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Monthly Oversight Report 43
ACS NPL Site
Griffith, Indiana
June 25, 2004 - July 30, 2004

BLACK & VEATCH

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Black & Veatch Special Projects Corp.

USEPA/RAC VII
American Chemical Services RAO (057-ROBF-05J7)

BVSPC Project 46526
BVSPC File C.3
August 13, 2004

Mr. Kevin Adler
U.S. Environmental Protection Agency
77 W. Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Subject: Monthly Oversight Summary Report No. 43 for July 2004

Dear Mr. Adler:

Enclosed is the Monthly Oversight Summary Report No. 43 for July 2004 for the American Chemical Services Superfund Site in Griffith, Indiana.

If you have any questions, please call (312-683-7856) or email (campbelllm@bv.com).

Sincerely,

BLACK & VEATCH Special Projects Corp.

Larry M. Campbell

Larry M. Campbell, P.E.
Site Manager

Enclosure

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Monthly Oversight Summary Report No. 43
ACS Superfund Site WA57, 46526.238

Reporting Period: Month of July (June 26, 2004 - July 30, 2004).
BVSPC O/S Dates: July 8, 15, and 22, 2004.

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	2	Respondent's General Contractor
U.S. Environmental Protection Agency	1	Federal Regulatory Agency
Indiana Department of Environmental Management	1	State Regulatory Agency
Black & Veatch Special Projects Corp.	1	USEPA Oversight Contractor
Austgen	1	General Contractor
Ryan Construction	1	General Contractor
Midwest Environmental, Inc.	2	SBPA Grading Contractor
Simalabs	1	GWTP Sampling Contractor

Construction Activities

Major Activities:

- Montgomery Watson Harza cut-up, decontaminated, and disposed of the leaking sulfuric acid tank.
- Montgomery Watson Harza reported that a power surge shut down the groundwater treatment plant, but not the thermal oxidizer, resulting in overflow of water and oil from tanks onto the floor of the groundwater treatment plant.
- Montgomery Watson Harza continued to operate the On-Site Containment Area Still Bottoms Pond Area and Off-Site Containment Area in-situ soil vapor extraction systems, processing vapors through the Global thermal oxidizer unit 2.
- Montgomery Watson Harza reactivated the catalytic oxidation unit to process vapors from the in-situ soil vapor extraction systems.
- Montgomery Watson Harza installed dedicated pumps in nonperforming soil vapor extraction wells in the Still Bottoms Pond Area and pumped product from the wells.
- Midwest Environmental, Inc. regraded the gravel cover in the Still Bottoms Pond Area.

- Midwest Environmental, Inc. prepared the foundation for the supplemental blower shed in the Off-Site Containment Area.
- Midwest Environmental, Inc. prepared the surface area of the On-Site Containment Area Still Bottoms Pond Area in-situ soil vapor extraction well and air sparge point to be overdrilled and removed.
- Simalabs collected samples from the groundwater treatment plant for routine process monitoring.
- Montgomery Watson Harza held biweekly construction coordination meetings at the site on July 8 and 22, 2004.

Activities Performed:

Montgomery Watson Harza (MWH) reported that it has decided to replace the leaking sulfuric acid tank with a smaller tank. MWH reported that it cut the leaking tank into pieces, decontaminated the pieces, tested the pH of the rinse water, and disposed of the tank offsite as general debris. The diluted leaked sulfuric acid is still being temporarily stored in a group of poly tanks within secondary containments. MWH is evaluating offsite recycling and/or reuse options for the acid. MWH reported that the leaking sulfuric acid had compromised the surface coating of the secondary containment area, but had not damaged the concrete. MWH will retain a contractor to recoat the secondary containment floor and walls. MWH is currently pumping sulfuric acid into the groundwater treatment plant (GWTP) system from a 55-gallon drum that does not have independent secondary containment. MWH is planning to provide such secondary containment for this drum.

MWH continued to operate the On-Site Containment Area (ONCA) Still Bottoms Pond Area (SBPA) and Off-Site Containment Area (OFCA) in-situ soil vapor extraction (ISVE) systems, processing vapors through the Global thermal oxidizer unit 2. MWH reported that a power surge from storms during the evening of Saturday July 3 shut down the GWTP system. However, the thermal oxidizer unit 2 continued to operate, producing a liquid effluent that was discharged into tanks of the non-operating GWTP. MWH reported that the system did not send an alarm to page the plant operator. On Monday July 5, the operator found that tanks T-2 and T-4 had overflowed onto the GWTP floor. MWH reported that none of the overflowed water and oil had escaped from the GWTP into the surrounding environment. MWH and Austgen cleaned up the overflow and restarted the GWTP on Tuesday July 6.

MWH reported that the caustic pump supplying the Global thermal oxidizer unit 2 malfunctioned on July 14. The pH in the thermal oxidizer, therefore, dropped, shutting down the thermal oxidizer, which in turn shut down the GWTP. MWH reported repair of the caustic pump and restart of the ISVE and GWTP systems on July 16. The ISVE systems were also shutdown because of a power failure on July 21-22. MWH reported repairing a motor in the ONCA SBPA ISVE system on July 21.

MWH reported that it reactivated the catalytic oxidation unit to process vapors from the ONCA SBPA and OFCA ISVE systems, especially when the Global thermal oxidizer unit 2 is not operable. The catalytic oxidization unit has an upper temperature limit of 1050° F, so MWH must be careful not to process the more highly contaminated vapors through the catalytic oxidation unit. The catalytic oxidation unit was operated for a few hours on July 15 in order to assess its operational status, then shut down.

MWH continued to operate the GWTP during the reporting period at 20 to 30 gpm except for isolated periods when the GWTP was shut down for maintenance or power interruptions. MWH reported that the GWTP was shut down early in the week of July 19 because of a pump failure. The pump was replaced and the GWTP operation was resumed. The GWTP automatically shutdown on July 21 because of heavy storms and power loss. Operations resumed on July 22. MWH reported a sludge pump failed early in the week of July 26; it has been repaired and returned to service. During the shut-down on July 14 because of the caustic pump malfunction, MWH replaced a valve that had caused the activated sludge tank ME-101 to overflow on May 6. Simalabs collected samples from the GWTP for routine process monitoring.

MWH installed a groundwater pump in the non-functioning ONCA SBPA ISVE well SVE-61 containing product, but was not able to pump out any water or product. MWH reported that it had installed groundwater pumps in the non-functioning vapor wells containing product in the ONCA SBPA ISVE system. MWH reported that it installed the discharge tubing and electrical connection to the pump such that the liquid can be removed from the wells without its personnel being potentially exposed to vapors. MWH transfers the liquid to a 55 gallon drum and subsequently transfers it to tank T-6 in the GWTP. MWH reported that it pumped about 5 gallons of product from each of five ISVE wells.

MWH reported that it continues to evaluate the non-functioning wells and proposes a plan to overdrill and remove ISVE well SVE-59 and air sparge (AS) point AS-5 to investigate their condition and subsurface conditions that might impede the functioning of these ISVE wells. Both the ISVE well and AS point will be replaced with screens having larger slots and coarser granular filter material. Midwest Environmental, Inc. (MEI) removed the concrete pad surrounding air sparge point AS-5 and removed the soil and the vapor conveyance piping and flange from well SVE-59 during the week of July 26.

