Message

From: Richards, Robert [Richards.Robert@epa.gov]
Sent: 5/22/2014 9:27:15 PM
To: Vann, Bradley [Vann.Bradley@epa.gov]
Subject: RE: Vogel Paint and Wax Fourth Five-Year Review (UNCLASSIFIED)

Flag: Follow up

Brad,

I reviewed the draft and provided you a marked up copy of my comments. However, I believe fundamental changes are necessary in the draft FYR for it to be acceptable for EPA to issue.

The primary objections are that the draft proposes adjusting the point of compliance beyond the property boundary of the Vogel property, and conditions a potential restart of the groundwater treatment system on the words "if able".

From reading the history of the site, the treatment system was shut down in 2004 and an attempt to control the plume by phytoremediation and natural attenuation was pursued. Since then the contamination plume has expanded to the adjacent property, where previously it was controlled. The 2004 change in approach appears to have failed in controlling the plume. The effective technology of the pump and treat system should be restored by either restarting or reconstructing it, and the point of compliance should not be moved. What the draft FYR essentially proposes is a technical impracticability waiver, and I do not see the site conditions to support that, notwithstanding that a formal TI waiver and the process to get that have not been pursued.

Thus you will see in my markup that the draft should delete all references to a recommendation of adjusting the point of compliance, and changes reference to the treatment plant to "restart or reconstruct the groundwater treatment plant" and deletes the condition "if able."

The other changes would be to emphasize getting a Iowa UECA as the institutional control, on both the Vogel property and the adjacent property.

--Bob

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-----Original Message-----
From: Vann, Bradley
Sent: Monday, March 24, 2014 5:14 PM
To: Nicoski, Dan; Jacobs, Ann; Madden, Venessa; Richards, Robert; Dalal, Pradip; Jackson, Hylton [DNR]
Cc: Washburn, Ben
Subject: FW: Vogel Paint and Wax Fourth Five-Year Review (UNCLASSIFIED)

Vogel FYR Team,

Corps stuck to their delivery schedule of March 25 (got it a day early in fact). Attached is the draft FYR. Please review and submit your comments to me by May 5. Please note that I've added Dan from ENSV due to Bill's pending retirement this week.

Thanks,

Bradley Vann - Remedial Project Manager
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-----Original Message-----
From: Kamp, Kenneth C NWK [mailto:Kenneth.C.Kamp@usace.army.mil]

Sent: Monday, March 24, 2014 10:08 AM
To: Vann, Bradley
Subject: Vogel Paint and Wax Fourth Five-Year Review (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Mr. Vann,

Attached is the Draft Five-Year Review report for the Vogel Paint and Wax Superfund Site. The body of the report, as well as individual Attachments A-F are included in this email. If there are any questions, comments, or concerns you wish to address during the review process, just let me know so I can document and address them within the report.

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Classification: UNCLASSIFIED
Caveats: NONE