Message

**From:** Eric Smith [ESmith@ramboll.com]
**Sent:** 11/8/2019 12:37:01 AM
**To:** Mehta, Sandeep [mehta.sandeep@epa.gov]; Hylton Jackson [hylton.jackson@dnr.iowa.gov]
**CC:** 'Amie Davidson' [amie.davidson@dnr.iowa.gov]; 'Scott Heemstra' [Scott.Heemstra@diamondvogel.com]; 'Keith Delange' [KDelange@geotekeng.com]; Danielle Schreiber [dschreiber@verdantlaw.com]
**Subject:** RE: Vogel semi-annual report
**Attachments:** ATT00001.txt

Sandeep and Hylton

Wanted to provide you a quick update on our field progress of the in-situ bioremediation activities. We have made very good progress so far this week, despite below freezing temperatures and some snow. We anticipate (barring any unforeseen issues) that we will complete the injection work sometime over the weekend.

**Eric Smith, PG, CHG**
Principal Consultant

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**From:** Eric Smith
**Sent:** Friday, November 1, 2019 9:46 AM
**To:** Mehta, Sandeep <mehta.sandeep@epa.gov>; Hylton Jackson <hylton.jackson@dnr.iowa.gov>
**Cc:** Amie Davidson <amie.davidson@dnr.iowa.gov>; Scott Heemstra <Scott.Heemstra@diamondvogel.com>; Keith Delange <KDelange@geotekeng.com>; Danielle Schreiber <dschreiber@verdantlaw.com>
**Subject:** RE: Vogel semi-annual report

Sandeep

There are 33 injection points left to complete. We will be back on site to conduct injection activities on November 5th (just completed the second 10-day field period yesterday) We anticipate that the work may be completed on/by November 12th, contingent on weather conditions. We can update you towards the end of next week regarding our progress. November 11th is Veterans Day so I would not anticipate that you would be working that day.

**Eric Smith, PG, CHG**
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**From:** Mehta, Sandeep <mehta.sandeep@epa.gov>
**Sent:** Thursday, October 31, 2019 5:45 AM
**To:** Eric Smith <ESmith@ramboll.com>; Hylton Jackson <hylton.jackson@dnr.iowa.gov>
**Cc:** Amie Davidson <amie.davidson@dnr.iowa.gov>; Scott Heemstra <Scott.Heemstra@diamondvogel.com>; Keith Delange <KDelange@geotekeng.com>; Danielle Schreiber <dschreiber@verdantlaw.com>
**Subject:** RE: Vogel semi-annual report

Good morning!

Would there be a possibility for Nov 11-12? I still need to check if the EPA has the travel funds, but I can check internally if that works for Vogel. Please let me know. Thanks for the update.

Very Respectfully,
Sandeep Mehta, P.E.

Email: Mehta.sandeep@epa.gov
Work: 913-271-5433

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**From:** Eric Smith <ESmith@ramboll.com>
**Sent:** Wednesday, October 30, 2019 3:42 PM
**To:** Mehta, Sandeep <mehta.sandeep@epa.gov>; Hylton Jackson <hylton.jackson@dnr.iowa.gov>
**Cc:** Amie Davidson <amie.davidson@dnr.iowa.gov>; Scott Heemstra <Scott.Heemstra@diamondvogel.com>; Keith Delange <KDelange@geotekeng.com>; Danielle Schreiber <dschreiber@verdantlaw.com>
**Subject:** RE: Vogel semi-annual report

Sandeep

In our original schedule we had estimated that the total time to inject all the EOx+DAP materials take a total of 35 working days with a work schedule of 10-days on and 4-days off. The final 5-days of the original estimated schedule would be Nov. 19 – 23. So far we are ahead of schedule on our injection work; therefore, we anticipate that we will complete the work sometime during the third 10-day shift (November 5 – 14).