MEI started regrading the gravel in the SBPA cover area in preparation for future placement of the asphalt final cover. MEI filled in eroded areas and cut down excess gravel from around concrete pads at flush-mounted ISVE wells and air sparge points. MEI also constructed wood forms around the remaining stick-up ISVE wells and power poles in the SBPA.

MWH reported that the conex container to be used as the supplemental blower shed for the OFCA ISVE system arrived on July 26. MEI prepared the foundation area for the conex container by removing vegetation and soil west of the existing OFCA blower shed and then placing and compacting gravel. The conex container was then placed on the gravel and leveled.

MWH reported that IDEM had informed them that the permit to place wood chips on wetland pathways to monitoring wells was approved as of July 22. MWH reported they will begin work on the pathways soon, depending on the weather.

MWH held two biweekly construction coordination meetings at the site on July 8 and 22, 2004.

Attached are BVSPC weekly reports No. 174 through 178, correspondence, log book notes, and photographs of the daily activities. BVSPC's crew conducted oversight of the major field activities on July 8, 15, and 22, 2004. BVSPC's crew attended two construction coordination meetings at the site on July 8 and 22, 2004.

Topics of Concern:

- Air monitoring activities during Eagle Services work vacuuming the ONCA SBPA ISVE system wells were not clearly established with respect to volatile organic compounds.
- The sulfuric acid tank in the GWTP leaked into its secondary containment. BVSPC expressed concern that a job hazard analysis had not been prepared or evaluated for the work of transferring the acid and cleaning the leaking tank.
- Inability of GWTP to send page to operator when system stops operating.

Concern Resolution:

- MWH reported that it will evaluate procedures that were established for other work activities and determine an appropriate monitoring plan for future activities related to the ONCA SBPA ISVE system wells.
- MWH transferred the leaked and diluted sulfuric acid into poly tanks for temporary storage. MWH completed an incident form detailing the incident that occurred and the health and safety procedures that would be followed when mitigating the incident.
- MWH and Austgen reprogrammed logic in GWTP controls to page operator when power is lost and/or system stops operating.

Upcoming Activities:

- MWH to replace the heat exchanger for the Durr thermal oxidizer unit 1.
- MWH to complete expansion of the OFCA ISVE blower system.
- MWH to continue proving out the ONCA SBPA ISVE system wells, to include the investigation of the installation of ONCA SBPA ISVE well and AS point.
- MWH to continue operating the GWTP and the OFCA and ONCA SBPA ISVE systems.
- MWH to complete grading and compaction of the gravel on the SBPA cover, place concrete pads around wells and power poles, and place the final asphalt cover over the ONCA SBPA.
- MWH to place the wood chips in the wetland paths to the monitoring wells.
- MWH to evaluate soil vapor intrusion into the house basement resulting from the smear zone in the South Area.
- MWH to investigate benzene levels in the lower aquifer in the wetlands area.
- MWH and EPA to conduct Pre-Final Inspection of construction in early September.

Signature: Larry Campbell Date: August 13, 2004

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Weekly Oversight Summary Report No. 174
ACS Superfund Site WA57, 46526.238

Reporting Period: Week of June 28, 2004.
BVSPC O/S Dates: Cancelled because of limited site activities.

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	1	Respondent's General Contractor
Austgen	1	General Contractor

Construction Activities

Major Activities:

- Montgomery Watson Harza cut-up, decontaminated, and disposed of the leaking sulfuric acid tank.

Activities Performed:

Montgomery Watson Harza (MWH) reported that it has decided to replace the leaking sulfuric acid tank. MWH reported that it cut the leaking tank into pieces, decontaminated the pieces, tested the pH of the rinse water, and disposed of the tank offsite as general debris. MWH reported that it is also evaluating locations where it can either dispose of or recycle the diluted sulfuric acid. MWH reported that U.S. Floors will come to the site to inspect the damaged surface of the concrete containment and provide a quote to recoat the secondary containment floor and walls.

MWH continued to operate the On-Site Containment Area (ONCA) Still Bottoms Pond Area (SBPA) and Off-Site Containment Area (OFCA) in-situ soil vapor extraction (ISVE) systems, processing vapors through the Global thermal oxidizer unit 2. MWH continued to operate the groundwater treatment plant (GWTP) at 25 to 30 gpm.

MWH installed a groundwater pump in the non-functioning ONCA SBPA ISVE well SVE-61 containing product, but was not able to pump out any water or product. MWH reported that it continues to evaluate the non-functioning wells in the system.

Topics of Concern:

- Air monitoring activities during Eagle Services work vacuuming the ONCA SBPA ISVE system wells were not clearly established with respect to volatile organic compounds.
- The sulfuric acid tank in the GWTP leaked into the secondary containment. BVSPC expressed concern that a job hazard analysis had not been prepared or evaluated for the work of transferring the acid and cleaning the leaking tank.

Concern Resolution:

- MWH reported that it will evaluate procedures that were established for other work activities and determine an appropriate monitoring plan for future activities related to the ONCA SBPA ISVE system wells.
- MWH transferred the leaked and diluted sulfuric acid into poly tanks for temporary storage. MWH completed an incident form detailing the incident that occurred and the health and safety procedures that would be followed when mitigating the incident.

Upcoming Activities:

- MWH to replace the heat exchanger for the Durr thermal oxidizer unit 1.
- MWH to expand the OFCA ISVE system.
- MWH to continue proving out the ONCA SBPA ISVE system wells.
- MWH to continue operating the GWTP and the OFCA and ONCA SBPA ISVE systems.
- MWH to grade and compact the gravel on the SBPA cover and place the final asphalt cover over the ONCA SBPA.
- MWH to place the wood chips in the wetland paths to the monitoring wells.
- MWH to evaluate soil vapor intrusion into the house basement resulting from the smear zone in the South Area.
- MWH to investigate benzene levels in the lower aquifer in the wetlands area.

Signature: Larry Campbell Date: July 12, 2004

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Weekly Oversight Summary Report No. 175
ACS Superfund Site WA57, 46526.238

Reporting Period: Week of July 5, 2004.
BVSPC O/S Dates: July 8, 2004 (Ms. Peters)

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	2	Respondent's General Contractor
Indiana Department of Environmental Management	1	State Regulatory Agency
Black & Veatch Special Projects Corp.	1	USEPA Oversight Contractor
Austgen	1	General Contractor

Construction Activities

Major Activities:

- Montgomery Watson Harza reported that a power surge shut down the groundwater treatment plant, but not the thermal oxidizer, resulting in overflow of water and oil from tanks onto the floor of the groundwater treatment plant.
- Montgomery Watson Harza installed dedicated pumps in nonperforming soil vapor extraction wells in the Still Bottoms Pond Area and pumped product from the wells.
- Montgomery Watson Harza held the biweekly construction coordination meeting at the site on July 8, 2004.

