From: Bury, Carolyn
To: "Michael PINTO"
Subject: RE: Request for Area 17 IM Monitoring Plan
Date: Friday, November 22, 2013 1:26:00 PM
Attachments: Nov 22, 2013 Request for Area 17 IM Monitoring Plan Arkema East.pdf
image001.png
image002.png

Mike,

Please replace the earlier letter with typos sent at 1:04 Central with the attached letter.

Thanks and enjoy your weekend.

Carolyn

From: Michael PINTO [mailto:michael.pinto@total.com]
Sent: Friday, November 22, 2013 1:14 PM
To: Bury, Carolyn
Subject: RE: Request for Area 17 IM Monitoring Plan

Carolyn,

There are a couple of typos you might want to address. Number 7 seems incomplete:

7) Observation of DNAPL and

And the numbering in the next paragraph is not sequential

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Let me know if you want me to delete the first letter and wait for a revised draft, or just work with the letter as-is. Either way, we'll start on the plan.

Thanks.

Michael Pinto
RETIA USA LLC/Legacy Site Services LLC
468 Thomas Jones Way, Suite 150
Exton, PA 19341
Office: 610 594-4435
Fax: 610 594-4439

From: Bury, Carolyn [mailto:bury.carolyn@epa.gov]
Sent: Friday, November 22, 2013 2:04 PM
To: Michael PINTO
Subject: Request for Area 17 IM Monitoring Plan

Hi Mike,

Please let me know if you have any questions regarding the attached letter. Also, please add any other monitoring measures that you feel would be beneficial to observing the effectiveness of the IM, to the monitoring plan.

Carolyn

Carolyn Bury
Project Manager
U.S. Environmental Protection Agency
Remediation and Re-use Branch
Corrective Action Section 2 - LU9J
77 W. Jackson Blvd.
Chicago, IL 60604

312-886-3020
bury.carolyn@epa.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

LU-9

November 22, 2013

CERTIFIED MAIL 7001 0320 0006 0188 1281
RETURN RECEIPT REQUESTED
and *via* email

Michael J. Pinto
Legacy Site Services
468 Thomas Jones Way, Suite 150
Exton, PA 19341-2528

Re: Administrative Order on Consent
U.S. EPA ID NO. MID 005 363 114
U.S. EPA Docket No. V-W-89-R-45
Pennwalt Corporation Site
in Wyandotte, Michigan,
aka Arkema East Plant

Dear Mr. Pinto,

This letter is a request that Legacy Site Services continue to sample the monitoring wells around Area 17 at the Arkema East Plant Site in Wyandotte, MI and to submit a monitoring plan to EPA. The sampling data are needed to evaluate the effectiveness of the DNAPL and groundwater containment/recovery/treatment interim-measure. The monitoring should be completed on a quarterly basis.

EPA understands that it had been Arkema's intent to routinely monitor the area should the interim measure be approved as a final measure. However, even as an interim measure, the remedy needs to be monitored for its effectiveness in achieving source reduction and control, to ensure that contaminated groundwater is being contained, removed and/or treated, and that contamination is not migrating to the Detroit river or to other off-site media, or to other areas of the Site. Please submit a monitoring plan proposal by December 20, 2013 that includes, at a minimum, the following information:

1) A summary of the Area 17 Interim Measure
2) Wells within the monitoring network and a figure showing their location
3) Information about the wells such as screening intervals
4) A cross-sectional diagram showing the wells within the hydrogeologic profile and where DNAPL has been measured
5) Groundwater analyte list including VOCs, SVOCs, chromium, and lead
6) Corrective Action Objectives (CAOs) for the groundwater based on Michigan Part 201 criteria for non-residential property and the groundwater/surface water interface criteria, as available.

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7) Observation of DNAPL, and
8) The sampling schedule.

The monitoring plan should include a description of the monitoring report content that includes, at a minimum, the following information:

1) A table reporting the measured groundwater concentrations compared to the CAOs/GSI values
2) The above table should indicate any detection and/or measured concentration that exceeds a CAO or GSI value (for example using bold font or shading)
3) The narrative portion of the report should also highlight and describe any results exceeding the CAO/GSI values
4) Measurements of any DNAPL (depth to water, depth to DNAPL, total depth, and DNAPL thickness), and
5) The report submittal schedule.

Additionally, please reference the approved SOPs for field collection and analytical methods in the monitoring plan.

If you have any questions, please contact me at (312) 886-3020.

Sincerely,

Carolyn Bury

Carolyn Bury
Project Manager
Corrective Action Section 2
Remediation and Reuse Branch

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