UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
EMERGENCY RESPONSE BRANCH
2525 N. SHADELAND AVENUE, SUITE 100
INDIANAPOLIS, IN 46219

REPLY TO ATTENTION OF:
SE-GI

December 30, 2013

Mr. Bradley Adams
SESCO Group
1426 West 29th Street
Indianapolis, IN 46208

TRANSMITTED ELECTRONICALLY

Re: EPA Comments on Revised Work Plan
Kokomo Dump Site (C564)
1130 South Dixon Road
Kokomo, Indiana
Docket No. V-W-13 C-018

Dear Mr. Adams:

The U.S. Environmental Protection Agency completed its review of the revised Work Plan, dated October 25, 2013, for the Kokomo Dump Site. SESCO Group (SESCO) submitted a Site Health and Safety Plan (HASP) and Quality Assurance Project Plan (QAPP) as attachments to the Work Plan. SESCO submitted these documents on behalf of the City of Kokomo to comply with the Administrative Settlement Agreement and Order on Consent (ASAOC) between EPA and the City of Kokomo.

EPA requires modifications to the Work Plan and HASP, as outlined in the attached pages. However, EPA disapproves the QAPP in its entirety. The ASAOC requires that the QAPP is developed using the Uniform Federal Policy for Quality Assurance Projects Plans (UFP-QAPP). The UFP-QAPP format was not followed. Attached to this document is a draft QAPP that EPA and its contractors prepared. This QAPP is under internal EPA review, but may used in the interim.

The final Work Plan must be submitted by 5 p.m. Eastern time within seven business days of receipt of this letter, or January 9, 2014, as specified in Section VIII, 17b of the ASAOC. Due to the holidays, if an extension is needed, please contact me as soon as possible.

The enclosed comments must be addressed. If the comments are not addressed, EPA will modify the document and provide the revised document to you for implementation. If you believe that any changes are necessary other than those directed by EPA's enclosed comments, those changes must be discussed with, and approved by, me prior to re-submittal of the document. In addition, all changes made to the document, other than those specifically at the direction of EPA, must be specified in writing to EPA upon re-submittal of the document.

If you have any questions concerning this matter, or would like to discuss the attached comments in detail, please contact me at 317-417-0980.

Sincerely,

Shelly Lam, LPG
Federal On-Scene Coordinator

cc: William Pickard, SESCO Group
Brent Graves, SESCO Group
David Guevara, Taft Stettinius & Hollister, LLP
Lawrence McCormack, City of Kokomo
Maria Gonzalez, EPA Region 5
File

Work Plan Modifications

1. **Section 1.1, Introduction**
   Modify the last bullet of the third paragraph as such, "Development of a Summary Report detailing the work performed and recommendations for additional work."

2. **Section 2.7, Emergency Contingency Plan**
   Add the Kokomo Police Department and Indiana Department of Environmental Management (IDEM) Emergency Response Section to the distribution list for emergency contingency plans.

3. **Section 3.3.1, Site Boundary Survey Procedures**
   In the second paragraph under Final Plan, change "it's" to "its."

4. **Section 3.3.6, Surface and Subsurface Soil (Soil Borings) Procedures**
   a. Add that both surface and subsurface soil samples will be field screened with a photo-ionization detector (PID) or flame-ionization detector (FID) and x-ray fluorescence (XRF) detector.

   b. It is unclear what sampling design is used in the Work Plan, although this information was requested in EPA's comments on the previous Work Plan. The objective of soil sampling is to determine the nature and extent of contamination. A random-start equilateral triangular gridded sampling approach is the most appropriate sample design. The attached figure displays co-located surface and subsurface soil sampling locations using the above design; this figure should be used to update the Work Plan, figures, and tables.

   c. For subsurface soil samples, a minimum of two samples will be collected from each boring as indicated by the highest field screening responses, at the base of the fill, or at the bottom of each boring.

   d. Revise the subsurface sampling analyses to collect samples for all proposed analytes at all subsurface soil sample locations.

   e. Table 9 must be revised to incorporate the comments in 4b, 4c, and 4d.

5. **Section 3.3.7, Test Pit Excavation Procedures**
   Add the following to the end of this section:

   "A minimum of one (1) sample will be collected along each wall and the floor of each excavation. Sampled materials will be field screened with both PID and XRF. Samples will be submitted for laboratory analysis of RCRA metals, SVOCs, PCBs, 2,3,7,8-TCDD, and VOCs, if indicated by field screening results.

   Excavated materials will be placed on heavy plastic sheeting. Heavy plastic sheeting will be used to cover excavation stockpiles overnight, during high wind, or during rain. The sheeting will be secured in place with sandbags or boulders. Surface water runoff resulting from rain will be diverted around covered stockpiles.

Excavations will be backfilled with the removed soil material. If drums or metal debris are encountered in excavations, those materials will be removed prior to backfilling. Excavated drums and metal debris will be relocated to the drum staging area."

6. **Section 4.1, Cleanup Criteria**
   a. Modify the second sentence of the first paragraph to reflect that Industrial Direct Contact Screening Levels (IDCSL) may be used as on-site cleanup objectives. Off-site cleanup objectives must meet residential standards.

   b. Provide a table with on-site and off-site cleanup criteria.

7. **Section 4.2.5, Air Monitoring**
   a. Modify this section to state that air monitoring will also be used for protection of off-site populations.

   b. Include Table 8.2 from the HASP in this section.

8. **Section 4.3, Waste Disposal**
   The proposed disposal facilities are in compliance with EPA's Off-Site Rule and are acceptable to EPA.

9. **Section 6.1, Responsibilities and Functions**
   The organizational chart must reflect that EPA is not subordinate to the City of Kokomo.

10. **Section 6.2 and Appendix E, Project Schedule.**
    a. The project schedule must be revised. It should include an estimated start date. EPA strongly recommends that the revised project schedule be placed into a Gantt chart format and include task name, duration, start date, finish date, and should indicate which tasks can be conducted concurrently and which tasks are dependent upon other tasks. For example, the site boundary survey and Phase I environmental site assessment can be conducted concurrently. Drum removal, waste characterization sampling, and soil sampling can be conducted at the same time.

    b. Change Final Report to Summary Report.

11. **Section 6.3, Reporting**
    Add Monthly Progress Reports.

Site-Specific Health and Safety Plan

1. **Entire Document**
   Correct the spelling of Shelly Lam throughout the document.

2. **Section 4.0, Hazard Assessment**
   Excavations should be checked "Yes" since test trenching is part of the scope of work.

3. **Section 12.2, Additional Emergency Numbers**
   Add the IDEM Spill Line, 888-233-7745.

SAMPLE LOCATION MAP
KOKOMO DUMP
1130 S. DIXON ROAD
KOKOMO, HOWARD COUNTY, INDIANA

(c) 2009 Microsoft Corporation
and its data suppliers
http://www.bing.com/maps
Samples locations were determined using EPA's Visual Sample Plan.

1:1,700
0 100 200 Feet