EPA-R5-2013-003300RR-1

Jan Nona
[redacted]
07/13/2003 11:41 AM

To Timothy Drexler
cc
bcc
Subject Fw: Trail Creek Dredgings

----- Original Message -----
From: Jan Nona
To: ken theisen ; mark jaworski
Cc: Matt Mankowski ; Tim Drexler ; Kevin Herron
Sent: Sunday, July 13, 2003 6:39 AM
Subject: Trail Creek Dredgings

Received a phone call last week. Supposedly, about 10 years ago, they dumped dredgings from Trail Creek in Michigan City in the area [redacted] Pine School has an address of 1574 N, 500 E. The caller indicated there is a high incidence of cancer among his neighbors and himself. It was dumped very close to a tributary of Brown Ditch.

Russell Shirley of the Porter County Environmental Department indicated some time ago that these Trail Creek Dredgings contain a lot of "heavy metal" (and I'm not talking Metallica). If I remember correctly, one company has been "dinged" a few times by either the EPA or IDEM in the past.

Because of the close proximity to Pine School and the cancer issue, I think further investigation is needed.

I'll appreciate hearing what you find.

jan nona

EPA-R5-2013-003300RR-2

KEVIN HERRON
<KHERRON@dem.state.in.us>

08/19/2003 11:39 AM

To TROY WEAVER, irelandfamily

cc JOHN GUERRETTAZ, MICHAEL DUNN, MARK JAWORSKI, Timothy Drexler, Kenneth Theisen

bcc

Subject Re: Yard 520 Groundwater Flow

Troy & Mr. Ireland,

It is my understanding that groundwater flow at the Yard 520 Landfill in mostly southeast and easterly with an occasional northeasterly flow when there are heavy rains. Therefore, it would be very unlikely under these circumstances for groundwater flow from or through the Yard 520 Landfill to impact an area that is nearly 1.0 mile to the northwest of the Yard 520 Landfill.

It is likely that further investigations in the future will determine additional groundwater flow characteristics for more of the area. Until this information or data is known, it would be difficult to identify the Yard 520 Landfill as a potential source for Boron and Molybdenum in the wells in the Town of Beverly Shores. On a similar note, the same conclusion is likely for the landfill being the source of contamination in the wells for those residential properties east of Brown Ditch. Other sources are most likely, such as the use of fly ash as backfill material by many property owners and as road base for many, if not all, of the streets in the area.

Kevin

Kevin D. Herron, Project Manager
Office of Land Quality
Federal Programs Section
P.O. Box 6015
Indianapolis, IN 46206

317.234.0354
317.234.0428 (fax)

>>> TROY WEAVER 08/19/2003 8:34:43 AM >>>
Mr. Ireland,
You have heard correctly, Yard 520 will not be continuing operation and will be closing. It appears that they will initiate and complete construction work related to this closure this year. I recommend that you contact the Yard520 Permit Manager, Michael Dunn, if you have additional Yard 520 permit related questions. Ground water and surface water monitoring will continue at Yard 520 during the post-closure care period.

Thanks,
T.Weaver

>>> MARK JAWORSKI 08/18/2003 9:16:46 AM >>>
Troy and Kevin,
I spoke with Mr. Ireland this morning. He stated that some of the Beverly Shores wells were sampled and were found to contain boron at 1.79 mg/l and molybdenum at .92 mg/l. Could you please follow up with this information.

Please note Mr. Ireland's e-mail. Thanks
Mark

>>> "grant ireland" <[redacted] Exemption 6> 08/18/03 06:33AM >>>
Mr. Jaworski, will you please provide me with an update on the status of Yard 520 in the Town of Pines? Last I heard Brown had not re-newel their permit of operation. Has this Yard been shut down? What is the plan for clean up? etc..

Thanks,

Grant Ireland
Association of Beverly Shores Residents
PO Box 436
[redacted] Exemption 6
[redacted] Exemption 6
[redacted] Exemption 6

EPA-R5-2013-003300RR-3

Jan Nona
Exemption 6
10/17/2003 01:52 PM

To William Muno, Timothy Drexler
cc Kenneth Theisen, Lori Kaplan, Bruce Palin, Felicia Robinson, Tim Method, JERRY RUD, Michael Dunn, Kevin Herron, Kathleen Mills, Cindy Shively Klem
bcc
Subject 520 Yard Closure

Cathi Murray had a phone call last week from an IDEM attorney regarding the 520 Yard Closure plan.

Cathi asked if IDEM would consider requiring a slurry wall in the plan. A definite no. She was told that they had been researching our (PINES) activities and knew we had the EPA involved in our problems. The attorney stated that the EPA was doing a remedial study and they could require the slurry wall.

Is this true - can your remedial efforts include the requirement for a slurry wall? I was under the impression that all closure activites were the responsibility of the Indiana Department of Environmental Management.

jan nona

EPA-R5-2013-003300RR-4

Jan Nona
Exemption 6
11/13/2003 08:42 AM

To Timothy Drexler
cc Cathi Murray
bcc
Subject test results

We have gotten a few calls asking if the test results you took in early October. When will these be available.

By the way I don't think I ever thanked you for the Barrier booklet you sent. It has a wealth of very valuable information and I'm plowing through it as time permits --- getting ready for our pre-hearing conference on the closure which is now scheduled for 12-11.

jan nona

EPA-R5-2013-003300RR-5

Jan Nona
Exemption 6
12/03/2003 03:52 AM

To Timothy Drexler
cc
bcc
Subject Test results

How is this project coming along. Anything you can share on paper yet. Ken has generously been sharing a complete set as we have gone along. It frequently comes in very handy as you can imagine.

jan nona

EPA-R5-2013-003300RR-6

Jan Nona
Exemption 6
12/03/2003 04:58 PM

To Timothy Drexler
cc
bcc
Subject Re: Test results

YES ---- I WANT IT ALL!!! GREEDY OLD LADY AREN'T I? WHEN I GOT #'S FROM KEN THERE WAS USUALLY A WAY THAT I COULD PUT THE TWO (ADDRESSES & TEST RESULTS) TOGETHER. DO YOU THINK I'LL BE ABLE TO DO THAT WITH YOUR NUMBERS?

jan
----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "Jan Nona" <Exer Exemption 6>
Sent: Wednesday, December 03, 2003 4:52 PM
Subject: Re: Test results

>
>
>
>
> Hi Jan:
>
> First, I need to delete the names and addresses from the information
> before I can release it due to privacy issues. Unfortunately, the
> sample numbers are linked to addresses on all of the sheets. Also, do
> you want all of the information (volatiles, semi-volatiles, metals,
> nitrates, nitrites, ammonia, etc.) or just the metals information?
>
> Tim Drexler
> Remedial Project Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-5J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
> fax: 312.886-7191
>
>
>
>
> Jan Nona
> <Exemption 6
Exemption 6 To: Timothy Drexler/R5/USEPA/US@EPA
> cc:
> 12/03/03 03:52 AM cc:
> bcc:
> Fax to:
> Subject: Test results
>
>
>
>
>

> How is this project coming along. Anything you can share on paper yet.
> Ken has generously been sharing a complete set as we have gone along.
> It frequently comes in very handy as you can imagine.
>
> jan nona
>
>
>

EPA-R5-2013-003300RR-7

Jan Nona
Exemption 6
12/05/2003 12:28 AM

To Timothy Drexler
cc
bcc
Subject Re: Test results

Why only moly results????

