# Workplan for the Second Five-Year Review of the Palos Verdes Landfill Rolling Hills Estates, California

July 2014

Prepared by:

County Sanitation Districts of Los Angeles County 1955 Workman Mill Road Whittier, CA 90601

# **Table of Contents**

1.	<b>INTROD</b>	UCTION	1			
2.	FACILITY OVERVIEW1					
3.	FIVE-YE	EAR REVIEW PROCESS	2			
4.	REFERE	NCE DOCUMENTS	3			
5.	SUMMA	RY	3			
6.	REFERE	NCES	4			
List	of Figure	es ·				
Figu	re 1	Site Location Map				
Figu	re 2	Site Layout				
Figu	re 3	Location of Groundwater Extraction Wells				
List	of Appen	ndices				
App	endix A	Five-Year Review Site Inspection Checklist				
App	endix B	Five-Year Review Report Content Checklist				
App	endix C	Five-Year Review Summary Form				

## 1. INTRODUCTION

The Operation and Maintenance (O&M) Agreement (DTSC, 1998) between the County Sanitation Districts of Los Angeles County (Sanitation Districts) and the Department of Toxics Substances (DTSC) for the Palos Verdes Landfill (site, PVLF) requires the Sanitation Districts conduct a review and reevaluation of the remedial actions at the site every five years. The requirement is consistent with Section 121 of the Federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA), which subject remedial actions that result in hazardous substances, pollutants, or contaminants remaining at a site to a Five-Year Review. DTSC is the primary regulatory agency overseeing the implementation and the performance review of these remedial activities at the PVLF.

While the PVLF is not regulated under CERCLA and is not a Superfund site, five-year reviews for the site are performed in general accordance with provisions of CERCLA and the National Contingency Plan (NCP) at the direction of the DTSC. The first Five-Year Review for the PVLF was completed and approved by DTSC on November 4, 2009 (DTSC, 2009). In 2014, the Sanitation Districts will perform a second Five-Year Review of the site. The review will be conducted based on the United States Environmental Protection Agency's (USEPA) Comprehensive Five-Year Review Guidance (USEPA, 2001).

In accordance with the review guidance, the purpose of the Five-Year Review is to evaluate the implementation and performance of remedial actions at the PVLF to determine if the implemented remedy continues to be protective of human health and the environment and whether remedial action objectives are being fulfilled.

# 2. FACILITY OVERVIEW

The PVLF is located at 25706 Hawthorne Boulevard, Rolling Hills Estates, Los Angeles County, California (Figure 1) and covers approximately 291 acres. About 83 acres of the site are operated by the County of Los Angeles Department of Parks and Recreation as the South Coast Botanic Garden; 35 acres are operated by the City of Rolling Hills Estates as Ernie Howlett Park; and the remaining 173 acres, referred to as the Main Site, are operated by the Sanitation Districts with limited access to the public (Figure 2).

From the early 1900s until the 1950s, much of the area covered by the PVLF was operated as a diatomite mine. In 1952, Ben K. Kazarian and Sons (BKK) began landfill operations in the area now developed into the South Coast Botanic Garden. In May 1957, the Sanitation Districts acquired the landfill from BKK and assumed landfill operations. The Sanitation Districts expanded the landfill and operated the facility until December 1980 when the landfill reached design capacity. A portion of the facility was permitted to receive hazardous waste and approximately 3 to 4 percent of the waste received at the landfill was considered hazardous. The types of hazardous waste accepted were primarily liquid wastes that included: acid wastes, solvents, alkaline wastes,

tetraethyl lead sludge, chemical toilet wastes, hazardous tank bottoms, contaminated soil and sand, brine, pesticides, and other hazardous wastes (primarily refinery, oil field, and oil terminal wastes) (Sanitation Districts, 1997).

The Sanitation Districts have been performing groundwater monitoring and reporting analytical results since 1964. Groundwater contamination was first discovered in the northern corner of the Main Site in 1984. A remedial investigation and feasibility study (Sanitation Districts, 1995a and 1995b, respectively) were performed and identified affected groundwater onsite and offsite along Hawthorne and Crenshaw Boulevards. The remedial investigation report concluded that the constituents of concern in groundwater were arsenic and landfill-related volatile organic compounds. In an effort to control groundwater contamination, the Sanitation Districts operate groundwater extraction wells and treatment systems to mitigate affected groundwater. Currently, a total of 18 extraction wells have been installed to pump affected groundwater (Figure 3) from the PVLF. Extraction wells E01 through E13, E17, and E18 are part of a subsurface cement-bentonite barrier system installed to control affected groundwater near Hawthorne Boulevard. Extraction wells E14, E15, and E16 were installed to control affected groundwater near Crenshaw Boulevard.

The first Five-Year Review of the remedial actions for the PVLF was completed and approved by DTSC on November 4, 2009. The review found the environmental control systems in place (landfill soil cover, gas collection/control system for surface air and subsurface gas, groundwater containment system, industrial wastewater, and stormwater, etc.) effective and that the site is safe and well maintained. As a result, no additional remedial measures were recommended.

#### 3. FIVE-YEAR REVIEW PROCESS

The second Five-Year Review for the PVLF will be conducted based on the guidelines provided by the USEPA Comprehensive Five-Year Review Guidance, report number EPA 540-R-01-007. The Five-Year Review Inspection Checklist, Content Checklist, and Review Summary Form, as provided in the Comprehensive Five-Year Review Guidance and presented in Appendices A-C, will guide the review process to ensure that all pertinent information is gathered for evaluation.

In accordance with the guidelines, the purpose of this Five-Year Review is to evaluate the implementation and performance of remedial actions at the PVLF in order to determine if the implemented remedy is protective of human health and the environment and whether remedial action objectives are being fulfilled since the first Five-Year Review. This Five-Year Review will include the review of all relevant site O&M data and documents, interviews with site staff, and a thorough inspection of the environmental control systems. The findings and conclusions of the Five-Year Review, including recommendations, follow-up actions to address any issues identified, and protectiveness determinations, will be presented in a report with all data and information necessary to support the findings and conclusions. The draft report for the second Five-Year Review will be submitted to DTSC 90 days from workplan approval.