**Eric Smith, PG, CHG**
Principal Consultant

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**From:** Mehta, Sandeep <mehta.sandeep@epa.gov>
**Sent:** Wednesday, October 30, 2019 12:03 PM
**To:** Hylton Jackson <hylton.jackson@dnr.iowa.gov>
**Cc:** Amie Davidson <amie.davidson@dnr.iowa.gov>; Scott Heemstra <Scott.Heemstra@diamondvogel.com>; Keith Delange <KDelange@geotekeng.com>; Eric Smith <ESmith@ramboll.com>; Danielle Schreiber <dschreiber@verdantlaw.com>
**Subject:** RE: Vogel semi-annual report

Hylton:

Thank you for your input.

Currently Nov 5 does not work for me. Seems like something was planned on Nov 19 – 23?

Very Respectfully,
Sandeep Mehta, P.E.
Email: Mehta.sandeep@epa.gov
Work: 913-271-5433

**From:** Jackson, Hylton <hylton.jackson@dnr.iowa.gov>
**Sent:** Wednesday, October 30, 2019 9:23 AM
**To:** Mehta, Sandeep <mehta.sandeep@epa.gov>
**Cc:** Amie Davidson <amie.davidson@dnr.iowa.gov>; Scott Heemstra <Scott.Heemstra@diamondvogel.com>; Keith Delange <KDelange@geotekeng.com>; Eric Smith <ESmith@ramboll.com>; Danielle Schreiber <dschreiber@verdantlaw.com>
**Subject:** Re: Vogel semi-annual report

Sandeep
I just heard from Vogel's attorney and she has informed me that they have about 5 to 7 days of EOx injections left at the site, apparently everything else is done. They plan on being on-site November 5th. Do you have any plans to observe any of the remaining activities?
Hylton

On Mon, Oct 7, 2019 at 8:31 AM Mehta, Sandeep <mehta.sandeep@epa.gov> wrote:

Scott:

Thank you for the quick response. I will check with IDNR if they would like to visit, and I also need to check internally for fund availability due to Continuing Resolution of the budget.

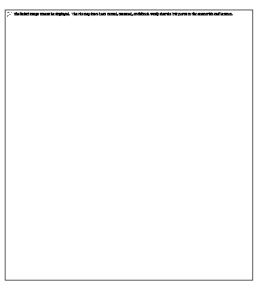
Once the determination is made, I will let you know the plans.

Very Respectfully,

Sandeep Mehta, P.E.

Email: Mehta.sandeep@epa.gov

Work: 913-271-5433



**From:** Scott Heemstra <Scott.Heemstra@diamondvogel.com>
**Sent:** Monday, October 7, 2019 7:43 AM
**To:** Mehta, Sandeep <mehta.sandeep@epa.gov>; Hylton Jackson <hylton.jackson@dnr.iowa.gov>
**Cc:** Keith Delange <KDelange@geotekeng.com>; Eric Smith (ESmith@ramboll.com) <ESmith@ramboll.com>
**Subject:** RE: Vogel semi-annual report

Sandeep,

I suspect Hylton Jackson and IDNR may also like to visit, so would suggest coordinating a visit with him as well. It sounds like Eric Smith will be on site 10/8-10/10, so that might be best for a visit. The alternative date that you mentioned would not work, as the plan is for those to be off-days from injection with the 10-day on/4-day off schedule. Current injection dates, weather-permitting, are as follows:

- October 8 – 17
- October 22 - 31
- November 5 - 14
- November 19 - 23

Regards,

Scott

**Scott Heemstra**

Diamond Vogel | Dir of Mfg/Whse/Eng

o: (712) 737-4993 | c: (712) 395-1659 | d: (712) 707-9740

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**From:** Mehta, Sandeep <mehta.sandeep@epa.gov>
**Sent:** Friday, October 04, 2019 12:32 PM
**To:** Scott Heemstra <Scott.Heemstra@diamondvogel.com>; Hylton Jackson <hylton.jackson@dnr.iowa.gov>
**Cc:** Keith Delange <KDelange@geotekeng.com>; Eric Smith (ESmith@ramboll.com) <ESmith@ramboll.com>
**Subject:** RE: Vogel semi-annual report

Scott:

Thank you for the update. Appreciate the timely response to our request.