jan
----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "Jan Nona" <Exer. Exemption 6 >
Sent: Wednesday, December 03, 2003 5:14 PM
Subject: Re: Test results

>
>
>
>
> Jan:
>
> First, I need to send the letters to the residents. I hope to get them
> out on Friday. Next, I'll mail the documentation to you with a map that
> will show the approximate locations of molybdenum results. You should
> be able to piece them together. Sound OK?
>
> -Tim Drexler
>
>
>
>
>
>
> Jan Nona
> <Exemption 6 .n
> Exem... To: Timothy
Drexler/R5/USEPA/US@EPA
> cc:
> 12/03/03 04:58 PM cc:
> bcc:
> Fax to:
> Subject: Re: Test results
>
>
>
>
>
> YES ---- I WANT IT ALL!!! GREEDY OLD LADY AREN'T I? WHEN I GOT #'S
> FROM
> KEN THERE WAS USUALLY A WAY THAT I COULD PUT THE TWO (ADDRESSES & TEST
> RESULTS) TOGETHER. DO YOU THINK I'LL BE ABLE TO DO THAT WITH YOUR
> NUMBERS?
>
> jan
> ----- Original Message -----
> From: <Drexler.Timothy@epamail.epa.gov>

> To: "Jan Nona" <[redacted]>
> Sent: Wednesday, December 03, 2003 4:52 PM
> Subject: Re: Test results
>
>
> >
> >
> >
> >
> > Hi Jan:
> >
> > First, I need to delete the names and addresses from the information
> > before I can release it due to privacy issues. Unfortunately, the
> > sample numbers are linked to addresses on all of the sheets. Also, do
> > you want all of the information (volatiles, semi-volatiles, metals,
> > nitrates, nitrites, ammonia, etc.) or just the metals information?
> >
> > Tim Drexler
> > Remedial Project Manager
> > Superfund Division
> > United States Environmental Protection Agency
> > 77 W. Jackson Blvd., SR-5J
> > Chicago, Illinois 60604-3590
> >
> > phone: 312.353.4367
> > fax: 312.886-7191
> >
> >
> >
> >
> > Jan Nona
> > [redacted].n
> > To: Timothy
> Drexler/R5/USEPA/US@EPA
> > cc:
> > 12/03/03 03:52 AM cc:
> > bcc:
> > Fax to:
> > Subject: Test results
> >
> >
> >
> >
> > How is this project coming along. Anything you can share on paper
> yet.
> > Ken has generously been sharing a complete set as we have gone along.
> > It frequently comes in very handy as you can imagine.
> >
> > jan nona
> >
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EPA-R5-2013-003300RR-8

Jan Nona
Exemption 6
12/05/2003 09:09 AM

To Timothy Drexler
cc
bcc
Subject Fw: Monitoring Wells

See my original message to Troy Weaver at IDEM. These monitoring well test results might be of interest to you also. I didn't know these monitoring wells existed until yesterday when I came across a map showing them to be there. I've probably really just been concentrating too hard on the 520 landfill.

Just for your information --- I think this landfill may be included in your investigations during your remedial process.

jan nona
----- Original Message -----
From: "Jan Nona" <Exer. Exemption 6>
To: "TROY WEAVER" <TWEAVER@dem.state.in.us>
Sent: Friday, December 05, 2003 8:57 AM
Subject: Re: Monitoring Wells

> Thanks for the info. Look forward to hearing from Tom also. How do I
> access these public records from the file room?
>
> jan
> ----- Original Message -----
> From: "TROY WEAVER" <TWEAVER@dem.state.in.us>
> To: <Exer. Exemption 6>
> Cc: <Exemption 6 tion 6>; "DAVE BECKA" <DBECKA@dem.state.in.us>; "KARYL
> SCHMIDT" <KSCHMIDT@dem.state.in.us>; "MICHAEL DUNN"
<MDUNN@dem.state.in.us>;
> "TOM BROWN" <TBROWN@dem.state.in.us>
> Sent: Friday, December 05, 2003 7:39 AM
> Subject: Re: Monitoring Wells
>
>
> Ms. Nona,
>
> You are correct, there are wells around the 'Pines Landfill.' Please
note
> that there is data available in the IDEM public file room for this site.
I
> contacted Tom Brown, the Permit's Branch geologist assigned to this site
> about your recent questions. He is also planninig on contacting you via
> email.
>
> Thanks,
> tw
>
> >>> "Jan Nona" <Exer. Exemption 6> 12/04/2003 4:35:12 PM >>>
> I just came across a map created by Greg Overtoom in the IDEM Office of
> Land Quality - Science Services Branch dated March 21, 2001.
>
> This map shows five monitoring wells at the "Pines Landfill" site. This
is

> not the Yard 520 site.
>
> They are listed as G-1, G-2, G-3, G-4, G-5. Do these wells actually exist.
> Is there any test data available?
>
> jan nona
> PINES
>
>

EPA-R5-2013-003300RR-9

Jan Nona
Exemption 6
12/05/2003 02:04 PM

To Timothy Drexler
cc
bcc
Subject Fw: Monitoring Wells

If you can open the attached it is absolutely fantastic. 93 pages of data --- did come across one entry of 1100 boron but haven't had a chance to really analyze the rest of it. Still in process of printing the big thing. Very interesting.

jan nona

----- Original Message -----
From: TOM BROWN
To: Exe Exemption 6
Cc: BRUCE PALIN ; DAVE BECKA ; DANIELA KLESMITH ; MICHAEL DUNN ; MELESSIA HAWKINS ; TROY WEAVER
Sent: Friday, December 05, 2003 9:17 AM
Subject: Re: Monitoring Wells

Ms Nona.
Troy Weaver forwarded your note to me since you asked about the old Town of Pines Landfill. Since you have a map and the well locations, I won't send you a copy of those, however, I have a spreadsheet with the available data that has come from these wells.
Please note:
* that the format of the data is a ".txt" file and can be opened in most programs such as excel, quattro pro, word pad, etc... I suggest you open it in a spreadsheet program.
* the units vary from constituent to constituent, please be sure that any reference to the data includes the proper unit.
* any non-detects are listed at the detection limit rather than by an ND or some such notation. This is done for statistical purposes. Please check the "detected" column prior to citing any result: if the "detected" column says "no", then that constituent was not detected.
* this information is also available in the public file, along with correspondences relating to the data. I am sending the data to you only because I happen to have it readily available: usually, I would simply refer you to the public fileroom on the 12th floor of the North Government Center (Indianapolis).
* In 1986, Waste Management (the new owner of the site) voluntarily installed the wells and began sampling them. This had been required in 1977 of the then-owner Nyby, but he didn't do it. The first few quarterly samplings were submitted to IDEM.
Since around 1990, WM continued sampling for a limited list of constituents, however this was not submitted until IDEM requested it around early 2001.
* Based on the historical data, Well G3 was found to be hitting some moderate levels of contamination. Because of this, a renewed monitoring program has begun in March 2003:

- They sampled for an extended list based on typical MSW landfill leachate-derived contaminants.
- They will continue to sample annually for a very short list of specific parameters to measure the continued stability of the plume (this might even be limited to Chloride and Ammonia). Beyond this, and based on what is found in the extended list sampling, we may incorporate a long-list every few years.
- If, during the initial or subsequent extended list samplings, they find contaminants that compare unacceptably to MCLs or other health-based levels they will propose to replace the well G3 (there is a good possibility that the well is installed and screened in waste) and determine the lateral extent of the plume.