DOC # 3036491 Page 2

# 4. REFERENCE DOCUMENTS

Routine sampling and monitoring data for groundwater, surface air, subsurface gas, stormwater, and industrial wastewater will be compiled for review and reevaluation. These include: groundwater monitoring reports submitted to DTSC, routine reports for surface air and subsurface gas submitted to the South Coast Air Quality Management District; quarterly and annual site inspection reports performed in accordance with the site's Storm Water Pollution Prevention Plan; annual stormwater reports submitted to the Regional Water Quality Control Board; and industrial wastewater monitoring reports submitted in accordance with the Sanitation Districts' discharge requirements will be used to aid the Five-Year Review process by providing a basis for drawing conclusions about the success of the implemented remediation techniques. The Sanitation Districts have most sampling and monitoring data available in electronic format in a database. This database will be queried to extract the pertinent data for this review.

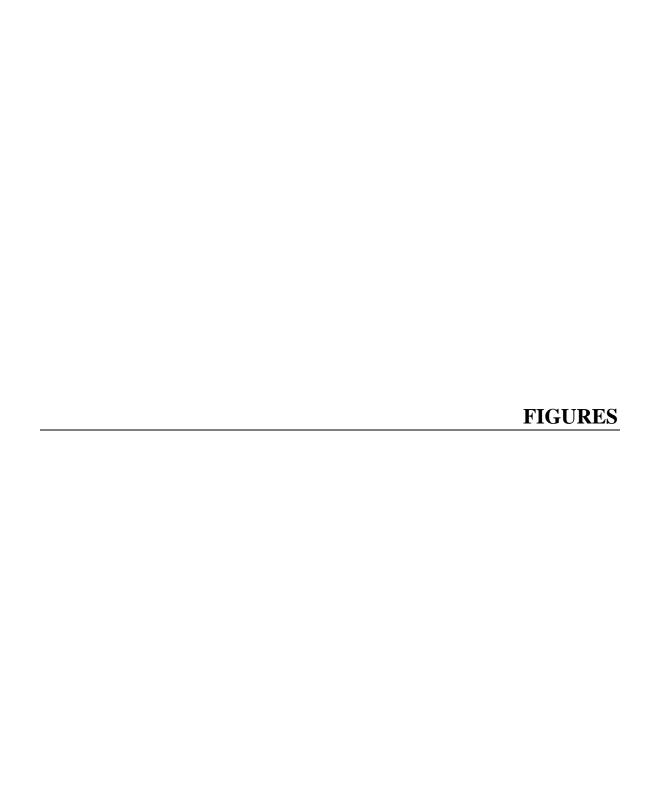
The first Five-Year Review for the PVLF reviewed monitoring data through December 2006. This second Five-Year review will evaluate all relevant site operation and maintenance information including sampling and monitoring data collected since the last Five-Year review (between January 2007 and December 2013).

## 5. SUMMARY

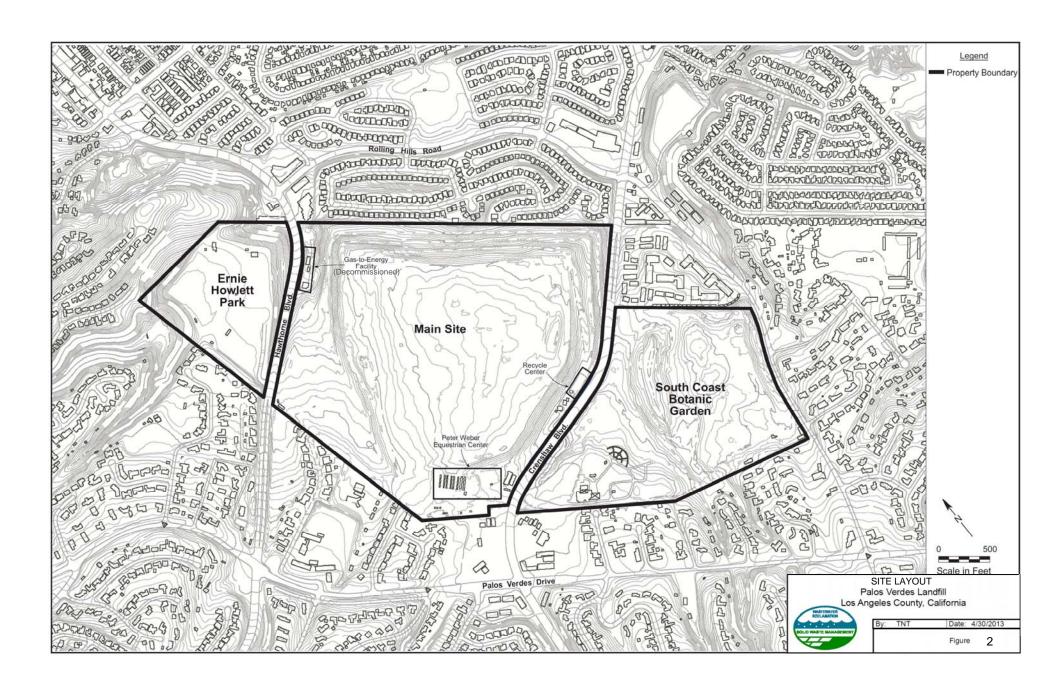
The Sanitation Districts have prepared this workplan for the upcoming Five-Year Review that will review and reevaluate the implementation and performance of remedial actions at the PVLF. Guidance provided by the USEPA in the Five-Year Review's Site Inspection Checklist (Appendix A), Content Checklist (Appendix B), and Review Summary (Appendix C) will be followed to complete the Five-Year Review. The draft Five-Year Review Report will be submitted to the DTSC 90 days from workplan approval.

