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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

MEMORANDUM

RE: Duck Valley Emergency Order Work Plan

TO: John Krause, BIA

FROM: Alisa Wong and Cynthia Sans, EPA

EPA received the initial draft Work Plan submitted by the Bureau of Indian Affairs ("BIA") in response to the emergency order issued to BIA's Road Maintenance Shop ("Facility") located on the Duck Valley Reservation in Owyhee, Nevada. Following are some comments on the Work Plan and some general questions about the Facility.

COMMENT ON BIA DRAFT Work Plan:
(The paragraph numbers correspond to numbers sited in the BIA Work Plan.)

EPA Comments to Paragraph 21 c and d Regarding the Description of Roads Shop Facility Drain System--

Give a further description of two vertical pipes (one located inside the Facility and the other located approximately 1' off the west wall of the Facility). Information should include when the vertical pipes were installed, the purpose of the vertical pipes, the material the pipe are made of (is it the same as the drain lines), the length of the vertical pipes, and any discharge or disposal that has taken place into either of the vertical pipes.

Regarding, the vertical pipe just outside the west wall of the Facility: does this pipe extend 3' above ground or below (see BIA response Paragraph 21 d)? Include information about how the top of the vertical pipe is closed or sealed to prevent any material from entering the pipe and into the drain system.

EPA Comments to Paragraph 22-26 Regarding Closure of Drain System and Characterization of Discharge-

The following comments are ordered as follows: sampling points in the drain system, sampling points in the surrounding subsurface soil, plans for the removal and disposal of waste inside the drain system (the drain system includes all sumps, drain lines, vertical line, and

outlets), plans for the excavation of the drain system, and plans for the remediation of any contaminated soil and\or groundwater.

Sampling of Drain Liquid and Sediment (refer to part a in BIA Work Plan)

A more detail description of 6 sample points of the waste in the drain system must be given, either a written description or a map with the sample points clearly marked is acceptable. EPA recommends that 2 samples each should be taken at the south sump, the vertical pipe, and the overpack, with one sample of the liquid and the other sample of the sediment.

In accordance with the Order, all samples collected should be analyzed for volatile organics, semi-volatile organics, metals, and total recoverable petroleum hydrocarbons (TRPH).

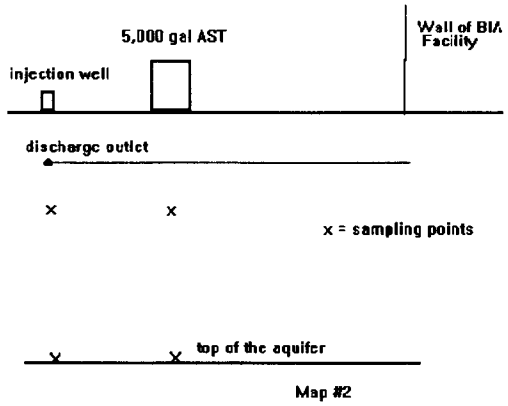
Sampling of Subsurface Soils (Refer to part d, e, f, and i in BIA Work Plan)

A more detailed description of 4 sample points of the area surrounding the drain system must be given, either a written description or a map with the sample points clearly marked is acceptable.

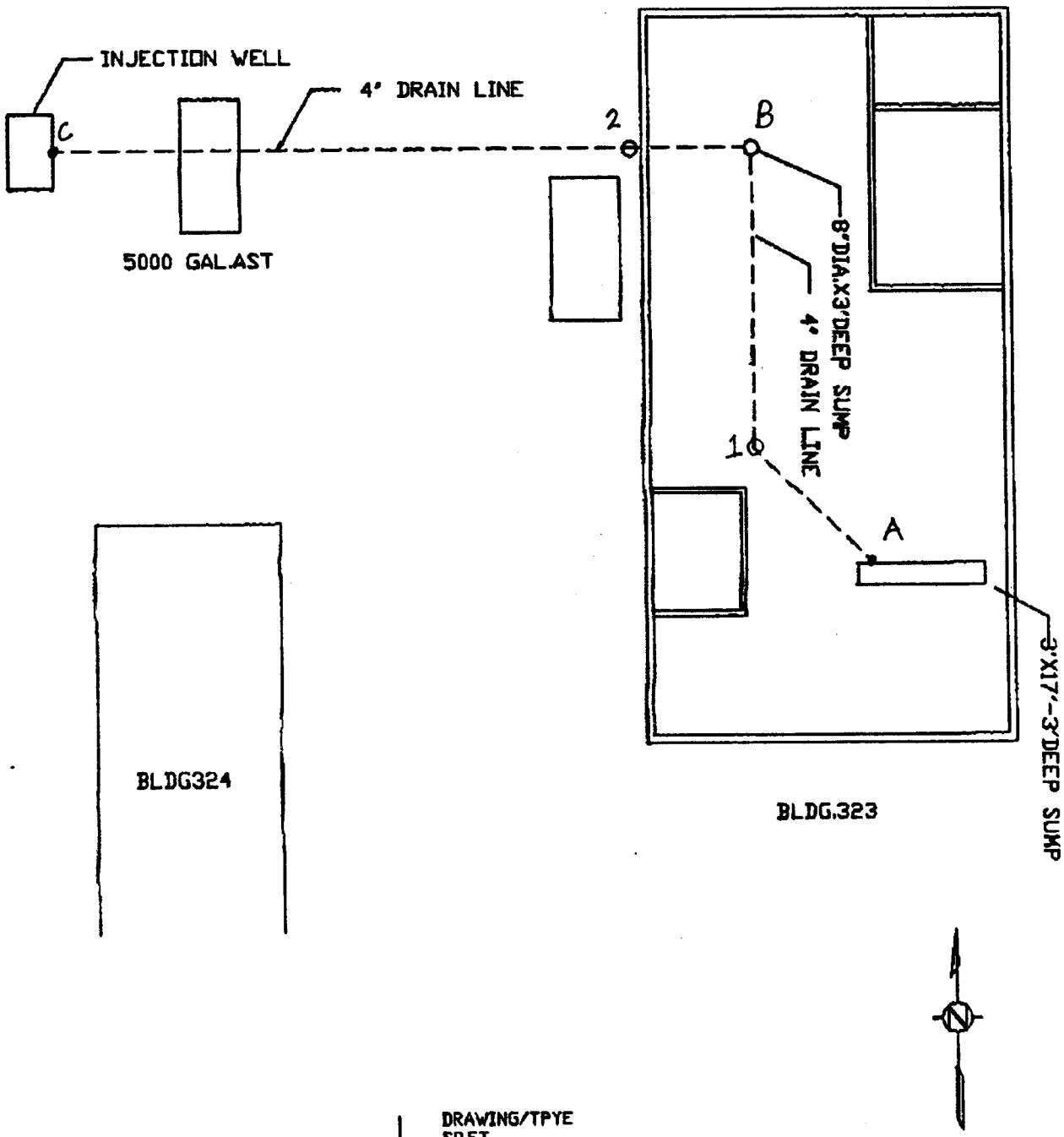
Point A (refer to part d of BIA Work Plan--only one sample is necessary at this point. If BIA chooses to do only one sample (Work Plan has 2 samples at this point), the one sample must be taken 1' below the connection of the south sump to the drain line. The sample should not be taken 'one to two feet below the concrete slab';