* Judging from the location of the plume and the known ground water attributes in the area, I am confident that the current problem at this landfill can not be impacting anyone's ground water supply.
* In the very worst case, the plume might extend almost to the "Lawrence Dump" of which no ground water information is available. The Lawrence Dump closed prior to state permitting requirements. Should there be any evidence of the Lawrence Dump causing problems, the site would be referred to State Cleanup to be scored and possibly to be cleaned up.
* Based on topography, if the Lawrence Dump was causing extensive ground water problems, they might be evident in Brown Ditch, or it's tributaries, or in local ground water extraction points. Typical landfill contaminants would include Chloride and Sodium as well as Ammonia and several lesser concentrated constituents. If there are any local well owners that complain about a salty taste in their well, this would be an indication of a problem.

If you have any comments, or would like to discuss the Town of Pines Landfill, please call me at 317 233-6540, or toll-free at (800) 451-6027.

Town of Pines Landfill ground water data.txt

EPA-R5-2013-003300RR-10

Jan Nona
Exemption 6
12/05/2003 02:38 PM

To Timothy Drexler
cc
bcc
Subject monitoring wells

I'm getting more senile. Did I just send you a copy of the message that I got from Tom Brown regarding the monitoring wells at the Pines Landfill. Let me know if I didn't --- and if you even want it. It contains 93 pages of data.

One thing I did really want to point out to you is Tom's note regarding the 1977 requirement of the then landfill owner Nyby, to install monitoring wells which he never did. It was then done in 1986 when Waste Management took over the site. Very interesting.

jan nona
senile old lady in the PINES

EPA-R5-2013-003300RR-11

Jan Nona
Exemption 6
12/09/2003 01:18 AM

To William Muno, Kenneth Theisen, Timothy Drexler
cc Cathi Murray
bcc
Subject Town of Pines

I'm seeing more and more references to the Town of Pines being a "Superfund Site". Are we or aren't we. Or is everyone just dropping the word "alternate"?

jan nona
PINES

EPA-R5-2013-003300RR-12

Jan Nona
[redacted] Exemption 6
12/15/2003 02:04 AM

To Kenneth Theisen, Timothy Drexler
cc
bcc
Subject Yard 520

Did IDEM ever tell the EPA about the newly found pile of flyash? Evidently it is located from the "toe" of the northern (closed) section of the landfill and north up to US Rt. 20. I say newly with tongue in cheek a/c they really found it last year when they were installing those new monitoring wells along the north side of Rt. 20. They just made a real issue of sharing this information with us on Thursday, Dec. 11.

It is on bare ground and has depths of up to 9' (yep - that's nine feet).

jan nona

EPA-R5-2013-003300RR-13

Jan Nona
Exemption 6
12/28/2003 09:38 PM

To Kenneth Theisen, Timothy Drexler
cc Cathi Murray
bcc
Subject Fw: Yard 520

Did you receive this message?
----- Original Message -----
From: Jan Nona
To: ken theisen ; Timothy Drexler
Sent: Monday, December 15, 2003 2:04 AM
Subject: Yard 520
Did IDEM ever tell the EPA about the newly found pile of flyash? Evidently it is located from the "toe" of the northern (closed) section of the landfill and north up to US Rt. 20. I say newly with tongue in cheek a/c they really found it last year when they were installing those new monitoring wells along the north side of Rt. 20. They just made a real issue of sharing this information with us on Thursday, Dec. 11.

It is on bare ground and has depths of up to 9' (yep - that's nine feet).

jan nona

EPA-R5-2013-003300RR-14

Jan Nona
[redacted] Exemption 6
01/05/2004 02:41 PM

To Timothy Drexler
cc
bcc
Subject Re: Fw: Yard 520

Would enjoy visiting with you. You can call me at 219-879-3466 to let me know an approximate time (or e-mail me of course).

jan nona
----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "Jan Nona" <[redacted] Exemption 6>
Sent: Monday, January 05, 2004 11:41 AM
Subject: Re: Fw: Yard 520

>
>
>
>
> Hi Ms. Nona:
>
> Thanks for the note and the information. I'll be in town on Wednesday
> of this week and will take a look at that. Will you be around on
> Wednesday? Would you be interested in meeting?
>
> Tim Drexler
> Remedial Project Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-5J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
> fax: 312.886-7191
>
>
>
> Jan Nona
> [redacted] Exemption 6 To: Kenneth Theisen/R5/USEPA/US@EPA, Timothy
> Drexler/R5/USEPA/US@EPA
> 12/28/03 09:38 PM cc: Cathi Murray
< [redacted] Exemption 6 >
> cc: Cathi Murray
< [redacted] Exemption 6 >
> bcc:
> Fax to:
> Subject: Fw: Yard 520
>
>
>
>
>
> Did you receive this message?

> ----- Original Message -----
> From: Jan Nona
> To: ken theisen ; Timothy Drexler
> Sent: Monday, December 15, 2003 2:04 AM
> Subject: Yard 520
>
> Did IDEM ever tell the EPA about the newly found pile of flyash?
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> real issue of sharing this information with us on Thursday, Dec. 11.
>
> It is on bare ground and has depths of up to 9' (yep - that's nine
> feet).
>
> jan nona
>
>
>

EPA-R5-2013-003300RR-15

Jan Nona
Exemption 6
01/06/2004 09:14 AM

To Timothy Drexler
cc
bcc
Subject Re: Fw: Yard 520

Tim: 1:00 pm Wednesday will be a beatiful day in the neighborhood.

jan nona
----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "Jan Nona" <Exer. Exemption 6 >
Sent: Monday, January 05, 2004 3:18 PM
Subject: Re: Fw: Yard 520

>
>
>
>
> Hi Jan:
>
> Would 1 pm at your house be OK? That would be 1 pm, Wednesday, January
> 7th.
>
> Tim Drexler
>
>
>
>
>
>
> Jan Nona
> <Exemption 6 .n
> et> To: Timothy
Drexler/R5/USEPA/US@EPA
> cc:
> 01/05/04 02:41 PM cc:
> bcc:
> Fax to:
> Subject: Re: Fw: Yard 520
>
>
>
>
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> Would enjoy visiting with you. You can call me at 219-879-3466 to let
> me
> know an approximate time (or e-mail me of course).
>
> jan nona
> ----- Original Message -----
> From: <Drexler.Timothy@epamail.epa.gov>
> To: "Jan Nona" <Exer. Exemption 6 >
> Sent: Monday, January 05, 2004 11:41 AM
> Subject: Re: Fw: Yard 520
>

>
> >
> >
> >
> >
> > Hi Ms. Nona:
> >
> > Thanks for the note and the information. I'll be in town on Wednesday
> > of this week and will take a look at that. Will you be around on
> > Wednesday? Would you be interested in meeting?
> >
> > Tim Drexler
> > Remedial Project Manager
> > Superfund Division
> > United States Environmental Protection Agency
> > 77 W. Jackson Blvd., SR-5J
> > Chicago, Illinois 60604-3590
> >
> > phone: 312.353.4367
> > fax: 312.886-7191
> >
> >
> >
> > Jan Nona
> > <[redacted].n
> > et> To: Kenneth
> Theisen/R5/USEPA/US@EPA, Timothy
> >
> Drexler/R5/USEPA/US@EPA
> > 12/28/03 09:38 PM cc: Cathi Murray
> <[redacted]>
> > cc: Cathi Murray
> <[redacted]>
> > bcc:
> > Fax to:
> > Subject: Fw: Yard 520
> >
> >
> >
> >
> >
> > Did you receive this message?
> > ----- Original Message -----
> > From: Jan Nona
> > To: ken theisen ; Timothy Drexler
> > Sent: Monday, December 15, 2003 2:04 AM
> > Subject: Yard 520
> >
> > Did IDEM ever tell the EPA about the newly found pile of flyash?
> > Evidently it is located from the "toe" of the northern (closed)
> section
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> > new monitoring wells along the north side of Rt. 20. They just made a
> > real issue of sharing this information with us on Thursday, Dec. 11.
> >
> > It is on bare ground and has depths of up to 9' (yep - that's nine
> > feet).
> >
> > jan nona

> >
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>

EPA-R5-2013-003300RR-16

Jan Nona
Exemption 6
03/29/2004 08:44 AM

To Kenneth Theisen, Timothy Drexler
cc Cathi Murray, Peggy Richardson
bcc
Subject Pines Testing

The attached are the results of some private testing we did recently.