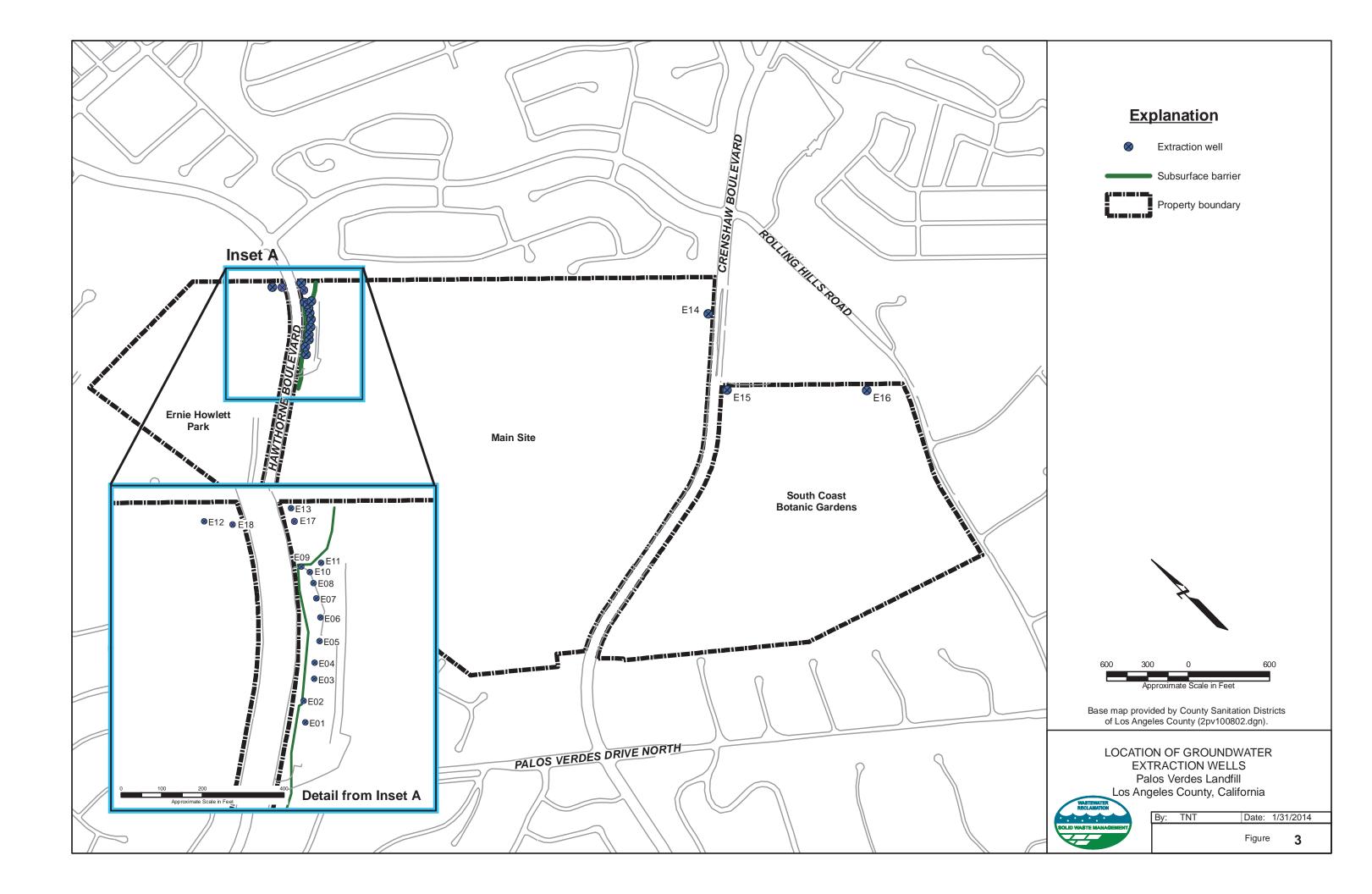
#### 6. REFERENCES

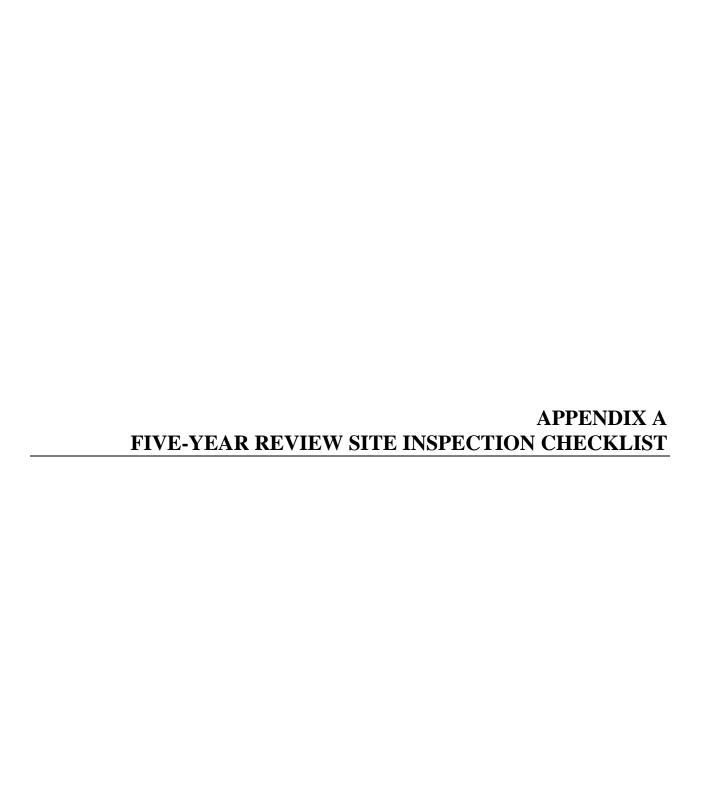
- Department of Toxic Substances Control, 1998, Operation and Maintenance Agreement, Palos Verdes Landfill Main Site, Rolling Hills Estates, California, December (DTSC, 1998).
- Department of Toxic Substances Control, 2009, Palos Verdes Landfill Five-Year Review, November (DTSC, 2009).
- U.S. Environmental Protection Agency, 2001, Comprehensive Five-Year Review Guidance, June (USEPA, 2001)
- County Sanitation Districts of Los Angeles County, 1997, Operation and Maintenance Plan for Remedial Action, Palos Verdes Landfill, April (Sanitation Districts, 1997).
- County Sanitation Districts of Los Angeles County, 1995, Remedial Investigation Report for the Palos Verdes Landfill, June (Sanitation Districts, 1995a).
- County Sanitation Districts of Los Angeles County, 1995, Feasibility Study Report for the Palos Verdes Landfill, June (Sanitation Districts, 1995b).











