of the secondary cleanup step . This reference has been included in Section 4.1.1 text.

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23	22	4.1.2	1	It is stated here that “{The interlaboratory comparison study} concluded that analytical results reported by Calscience for all DDT analytes were acceptable, based on the confidence intervals developed for the study.” It is unclear that Calscience adopted the additional cleanup procedure described above on Page 21 while running the inter-lab calibration. Although the SSRM results appeared to be comparable among six participating labs, archived 2009 sediment sample should be analyzed as the follow up.	Text has been added to reflect that Calscience did adopt the secondary cleanup procedure for the inter-lab calibration.
24	22	4.2	1	Regarding the calculation for OC normalization, all the interim and final limits are expressed and discussed in mg/kg OC. Suggest using same units as targets throughout document.	Where comparing results to cleanup goals, units have been changed to mg/kg OC.
25	25	4.5	1	When will the interim cleanup level of 46 mg/kg OC in surface sediment be reached? This is stated in the 1 st bullet in Section 4.5. Also, change “Table 8” to “Table 7” in the next paragraph, I believe this was a typo.	The IROD estimated that the interim cleanup level of 46 mg/kg OC mean DDTs would be reached 5 years after cap installation. Text has been added to this sentence to clarify. The table numbering has been corrected.
26	28	5.0	4	Any chance you can include the information coming from Burgess's lab on flux rates to elaborate on this statement: “...desorption of COCs from sediment into seawater.”	At this time, this information cannot be included because results from the flux study conducted by the EPA have not yet been published.
27	29	5.0	2	Could the reasons described in the first bullet (adoption of a secondary cleanup procedure by Calscience) be the cause of the huge loss of DDT? PCB mass also dropped dramatically.	No, the cleanup procedure was appropriate for the DDT analyses. The secondary cleanup step was proven to improve accuracy. This step was not used in PCB analyses, therefore, no relationship between this step and

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					PCB results exists.
28	Tbl 4	Tables	-	The estimates in the 5th column (estimated EA bed thickness [cm]), sometimes mislead the core length at certain sites. May try to see how good the estimated EA bed thickness is to correlate the actual core length? Also, I don't see a reason to sum the length of the individual cores at the bottom.	Core length and EA bed thickness refer to two different depths. Please refer to the vertical profiles in Appendix L for evidence of how the estimated EA bed thickness was calculated, also explained in Note #2 located below this table. Summation of core lengths has been removed.
29	Tbl 5	Tables	-	I suggest adding more columns of stats here (range, stdev, ...).	A wide range of values would be expected at PV Shelf, considering spatial variability due to impacts of the outfalls. Calculations of standard deviation were not considered necessary for the purposes of this report.
30	Tbl 7	Tables	-	Add concentration unit (ug/kg?) to all columns.	Footnotes have been added to indicate units. The OC-normalized values have been converted to mg/kg OC for comparing to cleanup goals.
31	Fig 1	Figures	-	The Portuguese Bend Landslide is discussed in the Intro, but not labeled on these base maps. Consider adding the PBL landslide area.	The location of the Portuguese Bend Landslide (PBL), based on the City of Rancho Palos Verdes website, has been added to Figure 1.

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32	Fig 2	Figures	-	According to the text and legend, compounds detected on the PVS are "enclosed". Since all compounds appear enclosed does that mean all have been detected or was this an error?	The figure has been edited to accurately duplicate the figure from the Eganhouse reference. Please see response to comment no. 7 above.
33	Fig 6	Figures	-	The upper boundary of the contour should be along the 40-m isobath, to be consistent with the lower boundary along the 150 m isobath. I also suggest using the ranges defined as the cleanup goal (23, 46, 78....). Add a unit to Note 2 for organic carbon (%C?).	The contoured areas in Figures 6 and 8 were generated using the geostatistical models cited in the figure notes. The models generated the contours as shown based on actual data points; the models do not generate data outside the limits of the sample grid. The cleanup goals are based on site-wide average concentrations and contouring those goals would have limited value.
34	Fig 7 & 9	Figures	-	I suggest including the location of the outfall system on this figure. The gap here is somehow misleading, can this be reduced? Upper portion is the most biological available depth (0-8 cm). What are these blue lines/scales? Delete or label?	The locations of where the 90" outfall diffusers cross the 60-m isobath have been added. The gap is provided to dramatize the 0-8 cm layer. The blue lines have been deleted.
35	Fig 8	Figures	-	Scale only up to 12,000 results in losing detail information on the high end. It should be expanded more beyond 12,000. There are 8 levels in DDT (Figure 6).	Comment noted. The PCB delineations in Figure 8 are considered appropriate for purposes of this report. EPA will reconsider this issue in future reports.
36	Fig 10 & 11	Figures	-	Missing outfall layer. Please add. Leave "NS" at the area beyond transect 1.	Outfalls have been added. A callout has been added stating that the area beyond Transect 1 was not sampled for the 2009 data set.