SOME OF THESE HOMES NEED IMMEDIATE INTERVENTION BY THE EPA.

Don't know which of you is responsible for things such as this at this point in time so you decide.

Please let me know what your plans are.

jan nona
PINES

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).

Version: 6.0.634 / Virus Database: 406 - Release Date: 3/18/2004 Private Testing 3-15-04.wps

EPA-R5-2013-003300RR-17

Jan Nona
Exemption 6
04/07/2004 02:14 AM

To Timothy Drexler
cc
bcc
Subject Order

Can you forward me a copy yet????????

Please!!!!!!

Just for additional information, we are starting to learn of flyash based roads south of the RR tracks. Don't know if you were aware of them or not. More on this when we get as much information as possible. This whole community appears to have been one big dump site for this stuff. What were they thinking?

jan

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).
Version: 6.0.634 / Virus Database: 406 - Release Date: 3/18/2004

EPA-R5-2013-003300RR-18

Jan Nona
Exemption 6
04/19/2004 04:23 PM

To Timothy Drexler
cc Kenneth Theisen, Cathi Murray, Peggy Richardson
bcc
Subject Pines Landfill

You may already know this but we have been under the impression for some time that Waste Management owned the Pines (NYBY) landfill. According to a Mr. Johnson from the LaPorte, IN office of Waste Management they do not now and never have owned this landfill.

Again, according to Mr. Johnson, they were trying to purchase it and something went wrong (he does not know what). They ended up suing NYBY and won to get out of the deal. He gave Peggy a name and number of a Chicago Atty. who might be able to help:

Dennis Wlit
630-218-1690

Don't know the name of the law firm.

jan nona

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).
Version: 6.0.659 / Virus Database: 423 - Release Date: 4/15/2004

EPA-R5-2013-003300RR-19

Jan Nona
[redacted] Exemption 6
04/20/2004 12:23 PM

To Kenneth Theisen, Timothy Drexler
cc
bcc
Subject Fw: Brown Ditch

as promised - even if we still don't have any word on bottled water for our residents.

jan nona
----- Original Message -----
From: dmockler@stl-inc.com
To: [redacted] Exe Exemption 6
Sent: Tuesday, April 20, 2004 10:39 AM
Subject: Brown Ditch
Attached is the final report for brown ditch
Di

Diana Mockler
Project Manager
Severn Trent Laboratories
2400 Cumberland Drive
Valparaiso, IN 46383
Phone: 219-464-2389
Leaders in Environmental Testing

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Checked by AVG anti-virus system (http://www.grisoft.com).

Version: 6.0.659 / Virus Database: 423 - Release Date: 4/15/2004

404048.pdf

EPA-R5-2013-003300RR-20

Jan Nona
[redacted]
04/20/2004 12:43 PM

To Kenneth Theisen, Timothy Drexler
cc Cathi Murray, Peggy Richardson
bcc
Subject Pines Landfill (NYBY)

Don't know if you already have this information or not but here goes:

2 Pieces of property one 3.6 acres, one 20 acres.

Owned by: Indiana Waste Systems, Inc.
PO Box 1450
Chicago, IL 60690

(**% Waste Management**)

Another Attorney: (As of 1999)

Thomas McNulty
Neal,Gerber,Eisenberg
2 N. LaSalle St.
Chicago, IL 60602
312-269-8077

Now isn't all this special?

jan nona

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).
Version: 6.0.659 / Virus Database: 423 - Release Date: 4/15/2004

EPA-R5-2013-003300RR-21

Jan Nona
[redacted] Exemption 6
04/21/2004 09:17 AM

To Timothy Drexler
cc
bcc
Subject Re: Pines Landfill (NYBY)

We've run into another snafu on that issue --- really getting totally disgusted with that whole program. But you know us --- we don't give up. We will get it to you soon I hope.

Just had a phone call from Cathi and she will be contacting you shortly on this issue.

In the meantime, could you give me the MCL's for all those metals we tested at Brown Ditch. I know I have a lot of it floating around and quite frankly, I can't get their "reporting limit" numbers to correspond to what I know we have been using. PLEASE!!!!

Also heard some residents started receiving their bottled water paper work yesterday (not me of course but I'll get mine I know).

later

jan nona
PINES
----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "Jan Nona" <[redacted] Exemption 6 Exemption 6 Exemption 6>
Cc: "Cathi Murray" <[redacted] Exemption 6 Exemption 6 Exemption 6>; "ken theisen" <theisen.kenneth@epamail.epa.gov>; "Peggy Richardson" <[redacted] Exemption 6>
Sent: Wednesday, April 21, 2004 8:57 AM
Subject: Re: Pines Landfill (NYBY)

>
>
>
>
> Thanks, Jan. And thanks also for the analytical report on Brown Ditch.
>
> Were you able to convert all of the residential boron/moly sampling data
> you collected to another format?
>
>
>
> -Tim Drexler
>

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).
Version: 6.0.659 / Virus Database: 423 - Release Date: 4/15/2004

EPA-R5-2013-003300RR-22

Jan Nona
Exemption 6
04/28/2004 08:11 AM

To Bruce Palin, Kevin Herron
cc Kenneth Theisen, Timothy Drexler, Cathi Murray
bcc
Subject Dumping at Yd. 520

Have had a couple of reports of dumping. I've told the callers that it is probably "closure material".

However, based on past practices, someone must make sure this is the case, since we also believe they are hauling flyash to Wheatfield.

Please don't just call and ask them what they are dumping --- physically go and inspect the material.

jan nona
PINES

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).
Version: 6.0.668 / Virus Database: 430 - Release Date: 4/24/2004

EPA-R5-2013-003300RR-23

Jan Nona
Exemption 6
05/06/2004 12:04 AM

To Bruce Palin, Kevin Herron
cc Cathi Murray, Kenneth Theisen, Timothy Drexler
bcc
Subject Fw: Dumping at Yd. 520

So what have you all decided to do?

jan nona
PINES
----- Original Message -----
From: "Jan Nona" <Exer. Exemption 6>
To: "BRUCE PALIN" <BPALIN@dem.state.in.us>; "KEVIN HERRON"
<KHERRON@dem.state.in.us>
Cc: <Exemption 6 Exemption 6>; <theisen.kenneth@epa.gov>;
<Drexler.Timothy@epamail.epa.gov>
Sent: Wednesday, April 28, 2004 3:31 PM
Subject: Re: Dumping at Yd. 520

