To: Kamke, Sherry[Kamke.Sherry@epa.gov]
From: Egan, Robert
Sent: Tue 7/14/2015 2:59:13 PM
Subject: RE: Tower Standard Work Plan comments

Thanks for looking at this. LDF has already responded with general concerns. I will forward the message to you. I assumed, incorrectly, that you were cc'd on Kristen's message.

Bob Egan

Corrective Action Manager

Underground Storage Tanks Section

RCRA Branch

(312) 886-6212

(312) 692-2911 (fax)

From: Kamke, Sherry
Sent: Tuesday, July 14, 2015 9:48 AM
To: Egan, Robert
Subject: RE: Tower Standard Work Plan comments

Bob,

Thanks for copying me on your proposed written comments on the Tower Standard workplan. I agree with the content of what you are saying and I think the write-up does a great job of highlighting our concerns. I hope LDF will chime in soon so that we can get a consolidated set of comments to WDNR soon.

Sherry

From: Egan, Robert
Sent: Tuesday, July 14, 2015 9:13 AM
To: KHanson@ldftribe.com
Cc: Kamke, Sherry
Subject: Tower Standard Work Plan comments

Kristen,

Please review the information below and see if it contains all the comments we spoke about with DNR and any other concerns that you may have about the project.

Thank you,

Bob

John and Greer,

Thank you for speaking to Kristen and me on Monday and discussing our initial comments about the work plan. It was clear that we share many of the same concerns. We look forward to a revision of the plan and the project moving forward.

General comments- We believe that it is important for the work plan to enhance the Conceptual Site Model for the Tower Standard site, and believe that some adjustments to the plan would better accomplish this goal. The addition of permanent monitoring wells to this phase of field work, using the information from the most recent investigations, would provide useful data on current contaminant levels between the Tower site and Haskell Lake. Also, fine-tuning some of the soil boring locations and the depths in which samples are collected may provide better information and save analytical samples for the suspected source area on the Tower site. We also believe that it will be very important to install a complete groundwater monitoring network as soon as possible after this initial effort concludes. If a revision of the work plan is required by WDNR, we suggest that REI be urged to provide a quick turn-around so field work will not be unduly delayed.

Detailed comments may be found below:

1) The location of the borings shown on Figure B.1.b cover a large area, including the Tower Standard site potential source area and other potential sources on adjacent properties. It would be helpful if the work plan contained additional information to justify the boring locations, including identifying the location of former USTs, and the reasoning behind locating samples within the road right-of-way and near the small pond.

2) Figure B.1.b should identify the former locations of USTs, pump islands, etc., at other sites off of the Tower Standard property. Not all properties described in Section 2.6 are identified on the figure and it is difficult to see how sample locations are related to potential contaminant sources.

3) There should be a higher density of borings in the suspected Tower Standard source area to assess the degree and extent of contamination on the site, and more widely spaced borings along the roadway. Past investigations have shown no contamination of groundwater from the former Grizzly Bill's moving in the direction of Haskell Lake. Also, the location of Highway 70 has changed since the operation of the USTs north of the highway, which may affect sample results.

4) The proposed sampling depths should be adjusted based on location, and not necessarily uniform for all locations. For example, locations along the roadway may encounter road materials in the top several feet, and shallow sampling may not be useful. Borings in the former Tower Standard UST pit may encounter clean backfill where excavation had previously occurred, and the locations along the pond would encounter groundwater very near the surface. Samples may not be necessary where no contamination is detected by headspace sampling, saving additional samples for contaminated locations.

5) Section 2.7 describes evaluating potential impact to receptors, including vapor intrusion, but does not describe how this will be accomplished.

6) Section 5.0- It would be helpful if this section listed each compound to be analyzed and provided the method detection limit for each compound.

7) Please notify LDF and the region when field work is scheduled. LDF representatives wish to be on site at the start of field work and I would like to be present for at least some of the activities.

Thank you again for the opportunity to review the plan and offer comments. We look forward to the initiation of site activities and working with you to achieve our shared goal of determining

the extent of contamination and protecting potential receptors.

Regards,

Bob

Bob Egan

Corrective Action Manager

Underground Storage Tanks Section

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