# **Five-Year Review Site Inspection Checklist**

# **Purpose of the Checklist**

The site inspection checklist provides a useful method for collecting important information during the site inspection portion of the five-year review. The checklist serves as a reminder of what information should to be gathered and provides the means of checking off information obtained and reviewed, or information not available or applicable. The checklist is divided into sections as follows:

- I. Site Information
- II. Interviews
- III. On-site Documents & Records Verified
- IV. O&M Costs
- V. Access and Institutional Controls
- VI. General Site Conditions
- VII. Landfill Covers
- VIII. Vertical Barrier Walls
- IX. Groundwater/Surface Water Remedies
- X. Other Remedies
- XI. Overall Observations

Some data and information identified in the checklist may or may not be available at the site depending on how the site is managed. Sampling results, costs, and maintenance reports may be kept on site or may be kept in the offices of the contractor or at State offices. In cases where the information is not kept at the site, the item should not be checked as "not applicable," but rather it should be obtained from the office or agency where it is maintained. If this is known in advance, it may be possible to obtain the information before the site inspection.

This checklist was developed by EPA and the U.S. Army Corps of Engineers (USACE). It focuses on the two most common types of remedies that are subject to five-year reviews: landfill covers, and groundwater pump and treat remedies. Sections of the checklist are also provided for some other remedies. The sections on general site conditions would be applicable to a wider variety of remedies. The checklist should be modified to suit your needs when inspecting other types of remedies, as appropriate.

The checklist may be completed and attached to the Five-Year Review report to document site status. Please note that the checklist is not meant to be completely definitive or restrictive; additional information may be supplemented if the reviewer deems necessary. Also note that actual site conditions should be documented with photographs whenever possible.

# **Using the Checklist for Types of Remedies**

The checklist has sections designed to capture information concerning the main types of remedies which are found at sites requiring five-year reviews. These remedies are landfill covers (Section VII of the checklist) and groundwater and surface water remedies (Section IX of the checklist). The primary elements and appurtenances for these remedies are listed in sections which can be checked off as the facility is inspected. The opportunity is also provided to note site conditions, write comments on the facilities, and attach any additional pertinent information. If a site includes remedies beyond these, such as soil vapor extraction or soil landfarming, the information should be gathered in a similar manner and attached to the checklist.

# **Considering Operation and Maintenance Costs**

Unexpectedly widely varying or unexpectedly high O&M costs may be early indicators of remedy problems. For this reason, it is important to obtain a record of the original O&M cost estimate and of annual O&M costs during the years for which costs incurred are available. Section IV of the checklist provides a place for documenting annual costs and for commenting on unanticipated or unusually high O&M costs. A more detailed categorization of costs may be attached to the checklist if available. Examples of categories of O&M costs are listed below.

<u>Operating Labor</u> - This includes all wages, salaries, training, overhead, and fringe benefits associated with the labor needed for operation of the facilities and equipment associated with the remedial actions.

<u>Maintenance Equipment and Materials</u> - This includes the costs for equipment, parts, and other materials required to perform routine maintenance of facilities and equipment associated with a remedial action.

<u>Maintenance Labor</u> - This includes the costs for labor required to perform routine maintenance of facilities and for equipment associated with a remedial action.

<u>Auxiliary Materials and Energy</u> - This includes items such as chemicals and utilities which can include electricity, telephone, natural gas, water, and fuel. Auxiliary materials include other expendable materials such as chemicals used during plant operations.

<u>Purchased Services</u> - This includes items such as sampling costs, laboratory fees, and other professional services for which the need can be predicted.

<u>Administrative Costs</u> - This includes all costs associated with administration of O&M not included under other categories, such as labor overhead.

<u>Insurance</u>, <u>Taxes</u> and <u>Licenses</u> - This includes items such as liability and sudden and accidental insurance, real estate taxes on purchased land or right-of-way, licensing fees for certain technologies, and permit renewal and reporting costs.

Other Costs - This includes all other items which do not fit into any of the above categories.

[This page intentionally left blank.]

Please note that "O&M" is referred to throughout this checklist. At sites where Long-Term Response Actions are in progress, O&M activities may be referred to as "system operations" since these sites are not considered to be in the O&M phase while being remediated under the Superfund program.

# **Five-Year Review Site Inspection Checklist (Template)**

(Working document for site inspection. Information may be completed by hand and attached to the Five-Year Review report as supporting documentation of site status. "N/A" refers to "not applicable.")

