Message

From: Scott Heemstra [Scott.Heemstra@diamondvogel.com]
Sent: 10/4/2019 3:57:26 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
Attachments: ATT00001.txt; UIC Notification.pdf

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

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

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

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

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