Activities Performed:

Montgomery Watson Harza (MWH) reported that the leaking sulfuric acid had compromised the surface coating of the secondary containment area, but had not damaged the concrete. MWH will retain a contractor to recoat the secondary containment floor and walls. MWH reported that it will replace the leaking tank with a smaller tank. The diluted spilled acid is still being temporarily stored in a group of poly tanks within secondary containments. MWH is evaluating offsite recycling and/or reuse options for the acid.

MWH continued to operate the On-Site Containment Area (ONCA) Still Bottoms Pond Area (SBPA) and Off-Site Containment Area (OFCA) in-situ soil vapor extraction (ISVE) systems, processing vapors through the Global thermal oxidizer unit 2. MWH reported that a power surge from storms during the evening of Saturday July 3 shut the groundwater treatment plant (GWTP) system down. However, the thermal oxidizer unit 2 continued to operate, producing a liquid effluent that was discharged into tanks of the non-operating GWTP. MWH reported that the system did not send an alarm page to the plant

operator. On Monday July 5, the operator found that tanks T-2 and T-4 had overflowed onto the GWTP floor. MWH reported that none of the overflowed water and oil had escaped from the GWTP into the surrounding environment. MWH and Austgen cleaned up the overflow and restarted the GWTP on Tuesday July 6. MWH continued to operate the GWTP at 25 gpm.

MWH reported that it had installed groundwater pumps in the non-functioning vapor wells containing product in the ONCA SBPA ISVE system. MWH reported that it installed the discharge tubing and electrical connection to the pump such that the liquid can be removed from the wells without its personnel being potentially exposed to vapors. MWH transfers the liquid to a 55 gallon drum and subsequently transfers it to tank T-6 in the GWTP. MWH reported that it pumped about 5 gallons of product from each of five ISVE wells. MWH reported that it continues to evaluate the non-functioning wells and proposes a plan to overdrill and remove an ISVE well and an air sparge (AS) point to investigate their condition and subsurface conditions that might impede the functioning of these ISVE wells. Both the ISVE well and AS point will be replaced with screens having larger slots and coarser granular filter material.

MWH reported that the permit application to place wood chips in the wetland access pathways had been sent to IDEM this week. MWH plans to place the chips soon after receipt of approval.

BVSPC attended the biweekly construction coordination meeting held at the site on July 8, 2004.

Topics of Concern:

- Air monitoring activities during Eagle Services work vacuuming the ONCA SBPA ISVE system wells were not clearly established with respect to volatile organic compounds.
- The sulfuric acid tank in the GWTP leaked into the secondary containment. BVSPC expressed concern that a job hazard analysis had not been prepared or evaluated for the work of transferring the acid and cleaning the leaking tank.
- Inability of GWTP to send page to operator when system stops operating.

Concern Resolution:

- MWH reported that it will evaluate procedures that were established for other work activities and determine an appropriate monitoring plan for future activities related to the ONCA SBPA ISVE system wells.
- MWH transferred the leaked and diluted sulfuric acid into poly tanks for temporary storage. MWH completed an incident form detailing the incident that occurred and the health and safety procedures that would be followed when mitigating the incident.
- MWH and Austgen reprogrammed logic in GWTP controls to page operator when power is lost and/or system stops operating.

Upcoming Activities:

- MWH to replace the heat exchanger for the Durr thermal oxidizer unit 1.
- MWH to expand the OFCA ISVE system, starting with foundation preparation.
- MWH to continue proving out the ONCA SBPA ISVE system wells.
- MWH to continue operating the GWTP and the OFCA and ONCA SBPA ISVE systems.

- MWH to grade and compact the gravel on the SBPA cover, place concrete pads around wells and power poles, and place the final asphalt cover over the ONCA SBPA.
- MWH to place the wood chips in the wetland paths to the monitoring wells.
- MWH to evaluate soil vapor intrusion into the house basement resulting from the smear zone in the South Area.
- MWH to investigate benzene levels in the lower aquifer in the wetlands area.
- MWH and EPA to conduct Pre-Final Inspection of construction in early September.

Signature: Larry Campbell Date: July 15, 2004

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WEEKLY CONSTRUCTION MEETING MINUTES
FOR JULY 8, 2004 MEETING
AMERICAN CHEMICAL SERVICE, NPL SITE
GRIFFITH, INDIANA

MEETING DATE: Thursday, July 8, 2004

MEETING TIME: 10:00 AM

MEETING LOCATION: ACS

ATTENDEES:
Kevin Adler – U.S. EPA
Prabhakar Kasarabada - IDEM
Leigh Peters – BVSPC
Pete Vagt – MWH
Todd Lewis – MWH
Rob Adams – MWH
Lee Orosz – MWH
Chris Daly – MWH
Jon Pohl – MWH
Chad Smith – MWH
Matthew Mesarch – MWH
Amy Clore - MWH

TOPICS:

Health and Safety Summary

MWH continued to cleanup the leak from the sulfuric acid tank that was observed on June 17th. The tank was emptied and cut up for disposal. Prior to disposal the tank was decontaminated and a pH risk test was performed on the rinse water. The personnel performing the cleanup wore the proper personal protective equipment (PPE). The acid that was removed from the leaking tank is still being held in the temporary containment structure with secondary containment. A 55-gallon drum of acid is currently being used to supply acid to the Groundwater Treatment Plant (GWTP) until the old tank is replaced. A contractor will be contacted for the purposes of recoating the secondary containment area surface that have been exposed to the acid.

On the evening of Saturday, July 3rd severe weather shut the GWTP system down, however, an emergency page was not sent to the plant operator. Sunday, July 4th, the plant operator dialed into the GWTP, which reported that the system had shutdown. When he arrived at the plant on Monday, July 5th, the plant operator found that tank T-2 and T-4 had overflowed onto the GWTP floor so there was an accumulation of water and oil. Neither the oil nor water had escaped the secondary containment system. It appears

that that when the GWTP was shutdown, the Thermal Oxidizer/Scrubber Unit remained running and produced a small volume of water that continued to fill, and then overflowed the tanks. On Tuesday, July 6th, Augsten Electric reset the input cards for the GWTP and restarted the system.

No other health and safety issues have occurred since the last meeting on June 24th. Other activities at the site since the last meeting have included operation of the GWTP, and operation of the Off-Site Area In-Situ Vapor Extraction (ISVE) system and the Still Bottoms Pond Area (SBPA) ISVE system.

Groundwater Treatment Plant (GWTP) Status
The GWTP is currently operating at approximately 25 gallons per minute (gpm).

Off-Site Area/SBPA ISVE Systems
Thermal Oxidizer/Scrubber Unit 2 (Therm Ox 2) has been operating with no issues since the last meeting on June 24th. The unit was shut down for approximately three hours on June 25th for routine maintenance.

The epoxy coating has been applied to the scrubber system in Thermal Oxidizer/Scrubber Unit 1 (Therm Ox 1). The unit will be ready to re-assemble as soon as the new heat exchanger arrives, which is expected to occur at the end of July.

MWH continued pumping product from five SBPA ISVE wells where product was noted. Approximately five gallons of product is being pulled from each well and a new well is pumped about once a week. The extracted product is being pumped into a 55-gallon drum, which is processed through the GWTP for treatment.

