From:	Glum, Scott
To:	Linnear, David
Subject:	FW: Pristine Site followup ~COR-003250~
Date:	Tuesday, October 31, 2017 2:09:00 PM
Attachments:	Sept 2017 USEPA letter.pdf OEPALetter.pdf PriceQuote.pdf superfund_task_force_report.pdf

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Hello David. GHD sent me this e-mail yesterday afternoon. Lots of stuff happening on the site since we last talked. Are you close to sending out formal comments on the MNA Report?

What do you make of all this? I didn't realize that lawyers from U.S. EPA and Pristine Trust were involved.

-Scott

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Subject: Pristine Site followup

Dear Cheryl,

Once again, the Pristine Site Trustees, the member companies, and their consultant GHD thank USEPA for the opportunity to meet in August to discuss the status of the remediation of the Pristine Site. Several weeks after our meeting, we received documents from the Agency in response to a

FOIA request submitted in July. (The Trustees' legal counsel submits a FOIA request to USEPA and OEPA every 1-2 years to ensure that our files are complete.) In the documents are three (attached) that, in light of our discussions at the August 24 meeting, have generated questions from the member companies, and frankly have the Trustees confused as to the Agency's position regarding the viability of MNA for the off-site plume.

The first document is a letter from OEPA's Pristine Site Coordinator, dated June 13, 2017, to Mr. Linnear, indicating that OEPA: (1) reviewed GHD's April 21 submittal relating to the MNA study, (2) concluded that the submittal addresses the questions raised in Mr. Linnear's joint OEPA/USEPA January 27, 2017, letter to the Trustees and GHD, and (3) agrees with GHD's conclusion regarding stability and contraction of the off-site DCA plume, which are conditions necessary to support MNA. Because our notes from the conversations at the August meeting include the statement that USEPA and OEPA both believe that conditions for successful MNA are not being demonstrated, the Trustees are confused by the position reflected in OEPA's June 13 letter.

The second document is a September 12 memo from Mr. Linnear to GHD, stating again that OEPA and USEPA agree that MNA is not a viable option, and stating that USEPA will provide its formal response to GHD's April 21 submittal by the end of October. Once again, the Trustees are confused by the position reflected in OEPA's June 13 letter.

The third document is an August 30, 2017, quote from a groundwater consultant (Papadopulos & Associates) to USEPA, responding to the Agency's August 28 request for price quote. The quote summarizes a SOW to (1) evaluate the MNA study conducted for the off-site plume, (2) perform a detailed study of the Site's geology and groundwater, including review of previous studies, and (3) evaluate the effectiveness of the pump/treat system. The quote is for $89,050, and includes a timeline for submittal of several draft reports to USEPA by mid-November, with contingencies, and submittal of several final reports to the Agency w/in 30 days of receipt of comments. Because Mr. Linnear's September 12 memo states that USEPA will provide its response to GHD's April 21 MNA submittal by the end of October, the Trustees are confused by the August 30 quote and its proposed timelines, assuming that the Agency has decided to retain the consultant.

Finally, the Agency's annual oversight costs in non-5YR years have averaged less than $20K for several years now. That fact and the attached documents have generated questions and concerns from our member companies regarding: (1) the potential for a substantial increase in oversight costs next year if the consultant is hired, (2) the need for the consultant at this stage of the MNA study in light of the groundwater expertise of both agencies, (3) why a consultant is needed to study/model the geology/groundwater at the Site, when it has already been extensively studied; (4) whether hiring a consultant at this late stage of the remediation is consistent with the objectives of the Agency's July 2017 Superfund Task Force Recommendations (copy attached); and (5) whether the meeting in August was as productive as we thought it was, in terms of beginning to develop a joint strategy to complete the remediation after more than 25 years of operation.

The Trustees request an opportunity to discuss these concerns with USEPA at the earliest opportunity. We propose to host a telephone conference call and can provide to all participants a toll-free call-in number and code for the call. Please let me know at your earliest convenience if the

Agency is agreeable to the proposed call and, if so, please provide me some alternative dates and times for the call. Feel free to contact me, or one of the Trustees copied here, Martha Farr, Peggy Dewan or Ron Pitzer.

Best regards,
Betsy

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