Would Vogel have concerns if the EPA comes for observing the work for a couple of days, possibly drive to the site on Oct 9 or 10, and then leave the next day? The other alternative could be Oct 17 and 18?

I can then determine if the funding is available to visit. Please let me know as soon as you possibly can.

Very Respectfully,

Sandeep Mehta, P.E.

Email: Mehta.sandeep@epa.gov

Work: 913-271-5433

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**From:** Scott Heemstra <Scott.Heemstra@diamondvogel.com>
**Sent:** Friday, October 4, 2019 10:57 AM
**To:** Mehta, Sandeep <mehta.sandeep@epa.gov>; Hylton Jackson <hylton.jackson@dnr.iowa.gov>
**Cc:** Keith Delange <KDelange@geotekeng.com>; Eric Smith (ESmith@ramboll.com) <ESmith@ramboll.com>
**Subject:** RE: Vogel semi-annual report

Sandeep,

I have gathered updates and inserted responses in your original email below in red.

Regards,

Scott

**Scott Heemstra**

Diamond Vogel | Dir of Mfg/Whse/Eng

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**From:** Scott Heemstra
**Sent:** Thursday, October 03, 2019 1:27 PM
**To:** Mehta, Sandeep <mehta.sandeep@epa.gov>; Hylton Jackson <hylton.jackson@dnr.iowa.gov>
**Cc:** Keith Delange <KDelange@geotekeng.com>; Eric Smith (ESmith@ramboll.com) <ESmith@ramboll.com>
**Subject:** RE: Vogel semi-annual report

Sandeep,

I acknowledge that I have received this email and will work to develop a response. This should be complete by early next week at the latest.

Thanks,

Scott

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**From:** Mehta, Sandeep <mehta.sandeep@epa.gov>
**Sent:** Tuesday, October 01, 2019 2:36 PM
**To:** Scott Heemstra <Scott.Heemstra@diamondvogel.com>; Hylton Jackson <hylton.jackson@dnr.iowa.gov>
**Cc:** Keith Delange <KDelange@geotekeng.com>; Eric Smith (ESmith@ramboll.com) <ESmith@ramboll.com>
**Subject:** RE: Vogel semi-annual report

Mr. Scott:

Hello. The EPA has now provided a response to your item #2 below via email dated 9/17/2019 along with the copy of the letter response as well as the link to the signed Five-Year Review report.

The EPA also understands that Vogel, via email dated 8/30/2019 from their consultants, is currently in the implementation phase of the Pilot Study work plan, and the EPA appreciates that effort from Vogel. The email provided the information below related to the schedule:

- Installation the four groundwater monitoring wells as part of the additional north area characterization September 11 – 12 (13) and collecting the surface water samples from the unnamed creek as detailed in the north area work plan.
    - Response: Three of the four wells were installed on September 11, 2019. Due to significant rainfall, the fourth well location (most northern location) was not accessible due to soft ground conditions. This well is planned to be installed sometime the week of November 4th. The wells designated in the North Area workplan will be sampled sometime after the installation of the fourth groundwater monitoring well. Creek samples were collected on September 11, 2019. The creek samples and groundwater monitoring results from the north area wells will be presented in the north area characterization report following the sampling of the north area wells (scheduled in early December to correspond with the annual site-wide groundwater monitoring event).
- Submitting today via email the required request for rule by authorization from the Underground Injection Control (UIC) Program USEPA Region 7 Iowa Program Coordinator. I have attached this document for your records.
    - Response: This was previously provided to you on August 30, 2019, but I attached this document here as well.
- Submitting early next week the Design Plan Addendum to the PSWP.
    - Response: The plan will be submitted by the end of the week of October 6 or sooner.
- Conducting three soil borings, September 10 (11) in the area of the PlumeStop injection as part of the design verification testing (DVT) to verify the thickness and other injection parameters for the installation of the PlumeStop barrier.

