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11/28/2003 11:25 AM

To: Nabil Fayoumi/R5/USEPA/US@EPA
cc:
Subject: DNAPL work plan comments

EPA Region 5 Records Ctr.
208916

Nabil:

As we discussed earlier this week, attached are comments on the November 4, 2003 DNAPL submittal by the PRPs for Sauget Area 1. Although we have some minor comments, we do not believe any further revisions to the work plan are necessary prior to the commencement of field work.

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wweinig@laramideenvironmental.com 031128-Revised(2)DNAPLPlanComments

Comments Regarding "Response to Comments on Workplan DNAPL Characterization and Remediation Study, Sauget Area 1, Sauget, Illinois" dated November 4, 2003.

Comments prepared by Laramide Environmental, LLC November 28, 2003.

1. The revisions made in response to previous comments appear to be appropriate. Although we have some minor comments below, no further revisions to the work plan should be necessary.

2. *Cover Letter, Page 1, final paragraph:* The text of this paragraph requests that the Agency notify the PRPs if it believes that the data collected will not meet the data requirements for a Technical Impracticability (TI) determination by the Agency. As we have stated in previous comments and teleconferences, a TI waiver is only one of a range of options that should be evaluated in the finalized EE/CA and RI/FS report. At this time, we are not aware of any further data gaps that would need to be addressed prior to remedy selection, assuming that the tasks described in the work plan are fully completed and the subsequent data analyses are appropriate and complete. The final determination of data adequacy can only be made after the data are collected, assessed, quality-assured, interpreted, and the appropriate reports submitted for review.

3. *Response to Comments, Page 2, first paragraph*: Results from a particle-tracking model are described in this paragraph. However, no reports or documentation regarding the particle-tracking model have been submitted for review or comment. We reserve the right to comment on the modeling referenced in this paragraph if and when such a report is prepared and submitted. Insufficient information is provided in the work plan to assess the validity of the model or the conclusions presented in the text. A complete description of the modeling approach, assumptions, sensitivity, underlying data, and conclusions will be necessary if this modeling is to be used to support any aspect of remedy selection for Sauget Area 1.

4. *Response to Comments, Pages 4-7, Conceptual Model*: We appreciate the discussion of alternative conceptual models for the relationship between DNAPL mass removal and downgradient groundwater concentrations in the dissolved phase. Rather than focusing on a single, middle-of-the-road conceptual model for data interpretations, it may be more appropriate to evaluate the data gathered during the investigation in light of both the conceptual model advocated by Newell et al. (1996) (direct proportionality between DNAPL mass and dissolved concentrations) and the model attributed to Rao and Jawitz (2003) (small volume of DNAPL removal/large reduction in concentrations). Evaluating the data in light of both conceptual models would provide a bounding or sensitivity analysis that would be very useful in remedy evaluation, including assessment of the suitability of a TI waiver for the Area 1 fill areas and groundwater. We do not believe any additional field data collection would be necessary to perform both analyses, so inclusion of a bounding evaluation should not delay the commencement of the field tasks described in the work plan.