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<i>Comments from Bruce Joab, California Department of Fish and Wildlife (CDFW), dated 18 June 2013</i>					
General Comments					
1	-	-	-	<p>Historical data from the PVS is quite important for chemical residue trend analysis. Primarily, comparisons need to be made between the new data and the 2009 data set to evaluate whether it was anomalous in any way. Therefore, re-sampling the same array that was used in 2009 is important to be able to make that comparison. However, an overall evaluation of the recent data (both 2009 and 2013 results) with the earlier data is also critical. To that end, please include a summary of the various sediment sampling events that have occurred on the PVS area. Table 10 has information on p,p'dichloro-diphenyl-dichloroethane and PCB inventories from historical data sets, but the 2004 sampling results do not appear to be contained in this table. A more comprehensive table or map set, or combination of the two, would be helpful to elucidate what other data sets can be compared to the 2009 and 2013 data sets for a trend analysis.</p>	<p>Comment noted. Table 10 did not reference the 2004 data set (indicated in Figure 10), because the 2004 data were based only on Van Veen sampling events (during which only the top 2 cm of the sediment bed were retrieved – mass estimates based on these data sets are not typically derived).</p> <p>The 2013 sample design will include all 2009 sample points plus additional sample points. Comparisons between the 2009 and 2013 data will be made in a cleanup status report; the draft cleanup status report is planned for release in December 2014.</p> <p>A description of historical sampling events conducted at PV Shelf will be included in the upcoming Five-Year Review report, along with an analysis of trends. Due to CERCLA schedule requirements, the Five-Year Review report will be published before data from the 2013 sampling event will be ready.</p>

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2	-	-	-	Some additional information on how the data will be analyzed would be instructive. A paragraph or two that identifies the analyses, computations, or statistical comparisons to be made would be helpful. The objectives of this planned sampling event, including the analyses to be performed, should be clearly stated (per the data quality objectives process). For example, the calculation of mass inventory volume (MIV) on the PVS was performed with the results of the 2009 sediment sampling event. Will these MIV calculations be repeated based upon the 2013 data? Will other specific statistical comparisons or calculations be performed with this new data set?	For continuity, the sediment sampling event planned for fall 2013 will be designed to resemble the 2009 sampling event, with identical core locations plus additional locations. Comparisons between the 2009 and 2013 data will be made in a cleanup status report; the draft cleanup status report is planned for release in December 2014.
3	-	-	-	The 2013 results will be important in determining future actions. In particular, it would seem prudent to send splits of at least a subset of the sediment samples to a second fully accredited laboratory to help verify the data integrity. Some forethought will need to be given to how the samples are homogenized prior to such a split taking place to ensure that the results are comparable, and differences cannot be attributed to within-core heterogeneity alone.	Comment noted. The comment will be taken into consideration during sample design for the next round of sediment sampling, planned for fall 2013.
4	-	-	-	Some expert(s) have speculated that the sample locations selected for the 2009 sediment sampling event may have missed the areas that contain higher concentrations of the contaminants present on the PVS. In order to address potential spatial heterogeneity, we recommend adding additional sample locations proximal to some of the locations sampled in 2009 (i.e., "step-out" samples). Step-out samples should be collected both within and outside of the outfall area. While it appears unlikely that the 2009 samples were all taken in locations with relatively lower concentrations, such step-out sampling could help to	Comment noted. The comment will be taken into consideration during sample design for the next round of sediment sampling, planned for fall 2013.

