To: Hanson, Kristen[KHanson@ldftribe.com]
From: Manville, Jennifer
Sent: Tue 7/19/2016 7:47:40 PM
Subject: RE: LUST Optimization Pilot

Hi Kristen,

This is so outside of my technical expertise that I don't have any perspective to share on the actual approach, whether it is applicable to this situation, whether it is available for us to utilize, etc. I can imagine however, that the R5 Tanks Program would be hard pressed to find the staff resources right now to explore alternative approaches.

Thanks for your input on the CERCLA 128(a) call this afternoon. I think that hearing your experiences was very helpful for the tribal staff that are just embarking on standard development.

Jenny

From: Hanson, Kristen [mailto:KHanson@ldftribe.com]
Sent: Monday, July 18, 2016 4:09 PM
To: Manville, Jennifer <manville.jennifer@epa.gov>
Subject: LUST Optimization Pilot

Hi Jenny,

I stumbled across this presentation on Optimizing LUST sites. It appears to have been presented at a National Tanks Conference. The Presentation references a Pilot LUST Optimization Study that included 7 LUST sites on Tribal Lands. The review summary mirrors our experience and it appears that there is a strategy and recommendation to optimize efficiency and performance at LUST characterization sites on Tribal Lands. This exercise appears to have been also completed for state programs, but the results are vastly different for Tribal Lands. I have attached the presentation. I had to delete a few slides to meet email able size limits.

I am preparing a field summary of field work completed last week. Here is the short version. The goal of the MIP work was to characterize the source area. The State contractor and EPA spent 4 days utilizing very expensive sophisticated equipment designed to identify source areas and associated stratigraphy (soils holding the contaminant). Most of the boring locations were as far from the source area a possible, several in previously defined clean areas. In the end, one boring was advanced in the likely source area to a shallow depth.

The resources we have are not being utilized well. I wonder if bringing in this optimization specialist may be helpful to the entire project. If this gentleman is willing, available, and authorized, it may be helpful to explore inviting the optimization approach into this project. Your thoughts on this approach is appreciated.

Kristen Hanson

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