



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

VIA FACSIMILE & U.S. MAIL

December 31, 2002

Mr. Jim Geocaris  
20321 Acacia Street, Suite 200  
Newport Beach, CA 92660

Re: Work Plan for Well Relocation - 17300 Chestnut Street, City of Industry, CA

Dear Jim,

The U.S. EPA has reviewed the subject work plan for the abandonment and relocation of three wells (MW-2, MW-5 and MW-6) on the referenced property, and has provided the following comments and recommendations below. EPA approves of this proposed well abandonment and relocation work plan provided that these comments are addressed by the Industry Urban-Development Agency (IUDA). Please submit responses to these comments at your earliest convenience, as these matters are important to transfer of this land to the IUDA.

If you have any questions or comments, please feel free to give me a call at (415) 972-3178.

Penelope McDaniel

A handwritten signature in black ink, appearing to read "Penelope McDaniel", written over a large, light-colored scribble.

Superfund Project Manager  
Puente Valley Operable Unit

cc: Bill Keener  
Brett Moffatt

## Work Plan Comments

### Well Abandonment

1. Proposed well abandonment procedures are in substantial conformance with State Water Well Standards; however, there is no specific statement regarding a commitment to conform to those standards. It is recommended that the work plan specifically state that well abandonment will conform to State Water Well Standards, as presented in California Department of Water Resources (DWR) Bulletin 74-81 and supplemented by DWR Bulletin 74-90.
2. If the screen slot size of the monitoring wells to be abandoned is less than 0.020 inches, it is recommended that the screen and portions of the casing surrounded with gravel pack are perforated prior to pressure grouting to ensure adequate grout invasion.
3. When adding bentonite to the grout mix, the bentonite should be mixed with the water and fully hydrated prior to mixing with cement.
4. Addition of a grout accelerator, such as calcium chloride, should be avoided to minimize the potential for cracking, which could compromise the integrity of the sealant.
5. During pressure grouting, the pressure needs to be maintained until the grout has had the opportunity to set up.

### Drilling, Soil Sampling, and Well Construction

1. Given the heterogeneity of the subsurface in Puente Valley, soil sampling should be conducted more frequently than every 5 feet. It is recommended that soil sampling be conducted at an interval of no greater than every 2 feet.
2. A description of well development methods, and development completion thresholds should be provided.

### Investigation-Derived Waste

1. If emergent compounds (e.g., perchlorate, 1,4-dioxane, hexavalent chromium) have been analyzed and detected in Utility monitoring wells, then water generated during well development should be analyzed for those emergent compounds prior to disposal.