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January 26, 2016

Mr. Gerald Ruopp
Techalloy Company, Inc.
6509 Olson Road
Union, Illinois 60180

United State Environmental Protection Agency's Comments December 2015 Monthly Progress Report
EPA ID # ILD 005 178 975, Administrative Order on Consent (AOC),
Docket No. R8H-5-99-008

Dear Mr. Ruopp,

This letter provides the United States Environmental Protection Agency (EPA) comments on the December Monthly Progress Report for the Techalloy facility in Union, Illinois prepared by Autumwood Consultants, LLC (Autumwood), dated January 7, 2016. The EPA received the report on January 14, 2016. EPA has reviewed the report and has the following comments:

1. Progress Made: The sample log in checklist for the submission that included the P&T System effluent notes some of the sample bottles were broken and others had a large bubble. Autumwood should provide information on which samples contained broken bottles and bubbles, and if sufficient volume in the other bottles for that sample to allow an uncompromised analysis—the checklist suggests there was. Provide a full description of the issues with the integrity of the bottles, so that we can have explicit assurances that the reported values in this document area accurate, and not compromised.

2. Provide an explanation for the two data loggers sent back to the factory. Were there two transducers put down one hole to monitor water levels? Were different transducer used for different dates? Explain where the locations of the data loggers and what each of them monitored.

3. Explain "...Central Wire will check them against the first two months of operation in the spring and discuss it in the following Monthly Progress Report"? This text seems to indicate that

after collecting two months of water-level data, and then checking the data for accuracy, and then presented to EPA their findings. This plan seems to mean that something like three months of data collection will take place before any errors will be evaluated, let alone corrected. The accuracy of the data should be checked when the logger is put in place—move the transducer up and down by a calibrated distance and verify the transducer data agree with the known movement. The check accuracy of the data by comparing transducer values and tape-down measurements of water level at the end of the first month, and every month thereafter. If the data do not agree, steps take to improve the transducer readings. Provide the EPA written steps to improve the transducer readings.

4. Excepting the October 2014 result, MW-4 tested below the maximum contaminant levels (MCL) for trichloroethene (TCE) since June 2012, not December 2012.

5. Picky point, but when the word "since" is used to describe what has transpired after something last happened, the date of last occurrence should be used. Tetrachloroethene (PCE) concentrations in well MW-5 have been below 100 parts per billion (ppb) since December 2012 (the date of last occurrence of 100 ppb-plus PCE) not since June 2013 (the date of the first occurrence of PCE <100 ppb). Autumwood needs to make the appropriate changes at several places in this report. Alternatively, Autumwood could say something like PCE concentrations were below 1,000 ppb beginning in June 2013.

6. MW-5D, again, check the dates. Will not comment after here.

7. There is no Figure 10 plotting data from well DGW-1S. Autumwood should correct the text or add the figure.

8. For DGW-1D, note that "between" also incorrectly used to describe the dates of vinyl chloride exceedences of the MCL. Suggest something like "…from June 2013 through December 2015".

9. Where is the data for the DGW-2 wells? Even if there are no exceedences, provide the data, at least of the major volatile organic compounds in this area. These wells are close to the water-supply wells and it is important to understand what is going on at this location.

10. Monitoring wells, charts and graphs. The end date is incorrect for titles on Figures 5 and 6.

11. Table 2. Technically, it appears stabilization criteria were not met before sampling in a few wells, ex. pH was not +/- 0.1 SU for three consecutive readings at MW-4 (would be OK if rounding off the readings, but I don't recall rounding being part of the procedure), MW-8, 18408 Rt. 176. Dissolved Oxygen (DO) stabilization of +/- 10 percent was not met at a few locations (MW-5D, maybe MW-9, DGW-2I, etc.). For the DO readings, provide the rational or reasoning for sampling before the DO stabilized.

A reply is required in 30-days. Should you have any questions, regarding this letter, need any additional information, or wish to discuss this matter further, please contact me at (312) 353-1243 or contact me by email to [HYPERLINK "mailto:nordine.john@epa.gov"].

Sincerely,

John Nordine, CPG, LPG
Project Manager
Corrective Action Section 2

Cc: Karen Peaceman, U.S. EPA
Jack Thorsen, Autumnwood ESH Consultants