- Response: Two of the three proposed DVT borings (completed as temporary monitoring wells) were completed. Due to significant rainfall, the third boring location (most westerly location) was not accessible due to soft ground conditions. The necessary design information was obtained from the two borings. Based on the boring information, PlumeStop will be injected across the thickness of the water bearing zone (approximately 11 feet vertical thickness). Boring logs from the DVT borings will be included in the Design Plan.

- October 8 – estimated November 23, conduct injection of the slow release oxygen compound (EOx) and nutrient (diammonium phosphate, DAP) mixture in to the areas defined in the PSWP.
  - Response: Schedule confirmed. Work will be conducted starting October 8, 2019 and will be executed on a 10-day-on/4-day-off schedule, weather permitting.
- Sometime during the same period (dates will be finalized following completion of the DVT) installation of the PlumeStop Barrier (estimated to take 6 – 9 days).
  - Response: The PlumeStop barrier will be installed starting October 8, 2019 and will take 6 – 9 days to complete the injection of the materials, weather permitting.

The EPA also understands that the UIC submittal has been completed and reviewed by the EPA. Therefore, the EPA requests an update to the status of the remaining items on the list for this Pilot Study. The input is requested by the end of this week, if possible, and would be appreciated.

Please let me know if there are any concerns.

Very Respectfully,

Sandeep Mehta, P.E.

Email: Mehta.sandeep@epa.gov

Work: 913-271-5433

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**From:** Scott Heemstra <Scott.Heemstra@diamondvogel.com>
**Sent:** Monday, August 12, 2019 3:19 PM
**To:** Mehta, Sandeep <mehta.sandeep@epa.gov>; Hylton Jackson <hylton.jackson@dnr.iowa.gov>
**Cc:** Keith Delange <KDelange@geotekeng.com>; Eric Smith (ESmith@ramboll.com) <ESmith@ramboll.com>
**Subject:** RE: Vogel semi-annual report

Sandeep,

Keith already sent the 2019 Semi-Annual Report to IDNR on Monday, August 5, 2019. It was our understanding that

IDNR would be forwarding the Report to you.

On July 9, 2019, our attorney, Danielle Schreiber, sent you a letter regarding the groundwater point of compliance for the Site. She indicated that Vogel was questioning whether to move forward with the Pilot Study Work Plan (PSWP) because changing the groundwater point of compliance significantly changes the goals and scope of the PSWP (and is inconsistent with the Administrative Record). On July 15, 2019, IDNR sent a letter to EPA concurring with Ms. Schreiber's letter, stating that it did not agree with changing the groundwater point of compliance. Vogel has been waiting for EPA's response before moving forward with implementing the PSWP. What is the status of EPA's decision to change the groundwater point of compliance? As far as we are concerned, the ball is in EPA's court and we are waiting for your response. Thank you.

Sincerely,

Scott

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**From:** Mehta, Sandeep <mehta.sandeep@epa.gov>
**Sent:** Wednesday, August 07, 2019 9:59 AM
**To:** Scott Heemstra <Scott.Heemstra@diamondvogel.com>; Hylton Jackson <hylton.jackson@dnr.iowa.gov>
**Cc:** Keith Delange <KDelange@geotekeng.com>; Eric Smith (ESmith@ramboll.com) <ESmith@ramboll.com>
**Subject:** Vogel semi-annual report

Scott:

Good morning! I had not heard about the progress on the Pilot Study work nor the semi-annual sampling efforts. So I would request an update for the following:

1. Pilot Study progress
2. Semi-annual report: Would that still be delivered as planned to reach regulators on or earlier than August 10?

Thank you, in advance, for the status update.

Very Respectfully,

Sandeep Mehta, P.E.

Ph: (913) 551-7763

email: mehta.sandeep@epa.gov

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**Hylton Jackson**| Environmental Specialist
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