Message

From: Paddack, Mark [mpaddack@eaest.com]
Sent: 3/11/2019 1:40:22 PM
To: Shewmake, Kenneth [shewmake.kenneth@epa.gov]
Subject: RE: Draft SAP revisions

Mr. Shewmake:

Please see my below responses. Regarding comment 1, I have no problem with going with either recommendation of you concur with what TCEQ is recommending. Personally, the Alternative and Preferred method they mention may make better sense, because as they state, it will keep EA within the budgeted quantities, and may prevent the need to have to reassess these locations in the future. I went back and checked the language in EA's WP&CE – it states up to 16 boring locations, and up to three intervals at each boring location – in order to keep things honest, we could do a field change form that allows up to 4 samples intervals at some of the locations, and elimination of the three boring locations in exchange. This would not change quantities for any of the other work. In either case, we need to make a decision so I can capture any changes in the SAP while it's undergoing review and make the reviewers aware of these changes.

Thank You,
Mark Paddack
EA Project Manager

From: Shewmake, Kenneth [mailto:shewmake.kenneth@epa.gov]
Sent: Friday, March 08, 2019 3:43 PM
To: Paddack, Mark
Subject: FW: Draft SAP revisions

Mark,

Please see additional comments from TCEQ. I would like to discuss #1 with you. I will ask for more info on #2.

Kenneth Shewmake
US Environmental Protection Agency
Environmental Scientist
RPM Lane Plating

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From: Rebecca Storms <Rebecca.Storms@Tceq.Texas.Gov>
Sent: Friday, March 08, 2019 2:47 PM
To: Shewmake, Kenneth <shewmake.kenneth@epa.gov>
Cc: Tsui-Bowen, Alethea <Tsui-Bowen.Alethea@epa.gov>; Rauscher, Jon <Rauscher.Jon@epa.gov>; Pereira, Stephen <pereira.stephen@epa.gov>; Malott, Vincent <malott.vincent@epa.gov>; Sharon Barker <Sharon.Barker@tceq.texas.gov>
Subject: RE: Draft SAP revisions

Hi Kenneth,

Please see our thoughts below, and let me know if you'd like to discuss. I am leaving for the day but will be back on Monday. Otherwise, we look forward to reviewing the formal revised SAP.

Revised soil sample locations (Figure A-2/Table A-2)

1. TCEQ comment 7(b) and eco attachment comment 3; TCEQ recommends one of the following options below:
    a. Sample depth rearrangement option (switching 15-ft/refusal depth with 5-ft depth): TCEQ recommends adding DSB-7 and DSB-9 (instead of JSB-1) to the list of borings that will be sampled from 2 to 5 feet instead of 15 feet or refusal. These locations are close to the facility and more likely to be C/I than Residential. Likewise, JSB-1 is more likely to be Residential than DSB-9. With the above changes, TCEQ would be ok with the suggested boring designations that will be sampled from 2 to 5 feet instead of 15 feet or refusal, but would request the following acknowledgement to be added to the SAP: that if contamination in these borings is not delineated by 5 feet, additional soil samples will be collected in Phase 2. Likewise, for all other borings, if contamination is not delineated by 2 feet, additional soil samples will be collected in Phase 2.

    b. *Alternative and preferred option: TCEQ recommends keeping the original 3 sampling depths in all borings for consistency (0-0.5, 0.5-2, and 15 ft or refusal), but adding a fourth depth from 2-5 ft in the following borings: DSB-2, DSB-5, DSB-7, DSB-8, DSB-9, JSB-1 through JSB-4. This can be done by taking out the reserved DSB-10 through DSB-12 boring locations and associated 9 samples, and using the funding for these samples to apply to the fourth depth at select borings instead. This may prevent the need for additional vertical delineation in future sampling events.

2. TCEQ comment 26(a):
    a. We discussed with EA that one of the planned soil borings in the rectangular depression filled with water area would be shifted to assess this feature (DSB-5, DSB-6, DSB-7 area). Is this still the plan, and will the revised SAP discuss this)?