A memorandum detailing the scope of work for the field investigation of one or more ISVE wells is scheduled to go out to the Agencies next week. The scope of work will include overdrilling and removing an ISVE well and exchanging the well screen and gravel pack for a larger screen and also placing coarser aggregate around the well. Soil cores will be collected a couple of feet out from the current location to help evaluate if the capillary fringe is restricting air extraction. The well filter pack will also be observed to determine if it has been fouled and plugged. The drilling work is anticipated to begin the week of July 26th.

Construction of the foundation for the expansion equipment for the Off-Site ISVE system will begin in the next two weeks. The work will entail removing soil from the west side of the off-site shed and placing gravel in preparation for the new shed.

Access Path
The signed permit application form was mailed to the Agencies July 2nd. MWH will begin the construction to begin once authorization has been received and the weather is conducive. MWH will contact the Office of Water Quality at IDEM to confirm that the application has been received.

Lower Aquifer Investigation

MWH is currently conducting an internal review on the response to agency comments for the lower aquifer investigation. Responses will be forwarded to the agencies soon. Work is anticipated to begin in August.

On-Site Cover

An addendum to the request for proposal (RFP) for the SBPA cover was sent to the Agencies on July 7th. Work is anticipated to begin the week of July 12th with the regrading of the gravel. The target date for paving is the week of August 16th and the target date for completing the SBPA cover is August 27th. The U.S. EPA has scheduled a pre-final inspection for the SBPA cap for the September 1st to look at the work that has been completed since January 2001. MWH requested a visit by the U.S. EPA prior to the pre-final inspection and a date will be set at a later time.

Look Ahead Schedule

July 9, 2004 through July 22, 2004	• Off-Site ISVE system and SBPA ISVE system operation • GWTP/BWES/PGCS operation and routine maintenance • Work plan for the well reinstallation will be sent out to Agencies • Preparation work for the SBPA final cover • ISVE monitoring • Preparation work for the foundation for the Off-Site expansion equipment
Health and Safety Items to Monitor	• Safety issues associated with the GWTP acid leak cleanup • Safety issues associated with the SBPA asphalt work • Routine daily tailgate health and safety meetings

Next Construction Meeting – Thursday, July 22, 2004, 12 PM (Noon)

ALC/JLP/raa/pjv
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Weekly Oversight Summary Report No. 176
ACS Superfund Site WA57, 46526.238

Reporting Period: Week of July 12, 2004.
BVSPC O/S Dates: July 15, 2004 (Mr. Campbell).

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	3	Respondent's General Contractor
Black & Veatch Special Projects Corp.	1	USEPA Oversight Contractor
Austgen	1	General Contractor
Ryan Construction	1	General Contractor
Midwest Environmental, Inc.	2	SBPA Grading Contractor
BCS	1	Chemical Vendor

Construction Activities

Major Activities:

- Montgomery Watson Harza reported that it is reactivating the catalytic oxidation unit to process vapors from the in-situ soil vapor extraction systems.
- Midwest Environmental, Inc. regraded the gravel cover in the Still Bottoms Pond Area.

Activities Performed:

Montgomery Watson Harza (MWH) reported that the diluted leaked sulfuric acid is still being temporarily stored in a group of poly tanks within secondary containments. MWH is evaluating offsite recycling and/or reuse options for the acid. MWH reported that it has selected firms to recoat the acid secondary containment area and to furnish a new acid tank, but contracts have not yet been issued.

MWH continued to operate the On-Site Containment Area (ONCA) Still Bottoms Pond Area (SBPA) and Off-Site Containment Area (OFCA) in-situ soil vapor extraction (ISVE) systems, processing vapors through the Global thermal oxidizer unit 2. MWH reported that the caustic pump supplying the Global thermal oxidizer unit 2 malfunctioned on July 14. The pH in the thermal oxidizer, therefore, dropped, shutting down the thermal oxidizer, which in turn shut down the groundwater treatment plant (GWTP). MWH reported repair of the caustic pump and restart of the ISVE and GWTP systems on July 16. During the shut-down, MWH replaced a valve that had caused the activated sludge tank ME-101 to overflow on May 6. MWH continued to operate the GWTP at 20 to 25 gpm.

MWH reported that it is reactivating the catalytic oxidation unit to process vapors from the ONCA SBPA and OFCA ISVE systems, especially when the Global thermal oxidizer unit 2 is not operable. The catalytic oxidization unit has an upper temperature limit of 1050° F, so MWH must be careful not to process the more highly contaminated vapors through the catalytic oxidation unit. The catalytic oxidation unit was operated for a few hours in order to assess its operational status, then shut down.

Midwest Environmental, Inc. (MEI) started regrading the gravel in the SBPA cover area in preparation for future placement of the asphalt final cover. MEI filled in eroded areas and cut down excess gravel from around concrete pads at flush-mounted ISVE wells and air sparge points. MEI also constructed wood forms around the remaining stick-up ISVE wells and power poles in the SBPA.

Topics of Concern:

- Air monitoring activities during Eagle Services work vacuuming the ONCA SBPA ISVE system wells were not clearly established with respect to volatile organic compounds.
- The sulfuric acid tank in the GWTP leaked into the secondary containment. BVSPC expressed concern that a job hazard analysis had not been prepared or evaluated for the work of transferring the acid and cleaning the leaking tank.

Concern Resolution:

- MWH reported that it will evaluate procedures that were established for other work activities and determine an appropriate monitoring plan for future activities related to the ONCA SBPA ISVE system wells.
- MWH transferred the leaked and diluted sulfuric acid into poly tanks for temporary storage. MWH completed an incident form detailing the incident that occurred and the health and safety procedures that would be followed when mitigating the incident.

Upcoming Activities:

- MWH to replace the heat exchanger for the Durr thermal oxidizer unit 1.
- MWH to expand the OFCA ISVE system, starting with foundation preparation.
- MWH to continue proving out the ONCA SBPA ISVE system wells.
- MWH to continue operating the GWTP and the OFCA and ONCA SBPA ISVE systems.
- MWH to complete grading and compaction of the gravel on the SBPA cover, place concrete pads around wells and power poles, and place the final asphalt cover over the ONCA SBPA.
- MWH to place the wood chips in the wetland paths to the monitoring wells.
- MWH to evaluate soil vapor intrusion into the house basement resulting from the smear zone in the South Area.
- MWH to investigate benzene levels in the lower aquifer in the wetlands area.
- MWH and EPA to conduct Pre-Final Inspection of construction in early September.

Signature: Larry Campbell Date: July 27, 2004

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Weekly Oversight Summary Report No. 177
ACS Superfund Site WA57, 46526.238

Reporting Period: Week of July 19, 2004.
BVSPC O/S Dates: July 22, 2004 (Ms. Clark).