Point B (refer to part e of BIA Work Plan)--one sample below the vertical pipe is acceptable;

Point C (Refer to part g of BIA Work Plan)--four samples are to be taken in the area around the discharge outlet. See Map #2 for EPA recommended sampling locations;



Map #2



SCALE 1" = 20'

DATE 7-19-95

DRAWING/TPYE
SQ.FT.
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DWYHEE,E.NEVADA

ROADS SHOP BLDG NO.323

Points #1 and #2 (refer to part f of BIA Work Plan)--The BIA Work Plan includes four samples along the drain line of the drain system, EPA suggests at Point #1, two samples be taken. One 3' below the elbow of the drain line and the second at the surface of the water table. At Point #2, two samples should be taken. One sample 3" below the end of the vertical pipe and a second sample at the top of the water table.

Excavation of Drain Line and Outlet (Refer to part b and i of BIA Work Plan)

The drain system must be completely emptied of all product\waste before any excavation may commence. Once waste has been removed and properly disposed of, the pipeline must be removed. BIA must include in the Work Plan detailed information about how excavation of the cement, soil, and drain system will occur. Details must include the depth to which the excavation will occur, excavation procedures, the projected length of excavation, and anticipated method of disposal of excavated materials. Steam cleaning the line before disposal is not a necessary part of the Order.

EPA Comments on Paragraph 28-31 Regarding Heating Oil Line

BIA may not commence any excavation activity regarding the pipeline without completely emptying the pipeline of any product. The outlet from the pipeline to the heating fuel tank must be completely secured as to not release further any product on to the ground.

A more detailed description of the sample points should be given, either a written description or a map with the sample points clearly marked is acceptable. BIA should specify horizontal and vertical distances and the total number of samples to be taken. The Work Plan must also address the method by which BIA will dispose of all excavated soil, ground water, pipeline, and product in the pipeline.

**QA|QC must be submitted and approved by EPA prior to any sampling.

**How much work is still being done at the Facility? How many cars are serviced per week? If BIA is going to continue operating the Facility, a plan must be developed for the future removal and\or disposal of solvents, cleaning fluids, oils, gases, and any other product might endanger the USDW.

**Monitoring well and water well sampling. Per a 07.17.95 conversation with John Krause, EPA will consider reducing water monitoring of Well #1 and #2 if BIA is able to install a monitoring well within 6 months of EPA approval of the Work Plan.

Initial sampling at Well #1 and #2 are still required, but quarterly monitoring will be temporarily waved. However, EPA reserves the right to request sampling at Wells #1 and #2 if sampling becomes necessary.

**Health and safety plan that will govern all activities carried out by BIA and\or a contractor must be submitted to EPA for review.

Questions:

1) South Sump in the Facility: The map provided by BIA in the Work Plan package indicated that the drain line from the sump initially heads northwest for 22' then north for 40'. Is this the only drain line that exists extending from the south sump?

2) Product Removed from South Sump: It is EPA's understanding that all product that was removed from the sump is currently being stored in 55 gallon drums which are secured by an overpack. Where is the location of the overpack? We also understand that the sump has filled up again since February when product was pumped out, can you provide us with an explanation for this.

3) What is the status of funding for the Duck Valley Facility clean-up?

4)What is the current status of the injection well, when was it most recently used?

5)Why was the shed structure that was previously located just east of the injection well demolished? What did the shed store previously?