    As previously indicated in response to TCEQ comment 26a, and as discussed during the 20 February 2019 phone call, soil boring locations DSB-5 and/or DSB-7 will be used to assess this area as part of the Phase 1 RI field activities. If it is determined this area is impacted based on the Phase 1 sampling event and this feature is determined to hold water perennially, then additional characterization of this feature, to include sediment and/or surface water will be considered during the Phase 2 RI field event. A footnopte has been added to Table A-2 that states *"DSB-5 and/or DSB-7 will be used to assess a rectangular depression reported to contain water as part of the Phase 1 RI field activities. If it is determined this area is impacted based on the Phase 1 sampling event and this feature is determined to hold water perennially, then additional characterization of this feature, to include sediment and/or surface water will be considered during the Phase 2 RI field event. The locations of these borings may be adjusted in the field to accomodate the exact location of the depression."*

Revised GW sample/MW locations

1. TCEQ comment 24(a):
    a. TCEQ recommends adjusting the revised MW-1 location to the vicinity of previous soil sampling grids E6 or G5 (location of consistent RSL exceedances at mid-depths). If placed in the vicinity of grid E6, suggest placing between grids E6 and E7 or E6 and D6.

    During the 20 February 2019 phone call, it was agreed to move MW-1 to the east side of the Waste Storage shed. EA moved the location of MW-1 accordingly where it is located east of this structure, and will also be in close proximity to the blasting sand disposal area located southeast of the of the Waste

Storage Shed. The locations described above will place MW-1 a considerable distance northeast of the of the Waste Storage Shed (Near G5), or south (between E6 and E7) or west of the Waste Storage Shed (between E6 and D6), which contradicts what was agreed to on 20 February 2019. Given the presence of the blasting sand in this area, in addition to the staining around the Waste Storage Shed, any location around the Waste Storage Shed is within a probable source area, and the proposed location of MW-1 can be shifted as necessary, based on observed field conditions when the well location is being marked for installation.

2. Additional comments/questions:
    a. Will facility wells be surveyed to allow use in groundwater elevation determination? These are hand-dug wells with concrete pipe making up the well walls. However, EA is planning to survey the top of the concrete walls in order to calculate water elevations in the two wells.
    b. Flush mount vs. stick-up: TCEQ advises that the field area near the small pond is prone to flooding (proposed location of MW-3). This is noted by EA.

Thanks,
Rebecca

From: Shewmake, Kenneth <shewmake.kenneth@epa.gov>
Sent: Tuesday, March 5, 2019 4:47 PM
To: Rebecca Storms <Rebecca.Storms@Tceq.Texas.Gov>
Cc: Tsui-Bowen, Alethea <Tsui-Bowen.Alethea@epa.gov>; Rauscher, Jon <Rauscher.Jon@epa.gov>; Pereira, Stephen <pereira.stephen@epa.gov>; Malott, Vincent <malott.vincent@epa.gov>
Subject: FW:

Here are some revised figures and a table from our contractor based on comments on the Draft SAP for Lane plating . Let me know if you have any comments.

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From: Paddack, Mark <mpaddack@eaest.com>
Sent: Monday, March 04, 2019 1:50 PM
To: Shewmake, Kenneth <shewmake.kenneth@epa.gov>
Subject:

Mr. Shewmake:

As I had mentioned, attached are figures mark-ups showing sample locations that were shifted per EPA and TCEQ comments. once you have the chance to look these over, please let me know your thoughts, and I get formal revisions completed. If you recall, TCEQ also had two separate comments regarding sampling depths for soil borings, and as we discussed during the 20 February 2019 call, I shifted some of the from a portion of the boring location where the 2 to 5 feet interval will be sampled, versus the 15 feet as originally planned. I have included a copy of the revised Soil Sample Design Matrix tables that illustrates which soil boring locations will be sampled down to a total depth of 15 feet versus 15 feet.

Please let me know if you have questions or comments concerning this matter.

Thank You,
Mark Paddack
EA Project Manager