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Xcel Energy

August 1, 2008

Mr. Scott Hansen
Remedial Response Branch, Region 5
U.S. EPA (SR-6J)
77 West Jackson Blvd.
Chicago, IL 60604

RE: Ashland/NSP Lakefront Site
Final Groundwater Sampling Plan
CERCLA Docket No. V-W-04-C-764
USEPA ID# WISFN057952
WDNR BRRTS #02-02-00013

Dear Mr. Hansen:

The attached Groundwater Sampling Plan (GSP) incorporates your review comments from your emails of July 21st and July 29th. Accordingly, this represents the Agency's approved GSP. The field work for the initial sampling event as described in the plan will begin on August 11th. For planning purposes, we assume this complete round of sample collection will require two weeks to complete.

NSPW notes the following with regard to the Agency's review comments:

- Groundwater data have been collected at the Lakefront Site using the same sampling procedures described in the GSP beginning in 1995. The results prior to the RI were validated, combined with the RI data (collected 2003-2005), and incorporated in the RI report. Trend analyses for groundwater COCs were presented and described. As you know, the RI report was approved earlier this year.
- The GSP procedures include purging four well volumes with a pump or bailer. This method conforms to the WDNR groundwater sampling guidance, which was finalized in 1996; it specifies purging of multiple well volumes followed by sample collection. Low flow sampling became accepted practice by USEPA as an optimum sampling procedure several years after the initial data was collected at the Lakefront site.
- Low flow sampling is not applicable for all geologic environments. Many of the wells at the Lakefront Site are screened in such environments as described by USEPA for the SITE demonstration project (*Cool-Ox™ Technology Demonstration at Ashland MGP Lakefront Site*, page 2-3, USEPA 2008):

> "Initially groundwater samples from monitoring and extraction wells were collected using low-flow purging and sample collection methods to minimize suspension of solids and loss of volatiles due to degassing. However, the wells were unable to sustain flow

even for low flow conditions. Thereafter, samples were collected by bailing 3 well volumes from the well and then collecting a sample."

- The RI report discusses the groundwater flow regime and the fate and transport of contaminants in the filled ravine, the Kreher Park fill and the Copper Falls aquifer. Flow in the Copper Falls is highly influenced by the confining conditions that are present in the aquifer north of the former MGP. These confining conditions have restricted contaminant movement in the aquifer in both the vertical and horizontal direction. The water level and water quality results collected during the decade of monitoring between 1995 and 2005 have confirmed these conditions.

Based on these findings, NSPW remains concerned with the Agency's required addition to Section 1.0 (Purpose) of the GSP and provides this letter to document our position. The statement that the proposed sampling method cannot be used to evaluate trends because of the potential loss of VOCs inadvertently implies that the previous data are neither accurate nor worthy of being relied upon as we proceed to evaluate cleanup options. This statement also implies the Lakefront Site has not been fully characterized which is contrary to the Agency's approval of the RI report. Finally, it does not conform to USEPA's own findings arising from the SITE demonstration.

Sincerely,

Jerry C. Winslow

Jerry C. Winslow
Principal Environmental Engineer

Enclosure

cc: Jamie Dunn
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