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				address questions about such spatial heterogeneity.	
-	-	-	-	Overview: We are in agreement with the fundamentals of this report and believe it to be well prepared. However, we recommend the following: (1) that step-out samples be included for a subset of the sediment sampling sites in the 2013 sampling event, (2) that a second laboratory analyze a subset of the samples to allow comparison of results between laboratories, and (3) that more detail be provided regarding the comparisons and calculations that will be performed with the data once it is collected . We also note that other matrices such as water and fish tissue are not addressed in this sampling report, and while we expect that they will be treated separately, we acknowledge the importance of sampling these matrices.	Comment noted. The comment will be taken into consideration during sample design for the next round of sediment sampling, planned for fall 2013.
<i>Specific Comments</i>					
1	7	2.1.1	2	This section makes reference to a transect 0 located north of Palos Verdes Point. On figure 3, it is not clear which transect is transect 0, as only transects 1-10 appear to be labeled. Please revise the text and/or figure to clarify the location of this transect.	Figure 3 is self-explanatory in that Note 2 states that Transect 0 is located north of Palos Verdes Point and is not indicated on the map. No samples were collected north of Palos Verdes Point.

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2	25	4.4.3	1	<p>The second bullet in this section identifies ongoing monitored natural recovery (MNR) processes as potentially associated with the significantly lower mass estimates that have been calculated from the 2009 data set. One point to consider is that the 2009 sampling may be among the first sediment sampling events since the Sanitation Districts of Los Angeles County converted to tertiary treatment of their effluent. This change significantly altered the discharge into this area according to Los Angeles County Sanitation District employees, and in particular has reduced the loading of organic matter onto the PVS. Any associated changes in the presence of microorganisms that degrade and/or mobilize sediment contaminants could alter the rate(s) of change associated with the contaminants in the site sediments. This concept is certainly captured within the concept of MNR, as stated in this bullet point. However, please consider specifically identifying this potential relationship between alterations in effluent treatment and sediment concentrations in the text.</p>	<p>Comment noted. However, there is not tertiary treatment at JWPCP. Full (100%) secondary treatment came online in November 2002; prior to that LACSD had been discharging a mix of 60% secondary and 40% advanced primary since about 1985. Although the loading of suspended solids (with associated organic nitrogen and carbon) from the current discharge is only 3% of what it was in 1970 (97% reduction), the greatest decline in mass emission of organic materials took place between 1970 and 1986, due to implantation of advanced primary treatment methods. The reduced rate of solids loading over several decades may have given the system a chance to process the legacy organics and revert back to a more natural condition, possibly resulting in a shift in the microbiological community on PV Shelf.</p> <p>No changes to the text were made.</p>
<i>Comments from Mr. Peter Gathungu, Department of Substances Control (DTSC), dated 11 July 2013</i>					
1	ES-2	ES	1	<p>The second sentence in this paragraph states that ocean depths at core locations ranged from 40 to 50 meters. However, the sample locations and contour depths shown in Figure 3, as well as the text in the third paragraph of Section 2.1.1 Locations for Baseline Cores indicates that ocean depths at core locations ranged from 40 to 150 meters. Please revise the report for consistency and to indicate accurate ocean depths at core locations.</p>	<p>The range of ocean depths from which sediment core samples were taken has been corrected to “40 to 150 meters”.</p>