I. SITE INFORMATION					
Site name:	Date of inspection:				
Location and Region:	EPA ID:				
Agency, office, or company leading the five-year review:	Weather/temperature:				
Remedy Includes: (Check all that apply)  Landfill cover/containment					
Attachments: ☐ Inspection team roster attached ☐ Site map attached					
II. INTERVIEWS	(Check all that apply)				
Name     Interviewed □ at site □ at office □ by phone Phone Problems, suggestions; □ Report attached	Title Date no				
2. <b>O&amp;M staff</b> Name  Interviewed □ at site □ at office □ by phone Phore Problems, suggestions; □ Report attached	Title Date no				

Agency Contact			
Name Problems; suggestions; □ Report attached	Title	Date	Phone n
Agency			
Name Problems; suggestions; □ Report attached	Title	Date	Phone n
Agency Contact			
Name Problems; suggestions; □ Report attached	Title	Date	Phone n
Agency Contact			
Name Problems; suggestions; □ Report attached	Title	Date	Phone n
Other interviews (optional)   Report attache	ed.		

	III. ON-SITE DOCUMENTS & R	ECORDS VERIFIED (C	Theck all that app	ly)
1.	O&M Documents  ☐ O&M manual ☐ As-built drawings ☐ Maintenance logs Remarks	☐ Readily available ☐ Readily available ☐ Readily available	☐ Up to date ☐ Up to date ☐ Up to date	□ N/A □ N/A □ N/A
2.	Site-Specific Health and Safety Plan  ☐ Contingency plan/emergency response plan/emarks	•	-	□ N/A □ N/A
3.	O&M and OSHA Training Records Remarks	☐ Readily available	☐ Up to date	□ N/A
4.	Permits and Service Agreements  ☐ Air discharge permit  ☐ Effluent discharge  ☐ Waste disposal, POTW  ☐ Other permits  Remarks	☐ Readily available☐ Readily available☐ Readily available☐ Readily available☐ Readily available☐ Readily available	☐ Up to date	□ N/A □ N/A □ N/A □ N/A
5.	Gas Generation Records ☐ Read Remarks ☐		o date	Δ
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	□ N/A

IV. O&M COSTS					
1.	O&M Organization  ☐ State in-house ☐ PRP in-house ☐ Federal Facility in- ☐ Other	house	☐ Contractor for State ☐ Contractor for PRP ☐ Contractor for Federa	•	
2.	O&M Cost Records  ☐ Readily available ☐ Funding mechanism Original O&M cost ex	stimate	n place	eakdown attached criod if available	
3.			Total cost  Total cost  Total cost  Total cost  Total cost  Total cost  O&M Costs During R		
	V. ACCESS	AND INSTI	TUTIONAL CONTRO	<b>DLS</b> □ Applicable □ N/A	
A. Fen	cing				
1.	Fencing damaged Remarks	□ Locat	ion shown on site map	☐ Gates secured	□ N/A
B. Oth	er Access Restrictions	3			
1.	Signs and other secu Remarks	rity measure	s □ Location sho	own on site map □ N/A	

C. Ins	stitutional Controls (ICs)					
1.	Site conditions imply ICs	not properly implemented not being fully enforced	□ Ye	es □ No es □ No	□ N/A □ N/A	
	FrequencyResponsible party/agency	self-reporting, drive by)				
	ContactName	Title		Date	Phone no.	
	Reporting is up-to-date Reports are verified by the	ne lead agency		es 🗆 No	□ N/A □ N/A	
	Violations have been rep	deed or decision documents horted stions:		es 🗆 No es 🗆 No	□ N/A □ N/A	
2.	Adequacy Remarks	☐ ICs are adequate	☐ ICs are inadequate		□ N/A	
D. Ge	neral					
1.		☐ Location shown on site m				
2.	Land use changes on sit Remarks	e □ N/A				
3.	Land use changes off si Remarks	te□ N/A				
		VI. GENERAL SITE CO	ONDITIONS			
A. Ro	ads	□ N/A				
1.	Roads damaged Remarks	☐ Location shown on site m	nap □ Roads adec	uate	□ N/A	

В. О	ther Site Conditions		
	Remarks		
	VII. LA	NDFILL COVERS □ Applicable □	] N/A
A. L	andfill Surface		
1.	Settlement (Low spots) Areal extent Remarks	☐ Location shown on site map Depth	
2.	_	☐ Location shown on site map	☐ Cracking not evident
3.	Erosion Areal extentRemarks	☐ Location shown on site map Depth	☐ Erosion not evident
4.	Holes Areal extentRemarks	-	☐ Holes not evident
5.	Vegetative Cover ☐ © ☐ Trees/Shrubs (indicate size Remarks_		shed
6.	Alternative Cover (armored Remarks_	l rock, concrete, etc.)	
7.	Bulges Areal extent_ Remarks_		□ Bulges not evident

8.	Wet Areas/Water Damag  ☐ Wet areas  ☐ Ponding ☐ Seeps ☐ Soft subgrade  Remarks	Wet areas/water damage not evident  □ Location shown on site map Areal extent	
9.	Slope Instability		
B. Ben	(Horizontally constructed	cable $\square$ N/A mounds of earth placed across a steep landfill side slope to interrupt the slope velocity of surface runoff and intercept and convey the runoff to a lined	
1.		☐ Location shown on site map ☐ N/A or okay	
2.		□ Location shown on site map □ N/A or okay	
3.	Bench Overtopped Remarks	☐ Location shown on site map ☐ N/A or okay	
C. Lete		n control mats, riprap, grout bags, or gabions that descend down the steep will allow the runoff water collected by the benches to move off of the	
1.	Areal extent	☐ Location shown on site map ☐ No evidence of settlement ☐ Depth ☐ De	
2.	Material type	☐ Location shown on site map ☐ No evidence of degradation  Areal extent	
3.	Areal extent	□ Location shown on site map □ No evidence of erosion □ Depth	

