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MEMORANDUM

To: Miriam Villani

From: Eric Weinstock

Date: February 10, 2015

Subject: Utility

We prepared the attached drawing for use during our discussions with the USEPA regarding Utility. Please note the following:

- Geographically, the detections of PCE downgradient of Utility are neither within the Eastern or Central Plumes. Utility, and whatever groundwater contamination has been detected downgradient of Utility, is located between these two plumes.

- The concentrations of the source contaminants downgradient of the Frost Street sites (which corresponds with the Eastern Plume) and Tischon (which corresponds with the Central Plume) are orders of magnitude greater than the PCE concentrations downgradient of Utility. The highest PCE concentration downgradient of the Frost Street sites was 11,000 ug/l and the highest 1,1,1-TCA concentration downgradient of Tishcon was

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1,400 ug/l. In comparision, the highest PCE concentration downgradient of Utility was 220 ug/l.

- The Off-Site ROD for the Utility Site identified monitoring and natural attenuation as the selected remedy for the PCE detected in the groundwater downgradient of Utility. If the other releases in the New Cassel Industrial Area did not exist, there would be no need for the elaborate off-site remediation system. Since the source area has been cleaned up, Utility's Plume could have been addressed with long-term monitoring.

- Based on the statements identified above, Utility should be viewed as a de minimis contributor to the groundwater contamination in EPA OU-1.

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