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	1	Respondent's General Contractor
U.S. Environmental Protection Agency	1	Federal Regulatory Agency
Indiana Department of Environmental Management	1	State Regulatory Agency
Black & Veatch Special Projects Corp.	1	USEPA Oversight Contractor
Austgen	1	General Contractor
Midwest Environmental, Inc.	2	SBPA Grading Contractor
Simalabs	1	GWTP Sampling Contractor

Construction Activities

Major Activities:

- Montgomery Watson Harza continued operation of the groundwater treatment plant and the in-situ soil vapor extraction systems.
- Midwest Environmental, Inc. regraded the gravel cover in the Still Bottoms Pond Area.
- Simalabs collected samples from the GWTP for routine process monitoring.
- Montgomery Watson Harza held the biweekly construction coordination meeting at the site on July 22, 2004.

Activities Performed:

Montgomery Watson Harza (MWH) reported that the diluted leaked sulfuric acid is still being temporarily stored in a group of poly tanks within secondary containments. MWH is evaluating offsite recycling and/or reuse options for the acid. MWH is currently pumping sulfuric acid into the groundwater treatment plant (GWTP) system from a 55-gallon drum that does not have independent secondary containment. MWH is planning to provide such secondary containment for this drum.

MWH reported that the GWTP was shut down early this week because of a pump failure. The pump was replaced and the GWTP operation was resumed. The GWTP automatically shutdown on July 21 because

of heavy storms and power loss. Operations resumed on July 22. MWH continued to operate the GWTP at 25 to 30 gpm. Simalabs collected samples from the GWTP for routine process monitoring.

MWH continued to operate the On-Site Containment Area (ONCA) Still Bottoms Pond Area (SBPA) and Off-Site Containment Area (OFCA) in-situ soil vapor extraction (ISVE) systems, processing vapors through the Global thermal oxidizer unit 2. The ISVE systems were also shutdown because of the power failure on July 21-22. MWH reported repairing a motor in the ONCA SBPA ISVE system on July 21.

Midwest Environmental, Inc. (MEI) continued regrading the gravel in the SBPA cover area in preparation for future placement of the asphalt final cover.

MWH reported that IDEM had informed them that the permit to place wood chips on wetland pathways to monitoring wells was approved as of July 22. MWH reported they will begin work on the pathways soon, depending on the weather.

BVSPC attended the biweekly construction coordination meeting held at the site on July 22, 2004.

Topics of Concern:

- Air monitoring activities during Eagle Services work vacuuming the ONCA SBPA ISVE system wells were not clearly established with respect to volatile organic compounds.
- The sulfuric acid tank in the GWTP leaked into the secondary containment. BVSPC expressed concern that a job hazard analysis had not been prepared or evaluated for the work of transferring the acid and cleaning the leaking tank.

Concern Resolution:

- MWH reported that it will evaluate procedures that were established for other work activities and determine an appropriate monitoring plan for future activities related to the ONCA SBPA ISVE system wells.
- MWH transferred the leaked and diluted sulfuric acid into poly tanks for temporary storage. MWH completed an incident form detailing the incident that occurred and the health and safety procedures that would be followed when mitigating the incident.

Upcoming Activities:

- MWH to replace the heat exchanger for the Durr thermal oxidizer unit 1.
- MWH to expand the OFCA ISVE system, starting with foundation preparation.
- MWH to continue proving out the ONCA SBPA ISVE system wells.
- MWH to continue operating the GWTP and the OFCA and ONCA SBPA ISVE systems.
- MWH to complete grading and compaction of the gravel on the SBPA cover, place concrete pads around wells and power poles, and place the final asphalt cover over the ONCA SBPA.
- MWH to place the wood chips in the wetland paths to the monitoring wells.
- MWH to evaluate soil vapor intrusion into the house basement resulting from the smear zone in the South Area.
- MWH to investigate benzene levels in the lower aquifer in the wetlands area.

- MWH and EPA to conduct Pre-Final Inspection of construction in early September.

Signature: Larry Campbell Date: July 30, 2004

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WEEKLY CONSTRUCTION MEETING MINUTES FOR JULY 22, 2004 MEETING AMERICAN CHEMICAL SERVICE, NPL SITE GRIFFITH, INDIANA

MEETING DATE: Thursday, July 22, 2004

MEETING TIME: 12:00 PM

MEETING LOCATION: ACS

ATTENDEES:
Kevin Adler – U.S. EPA
Prabhakar Kasarabada - IDEM
Margaret Clark – BVSPC
Pete Vagt – MWH
Chris Daly – MWH
Jon Pohl – MWH
Chad Smith – MWH
Matthew Mesarch – MWH

TOPICS:

Health and Safety Summary

There have been no health and safety issues since the last meeting on July 8th. Activities at the site since the last meeting have included operation and maintenance of the groundwater treatment plant (GWTP), re-grading work of the gravel layer in the Still Bottoms Pond Area (SBPA) cover, and operation of the Off-Site Area and SBPA (On-Site) In-Situ Vapor Extraction (ISVE) systems.

The acid placed into temporary storage containers after the leak observed on June 7th remains at the site, in secondary containment. MWH is making preparations for processing the acid. MWH is currently using a 55-gallon drum of acid for the treatment process. This drum is not currently being stored within it's own secondary containment system. However, the entire treatment plant building has a sloped floor with center collection drains and which acts as secondary containment for all tanks and other units within the plant. Plans are being finalized for placing this drum within a secondary containment area.

GWTP Status

The GWTP is currently operating at approximately 20 gallons per minute (gpm). The GWTP shutdown automatically during the night of July 21st due to heavy storms in the area and was brought back online the morning of July 22nd.

Off-Site Area/SBPA ISVE Systems

Thermal Oxidizer/Scrubber Unit 2 (Therm Ox 2) was shutdown on July 21st due to the storm-related shutdown of the GWTP. Therm Ox 2 was brought back online on July 22nd. The SBPA ISVE system was taken offline on July 21st in order to repair a motor for the scrubber recirculation pump. The repairs were completed on July 21st and the system was brought back online. There have been no other issues with the unit.

The epoxy coating of the scrubber system in Thermal Oxidizer/Scrubber Unit 1 (Therm Ox 1) has been completed. The heat exchanger for the unit has been ordered and will be onsite for assembly in the beginning of August.

MWH anticipates proceeding with the next stage of the SBPA ISVE well investigation in the next two weeks. The investigation will consist of using a drilling crew to remove one ISVE well and one air sparge point. The well and air sparge point will then be reinstalled with different size well screens in order to determine if this will increase the available extraction capacity of the individual well. In addition, shelby tubes will be advanced in three locations to collect soil samples to determine if there are conditions or anomalies that may be limiting the performance of the ISVE wells. It is anticipated that the work will take two days to complete.

Wetlands Access Path

MWH has contacted Marty Maupin of the Indiana Department of Environmental Management (IDEM) to determine the status of the Wetlands Access Path permit. Mr. Maupin indicated that when the ten-day waiting period elapsed the permit was considered approved and work may commence. The waiting period ended on July 22nd so that work will commence on the access paths once the weather is conducive.

Chemical Oxidation Application

MWH has received approval from the PRP group to proceed with the full-scale chemical oxidation application. MWH will submit to the Agencies, the Chemical Oxidation Report on July 23rd. The report includes the results of the initial study, the plan for the full-scale application, and the plan for the soil gas sampling near the intersection of Reder Road and Colfax Avenue. It is anticipated that the work will begin within 30 days, as soon after Agency review and approvals of the report as practicable.