> So that still leaves the question of whether they should be capping the
site
> when additional material from the north side may have to be placed there.
>
> jan nona
> PINES
> ----- Original Message -----
> From: "BRUCE PALIN" <BPALIN@dem.state.in.us>
> To: <Exer. Exemption 6>; "KEVIN HERRON" <KHERRON@dem.state.in.us>
> Cc: <Exemption 6 Exemption 6>; <theisen.kenneth@epa.gov>;
> <Drexler.Timothy@epamail.epa.gov>
> Sent: Wednesday, April 28, 2004 3:00 PM
> Subject: Re: Dumping at Yd. 520
>
>
> I just received a call from our field inspector and he verified that the
> only materials being placed on the site is clay being utilized to cap the
> site.
>
> >>> "Jan Nona" <Exer. Exemption 6> 04/28/04 08:11AM >>>
> Have had a couple of reports of dumping. I've told the callers that it is
> probably "closure material".
>
> However, based on past practices, someone must make sure this is the case,
> since we also believe they are hauling flyash to Wheatfield.
>
> Please don't just call and ask them what they are dumping --- physically
go
> and inspect the material.
>
> jan nona
> PINES
>
>
> ---
> Outgoing mail is certified Virus Free.
> Checked by AVG anti-virus system (http://www.grisoft.com).

> Version: 6.0.668 / Virus Database: 430 - Release Date: 4/24/2004
>

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).
Version: 6.0.675 / Virus Database: 437 - Release Date: 5/3/2004

EPA-R5-2013-003300RR-24

[redacted]
Exemption 6
05/18/2004 03:10 PM

To ken theisen, Drexler.Timothy
cc Cathi Murray
bcc
Subject Progress Reports

Could we please get any and all future copies of the progress reports submitted by NIPSCO/Brown as the administrative orders are being carried out.

jan nona
PINES

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).
Version: 6.0.682 / Virus Database: 444 - Release Date: 5/11/2004

EPA-R5-2013-003300RR-25

Jan Nona
Exemption 6
05/20/2004 02:26 AM

To Drexler.Timothy
cc ken theisen, Cathi Murray, Peggy Richardson
bcc
Subject water (what else)

The Streets getting only bottled water ---

Listed is Poplar - all - Resident at Exemption 6 received a release form from Brown.

Listed is Pine from Birch to Hwy 12 - Resident on another Exemption 6 received a release form from Brown.

I don't begrudge anyone water - but what rules are they operating under - their own?

If they are going to give one resident on Poplar water, give it to all. If they are going to give to one resident on Pine west of Birch, give it to all. Get my drift here?

jan nona
PINES

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).
Version: 6.0.688 / Virus Database: 449 - Release Date: 5/18/2004

EPA-R5-2013-003300RR-26

Jan Nona
<r.nona@comcast.net>
05/20/2004 03:13 AM

To Drexler.Timothy
cc
bcc
Subject Fw: water (what else)

A couple of more things --- this is starting to get very sticky:

[redacted] listed as not getting muni water - my sources tell me they are and they are some distance west of Birch. Also hearing that Beverly Shores expects the people on US 12 west of Birch to pay the TOTAL cost of the water extension line from [redacted].

Getting ugly.

jan

----- Original Message -----
From: Jan Nona
To: Drexler.Timothy@epamail.epa.gov
Cc: ken theisen ; Cathi Murray ; Peggy Richardson
Sent: Thursday, May 20, 2004 2:26 AM
Subject: water (what else)

The Streets getting only bottled water ---

Listed is Poplar - all - Resident at [redacted] received a release form from Brown.

Listed is Pine from Birch to Hwy 12 - Resident on another [redacted] received a release form from Brown.

I don't begrudge anyone water - but what rules are they operating under - their own?

If they are going to give one resident on Poplar water, give it to all. If they are going to give to one resident on Pine west of Birch, give it to all. Get my drift here?

jan nona
PINES

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).

Version: 6.0.688 / Virus Database: 449 - Release Date: 5/18/2004

EPA-R5-2013-003300RR-27

Jan Nona
Exemption 6
05/27/2004 03:40 AM

To Timothy Drexler
cc
bcc
Subject test results

I've finally gotten around to going thru the package of "stuff" you gave me on April 13.

What am I missing here? I can only find results for volatiles --- no metals.

jan nona
PINES

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).
Version: 6.0.691 / Virus Database: 452 - Release Date: 5/26/2004

EPA-R5-2013-003300RR-28

Jan Nona
Exemption 6
06/04/2004 03:15 PM

To Timothy Drexler
cc Cathi Murray
bcc
Subject P.I.N.E.S. Incorporation

As of 5-27-04, the PINES group is an Indiana Non-Profit Corporation. This I think makes us further eligible for the TAP Grant. Right?????

jan nona
PINES

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).
Version: 6.0.691 / Virus Database: 452 - Release Date: 5/26/2004

EPA-R5-2013-003300RR-29

Jan Nona
Exemption 6
06/05/2004 04:45 PM

To Kenneth Theisen, Timothy Drexler
cc
bcc
Subject A question

On 3-15-04, a home at Exemption 6 was tested by Severn Trent Labs through our PINES group. Boron 1100, Managanese 90 and Molybdenum 40. Have you retested this home??? If so when and what were your results.

Thanks in advance

jan non
PINES

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).
Version: 6.0.699 / Virus Database: 456 - Release Date: 6/4/2004

EPA-R5-2013-003300RR-30

Timothy Drexler/R5/USEPA/US
06/15/2004 01:27 PM

To lbradley
cc asenn
bcc
Subject Additional Resident Information

Hi Lisa:

Attached is some residential well sampling information collected by the PINES group. I have a key identifying the residence that corresponds to the sample number that I will fax. I don't have that in electronic form.

Call if you have questions.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-5J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886-7191

403336.pdf 403023.pdf 403022.pdf

EPA-R5-2013-003300RR-31

Jan Nona
Exemption 6
06/30/2004 10:29 AM

To Kenneth Theisen, Timothy Drexler
cc
bcc
Subject Soil Samples

I understand some soil samples were taken near and around the Brown (Bulk) truck washing area at Exemption 6. Do you have the results back yet and could you please share them with me if so?????

jan nona
PINES

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).
Version: 6.0.709 / Virus Database: 465 - Release Date: 6/22/2004

EPA-R5-2013-003300RR-32

Jan Nona
Exemption 6
07/21/2004 11:01 AM

To Kenneth Theisen, Timothy Drexler
cc
bcc
Subject June Test Results

fyi -

no smoking guns - the one high one on Exemptio... s a retest from March when the reading was over 1000. (Boron) They have since had a reverse osmosis attachment put on their softener/filter system and still have this high reading. So much for reverse osmosis.

jan nona
PINES

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).
Version: 6.0.719 / Virus Database: 475 - Release Date: 7/12/2004

June 23, 2004 Test Results.wps

June 23, 2004 Test Results.wps.rtf

EPA-R5-2013-003300RR-33

Timothy Drexler/R5/USEPA/US
07/27/2004 09:35 AM

To lbradley
cc Mark Johnson, Michelle Colledge, Bob Kay
bcc
Subject Fw: June Test Results

Hi Lisa:

Attached are some additional sampling results from the PINES group.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-5J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886-7191

----- Forwarded by Timothy Drexler/R5/USEPA/US on 07/27/04 09:29 AM -----

Jan Nona
Exemption 6
07/21/04 11:01 AM

To
Subject June Test Results

fyi -

no smoking guns - the one high one on Exempti... is a retest from March when the reading was over 1000. (Boron) They have since had a reverse osmosis attachment put on their softener/filter system and still have this high reading. So much for reverse osmosis.

