To: Lam, Shelly[lam.shelly@epa.gov]
Cc: Bill Pickard[bpickard@sescogroup.com]; Brad Adams[badams@sescogroup.com]; Lam, Shelly[lam.shelly@epa.gov]
From: Brent Graves
Sent: Fri 9/27/2013 6:11:06 PM
Subject: Re: EPA Comments on Kokomo Dump Site (C564) Work Plan

You are correct. We did not state it would be an iterative process, so that was our oversight. I'm glad you are in agreement that we can take this approach, and we'll move forward accordingly. Regarding the deadline, if we think we will need an extension, how much time do you typically allow?

Brent A. Graves, LPG
SESCO Group
Sent from my iPhone

On Sep 27, 2013, at 1:58 PM, "Lam, Shelly" <lam.shelly@epa.gov> wrote:

Brent,

Your proposed approach is certainly acceptable, and I thought that might be your intent. However, it wasn't stated anywhere in the work plan that it was intended to be an iterative process. If you want to take a phased approach, please state in the work plan which items in the order will be addressed during this first phase and what will be addressed later.

My recommendation is that the work plan address determining the extent of contamination and buried drums by whatever methods you propose, e.g. geophysical surveys, surface and subsurface soil sampling, etc. The report you provide to me could include the results of the investigations and include a plan for removal of soil and drums. The schedule in the work plan should be updated to reflect the phased approach and should give estimates on when the investigation report will be submitted and when removal actions are likely to be complete.

Please note that the process of approving the work plan and future removal actions will be much easier if the HASP and QAPP are inclusive of all the work to be performed – both investigatory and removal activities.

We can talk next week if you still have questions. However, I have a meeting in a few minutes and will be unavailable today.

Shelly

Shelly Lam, LPG

Federal On-Scene Coordinator

U.S. EPA

2525 N. Shadeland Avenue, Suite 100

Indianapolis, IN 46219

Office: 317-308-3073

Cell: 317-417-0980

From: Brent Graves [mailto:bgraves@sescogroup.com]
Sent: Friday, September 27, 2013 1:48 PM
To: Lam, Shelly
Cc: Bill Pickard; Brad Adams
Subject: RE: EPA Comments on Kokomo Dump Site (C564) Work Plan

That's fine. My intent right now was not to dig deep into the comments, but to discuss your statement about the apparent disconnect between our Work Plan and the EPA Order. Now that I have reviewed the comments I have a better understanding of your position. We have every intention of meeting the goals of the Order; however, our Work Plan was developed with the approach in mind that we tackle the site in a more strategic step-wise manner given the limited amount of data currently available. The Work Plan presented addresses the immediate concern of removing the known drums and associated soil impacts while collecting additional data to determine if other drums or unknown sources of contamination exist (i.e., the Geophysical Survey). The next Work Plan would be designed based on these findings. This approach would be our preference as we think we can maintain a good pace on completing the work while also maintaining better control on strategy and costs. We want to know if EPA is

amenable to this approach, so we can determine how we need to proceed from here. Please let me know your thoughts ASAP as we have our response deadline. Thanks.

From: Lam, Shelly [mailto:lam.shelly@epa.gov]
Sent: Friday, September 27, 2013 12:34 PM
To: Brent Graves
Cc: Bill Pickard; Brad Adams; Lam, Shelly
Subject: RE: EPA Comments on Kokomo Dump Site (C564) Work Plan

I do not. I can be available next week. If the government shutdown occurs, I am exempt from it but the other reviewers will not be available.

Shelly Lam, LPG

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From: Brent Graves [mailto:bgraves@sescogroup.com]
Sent: Friday, September 27, 2013 11:28 AM
To: Lam, Shelly
Cc: Bill Pickard; Brad Adams
Subject: RE: EPA Comments on Kokomo Dump Site (C564) Work Plan

Do you have time for a brief phone call today to discuss these comments?

From: Lam, Shelly [mailto:lam.shelly@epa.gov]

Sent: Thursday, September 26, 2013 12:03 PM
To: Brad Adams
Cc: Brent Graves; Bill Pickard; Guevara, David; Lawrence McCormack; Gonzalez, Maria; Ursic, James; Levin, Ida; Newell, Duane; Stacey DeLaReintrie; Lam, Shelly
Subject: EPA Comments on Kokomo Dump Site (C564) Work Plan

Attached are EPA's comments on the Work Plan for the Kokomo Dump Site (C564). A revised Work Plan must be submitted by 5 p.m. Eastern time within seven business days of receipt of this letter, or October 7, 2013. If you require clarification on any of the comments, please contact me as soon as possible so that we can set up a conference call.

Shelly Lam, LPG

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