Message

From: d'Almeida, Carolyn K. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9EC4401AFA1846DD93D52A0DDA973581-CDALMEID]
Sent: 2/15/2017 8:10:07 PM
To: Davis, Eva [Davis.Eva@epa.gov]; Henning, Loren [Henning.Loren@epa.gov]
CC: Dan Pope [DPope@css-inc.com]; Wayne Miller (Miller.Wayne@azdeq.gov) [Miller.Wayne@azdeq.gov]; Butler, Thomas [Butler.Thomas@epa.gov]
Subject: my notes
Attachments: Discrepancies with RDRA WP.docx; Draft_Final_ST012_RD-RAWP_highlights (2).pdf

Hey Eva

I trust you made it home ok last night. I misread the monitors and my flight actually left out of the same gate as yours a couple hours later. But I finished skimming through the draft final RDRA report and found some more interesting things in it, sending you my notes. When we come up with our list the rationale for identified discrepancies between the 2014 ST12 RDRA workplan and what was actually performed, and what was omitted from the 2015 EBR design in the most current workplan version. Here's just a few things I found:

1. SEE extraction system was supposed to run for 90 days following shutdown of SEE. What was the rationale for the reduction to only 12 weeks of post SEE extraction?
2. Extraction wells in the cell phone lot were supposed to have been connected to SEE extraction system with permanent underground piping for the extraction to EBR transition phase
3. Continued hydraulic containment was included as part of the original EBR workplan; what is the rationale for abandoning hydraulic containment in the current workplan?
4. Anticipated residual saturations following SEE that were in the RDRA workplan should be compared with current EBR workplan; AF was saying yesterday that they were within the same model parameters and assumptions; not sure this is true.
5. Original EBR workplan called for 60' well spacing and 5 point injection pattern for EBR injection, current plan appears to be provide much less coverage. What is the rationale for this change?
6. EPA commented on the 2015 workplan that a single criteria (10% of peak mass removal) should not be used as the single criteria for determining SEE shutdown criteria is met but should be a multiple lines of evidence approach; AF's response in 2015 RDRA workplan agrees to use multiple lines of evidence approach; but this is not what happened when SEE was abruptly terminated last year.

We should go though and compare the original workplan to compare with how SEE was actually performed, document unexplained changes; also document changes between the original design plans and the current plan, and request justification on each and every one of these points. The underlying theme that seems to run though each of these is that the scale and budget for the project appears to be significantly downsized from the original workplan, which could have something to do with why amec attorneys have been participating in the technical meetings ever since their unilateral decision to shut down the SEE was made.

Carolyn d'Almeida
Remedial Project Manager
Federal Facilites Branch (SFD 8-1)
US EPA Region 9

(415) 972-3150

"Because a waste is a terrible thing to mind…"