4.	Undercutting ☐ Location shown on site map ☐ No evidence of undercutting  Areal extent ☐ Depth ☐ No evidence of undercutting  Remarks ☐ Depth
5.	Obstructions Type No obstructions  Location shown on site map Areal extent  Size Remarks
6.	Excessive Vegetative Growth  No evidence of excessive growth  Vegetation in channels does not obstruct flow  Location shown on site map  Areal extent  Remarks
D. Cov	<b>rer Penetrations</b> $\square$ Applicable $\square$ N/A
1.	Gas Vents ☐ Active ☐ Passive ☐ Properly secured/locked☐ Functioning ☐ Routinely sampled ☐ Good condition ☐ Evidence of leakage at penetration ☐ Needs Maintenance ☐ N/A  Remarks ☐ Active ☐ Passive ☐ Routinely sampled ☐ Good condition ☐ Needs Maintenance
2.	Gas Monitoring Probes  □ Properly secured/locked□ Functioning □ Routinely sampled □ Good condition □ Evidence of leakage at penetration □ Needs Maintenance □ N/A  Remarks
3.	Monitoring Wells (within surface area of landfill)  □ Properly secured/locked□ Functioning □ Routinely sampled □ Good condition □ Evidence of leakage at penetration □ Needs Maintenance □ N/A  Remarks
4.	Leachate Extraction Wells         □ Properly secured/locked □ Functioning       □ Routinely sampled       □ Good condition         □ Evidence of leakage at penetration       □ Needs Maintenance       □ N/A         Remarks       □
5.	Settlement Monuments       □ Located       □ Routinely surveyed       □ N/A         Remarks       □

E. Gas Collection and	d Treatment	plicable	□ N/A	
	nt Facilities  ☐ Thermal desition ☐ Needs Main	itenance	☐ Collection for reuse	
☐ Good cond	on Wells, Manifolds and Pition □ Needs Main	itenance		
☐ Good cond	ing Facilities (e.g., gas mor ition ☐ Needs Main	itenance		gs)
F. Cover Drainage L	ayer □ Ap	plicable	□ N/A	
1. <b>Outlet Pipes</b> Remarks	Inspected □ Fur	nctioning	□ N/A	
2. Outlet Rock Remarks	Inspected □ Fu		□ N/A	
G. Detention/Sedime	ntation Ponds	plicable	□ N/A	
☐ Siltation no	ıl extent ot evident	_		□ N/A
☐ Erosion not	Areal extentt evident		-	
3. Outlet Works Remarks	s □ Functioning			
4. <b>Dam</b> Remarks	□ Functioning	g □ N/A		

H. Ret	taining Walls	□ Applicable □ N/A			
1.	Rotational displacement_	Vertical	displace		
2.	<b>Degradation</b> Remarks	☐ Location shown on site		☐ Degradation not evident	
I. Peri	meter Ditches/Off-Site Di	scharge	icable	□ N/A	
1.	Siltation			not evident	
2.	☐ Vegetation does not im Areal extent			□ N/A	
3.		☐ Location shown on site Depth		□ Erosion not evident	
4.		☐ Functioning ☐ N/A			
	VIII. VER	TICAL BARRIER WAL	LS 🗆	Applicable □ N/A	
1.	Settlement Areal extent Remarks	☐ Location shown on site Depth	-	☐ Settlement not evident	
2.	Head differential	ored	□ Evide	ence of breaching	

	<b>IX. GROUNDWATER/SURFACE WATER REMEDIES</b> □ Applicable □ N/A
A.	Groundwater Extraction Wells, Pumps, and Pipelines □ Applicable □ N/A
1.	Pumps, Wellhead Plumbing, and Electrical  ☐ Good condition ☐ All required wells properly operating ☐ Needs Maintenance ☐ N/A  Remarks
2.	Extraction System Pipelines, Valves, Valve Boxes, and Other Appurtenances  Good condition Needs Maintenance Remarks
3.	Spare Parts and Equipment  ☐ Readily available ☐ Good condition ☐ Requires upgrade ☐ Needs to be provided  Remarks
B.	<b>Surface Water Collection Structures, Pumps, and Pipelines</b> □ Applicable □ N/A
1.	Collection Structures, Pumps, and Electrical  ☐ Good condition ☐ Needs Maintenance  Remarks
2.	Surface Water Collection System Pipelines, Valves, Valve Boxes, and Other Appurtenances  Good condition  Needs Maintenance  Remarks
3.	Spare Parts and Equipment  ☐ Readily available ☐ Good condition ☐ Requires upgrade ☐ Needs to be provided  Remarks

C.	Treatment System	☐ Applicable	□ N/A		
1.	<ul><li>☐ Air stripping</li><li>☐ Filters</li><li>☐ Additive (e.g., chelation</li><li>☐ Others</li></ul>	☐ Oil/w ☐ Carb on agent, flocculen ☐ Need ly marked and fund log displayed and entified er treated annually tter treated annuall	vater separation on adsorbers  t)  ds Maintenance ctional l up to date		
2.	Electrical Enclosures an  □ N/A □ Good Remarks	d condition	☐ Needs Maintena	al) nce	
3.	Tanks, Vaults, Storage  □ N/A □ Good Remarks	d condition		y containment    Needs Maintenance	
4.	Discharge Structure and ☐ N/A ☐ Good Remarks	d condition	☐ Needs Maintena	nce	
5.	☐ Chemicals and equipm				
6.	Monitoring Wells (pump and treatment remedy)  □ Properly secured/locked□ Functioning □ Routinely sampled □ Good condition □ All required wells located □ Needs Maintenance □ N/A  Remarks				
D.	Monitoring Data				
1.	Monitoring Data  ☐ Is routinely so	ubmitted on time	☐ Is of accept	able quality	
2.	Monitoring data suggests  ☐ Groundwater plume is		ned □ Contaminar	t concentrations are declining	

D. Monitored Natural Attenuation				
Monitoring Wells (natural attenuation remedy)  □ Properly secured/locked□ Functioning □ Routinely sampled □ Good condition □ All required wells located □ Needs Maintenance □ N/A  Remarks				
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.				
XI. OVERALL OBSERVATIONS				
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.).				
Adequacy of O&M				
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.				
1				

C.	Early Indicators of Potential Remedy Problems
	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.
D.	Opportunities for Optimization
	Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy.



