From: Garyg Miller
To: Howard Fribush
Cc: Donald Williams; Barbara Nann; Barbara Aldridge
Subject: Fw: Draft Agenda for January 16th Meeting with You
Date: 01/08/2008 03:51 PM

Howard,

See the issues below regarding Gulfco.

Are you available for a 1:00 pm (CT) Thursday conference call on this?

Thanks,

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Sam, Mark:

I've reviewed the agenda and spoken to the Gary Miller (the RPM) about the site. I think we all want to move forward and get to actual remedial work as quickly as possible, and I think that removals can get the PRPs to a point where the site can be redeveloped. However, I have a couple of issues related to the agenda and the approach that the PRPs want to take toward completing the cleanup at Gulfco.

My first concern is related to ground water. Ground water contamination from the site has been found in deeper aquifers and has not been completely characterized. The presence of contamination in deeper ground water necessitates further investigation of extent of contamination and potential receptors. The presence of contamination in deeper ground water also raises questions regarding the adequacy of the closure of the former waste impoundment. Without knowing the extent of the contamination, we can't say that a No Action Remedy or Institutional Controls to prohibit ground water use will be appropriate for the ground water remedy. I also don't believe that the PRPs could design and implement an adequate ground water remedy this fiscal year. Because of the ground water questions that remain to be answered and the probability that some construction will be needed to address ground water contamination, I don't believe that Construction Completion or partial deletion is realistic this fiscal year.

My second concern is related to Natural Resource Trustee issues and the wetlands surrounding the site. The agenda doesn't mention anything about possible wetlands impacts.

My third concern is related to site bifurcation. I bellieve that the entire site should remain under Superfund authority and not be split between Superfund and the State Voluntary Cleanup Program. I believe that the PRPs can conduct removals under Superfund that will make the site available for reuse. Upon completion of an adequate surface cleanup, we could consider a partial deletion for the site surface.

My fourth concern relates to the people in the vicinity of the site who are watching the site activities very closely. We need to make sure that we follow the NCP and not inadvertantly create a perception that the cleanup is somehow less than adequate or that we didn't follow our own process.

We should proceed to complete the investigation, risk assessment, and ROD, and develop an accelerated schedule to do it. It may be that the final remedy will only include institutional controls, monitoring, and a removal. If that is the case, then the entire site can be deleted when the necessary work is done. If a long term ground water remedy is needed, then the entire surface could be deleted while the ground water remedy is continuing. Regardless, the southern part of the site cannot be deleted since a release occurred there, the extent and risk has yet to be determined, and the necessary actions have not been selected.

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