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Secretary for
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Department of Toxic Substances Control

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Arnold Schwarzenegger
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January 24, 2007

Mr. Dave Dassler
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REQUIREMENT TO COLLECT UNFILTERED GROUNDWATER SAMPLES DURING WATER QUALITY SAMPLING, SANTA SUSANA FIELD LABORATORY (SSFL), VENTURA COUNTY

Dear Mr. Dassler:

As part of ongoing corrective action activities, the Department of Toxic Substances Control (DTSC) continually evaluates groundwater sampling procedures, including sample filtration for metals in groundwater to ensure that data quality needs and objectives are being met, and to evaluate future data quality needs and make recommendations as necessary.

As the Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) at portions of the site are nearing completion and work is beginning to assess the current and future risk associated with the site conditions, data quality needs have changed. It is reasonable, when evaluating potential exposure, to consider the total mass of a contaminant that is potentially mobile via the groundwater pathway. By relying on the filtered data, it is acknowledged that the mobile fraction consisting of colloids greater than 0.45 microns is removed and not accounted for. Therefore, in order to conservatively assess the risk to the human health and the environment from inorganic constituents in the ground water, DTSC is requiring that the *Site Wide Sampling and Analysis Plan* (SAP) for SSFL, which describes the required sampling protocols for the site, be modified to collect both filtered and unfiltered groundwater metal data to meet the data objectives of both characterization (filtered data) and risk assessment activities (both unfiltered and filtered data). Please refer to the attached Geological Services Unit (GSU) memorandum for a more-detailed discussion of the data quality needs and objectives for both characterization and risk assessment.

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Beginning with the First Quarter of groundwater sampling in 2007, the facility shall collect both filtered/unfiltered samples on a quarterly basis for five quarters in all groundwater monitoring wells in which metals are a contaminant of potential concern. Please work with Mr. Thomas Seckington of GSU to revise the Water Quality SAP to include procedures to collect both filtered and unfiltered groundwater samples and ensure that well purging is conducted at a rate that does not create significant drawdown. After one-year, field filtered/unfiltered groundwater results should be compared and evaluated. Based on the data, sampling frequencies may be adjusted as determined by DTSC.

If you have any questions, please contact me at (916) 255-3600.

Sincerely,

Signed by Gerard Abrams 01/24/07

Gerard Abrams, C.HG.
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Enclosure

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