jan nona
PINES

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).
Version: 6.0.719 / Virus Database: 475 - Release Date: 7/12/2004

June 23, 2004 Test Results.wps June 23, 2004 Test Results.wps.rtf

EPA-R5-2013-003300RR-34

Jan Nona
Exemption 6
08/05/2004 07:51 AM

To Timothy Drexler, Janet Pope
cc Cathi Murray, bud prast
bcc
Subject PINES Member List

Sorry for the delay in getting this to you. Busy, busy summer time in my part of the world.

jan nona
PINES

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).
Version: 6.0.732 / Virus Database: 486 - Release Date: 7/29/2004

PINES MEMBER LIST.wps

PINES MEMBER LIST.wps.rtf

EPA-R5-2013-003300RR-35

Jan Nona
[redacted]
Exemption 6
08/26/2004 12:51 AM

To Timothy Drexler, Kenneth Theisen
cc Cathi Murray
bcc
Subject flyash

They are getting ready to start digging in those areas where we have suspected flyash. Will someone be documenting any areas where it is found and the amount located?

jan nona
PINES

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).
Version: 6.0.736 / Virus Database: 490 - Release Date: 8/9/2004

EPA-R5-2013-003300RR-36

Timothy Drexler/R5/USEPA/US
08/26/2004 09:03 AM

To lbradley
cc
bcc
Subject Fw: flyash

Hi Lisa:

I just received this email from Jan Nona. I'm not sure to what area she is referring. Would you still have sampling plans?

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-5J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886-7191

----- Forwarded by Timothy Drexler/R5/USEPA/US on 08/26/04 09:00 AM -----

[redacted] Exemption 6
08/26/04 12:51 AM

To
Subject flyash

They are getting ready to start digging in those areas where we have suspected flyash. Will someone be documenting any areas where it is found and the amount located?

jan nona
PINES

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).
Version: 6.0.736 / Virus Database: 490 - Release Date: 8/9/2004

EPA-R5-2013-003300RR-37

Alan Murray
Exemption 6 ption 6
09/08/2004 03:42 PM

To Timothy Drexler, Kenneth Theisen
cc KHERRON, Jan Nona
bcc
Subject Flyash and roads

Hi Ken & Tim,

At the intersection of Exemption 6 there appears to be something that looks allot like flyash----is there anyone making sure that if it is:

1 It is being documented
2 That is being kept from spreading around

This particular intersection, as well, as all the other Exemption 6 are School bus stops. My concern is for the children. It would not be a good thing for them to come in contact with this stuff (if it is flyash) while they are waiting for the bus and getting off the bus to come home. Today the street has not been swept and it is very windy. The sweeper is sitting in front of our house.

Also, what is the schedule for completion on Exemption 6 This is,as I have already explained a School bus route, and a main thoroughfare for our town. The safety issue is imperative. Currently it is narrowed by about 3-4 feet from it's original width, and when the fall and winter weather hit us it will be quite a mess in it's current condition.

One last item. Will they be paving the road to fix any of the black top that the heavy machinery dents? It seems that the real big earth mover with the tracks like a tank can eat up just about any surface.

Thank you,

Cathi

EPA-R5-2013-003300RR-38

[redacted]
Exemption 6
09/09/2004 05:32 PM

To Timothy Drexler
cc
bcc
Subject conference call

Once again - sincere thanks - I think we are getting a handle on how this will proceed.

Thanks so much for the progress reports - already received and copied - ready to read then file for future.

One more thing I meant to ask you. Is there any chance that you have historical aerial photos of the entire site to which we might have access?????

jan nona
PINES

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).
Version: 6.0.752 / Virus Database: 503 - Release Date: 9/3/2004

EPA-R5-2013-003300RR-39

Jan Nona
Exemption 6
10/16/2004 06:50 AM

To Timothy Drexler, Exemption 6, Bob_Daum, dale_engquist
cc Bob Kay, MARK JOHNSON, Michelle Colledge, EDWARD KARECKI
bcc
Subject Re: Pines AOC II - September Progress Report

Tim: May I have copies of the Revised Site Management Strategy of 9-13-2004; A copy of the e-mail of 9-16-2004 on the status of the sampling conducted as part of the Municipal Water Service Extension and copies of the sampling of CCB results when they are submitted to the EPA.

Thanks in advance

jan nona
PINES
----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: <Exemption 6 Exemption 6>; <Exemption 6 Exemption 6>; <Bob_Daum@nps.gov>; <dale_engquist@nps.gov>
Cc: <kay.bob@epamail.epa.gov>; <Johnson.Mark@epamail.epa.gov>; <Colledge.Michelle@epamail.epa.gov>; <Karecki.Edward@epamail.epa.gov>
Sent: Friday, October 15, 2004 2:57 PM
Subject: Fw: Pines AOC II - September Progress Report

>
> ----- Forwarded by Timothy Drexler/R5/USEPA/US on 10/15/04 02:55 PM
> -----
>
> "Bradley, Lisa"
> <lbradley@ensr.c
> om>
> To
> 10/15/04 02:49 To
> PM Timothy Drexler/R5/USEPA/US@EPA,
> kherron@dem.state.in.us
> cc
> Larry Johnson/R5/USEPA/US@EPA
> Larry Johnson/R5/USEPA/US@EPA
> bcc
>
>
> Fax to
>
>
>
>
>
>
>
>
>
> Subject
> Pines AOC II - September Progress
> Report
>

>
>
>
>
>
> Tim and Kevin -
>
>
> Please see the attached, and feel free to call me if you have any
> questions.
>
>
> :) LSIA
>
>
> Lisa JN Bradley, Ph.D., DABT
> Senior Toxicologist
> ENSR International
> 2 Technology Park Drive
> Westford, MA 01886
> 978-589-3059 (direct)
> 978-589-3000
> 978-589-3282 (fax)
> lbradley@ensr.com
> www.ensr.com
>
>
> <<Progress Report 10-15-04.pdf>> (See attached file: Progress Report
> 10-15-04.pdf)

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).
Version: 6.0.775 / Virus Database: 522 - Release Date: 10/8/2004

EPA-R5-2013-003300RR-40

Jan Nona
Exemption 6
10/17/2004 05:47 AM

To Timothy Drexler, Janet Pope
cc Cathi Murray
bcc
Subject TAP

STOP WITH ANY PLANS YOU MAY BE IN THE PROCESS OF MAKING FOR A MEETING WITH BROWN/NIPSCO!!!!!!!!!!!!

We are totally ticked off. We don't even want to talk to these people until we have had a chance to sit down and talk with both of you and any other big guns you may have floating around that might help.

jan nona
PINES

PS - all of this and I'm only about 1/4 of the way thru reading it. It's nothing but a total insult to both the EPA and the PINES group.

Outgoing mail is certified Virus Free.
Checked by AVG anti-virus system (http://www.grisoft.com).
Version: 6.0.775 / Virus Database: 522 - Release Date: 10/8/2004

EPA-R5-2013-003300RR-41

Jan Nona
Exemption 6
10/21/2004 02:40 PM

To Kenneth Theisen, Timothy Drexler
cc
bcc
Subject Fw: Results in Excel

Attached are results of our most recent Brown Ditch testing event. Haven't had a chance to analyze yet. FYI

jan nona
PINES
----- Original Message -----
From: Busch, Ken
To: Jan Nona
Sent: Thursday, October 21, 2004 11:06 AM
Subject: Results in Excel

Ken Busch
Project Manager
STL Valparaiso
Office: 219-464-2389
Fax: 219-462-2953
Leaders in Environmental Testing

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File has not been scanned
Checked by AVG anti-virus system (http://www.grisoft.com).