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2	ES-3	ES	2	<p>The text in the second bullet listing the main conclusions of the sediment sampling program states that construction on an interim cap has been rendered unnecessary based on the fact that the concentrations of DDTs and PCBs measured are below cleanup levels. While the measured COC concentrations are below cleanup levels, data from a single sediment sampling effort may not be sufficient to conclude that an interim cap is unnecessary. DTSC recommends additional sampling, as recommended in the third bullet, to establish whether a sustained reduction/downward trend in COC concentrations is occurring prior to concluding that construction of an interim cap is unnecessary. In addition, we note that although the biologically active layer is defined as the 0 - 8 centimeter (cm) sediment depth interval, the vertical location of this layer likely will vary over time due to erosion and other forces. The declining COC concentrations may not be sustainable in the long term if continued erosion exposes what is described as heavily contaminated sediment in the second bullet in the fourth paragraph of Section 1.2 Site Description.</p>	<p>Sediment cores will be collected at all locations sampled in 2009 plus other locations during the September 2013 sampling event. Comment noted.</p>
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3	11	2.3.1	1	<p>The text in the first paragraph states that sample preparation included thawing, mixing in original sample containers, and compositing. The text in the third paragraph lists the tests that were performed on the samples including bulk density (bullet 2). The test results presented in Appendices D and E include sample depths. As presented, it is not clear whether the bulk density tests were performed on "undisturbed" or remolded (disturbed) samples. Please expand the text in the second bullet (third paragraph) and discuss the nature of the bulk density test samples.</p>	<p>Bulk density analyses were performed on portions of frozen (undisturbed) samples using ASTM D 7263-09; the text was be modified to reflect this approach.</p>
4	15	3.1	1	<p>The text of the second sentence in the first paragraph states that cores were collected on 14 - 16 October and 19 - 20 October. However, the text in Section 2.1 Collection of Sediment Cores (page 7) states that daily cruises to collect sediment cores occurred 16 through 20 October, 2009. Please revise the text to clarify when sediment core collection occurred.</p>	<p>Text has been clarified.</p>
5	16	3.2.2	1	<p>The text in the first sentence on the first paragraph states that the reported bulk density was obtained from geotechnical testing, but the reported moisture content was obtained during chemical testing. With the reported sample preparation and compositing, it is not clear whether the samples tested for bulk density and moisture at two different laboratories were identical. Please revise/expand the text to indicate whether this is the case, and if so, how this was achieved.</p>	<p>As described in Section 2.2, each core sample was split into equal portions; one portion was sent to a chemical testing laboratory and two portions were sent to a geotechnical laboratory. As described in Section 2.3, moisture content (MC) was tested at the chemistry laboratory. Section 3.2 has been retitled "Results of Physical Tests" to reduce confusion that MC was tested at the chemistry laboratory.</p>

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6	9	App A – Section 3.2	1	MVS Model Output, Section 3.2 Methodology for Estimating Average Concentrations and Mass of COCs. The term Pow in the expression for the MIV equation is not defined, unlike the other variables. Please revise the text to include a definition of the Pow term.	<p>The text has been edited to explain the Pow acronym as a power function, as in 10 to the power of 2 is 100 or $10^2=100$ or POW(10,2) or Pow(base,exponent). By default, MVS takes the log(10) of the analytical results prior to doing the interpolation and stores the estimated value as the log(10) transformed number. Therefore, to use the nodal estimated value for mass calculations, it is necessary to calculate the inverse log of the model estimated value or Pow(10,An0) in order to get the non-log value.</p> <p>Text was edited to define the acronym “MIV” as mass inventory volume (in kg/cm3).</p>
7	-	App B & C	-	In Appendix B Grain Size Results - Baseline and Appendix C Grain Size Results – Outfall Area, the tabulated particle size distribution data appears to define small pebble as material retained on the number 4 sieve, gravel as material retained on the number 10 sieve, and very fine sand as material passing the number 200 sieve and retained on the number 230 sieve. These definitions do not conform to the Unified Soil Classification System (USCS) in the use of term "pebble" as well as the divisions/descriptors and sizes of the fine and coarse fractions. Please revise the text so that the soil type definitions/descriptions, sieve numbers and sieve sizes conform to the USCS format.	Sieve sizes and the classification system used by the geotechnical laboratories for grain size analyses are based on the Wentworth Classification System (Phi scale), not the USCS. The Wentworth Classification System is typical for marine sediments and is appropriate for our application, allowing our data to be compared to data from similar marine environments. Text in Section 3.2.1 – Grain Size has been revised to clarify that grain size data conforms to this classification system. The references to USCS have been removed from the tables in Appendices B and C.
<i>End of comments</i>					