From:	Rob Rau
To:	Yen-Vy Van
Cc:	Deborah Hilsman
Bcc:	Rob Rau
Subject:	EPA Comments on Draft Supplemental RI Report - Former Smitty's Conoco #140
Date:	03/08/2011 03:35 PM

Hello Yen-Vy:

EPA received the above referenced document on March 4, 2011. Overall, the report is a very professional, well written document that does an excellent job of describing the work tasks accomplished along with the investigation results. Thank you! Provided below are EPA comments for your use in finalizing the report. Please give me a call or send an email if you have any questions.

Rob

General Comment: The document should present a revised conceptual site model based upon the additional data gathering activities from January 2011. This could be revised text from work plan, but should also include a CSM graphically displayed as a figure that should sources, transport mechanisms, media, receptors and exposure pathways (both complete and incomplete), etc...

1) Section 1.3, 1st Sentence: There is discussion of a petroleum hydrocarbon plume here and elsewhere throughout the document. When the word "plume" is used, I assume that you are referring to groundwater, not soil contamination. This is not clear however because a map showing groundwater contamination (in either plan view or cross section) has not been presented here or in any previous document. This is essentially the same comment transmitted on 12/14/10, and previously on 10/5/10. It is my understanding that the term plume as it is commonly used refers to 3-dimensional body that has shape and geometry. This concept is lost when all that is shown is a table of numbers. As a more general comment, it would be very helpful for the reader to see maps showing both groundwater and soil contamination so tables of data do not have to be put in geographic context.

2) Page 8, Supplemental Remedial Investigation: This section identifies all of the tasks performed as part of the January 2011 field investigation through 4 pages of primarily bulleted text. A Sample Summary table of some sort would be of great benefit to the reader where all of the data collection activities are presented at a glance. This could include all environmental and control samples collected, matrix type, location, depth, analyses, field measurements, field screening, dates, special comments, etc...

3) Page 10 and top of Page 16: These sections describe the groundwater sampling procedures, but the description is not clear. It was EPA's understanding that low-flow purge and sampling protocols would be used for well sampling throughout this project; however, it seems this is not the case. The first paragraph on page 16 seems to indicate that three well volumes were purged or until water quality parameters stabilized. It seems like it should be just the opposite. The text should be clarified as to what procedures were used for well sampling. If low-flow protocols were used, it is assumed that Table 8 presents the final water quality parameters as measured in the field after they had stabilized. If so, this should be clarified. Third bullet on page 10 adds to this confusion by stating that samples

were collected after an "appropriate volume" of water was purged.

4) Section 2.3, Offsite Preliminary Investigation: Please identify the date(s) that this investigation was conducted.

5) Page 20, Recommendation, third paragraph: Your suggestion that 4 quarters of groundwater monitoring is necessary prior to the installation of a remedial system is contrary to the agreed upon schedule in the AOC. EPA strongly disagrees with this assertion.

6) Figure 4: Revise as discussed on the phone.

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