# **Content Checklist For Five-Year Review Reports**

This checklist may be used by you, your managers, etc., to verify that you have included all of the appropriate information in your Five-Year Review report. Depending on site-specific circumstances, some items may not be applicable. For example, a report for a site just beginning construction will generally contain less data than for a site that has reached construction completion.

Gene	ral Report Format			
	Signed concurrence memorandum (as appropriate)			
	Title page with signature and date			
	Completed five-year review summary form (page E-15)			
	List of documents reviewed			
	Site maps (as appropriate)			
	List of tables and figures			
	Interview report (as appropriate)			
	Site inspection checklist			
	Photos documenting site conditions (as appropriate)			
Intro	duction			
	The purpose of the five-year review			
	Authority for conducting the five-year review			
	Who conducted the five-year review (lead agency) and when			
	$\Box$ Organizations providing analyses in support of the review (e.g., the contractor			
	supporting the lead agency )			
	□ Other review participants or support agencies			
	Review number (e.g., first, second)			
	□ Trigger action and date			
	If review covers only part of a site, explain approach			
	□ Define which areas are covered in the five-year review			
	□ Summarize the status of other areas of the site that are not covered in the present five			
	year			

# Site Chronology

 $\Box$  List all important site events and relevant dates (*e.g.*, date of initial discovery of problem, dates of pre-NPL responses, date of NPL listing, etc.)

Back	ground				
	General site description (e.g., size, topography, and geology)				
	Former, current, and future land use(s) of the site and surrounding areas				
	□ History of contamination				
	Initial response (e.g., removals)				
	Basis for taking remedial action $(e.g., contaminants)$				
Reme	edial Actions				
	Regulatory actions ( <i>e.g.</i> , date and description of Records of Decision, Explanations of Significant Difference, Administrative Orders on Consent, Consent Decrees and Action Memorandum)				
	Remedial action objectives				
	Remedy description				
	Remedy implementation (e.g., status, history, enforcement actions, performance)  Systems operations/Operations & Maintenance  Systems operations/O&M requirements				
	☐ Systems operations/O&M operational summary ( <i>e.g.</i> , history, modifications, problems, and successes)				
	□ Summary of costs of system operations/O&M effectiveness ( <i>i.e.</i> , are requirements being met and are activities effective in maintaining the remedy?)				
Progr	ress Since Last Five-Year Review (if applicable)				
	Protectiveness statements from last review				
	Status of recommendations and follow-up actions from last review				
	Results of implemented actions, including whether they achieved the intended effect Status of any other prior issues				
Five-	Year Review Process				
	Administrative Components				
	□ Notification of potentially interested parties of initiation of review process				
	☐ Identification of five-year review team members (as appropriate)				
	□ Outline of components and schedule of your five-year review				
	Community Involvement				
	□ Community notification (prior and post review)				
	☐ Other community involvement activities (e.g., notices, fact sheets, etc., as appropriate)				
□ Document review					
	Data review				
	Site inspection				
	□ Inspection date				
	□ Inspection participants				

# Five-Year Review Process, cont'd. □ Site inspection scope and procedures □ Site inspection results, conclusions □ Inspection checklist □ Interviews ☐ Interview date(s) and location(s) ☐ Interview participants (name, title, etc.) □ Interview documentation □ Interview summary **Technical Assessment** □ Answer Question A: Is the remedy functioning as intended by the decision documents? $\Box$ remedial action performance (*i.e.*, is the remedy operating as designed?) □ system operations/O&M □ cost of system operations/O&M □ opportunities for optimization □ early indicators of potential issues □ implementation of institutional controls and other measures ☐ Answer Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives (RAOs) used at the time of the remedy selection still valid? □ changes in standards, newly promulgated standards, TBCs □ expected progress towards meeting RAOs □ changes in exposure pathways □ changes in land use □ new contaminants and/or contaminant sources □ remedy byproducts □ changes in toxicity and other contaminant characteristics □ risk recalculation/assessment (as applicable) ☐ Answer Question C: Has any other information come to light that could call into question the protectiveness of the remedy? □ new or previously unidentified ecological risks □ natural disaster impacts □ any other information that could call into question the protectiveness of the remedy

#### Issues

□ Technical Assessment Summary

- ☐ Issues identified during the technical assessment and other five-year review activities
- □ Determination of whether issues affect current or future protectiveness

# Issues, cont'd.

□ A discussion of unresolved issues raised by support agencies and the community (States, Tribes, other Federal agencies, local governments, citizens, PRPs, other interested parties), if applicable

# **Recommendations and Follow-up Actions**

- □ Required/suggested improvements to identified issues or to current site operations
- □ Note parties responsible for actions
- □ Note agency with oversight authority
- □ Schedule for completion of actions related to resolution of issues

## **Protectiveness Statements**

- □ Protective statement(s) for each OU (If the remedy is not protective of human health and/or the environment, have you provided supporting discussion and information in the report to make this determination, such as current threats or level of risk?)
- □ Comprehensive protectiveness statement covering all of the remedies at the site (if applicable)

#### **Next Review**

- □ Expected date of next review
- ☐ If five-year reviews will no longer be done, provide a summary of that portion of the technical analysis presented in the report that provides the rationale for discontinuation of five-year reviews



