To: Kamke, Sherry[Kamke.Sherry@epa.gov]
From: Hanson, Kristen
Sent: Tue 3/22/2016 9:25:44 PM
Subject: FW: comments on work plan and H&S Plan : KH comments part 1- pages 1-3

Sorry Sherry,

I neglected to copy you on this.

Kristen

From: Hanson, Kristen
Sent: Tuesday, March 22, 2016 4:24 PM
To: 'Egan, Robert'; Faust, Matt (mfaust@bristol-companies.com)
Subject: RE: comments on work plan and H&S Plan : KH comments part 1- pages 1-3

Bob and Matt:

Here are my comments from pages 1-3. Comments from the remainder of the document are forthcoming .

Comments:

Page 2:

Several Private Wells were contaminated with Benzene: Hotel and Bill and Linda's. Lust replaced several wells at the hotel and one well at Bill and Linda's.

Page 2 paragraph 2:

The Tribe opened the perchlorate site investigation in 2008. A Preliminary Site Assessment, EPA removal Action, Tribal Investigation, and 2 TBAs were initiated at the site across the highway. There seems to be quite a lot of text here that is unrelated to a work plan. It would make sense to either describe it in entirety or leave it out. As written it is misleading.

Paragraph 3:

Seams applicable

Page 3:

The Tribe requested assistance from EPA in 2011.

Page 3 paragraph 4:

A total of 46 borings, although 8 encountered shallow refusal and were replicated nearby. 38 borings provided data.

I counted 64 soil samples collected by REI. The workplan cites 81.

EPA collected 17 soil samples splits

General Comment: There is a lot of discussion about state activities, but no discussion about EPA activities (i.e. EPA remedial investigation parallel to State, EPA corrective action notice)

Kristen

From: Egan, Robert [mailto:egan.robert@epa.gov]
Sent: Monday, March 21, 2016 4:31 PM
To: Hanson, Kristen
Cc: Faust, Matt; Kamke, Sherry
Subject: RE: comments on work plan and H&S Plan

They are not available yet. We will need to provide comments on what we have so they can produce a final document. It's not the best situation, I know, but Bristol needs some time to get the final out and submitted before we get to the field next week. As I mentioned last week, we can change locations and samples as needed in the field, which I do often at other sites based on what we learn as we move forward. I do expect that we will have the cross sections this week for our review.

I will ask Bristol what the cut off date is to provide comments so they can make changes and produce a final version, and then let you know.

Bob Egan

Corrective Action Manager

Underground Storage Tanks Section

RCRA Branch

EPA Region 5

(312) 886-6212

(312) 692-2911 (fax)

From: Hanson, Kristen [mailto:KHanson@ldftribe.com]

Sent: Monday, March 21, 2016 4:15 PM
To: Egan, Robert <egan.robert@epa.gov>
Subject: RE: comments on work plan and H&S Plan

Good Afternoon Bob,

I do have comments on the workplan. I need the cross sections to evaluate locations and the scope of work. I have not seen them yet.

Kristen

From: Egan, Robert [mailto:egan.robert@epa.gov]
Sent: Monday, March 21, 2016 3:55 PM
To: Hanson, Kristen
Subject: FW: comments on work plan and H&S Plan

Kristen,

Here below are the few comments I sent to Bristol on the work plan and health and safety plan.

Please let me know as soon as you can whether you have any additional concerns or comments.

Thank you.

Bob Egan

Corrective Action Manager

Underground Storage Tanks Section

RCRA Branch

EPA Region 5

(312) 886-6212

(312) 692-2911 (fax)

From: Egan, Robert
Sent: Monday, March 21, 2016 9:45 AM
To: 'Faust, Matt' <mfaust@bristol-companies.com>
Cc: Worley, Ray <Worley.ray@epa.gov>; Kamke, Sherry <Kamke.Sherry@epa.gov>
Subject: comments on work plan and H&S Plan

Matt,

I have a few comments on the plans. I am still waiting for the tribe's comments but should get them today.

Work Plan:

Section 1.1- In the first paragraph, change the reference to the tribal land management office to a construction office.

Section 2.1.4- In the second bullet, Pace is misspelled.

Section 3.3.3- In the last sentence of the first paragraph, there is reference to extraction in the field for soil samples. Please revise this to better explain what is happening. It sounds as if a lab procedure is occurring in the field.

Section3.3.5- We are revising the number of samples to be collected at the hotel. Although it may be prudent to bring extra canisters in case of unexpected problems, we are not collecting air samples in the living space at the hotel. Only the four crawl space samples will be collected. Also, we will add one indoor air sample at the bait shop. This sample is mentioned in Section 3.3.5, but not in 3.3.5.2. Please revise this section and others where the total number of samples is mentioned. Four crawl space, one indoor at bait shop, one sub-slab at bait shop, and one outdoor will be collected.

Section 3.3.5.1- In the fifth paragraph, the collection time is stated as approximately 5 minutes. Revise this to state that the flow rate will not exceed 200 ml/min, with a target rate of 100-200 ml/min.

H&S Plan:

Revise sample numbers to correspond to the work plan.

In Section 3.3.3, there is discussion about work near community streets. At the Tower site, we will be adjacent to Wisconsin Hwy 70 and not typical town streets. Please revise the text to discuss work near a highway. The speed limit is 55 mph near the site.

Please let me know if you have any questions about these comments.

Bob Egan

Corrective Action Manager

Underground Storage Tanks Section

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