On-Site Cover

During the week of July 19th, Midwest Environmental Services (MES) was onsite re-grading the gravel layer for the SBPA final cover. In addition, MES constructed forms around the stick up ISVE wells in preparation of placing concrete pads around these wells.

Look Ahead Schedule

July 23, 2004 through August 5, 2004	• Off-Site ISVE system and SBPA ISVE system operation • GWTP/BWES/PGCS operation and routine maintenance • Continue work preparing the SBPA cover area for placement of the asphalt layer • Removal and replacement of one ISVE well and one air sparge point • Processing GWTP acid from leak cleanup
Health and Safety Items to Monitor	• Potential exposure to vapors during well drilling. All drilling personnel will wear Level B PPE • Safety issues associated with the On-Site asphalt work • Routine daily tailgate health and safety meetings for all work activities

Next Construction Meeting – Thursday, August 5, 2004, 10 AM

JDP/RAA/PJV
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Weekly Oversight Summary Report No. 178
ACS Superfund Site WA57, 46526.238

Reporting Period: Week of July 26, 2004.
BVSPC O/S Dates: Cancelled because of limited site activities.

Personnel Summary Affiliation	No. of Personnel	Responsibility
Montgomery Watson Harza	1	Respondent's General Contractor
Austgen	1	General Contractor
Midwest Environmental, Inc.	2	SBPA Grading Contractor

Construction Activities

Major Activities:

- Montgomery Watson Harza continued operation of the groundwater treatment plant and the in-situ vapor extraction systems.
- Midwest Environmental, Inc. prepared the foundation for the supplemental blower shed in the Off-Site Containment Area.
- Midwest Environmental, Inc. prepared the surface area of the Onsite Containment Area Still Bottoms Pond Area in-situ soil vapor extraction well and air sparge point to be overdrilled and removed.

Activities Performed:

Montgomery Watson Harza (MWH) reported that the diluted leaked sulfuric acid is still being temporarily stored in a group of poly tanks within secondary containments. MWH is evaluating offsite recycling and/or reuse options for the acid. MWH is currently pumping sulfuric acid into the groundwater treatment plant (GWTP) system from a 55-gallon drum that does not have independent secondary containment. MWH is planning to provide such secondary containment for this drum.

MWH reported that it continued to operate the GWTP at 25 to 30 gpm. A sludge pump failed early in the week; it has been repaired and returned to service.

MWH continued to operate the On-Site Containment Area (ONCA) Still Bottoms Pond Area (SBPA) and Off-Site Containment Area (OFCA) in-situ soil vapor extraction (ISVE) systems, processing vapors through the Global thermal oxidizer unit 2.

MWH reported that the conex container to be used as the supplemental blower shed for the OFCA ISVE system arrived on July 26. Midwest Environmental, Inc. (MEI) prepared the foundation area for the conex container by removing vegetation and soil west of the existing OFCA blower shed and then placing and compacting gravel. The conex container was then placed on the gravel and leveled.

MEI removed the concrete pad surrounding air sparge point AS-5 that will be overdrilled and removed as part of the SBPA well inspection program. MEI also removed the soil and the vapor conveyance piping and flange from well SVE-59 that will also be overdrilled and removed.

Topics of Concern:

- Air monitoring activities during Eagle Services work vacuuming the ONCA SBPA ISVE system wells were not clearly established with respect to volatile organic compounds.
- The sulfuric acid tank in the GWTP leaked into the secondary containment. BVSPC expressed concern that a job hazard analysis had not been prepared or evaluated for the work of transferring the acid and cleaning the leaking tank.

Concern Resolution:

- MWH reported that it will evaluate procedures that were established for other work activities and determine an appropriate monitoring plan for future activities related to the ONCA SBPA ISVE system wells.
- MWH transferred the leaked and diluted sulfuric acid into poly tanks for temporary storage. MWH completed an incident form detailing the incident that occurred and the health and safety procedures that would be followed when mitigating the incident.

Upcoming Activities:

- MWH to replace the heat exchanger for the Durr thermal oxidizer unit 1.
- MWH to complete expansion of the OFCA ISVE blower system.
- MWH to continue proving out the ONCA SBPA ISVE system wells, to include the investigation of the installation of ONCA SBPA ISVE well and AS point.
- MWH to continue operating the GWTP and the OFCA and ONCA SBPA ISVE systems.
- MWH to complete grading and compaction of the gravel on the SBPA cover, place concrete pads around wells and power poles, and place the final asphalt cover over the ONCA SBPA.
- MWH to place the wood chips in the wetland paths to the monitoring wells.
- MWH to evaluate soil vapor intrusion into the house basement resulting from the smear zone in the South Area.
- MWH to investigate benzene levels in the lower aquifer in the wetlands area.
- MWH and EPA to conduct Pre-Final Inspection of construction in early September.

Signature: Larry Campbell Date: August 12, 2004

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7/5/04 Lyle S. Peters

0800 Arrive Onsite, Sunny, Clear, 68°F
Personnel Present:

* Lee Orosz	MWH
* Todd Lewis	MWH
Tim Kirkland	Arstgen
* Luigi Peters	BVSPC

Spoke w/ T Lewis - he reported GWTP operating normally after problems this weekend. Weekend storms caused power surge that scrambled the GWTP computers. Trates overflowed. GWTP cleaned up on Tuesday and restarted. T. Lewis also reported that the sulfuric acid appears to have compromised the surface coating in secondary containment, but does not appear to have affected the concrete. MWH to replace with smaller tank.

0830 Roll 60 Photo 11 facing SW of secondary containment for former sulfuric acid tank.

0840 Walked ONCA SBPA. Observed that grass is growing on OFCA cover where the logs were formerly staged. Observed that the well cap is off SVE-66 and

Lyle S Peters

7/8/04 Lyle S Peters

vacuum being applied at well from blower.

0845 Roll 60 Photo 12 facing SE showing well cap not securely placed on SVE-66.

0850 Roll 60 Photo 13 facing N showing small erosion trail in ONCA SBPA interim cover between SVE-79 and SVE-80.

0853 Roll 60 Photo 14 facing SE showing erosion in ONCA SBPA interim cover and exposed geotextile on NW portion of SBPA.

0900 Worked on ACS reports

1000 Biweekly Construction Coordination Meeting.
Attendees - * on previous pgs:

Rob Adams	MWH		
Prabakar Kasuvabadu	IDEM		
Via phone:			
Pete Vagt	MWH	Chris Daly	MWH
Matt Mesarch	MWH	Jon Pohl	MWH
Amy Olova	MWH	Kevin Adler	EPA
Chad Smith	MWH		

H&S: No incident/issues. MWH determined inlet/outlet flanges were leaking. Acid stored in temp poly tanks w/secondary containment. MWH looking for some one to send the cleaned, cut and rinse tested old poly tank + disposed of as debris

Lyle S Peters

(142)

7/8/04 [signature]

MWH using 55 gal drum of sulfuric acid in interim.

