Message

From: Juett, Lynn [Juett.Lynn@epa.gov]
Sent: 7/9/2019 9:30:56 PM
To: Davidson, Amie [DNR] [Amie.Davidson@dnr.iowa.gov]
CC: Fisher, Susan [Fisher.Susan@epa.gov]; Mehta, Sandeep [mehta.sandeep@epa.gov]; Pessetto, Jared [Pessetto.Jared@epa.gov]
Subject: Follow Up from Vogel Paint Conference Call
Attachments: OSWER Directive 9283.1-33.pdf; OSWER Directive 9283.1-44.pdf; OSWER Directive 9355.0-129.pdf

Hello Amie – this email is in follow-up to our May 20th, 2019 conference call discussing the Vogel Paint and Wax Co., Maurice Iowa, Superfund site (Vogel). Representatives of the Iowa Department of Natural Resources (DNR), U.S. Environmental Protection Agency (EPA), Region 7, and EPA's Assessment & Remediation Division (ARD) participated on this conference call. Below is our summary of the discussion on the call. I just saw the email from Vogel Paint raising questions regarding the topics which were the subject of our May 20th call. I think the next step is to have another call between EPA and IDNR, followed by a conversation with Vogel Paint.

Summary of May 20th Call:

The primary issue under consideration was the need for modification of the Record of Decision to address Vogel's implementation of an in-situ bioremediation pilot study. The pilot study will evaluate whether in-situ bioremediation (ISB) and a permeable reactive barrier (PRB) will effectively reduce chemicals of concern in the groundwater plume. The pilot study also includes work to address issues and recommendations from the previous Fourth Five-Year Review report signed in September 2014.

The other items discussed during the conference call included modification to the operation of Remedial Action currently implemented at the site and potential site deletion from NPL listing.

HQ-ARD staff concluded and communicated the following based on information provided by IDNR and EPA Region 7:

- The site will need to meet current groundwater remedial action objectives established for the site in the October 2000 Explanation of Significant Differences (ESD), and restore groundwater to beneficial use throughout the plume, not just at the site boundary as identified in the October 2000 ESD. Please refer to attached EPA guidance entitled "Summary of Key Existing EPA CERCLA Policies for Groundwater Restoration", OSWER Directive 9283.1-33 (June 26, 2009);
- As part of this pilot study, Vogel is requested to scope and conduct additional investigations (1) to define the nature and extent of the source material, and (2) continue to evaluate additional remedial technologies. These investigations will support the selection of a comprehensive remedy to clean up the groundwater to beneficial use throughout the plume;
- ISB and PRB are fundamental changes to the existing Remedial Action of the on-going Pump & Treat system. If ISB and PRB are demonstrated to be viable technologies to reduce groundwater contamination at the site, Vogel will need to complete a feasibility study and issue a proposed plan for public comment prior to technology selection; and,
- Demonstration of groundwater restoration remedial action completion must comply with the attached EPA directive "Guidance for Evaluating Completion of Groundwater Restoration Remedial Actions", OSWER Directive 9355.0-129 (November 25, 2013). The Remedial Action that is selected would also need to consider "Recommended Approach for Evaluating Completion of Groundwater Restoration Remedial Actions at a Groundwater Monitoring Well", OSWER Directive 9283.1-44 (August 11, 2014).

Very Respectfully,
Sandeep Mehta, P.E.
Ph: (913) 551-7763

email: mehta.sandeep@epa.gov