Version: 6.0.778 / Virus Database: 525 - Release Date: 10/15/2004

411724JanNona.xls

EPA-R5-2013-003300RR-42

Jan Nona
Exemption 6
10/24/2004 08:27 AM

To Kenneth Theisen, Timothy Drexler
cc
bcc
Subject 10-4-04 Brown Ditch Testing

fyi

----- Original Message -----
From: "Jan Nona" <Exemption 6>
To: "Jan Nona" <Exemption 6>
Sent: Sunday, October 24, 2004 6:50 AM
Subject: 10-4-04 Brown Ditch Testing

>
>
>
> ---
> Outgoing mail is certified Virus Free.
> Checked by AVG anti-virus system (http://www.grisoft.com).
> Version: 6.0.778 / Virus Database: 525 - Release Date: 10/15/2004

Some files have not been scanned

Checked by AVG anti-virus system (http://www.grisoft.com).
Version: 6.0.778 / Virus Database: 525 - Release Date: 10/15/2004

BrownDitchTestHistory.wps

BrownDitchTestHistory.wps.rtf

EPA-R5-2013-003300RR-43

Jan Nona
Exemption 6
01/25/2005 04:08 PM

To Timothy Drexler
cc
bcc
Subject Test Results Exemption 6

The attached are test results from Exemption 6 taken on January 11, 2005.

Do you see any problems here?

This home is located about one block north of Pine School.

jan nona

Test Results Exemption 6 .jpg No virus found in this outgoing message.
Checked by AVG Anti-Virus.
Version: 7.0.300 / Virus Database: 265.7.3 - Release Date: 1/24/2005

EPA-R5-2013-003300RR-44

[redacted]
Exemption 6
01/25/2005 04:16 PM

To Timothy Drexler
cc Janet Pope, Larry Johnson
bcc
Subject Re: DRAFT note to Jan/Cathi Correct??

THIS IS EXACTLY WHAT I WAS LOOKING FOR.

THANKS

JAN NONA

----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: <[redacted] Exemption 6 >
Cc: <Pope.Janet@epamail.epa.gov>; <Johnson.Larry@epamail.epa.gov>
Sent: Tuesday, January 25, 2005 3:46 PM
Subject: Fw: DRAFT note to Jan/Cathi Correct??

>
> Jan:
>
> The P.I.N.E.S. $500 incorporation costs will be allowed by U.S. EPA to
> be reimbursed from the $5000 start up amount, even if the cost is paid
> prior to signing the TAP agreement. Please call if you have any
> questions.
>
>
> Tim Drexler
> Remedial Project Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-5J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
> fax: 312.886-7191
>
>
>
> --
> No virus found in this incoming message.
> Checked by AVG Anti-Virus.
> Version: 7.0.300 / Virus Database: 265.7.3 - Release Date: 1/24/2005
>
>

--
No virus found in this outgoing message.
Checked by AVG Anti-Virus.
Version: 7.0.300 / Virus Database: 265.7.3 - Release Date: 1/24/2005

EPA-R5-2013-003300RR-45

Timothy Drexler/R5/USEPA/US
01/26/2005 09:13 AM

To Jan Nona
cc Kenneth Theisen
bcc
Subject Re: Test Results Exemption 6

Hi Jan:

Thanks for the results. I've passed them on to ATSDR for their review. Based on what they've tested, though, I don't see anything that sticks out. Boron at 100 ppb, molybdenum at 1 ppb, and arsenic at 3.7 ppb are all below our action levels. Do you have an address?

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-5J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886-7191
Jan Nona < Exe Exemption 6 >

Exemption 6
01/25/2005 04:08 PM

To
Subject Test Results Exemption 6

The attached are test results from Exemption 6 taken on January 11, 2005.

Do you see any problems here?

This home is located about one block north of Pine School.

jan nona

Test Results Exemption 6 No virus found in this outgoing message.
Checked by AVG Anti-Virus.
Version: 7.0.300 / Virus Database: 265.7.3 - Release Date: 1/24/2005

EPA-R5-2013-003300RR-46

Jan Nona
<r.nona@comcast.net>
01/26/2005 11:10 AM

To Timothy Drexler
cc
bcc
Subject Re: Test Results [redacted]

Thanks - address is [redacted].

jan
----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "Jan Nona" <[redacted]>
Cc: <Theisen.Kenneth@epamail.epa.gov>
Sent: Wednesday, January 26, 2005 9:13 AM
Subject: Re: Test Results [redacted]

> Hi Jan:
>
> Thanks for the results. I've passed them on to ATSDR for their review.
> Based on what they've tested, though, I don't see anything that sticks
> out. Boron at 100 ppb, molybdenum at 1 ppb, and arsenic at 3.7 ppb are
> all below our action levels. Do you have an address?
>
>
> Tim Drexler
> Remedial Project Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-5J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
> fax: 312.886-7191
>
>
>
> Jan Nona
> <[redacted].
> net>
> To
> 01/25/2005 04:08 To
> PM Timothy Drexler/R5/USEPA/US@EPA
> cc
>
>
> bcc
>
>
> Fax to
>
>
>
>
>
>
>

>
>
>
> Subject
> Test Results Exemption 6
>
>
>
>
>
>
> The attached are test results from Exemption 6 taken on January 11,
> 2005.
>
> Do you see any problems here?
>
> This home is located about one block north of Pine School.
>
> jan nona
> (See attached file: Test Results Exemption 6.jpg)No virus found in this
> outgoing message.
> Checked by AVG Anti-Virus.
> Version: 7.0.300 / Virus Database: 265.7.3 - Release Date: 1/24/2005
>

--

No virus found in this incoming message.
Checked by AVG Anti-Virus.
Version: 7.0.300 / Virus Database: 265.7.4 - Release Date: 1/25/2005

--
No virus found in this outgoing message.
Checked by AVG Anti-Virus.
Version: 7.0.300 / Virus Database: 265.7.4 - Release Date: 1/25/2005

EPA-R5-2013-003300RR-47

Jan Nona
Exemption 6
01/26/2005 04:50 PM

To Timothy Drexler
cc
bcc
Subject Re: DRAFT note to Jan/Cathi Correct??

Tim: I notice that this says "draft". Please let me know when it's the real deal so we can proceed.

thnaks

jan nona
----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: <Exem Exemption 6>
Cc: <Pope.Janet@epamail.epa.gov>; <Johnson.Larry@epamail.epa.gov>
Sent: Tuesday, January 25, 2005 3:46 PM
Subject: Fw: DRAFT note to Jan/Cathi Correct??

