Message

From: Norman Bernstein [nwbernstein@nwbllc.com]
Sent: 1/18/2022 7:05:04 PM
To: Ohl, Matthew [ohl.matthew@epa.gov]
CC: Knox, Corey S CIV USARMY CELRL (USA) [Corey.S.Knox@usace.army.mil]; Hauber, Erin M CIV USARMY CEHNC (USA) [Erin.M.Hauber@usace.army.mil]; Clabaugh, William B CIV USARMY CELRL (USA) [William.B.Clabaugh@usace.army.mil]; Grimm, Jennifer J CIV USARMY CEHNC (USA) [Jennifer.J.Grimm@usace.army.mil]; Andrew A Gremos [agremos@ramboll.com]; Gary Wealthall [GWealthall@geosyntec.com]; Julie Konzuk [JKonzuk@geosyntec.com]; Krueger, Thomas [krueger.thomas@epa.gov]; Neighbors, Katie [kneighbo@idem.IN.gov]; Peter M. Racher Esq. [pracher@psrb.com]
Subject: Re: Reschedule Request for ERH at Third Site DNAPL Area Call

Thanks Matt

That time and date work for us.

Norm

On Tue, Jan 18, 2022 at 1:17 PM Ohl, Matthew <ohl.matthew@epa.gov> wrote:

> Norm,
>
> Would February 16, 2022 at 2 pm eastern work well?
>
> Thank you,
>
> Matt
>
> Matthew J. Ohl
> Remedial Project Manager
> United States Environmental Protection Agency
> 77 West Jackson Boulevard, SR-6J
> Chicago, IL 60604-3590
>
> phone: 312.886.4442
> fax: 312.692.2447
> e-mail: ohl.matthew@epa.gov
>
> **From:** Knox, Corey S CIV USARMY CELRL (USA) <Corey.S.Knox@usace.army.mil>
> **Sent:** Tuesday, January 18, 2022 10:41 AM
> **To:** Ohl, Matthew <ohl.matthew@epa.gov>; Hauber, Erin M CIV USARMY CEHNC (USA) <Erin.M.Hauber@usace.army.mil>; Clabaugh, William B CIV USARMY CELRL (USA) <William.B.Clabaugh@usace.army.mil>; Grimm, Jennifer J CIV USARMY CEHNC (USA) <Jennifer.J.Grimm@usace.army.mil>
> **Subject:** RE: Reschedule Request for ERH at Third Site DNAPL Area Call

Good morning Matt,

It appears that 16 February 2022 at 2pm Eastern would be a good date and time for USACE.

Respectfully,

Corey Knox

Project Manager

USACE Louisville District Environmental Support Section

Phone: (502) 315-2622

Cell: (502) 682-1173

Corey.S.Knox@usace.army.mil

http://www.lrl.usace.army.mil/

US Army Corps of Engineers

From: Ohl, Matthew <ohl.matthew@epa.gov>
Sent: Tuesday, January 18, 2022 8:42 AM
To: Knox, Corey S CIV USARMY CELRL (USA) <Corey.S.Knox@usace.army.mil>; Hauber, Erin M CIV USARMY CEHNC (USA) <Erin.M.Hauber@usace.army.mil>; Clabaugh, William B CIV USARMY CELRL (USA) <William.B.Clabaugh@usace.army.mil>; Grimm, Jennifer J CIV USARMY CEHNC (USA) <Jennifer.J.Grimm@usace.army.mil>
Subject: [Non-DoD Source] FW: Reschedule Request for ERH at Third Site DNAPL Area Call

Good morning all,

Please advise of your availability for a call during the weeks of 2/7 and 2/14/2022.

Thank you,

Matt

Matthew J. Ohl
Remedial Project Manager
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77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

From: Norman Bernstein <nwbernstein@nwbllc.com>
Sent: Monday, January 17, 2022 9:07 AM
To: Ohl, Matthew <ohl.matthew@epa.gov>
Cc: Andrew A Gremos <agremos@ramboll.com>; Clabaugh, William B CIV USARMY CELRL (USA) <William.B.Clabaugh@usace.army.mil>; Gary Wealthall <GWealthall@geosyntec.com>; Hauber, Erin M CIV USARMY CEHNC (USA) <Erin.M.Hauber@usace.army.mil>; Julie Konzuk <JKonzuk@geosyntec.com>; Knox, Corey S CIV (USA) <Corey.S.Knox@usace.army.mil>; Krueger, Thomas <krueger.thomas@epa.gov>; Neighbors, Katie <kneighbo@idem.IN.gov>; Peter M. Racher Esq. <pracher@psrb.com>
Subject: Re: Reschedule Request for ERH at Third Site DNAPL Area Call

Matt

I have subsequently determined that the weeks of the 7th or 14th of February would work much better.

Norm

On Mon, Jan 17, 2022 at 9:25 AM Norman Bernstein <nwbernstein@nwbllc.com> wrote:

> Matt
>
> I have been advised that neither the 27 th nor the 28th work for several members of our group.

Please provide dates that will work for your team the following week.

All the best and stay safe

Norm

On Sun, Jan 16, 2022 at 7:39 PM Norman Bernstein <nwbernstein@nwbllc.com> wrote:

Matt

By Federal Court Order, I am required to file extensive papers in another matter on the Jan 26th. Can we move this to the 27th or 28th?