GWTP: op @ 25 gpm. Storms set night - caused system to go down w/o paging L. Orosz. He logged into system Sunday night and observed GWTP down, ISVE systems running. Monday. T-2, T-4 overflowing + 70% of floor covered in water. Some oil present. MWH shut down ISVE system Monday. Austgen out on Tuesday to reset logic. Found that inside logic not latched to page L. Orosz when power is lost. MWH not clear as to why ISVE systems stayed running - water for scrubber continued to feed into plant + likely caused overflowing. Also pneumatic pumps in ONCA SDPA continue to operate until air released - appx 2 hours. BVSPC suggested looking into having a test page to L. Orosz weekly. MWH to evaluate. MWH also to evaluate routine system checks and monitoring to evaluate equipment and sensors. Also to look at programming logic to have signals

[signature]

7/8/04 [signature]

(143)

sent to switches, controls to ensure that they are functioning properly.

Thermoox 2: Running well - shut down Mon b/c of GWTP.

Thermoox 1: Coating installed in scrubber - to reassemble. Austgen onsite preparing flanges for heat exchanger installation expected end of July.

DFCA ISVE: 14 wells online - operating well

ONCA ISVE: 15-16 wells online. MWH installed electric pumps in SVE-53, 61, 72, + 38. Thicio product at SVE-61 - unable to pump w/electric pump - looking into diaphragm. MWH installed connection under cap at wells to allow for direct connect to pump and discharge - well not open when connecting. MWH pulled appx 5 gal from each of 3 functioning pumps last week.

Access Paths: MWH notified IDEM + to check on approval. May have approval as early as ~~Sat~~ 7/17. May start placing chips at end July or early August.

Lower Aquifer: Plan investigation for August but not yet set.

[signature]

(144) 7/8/04

ONCA Well field: MWH preparing document detailing SOW to pull one vapor and one air sparge well at minimum to inspect screen and evaluate why not functioning. MWH may replace screen with 20-slot MWH also to take discrete sample from around non functioning wells to see if the subsurface is related to the problem. MWH to give document out by 7/14 and to start work 7/26.

RFB Addendum: to modify documentation requirements b/c of MATCON's proprietary information w/ regards to asphalt.

Look Ahead

- GWTP op
- ONCA grading:
  - 7/12 - stake for cut/fill and begin regrading, cut perimeter
  - 7/19 - start compaction and testing.

  Proceed to concrete pads around wells, electric poles.

  MWH to have designated field inspector. Expand fence to include entire ONCA SBPA.

7/8/04 (145)

MWH expects paving to start 8/16

OFCA ISVE: Remove dirt west of blower shed for gravel base for expansion of ISVE system. Expect piping work to begin in upcoming weeks.

EPA's Pre final Inspection - first week of Sept. MWH request earlier walkthrough w/ BVSPC and EPA to make sure all issues are identified. Will cover activities since Jan 2001.

1045 Mtg Conclude - Next Mtg 7/22 @ 12 PM. Write up minutes.

1145-1210 Spoke with L. Campbell on site activities.

1215 Left site for day

7/8/04

15 July 04

~~027~~
1430 Arrive onsite - Clear hot 85°
Calm

Personnel onsite

Lee Orosz	MWH
Trevor Wood	MWH
Terry Frisk	Ryan
Rich Marsiglio	BCS
Dan Lawson	MEI
Steve Field	MEI
Tim Kirkland	Austgen
Rob Adams	MWH
Larry Campbell	BUSPC

1435 Talked w/ Lee Orosz.
Yesterday morning the caustic pump supplying Global Thermox 2 stopped pumping. Result is pH dropped & shut down Thermox 2 which shut down GWTP. While GWTP is down, MWH is replacing valve that caused MEI to overflow 2-3 weeks ago. MWH trying to find parts for pump

Jim Campbell

MWH is reactivating Cat Ox to handle vapors, but it has temp limit of 1050°F - so can't process highly contaminated vapors.

1454 Photo 61-1 looking E at regraded W end of SBPA gravel cap where erosion gullies have been filled

1456 Photo 61-2 Looking NE at SVE-58 DPE well flush mt pad. Note gravel has been cut down to make room for asphalt cap. Note wood forms in background around SVE wells and power poles

1513 Photo 61-3 Looking N at W drain inlet on S. side of SBPA cover. Steep slope and low elev trim will make const of asphalt cap difficult. May need to add concrete pad around drain.

1520 Disc. w/ Trevor Wood - new conc. pads to be 4' x 4' - different from existing pads @ 5.5' x 5.5'

1530 Photo 61-4 Looking NW at malfunctioning caustic pump (yellow)

Jim Campbell

1534 Photo 61-5 ~~facing~~ looking W into secondary containment for acid storage tank. Note leaking tank has been removed.

1532 Photo 61-6 looking NW into acid tank secondary containment. Note white marks on wall indicating level of diluted acid when it leaked.

1533 Photo 61-7 looking NW at 55gal drum of sulfuric acid being used to supply plant. Note lack of secondary containment around drum

1535 Disc in hand. MWH has selected firm to recoat acid tank secondary containment area. Also contacted tank supply co to furnish new acid tank. But neither is under contract.

1600 Left site for day

Margaret Clark

1/22/04 Margaret M. Clark

1100 Arrive Onsite pt. cloudy 82°F

Personnel Onsite

Mike Clemoweth Simalabs

Tim Kirkland Augsten

Kevin Adler EPA

Prabakar Kasarabada IDEM

1200 Bi-weekly construction meeting. Notes from meeting follow at end of days notes.

1230 Attempted to walk site for inspection w/ Adler & Kasarabada. Site gates were locked as was the GWTP.

1330 Left site for the day.

Meeting Notes: teleconference w/ MWH in Chicago

H&S

- Midwest has been onsite this week to do some prep. work for the ONCA cap.
- Acid from overflow a few weeks ago is still onsite & fully contained.
- BV asked if replacement acid in 55gal. drum has secondary containment. Chris Daly will look into that matter.

GWTP

- Plant was down earlier in the wk. due to a pump failure
- Plant was down earlier today b/c of power loss from

Margaret M. Clark

last nights storms

· Currently pumping 25-30 gpm.

ISVE:

· ISVE was down last night due to power failure

· ONCA ISVE is running today

· A motor was repaired yesterday for the ONCA ISVE

· Plan to pull two wells (1 ISVE, 1 air sparging) and reinstall. Schedule is to have drillers in two weeks. It will be a two day event. MWH will notify B&V when work is scheduled.

Therm Ox:

· A new heat exchanger was ordered for unit #1 and will be delivered in the beginning of August.

· The scrubber is ready to go.

ONCA cap:

· Midwest is doing some regrading work to prep.

· Next week they will be doing compaction testing.

Look Ahead:

· Prep. for final cap

· Drilling new wells & removing wells that are not functioning on ONCA.

Misc:

· MWH completed treatability plan for soil gas sampling. The PRP group has

approved it. MWH will submit report to B&V Monday.

· IDEM has been contacted regarding wetland trails. As of today they (MWH) can proceed with this work.

