Feldhahn, Brett

From: Palumbo, Janice
Sent: Tuesday, March 17, 2020 2:20 PM
To: Knittel, Janette; Feldhahn, Brett
Subject: RE: another idea re: Baxter

Thanks, Janette. That is helpful. Also good to know (b)(5) [redacted]. -Jan

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From: Knittel, Janette <Knittel.Janette@epa.gov>
Sent: Tuesday, March 17, 2020 12:38 PM
To: Palumbo, Janice <Palumbo.Jan@epa.gov>; Feldhahn, Brett <Feldhahn.Brett@epa.gov>
Subject: another idea re: Baxter

Hi Jan and Brett. We ran out of time on the RCAPP call this morning before I could bring up this idea. I was thinking that (b)(5) [redacted] At the Rhone-Poulenc East Parcel we selected a remedy but then told them that if it didn't lower toluene to a certain level within six months that they needed to submit a new plan for a contingent remedy. I attached the final decision, but here is an excerpt:

EPA is also requiring a contingent ground water remedy, as confirmation sampling has not yet demonstrated that toluene in ground water is below the final cleanup level. Specifically, within six months of issuance of today's final remedy selection, Respondents must submit either a demonstration that the concentration of toluene in ground water is below the final ground water cleanup level (1.0 mg/L), or a Corrective Measures Implementation Work Plan (as required by Paragraph 6.24 of the Order) for additional corrective measures for ground water, such as biosparging, bioventing, or ground water pump and treat.

I'd be happy to talk through this with you.
Janette

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