From: Walls (Young), Suzy
To: Mitchell, Tanya
Cc: Persico, John; Gutherz, Andrew
Subject: RE: Rolling Knolls FCR-02 Soil Sample Location Modification
Date: Monday, December 22, 2014 2:48:06 PM
Attachments: Rolling Knolls FCR-02_12222014.pdf

Tanya,
Please find attached the revised FCN-02 with the information you requested, specifically provided in the "Reason for Deviation" section.
Please let me know if you have any other questions.
Thanks,
Suzy

From: Mitchell, Tanya [mailto:Mitchell.Tanya@epa.gov]
Sent: Monday, December 22, 2014 1:21 PM
To: Walls (Young), Suzy
Cc: Persico, John; Gutherz, Andrew
Subject: RE: Rolling Knolls FCR-02 Soil Sample Location Modification
Hi Suzy,
As previously requested, this may just need a quick call. Please give me a call either you or John.
Thanks,
Tanya

From: Walls (Young), Suzy [mailto:Suzy.Walls@arcadis-us.com]
Sent: Monday, December 22, 2014 1:15 PM
To: Mitchell, Tanya
Cc: Persico, John; Gutherz, Andrew
Subject: RE: Rolling Knolls FCR-02 Soil Sample Location Modification
Tanya,
As stated in the FCN, relocation of the landfill boundary and samples is due to the visual observations of debris made in the field. Samples were not relocated because of inaccessibility – they were relocated based on the need to be 25 feet from the edge of the landfill boundary. If the field crew did not observe debris (i.e., the edge of the landfill) within 25 feet of the original sample location, they determined where the boundary should be and then relocated the sample accordingly. In some areas, the field crew observed debris near the sample location and moved the location further out so they would be 25 feet off the edge of the newly defined boundary.
The information you are requesting for each sample location (and the associated edge of the landfill) was provided in the table that was included in the revised FCN (see the column "basis for relocation").
I am in and out of the office today, so please cc John on all correspondence.
Thanks,
Suzy

From: Mitchell, Tanya [mailto:Mitchell.Tanya@epa.gov]
Sent: Monday, December 22, 2014 11:55 AM
To: Walls (Young), Suzy
Subject: FW: Rolling Knolls FCR-02 Soil Sample Location Modification
Hi Suzy,
Thank you for the modifications to the FCR. EPA is not questioning that the final sample

locations may be adjusted if field observations are indicated. However, the FCR should provide specific details to why these samples are being moved. Thus, "Additional detail is required for the Reason for Deviation section. For example, why are the sample locations being moved (debris, accessibility, etc.). Please provide additional information for each of the sample pair locations."

I left you a voice mail regarding this email. Please give me a call to discuss the requested information.

Regards,

Tanya

From: Persico, John [mailto:John.Persico@arcadis-us.com]
Sent: Friday, December 19, 2014 1:19 PM
To: Mitchell, Tanya
Cc: Walls (Young), Suzy; Gutherz, Andrew
Subject: Rolling Knolls FCR-02 Soil Sample Location Modification

Tanya – Suzy is out today. She forwarded me your comments on the FCR-02.

You asked for clarification regarding why the boundary of the landfill was revised. As indicated in FCR-02, "The Data Gaps SAP indicated that the landfill boundary will be confirmed based on visual observations at the time of sampling, and that final sample locations may be adjusted if field observations indicate the location of the landfill boundary differs from that shown in Figure 2" of the Data Gaps SAP. That is the exact process we used in the field: we looked for visual evidence of landfilled materials, and where our visual observations differed from the landfill boundary shown in Figure 2 of the Data Gaps SAP, we made adjustments to the sample locations to keep them 25 and 50 feet from the boundary. This is clear in FCR-02.

You also stated that the prior landfill boundary was determined by test pits. The prior landfill boundary was determined by both test pits and visual observations, so using visual observations to adjust the boundary of the landfill is consistent with the previous approach.

The locations of the test pits, and observations of trash at the test pits, are available on Figure 11 of the Site Characterization Summary Report. The revised landfill boundary provided in FCR-02 is consistent with observations at the test pits; the test pits where waste was observed are at or inside the boundary.

FCR-02 is attached again. We've added some text, and added the previous test pit locations to the figure showing the landfill boundary. Please contact me or Suzy with any questions.

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From: "Mitchell, Tanya" <Mitchell.Tanya@epa.gov>
Date: December 18, 2014 at 12:58:45 PM EST
To: "Walls (Young), Suzy" <Suzy.Walls@arcadis-us.com>
Subject: RE: Rolling Knolls FCN - Soil Sample Location Modification

Hi Suzy,

I have reviewed the FCR and have the following comments.

Additional detail is required for the Reason for Deviation section. For example, why are the

sample locations being moved (debris, accessibility, etc.). Please provide additional information for each of the sample pair locations.

It appears that the revised location Figure 3b includes revisions to the demarcated landfill boundary, based on field observations from this current event, as shown by the purple shading and purple dashed line. However, this change requires clarification. The prior landfill boundary is denoted by the fuchsia colored boundary and was determined by test pits. Now there is a purple line to denote the boundary (according to the note on the drawing based on observations of debris on the surface). If the boundary was moved “out” as in expanding the area of the landfill, this makes sense. However, in the case where boundary was moved in, it’s not so clear since in our view an observation at the surface is not as certain as one derived from test pits.

Please provide the aforementioned information and resubmit the FCR for approval. Should you have any questions or concerns regarding this email, please feel free to give me a call.

Regards,

Tanya