# **Five-Year Review Summary Form**

Site name (from WasteLAM):  Region: State: City/County:  SITE STATUS  NPL status:   Final   Deleted   Other (specify)	SITE IDENTIFICATION							
State:   City/County:   SITE STATUS	Site name (from WasteLAN):							
SITE STATUS	EPA ID (from WasteLAN):							
Remediation status (choose all that apply):	Region:	State:	City/County:					
Remediation status (choose all that apply):		SITE STATUS						
Multiple OUs?*   YES   NO   Construction completion date:   /   /    Has site been put into reuse?   YES   NO    REVIEW STATUS  Lead agency:   EPA   State   Tribe   Other Federal Agency    Author name:  Author title:   Author affiliation:  Review period:**   /   /   to   /   /    Date(s) of site inspection:   /   /    Type of review:   Post-SARA   Pre-SARA   NPL-Removal only   Non-NPL Remedial Action Site   NPL State/Tribe-lead   Regional Discretion    Review number:   1 (first)   2 (second)   3 (third)   Other (specify)    Triggering action:   Actual RA Onsite Construction at OU #   Actual RA Start at OU#   Previous Five-Year Review Report   Other (specify)    Triggering action date (from WasteLAN):   /   /   /	NPL status: □	NPL status: ☐ Final ☐ Deleted ☐ Other (specify)						
REVIEW STATUS  Lead agency:   EPA   State   Tribe   Other Federal Agency    Author name:  Author title:   Author affiliation:  Review period:**   /   /   to   /   /    Date(s) of site inspection:   /   /    Type of review:   Post-SARA   Pre-SARA   NPL-Removal only   Non-NPL Remedial Action Site   NPL State/Tribe-lead   Regional Discretion  Review number:   1 (first)   2 (second)   3 (third)   Other (specify)    Triggering action:   Actual RA Onsite Construction at OU #   Actual RA Start at OU#   Previous Five-Year Review Report   Other (specify)    Triggering action date (from WasteLAN):   /   /   /      Triggering action date (from WasteLAN):   /   /   /	Remediation st	atus (choose all th	at apply):   Ur	nder Construction   Operating   Complete				
REVIEW STATUS  Lead agency:   EPA   State   Tribe   Other Federal Agency    Author name:  Author title:   Author affiliation:  Review period:**   /     to   /      Date(s) of site inspection:   /   /    Type of review:   Post-SARA   Pre-SARA   NPL-Removal only   Non-NPL Remedial Action Site   NPL State/Tribe-lead   Regional Discretion    Review number:   1 (first)   2 (second)   3 (third)   Other (specify)    Triggering action:   Actual RA Onsite Construction at OU #   Actual RA Start at OU#   Previous Five-Year Review Report    Other (specify)   Triggering action date (from WasteLAN):   /   /	Multiple OUs?*	Multiple OUs?* □ YES □ NO Construction completion date://						
Author name:  Author title:  Author affiliation:  Review period:** / / to /  Date(s) of site inspection: / /  Post-SARA	Has site been p	ut into reuse?	☐ YES ☐ NO					
Author name:  Author title:  Review period:** / to /  Date(s) of site inspection: / /  Type of review:			REVIEV	V STATUS				
Author title:  Review period:** / to /  Date(s) of site inspection: /  Type of review:	Lead agency:	Lead agency: □ EPA □ State □ Tribe □ Other Federal Agency						
Review period:** / to /  Date(s) of site inspection: / /  Type of review: Post-SARA	Author name:							
Type of review:    Post-SARA   Pre-SARA   NPL-Removal only   Non-NPL Remedial Action Site   NPL State/Tribe-lead   Regional Discretion    Review number:   1 (first)   2 (second)   3 (third)   Other (specify)   Triggering action:   Actual RA Onsite Construction at OU #   Actual RA Start at OU#   Construction Completion   Previous Five-Year Review Report   Other (specify)   Triggering action date (from WasteLAN):   / / /	Author title:			Author affiliation:				
Type of review:    Post-SARA   Pre-SARA   NPL-Removal only   Non-NPL Remedial Action Site   NPL State/Tribe-lead   Regional Discretion    Review number:   1 (first)   2 (second)   3 (third)   Other (specify)   Triggering action:   Actual RA Onsite Construction at OU #   Actual RA Start at OU#   Construction Completion   Previous Five-Year Review Report   Other (specify)   Triggering action date (from WasteLAN):   / / /	Review period:	**//	to/	/				
□ Post-SARA □ Pre-SARA □ NPL-Removal only   □ Non-NPL Remedial Action Site □ NPL State/Tribe-lead   □ Regional Discretion    Review number: □ 1 (first) □ 2 (second) □ 3 (third) □ Other (specify)  Triggering action: □ Actual RA Onsite Construction at OU # □ Actual RA Start at OU# □ Construction Completion □ Previous Five-Year Review Report   □ Other (specify)    Triggering action date (from WasteLAN): / /								
Triggering action:  Actual RA Onsite Construction at OU # Actual RA Start at OU# Construction Completion Previous Five-Year Review Report Other (specify)  Triggering action date (from WasteLAN)://	Type of review:	Type of review:  ☐ Post-SARA ☐ Pre-SARA ☐ NPL-Removal only ☐ Non-NPL Remedial Action Site ☐ NPL State/Tribe-lead						
□ Actual RA Onsite Construction at OU # □ Actual RA Start at OU# □ Previous Five-Year Review Report □ Other (specify) □ Triggering action date (from WasteLAN): / /	Review number: ☐ 1 (first) ☐ 2 (second) ☐ 3 (third) ☐ Other (specify)							
	☐ Actual RA Onsite Construction at OU # ☐ Actual ☐ Construction Completion ☐ Previous ☐ Previo							
Due date (five years after triggering action date)://	Triggering action date (from WasteLAN)://							

<sup>\*\* [</sup>Review period should correspond to the actual start and end dates of the Five-Year Review in WasteLAN.]

# Five-Year Review Summary Form, cont'd. Issues: Summarize issues (see Chapter 3). **Recommendations and Follow-up Actions:** Summarize recommendations and follow-up actions (see Chapter 3). **Protectiveness Statement(s):** Include individual operable unit protectiveness statements. For sites that have reached construction completion and have more than one OU, include an additional and comprehensive protectiveness statement covering all of the remedies at the site (see Chapter 4). Other Comments: Make any other comments here.