Norm

On Mon, Jan 3, 2022 at 9:02 AM Ohl, Matthew <ohl.matthew@epa.gov> wrote:

Good morning,

Please advise if you're not available at the proposed time.

Thank you,

Matt

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From: Gary Wealthall <GWealthall@Geosyntec.com>
Sent: Friday, November 12, 2021 10:11 AM
To: Ohl, Matthew <ohl.matthew@epa.gov>
Cc: Norman Bernstein <nwbernstein@nwbllc.com>; Peter M. Racher Esq. <pracher@psrb.com>; Krueger, Thomas <krueger.thomas@epa.gov>; DPetroff <DPetroff@idem.IN.gov>; Julie Konzuk <JKonzuk@Geosyntec.com>; Andrew A Gremos <agremos@ramboll.com>
Subject: FW: Follow-up Request for ERH at Third Site DNAPL Area

Dear Matt

Thank you for your email dated November 3, 2021.

We respectfully disagree with EPA's approach and request a conference call with EPA and the Army Corps and IDEM personal that have come up with the approach that EPA has requested.

Our main concerns are outlined (italicized text) in the body of your email, below.

Sincerely

Gary Wealthall

Dr Gary Wealthall, FGS

Senior Principal

Geosyntec Consultants Ltd

Office: +44 (0)1179 805 772

Mobile: +44 (0)7485 184 452

Email: gwealthall@geosyntec.com

---------- Forwarded message ---------

From: **Ohl, Matthew** <ohl.matthew@epa.gov>
Date: Wed, Nov 3, 2021 at 9:46 AM
Subject: Follow-up Request for ERH at Third Site DNAPL Area
To: Julie Konzuk <JKonzuk@geosyntec.com>, Andrew A Gremos <agremos@ramboll.com>, Esq. Norm Bernstein <nwbernstein@nwbllc.com>, Peter Racher <pracher@psrb.com>
Cc: Krueger, Thomas <krueger.thomas@epa.gov>, DPetroff <DPetroff@idem.in.gov>

Good morning all,

Thank you for the additional information on bioremediation and the discussions we have had of site-specific conditions and the proposals the Trustees are considering. After consulting with the U.S. Army Corps of Engineers and IDEM, EPA believes further ERH treatment is the most likely approach to quickly and effectively achieve the cleanup standards. We continue to recommend and request additional ERH treatment for the DNAPL area as provided by the Amended Enforcement Action Memorandum of December 12, 2016. It appears that in locations that were fully and successfully heated, effective treatment was achieved. EPA suggests adding treatment points with an emphasis on addressing the remaining contaminated areas.

While ERH may result in a shorter timeframe to achieve remedial targets, there remains the potential to exacerbate further downward migration of NAPL. The timeframe for ambient temperature bioremediation achieves the same results as ERH, but over a longer timeframe at much lower cost and with less risk. Ambient temperature bioremediation should pose no risk of further migration of NAPL, the risk of VOC migration in groundwater would be low, and controllable due to the low groundwater flow

velocities. Additionally, to the extent that EPA is concerned that there may be contaminated groundwater flowing under the sheet-pile wall, that can be addressed by first sampling to the south and west of the PSGS-11 area, which is the only area where any DNAPL has been found. EPA has previously requested that that sampling be done, and we are prepared to undertake it as soon as reasonably practical, weather permitting.

Treating these areas using thermal remediation will likely entail completely delineating the depth of this contamination, and installing additional electrodes and extraction wells fully enveloping the defined treatment area.

It is anticipated that complete delineation (using Sonic drilling methods to recover soil and groundwater samples and install small diameter wells) will be required to depths greater than 55 feet, to treat the contamination using ambient temperature bioremediation. The small diameter wells can be used to extract DNAPL, water and vapor. If effective, that extraction may obviate the need for either ambient bioremediation or ERH in the PSGS-11 area.

A preliminary estimate is that an additional 20 electrodes and seven extraction wells installed to approximately 55 feet below ground surface (BGS) would be adequate to address the additional sub-40-foot BGS contamination observed in post-remediation sampling. It is noted that the existing aboveground equipment is more than adequately sized to handle the additional loads imposed by the likely treatment volume increase, and thus this equipment could be reused. However, given the time that the equipment has been left on-site, we expect four to six weeks of repair time will be needed before operation.

This comment that 20 electrodes and seven extraction wells (preliminarily estimated to cost in vicinity of $3 million) does not correctly reflect the current compliance status of the DNAPL area and is also inconsistent with EPA's recognition of the difficulties of complete remediation of DNAPL, particularly at depth. As to compliance, P-2, P-3 and the Sump have already achieved the required 90% reduction in total VOC concentrations. The only remaining compliance point that did not achieve the 90% required reduction in total VOCs is P-1. The most recent data shows rapid natural attenuation at that location. The remaining compliance obligation, which is separate from the 90% reduction of total VOCs, is to break down the DNAPL concentrations in the vicinity of PSGS-11 to less than DNAPL concentrations (at aqueous effective solubility). Based on its extensive experience with ambient bioremediation, Geosyntec continues to recommend the use of that technology to break down the remaining DNAPL if the use of small diameter well extraction does not solve the problem. However, even if ERH were to be used for that purpose in the PSGS-11 area, nothing like 20 electrodes and seven extraction wells would be needed.

Please provide a work plan for additional ERH treatment by December 1, 2021.

Sincerely,

Matt

Matthew J. Ohl
Remedial Project Manager
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77 West Jackson Boulevard, SR-6J
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