· Next meeting: Thursday August 5, 2004 @ 10:00 am

1220 Meeting concluded. Pete Vagt called the site per R. Adler's request. We discussed scheduling an information event to celebrate the completion of construction on the site in September. Kevin suggested having a public meeting & then offering a tour of the site. MWH would need to coordinate w/ ACS & the PRPs. Gen'l schedule: Install final cap in August, prelinal inspection the first week of September & the event one week after that.

· Kevin mentioned that the Explanation of Significant Differences would be issued in August. IDEM is currently reviewing.

Margaret M. Clark
July 22, 2004

Site: American Chemical Service, Inc.
Proj. #: 46526
Roll: 60 Photo #11
Date: 07-08-04 Time: 08:30
Photographer: Leigh Peters
Description: Photo facing southwest showing the floor of the secondary containment for the leaking sulfuric acid tank.

Site: American Chemical Service, Inc.
Proj. #: 46526
Roll: 60 Photo #12
Date: 07-08-04 Time: 08:45
Photographer: Leigh Peters
Description: Photo facing southeast showing well cap that is not securely placed on ONCA SBPA ISVE system well SVE-66.

Site: American Chemical Service, Inc.
Proj. #: 46526
Roll: 60 Photo #13
Date: 07-08-04 Time: 08:50
Photographer: Leigh Peters
Description: Photo facing north showing a small erosional trail in the ONCA SBPA interim cover between ISVE wells SVE-79 and SVE-80.

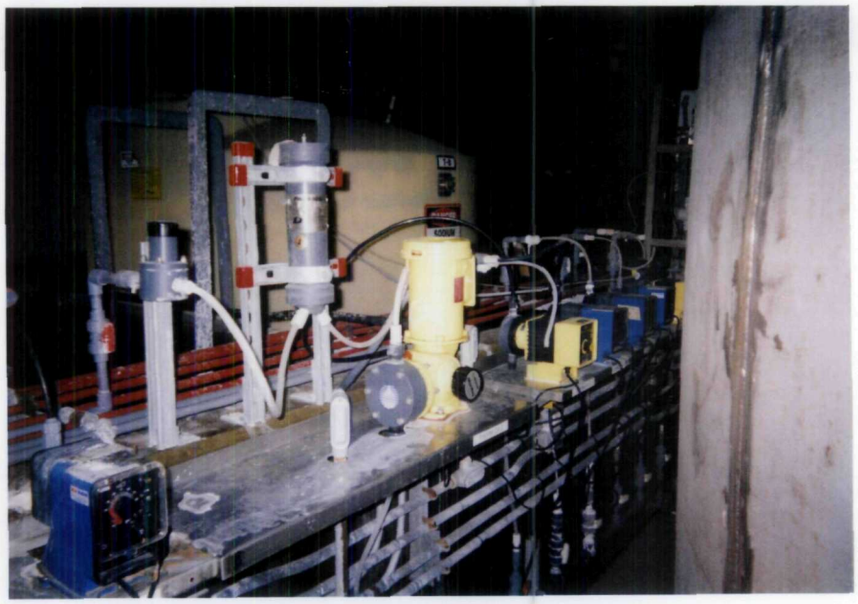
Site: American Chemical Service, Inc.
Proj. #: 46526
Roll: 60 Photo #14
Date: 07-08-04 Time: 08:53
Photographer: Leigh Peters
Description: Photo facing southeast showing erosion in the ONCA SBPA interim cover and the exposed geotextile on the northwest portion of the cover.

2

Site: American Chemical Service, Inc.
Proj. #: 46526
Roll: 61 Photo #1
Date: 07-15-04 Time: 1454
Photographer: Larry Campbell
Description: Photo facing east showing regraded west end of SBPA gravel cap where erosion gullies have been filled.

Site: American Chemical Service, Inc.
Proj. #: 46526
Roll: 61 Photo #2
Date: 07-15-04 Time: 1456
Photographer: Larry Campbell
Description: Photo facing northeast showing SVE-58 DPE well flush-mounted pad. Note gravel has been cut down to make room for asphalt cap.

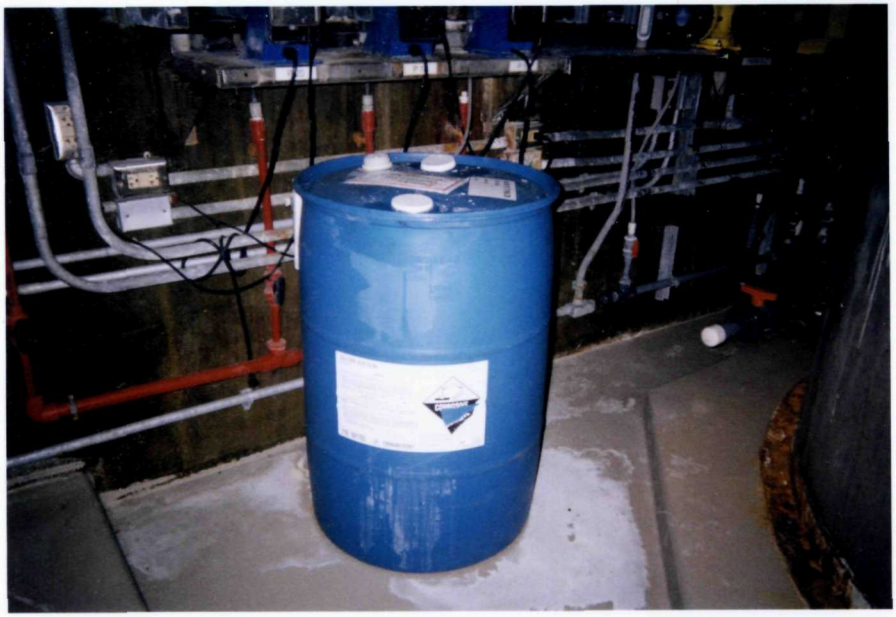
Site: American Chemical Service, Inc.
Proj. #: 46526
Roll: 61 Photo #3
Date: 07-15-04 Time: 1513
Photographer: Larry Campbell
Description: Photo facing north showing west drain inlet on south side of SBPA cover. Steep slope will make construction of asphalt cap difficult. May need concrete pad.



Site: American Chemical Service, Inc.
Proj. #: 46526
Roll: 61 Photo #4
Date: 07-15-04 Time: 1520
Photographer: Larry Campbell
Description: Photo facing northwest showing malfunctioning caustic pump (yellow).

Site: American Chemical Service, Inc.
Proj. #: 46526
Roll: 61 Photo #5
Date: 07-15-04 Time: 1531
Photographer: Larry Campbell
Description: Photo facing west into secondary containment for sulfuric acid tank. Leaking tank has been removed. White marks on wall indicate level of leaked diluted acid.

Site: American Chemical Service, Inc.
Proj. #: 46526
Roll: 61 Photo #6
Date: 07-15-04 Time: 1532
Photographer: Larry Campbell
Description: Photo facing northwest into secondary containment for sulfuric acid tank. Leaking tank has been removed.



Site: American Chemical Service, Inc.
Proj. #: 46526
Roll: 61 Photo #7
Date: 07-15-04 Time: 1535
Photographer: Larry Campbell
Description: Photo facing northwest showing 55 gal drum of sulfuric acid being used to supply GWTP. Note lack of dedicated secondary containment for this tank.