>
> Jan:
>
> The P.I.N.E.S. $500 incorporation costs will be allowed by U.S. EPA to
> be reimbursed from the $5000 start up amount, even if the cost is paid
> prior to signing the TAP agreement. Please call if you have any
> questions.
>
>
> Tim Drexler
> Remedial Project Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-5J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
> fax: 312.886-7191
>
>
>
> --
> No virus found in this incoming message.
> Checked by AVG Anti-Virus.
> Version: 7.0.300 / Virus Database: 265.7.3 - Release Date: 1/24/2005
>
>

--
No virus found in this outgoing message.
Checked by AVG Anti-Virus.
Version: 7.0.300 / Virus Database: 265.7.4 - Release Date: 1/25/2005

EPA-R5-2013-003300RR-48

Jan Nona
Exemption 6
02/18/2005 01:49 PM

To Timothy Drexler
cc
bcc
Subject Re: Pines AOC II - January 2005 Progress Report

Tim: Explain a couple of things please. Are these results for MUNICIPAL water? If they are for the regular monitoring wells, why are there so many J's? Even if it is municipal water, why so many J's. What's the use of testing if you're just going to get estimated results anyway.

jan nona
----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: <pete_penoyer@nps.gov>; <kherron@dem.state.in.us>; <Bob_Daum@nps.gov>; <scott_hicks@nps.gov>; <dale_engquist@nps.gov>; <Exer Exemption 6>; <Exemption 6 Exemption 6>
Sent: Thursday, February 17, 2005 8:10 AM
Subject: Fw: Pines AOC II - January 2005 Progress Report

> ----- Forwarded by Timothy Drexler/R5/USEPA/US on 02/17/2005 08:08 AM -----
>
> "Bradley, Lisa" <lbradley@ensr.com>
> 02/15/2005 02:42 PM
>
> To: Timothy Drexler/R5/USEPA/US@EPA, KEVIN HERRON <KHERRON@dem.state.in.us>
> cc:
> bcc:
> Fax to:
> Subject: Pines AOC II - January 2005 Progress Report

>
> Tim and Kevin -
>
>
> Please see the attached, and feel free to call me if you have any
> questions.
>
>
> :) LSIA
>
>
> Lisa JN Bradley, Ph.D., DABT
> Senior Toxicologist
> ENSR International
> 2 Technology Park Drive
> Westford, MA 01886
> 978-589-3059 (direct)
> 978-589-3000
> 978-589-3282 (fax)
> lbradley@ensr.com
> www.ensr.com
>
>
> <<Pines AOC II - Progress Report 2-15-05.pdf>> <<Progress Report
> Table_Pines_SepOct04_020805.xls>> (See attached file: Pines AOC II -
> Progress Report 2-15-05.pdf)(See attached file: Progress Report
> Table_Pines_SepOct04_020805.xls)

--

No virus found in this incoming message.
Checked by AVG Anti-Virus.
Version: 7.0.300 / Virus Database: 265.8.8 - Release Date: 2/14/2005

--
No virus found in this outgoing message.
Checked by AVG Anti-Virus.
Version: 7.0.300 / Virus Database: 266.0.0 - Release Date: 2/18/2005

EPA-R5-2013-003300RR-49

Jan Nona
[redacted]
Exemption 6
03/17/2005 08:16 AM

To Kenneth Theisen, Timothy Drexler
cc
bcc
Subject Environmental Justice

We have a new situation. A permit application has been submitted for a waste transfer station just south of RR Ave., approximately 1500' east of County Line Road. We naturally think this is extremely bad news.

Could you get me the name of an individual that we can contact since we feel this site (with all of our other problems) is an extremely environmental unjust location.

jan nona

--
No virus found in this outgoing message.
Checked by AVG Anti-Virus.
Version: 7.0.308 / Virus Database: 266.7.3 - Release Date: 3/15/2005

EPA-R5-2013-003300RR-50

Timothy Drexler/R5/USEPA/US
03/17/2005 09:33 AM

To kherron
cc Kenneth Theisen
bcc
Subject Fw: Environmental Justice

Would this be a county, State, or municipal issue?

-Tim Drexler

----- Forwarded by Timothy Drexler/R5/USEPA/US on 03/17/2005 08:31 AM -----

Jan Nona
Exemption 6
03/17/2005 07:16 AM

To
Subject Environmental Justice

We have a new situation. A permit application has been submitted for a waste transfer station just south of RR Ave., approximately 1500' east of County Line Road. We naturally think this is extremely bad news.

Could you get me the name of an individual that we can contact since we feel this site (with all of our other problems) is an extremely environmental unjust location.

jan nona

--
No virus found in this outgoing message.
Checked by AVG Anti-Virus.
Version: 7.0.308 / Virus Database: 266.7.3 - Release Date: 3/15/2005

EPA-R5-2013-003300RR-51

Alan Murray
Exemption 6 Exemption 6
03/28/2005 11:29 AM

To Timothy Drexler
cc
bcc
Subject Test results

Hi Tim,

I received the copy of the of the letter that you faxed to Jan. You can fax me directly at Exemption 6. My fax is always on.

I need the test results from the test taken on Nov. 18th of wells from the area of Exemp... in the Township. These test results should include several residents as well as the school test results. I will be the one that will need to receive these test results from now on please. Also, any PINES communication or information to PINES or requested from PINES should be directed to me as well, instead of Jan. Thanks,

Cathi

EPA-R5-2013-003300RR-52

Jan Nona
Exemption 6
04/11/2005 11:22 AM

To Timothy Drexler
cc Kenneth Theisen
bcc
Subject Environmental Justice

Were you ever able to contact Kevin Heron regarding the environmental justice issue for our proposed transfer station? Or is there a new guy in town?

Another couple of unrelated "thangs":

Fact: About 1/4 mile south of RR Ave., about 100' east of county line road - DUMP. Refrigerators, stoves, TVs, a boat, and depending on who you talk to, anywhere between 100 and 1000 semi-truck abandoned tires.

Rumor: Mich. City has been digging a couple of ponds at Hitchcock and Earl Road. This is designed to alleviate some serious flooding that goes on in that area and Kintzele Ditch is definitely involved. Brown is hauling the excess material and after they got down so far they encountered toxic soil. So now, instead of hauling it to their yard (Brown's) on Rt. 20 they are taking it someplace else so it can be disposed of safely. Needless to say the ponds won't be used for fishing or swimming.

Just a little info to brighten your day.

jan nona

--
No virus found in this outgoing message.
Checked by AVG Anti-Virus.
Version: 7.0.308 / Virus Database: 266.9.6 - Release Date: 4/11/2005

EPA-R5-2013-003300RR-53

Timothy Drexler/R5/USEPA/US
04/18/2005 08:07 AM

To kherron
cc
bcc
Subject Fw: Environmental Justice

Hey Kevin:

It was great seeing you last week. I got this message from Jan Nona about a new transfer station near Pines. Do you know who regulates them?

-Tim

----- Forwarded by Timothy Drexler/R5/USEPA/US on 04/18/2005 08:04 AM -----

[redacted] Exemption 6
04/11/2005 11:22 AM

To
Subject Environmental Justice

Were you ever able to contact Kevin Heron regarding the environmental justice issue for our proposed transfer station? Or is there a new guy in town?

Another couple of unrelated "thangs":

Fact: About 1/4 mile south of RR Ave., about 100' east of county line road - DUMP. Refrigerators, stoves, TVs, a boat, and depending on who you talk to, anywhere between 100 and 1000 semi-truck abandoned tires.

Rumor: Mich. City has been digging a couple of ponds at Hitchcock and Earl Road. This is designed to alleviate some serious flooding that goes on in that area and Kintzele Ditch is definitely involved. Brown is hauling the excess material and after they got down so far they encountered toxic soil. So now, instead of hauling it to their yard (Brown's) on Rt. 20 they are taking it someplace else so it can be disposed of safely. Needless to say the ponds won't be used for fishing or swimming.

Just a little info to brighten your day.

jan nona

--
No virus found in this outgoing message.
Checked by AVG Anti-Virus.
Version: 7.0.308 / Virus Database: 266.9.6 - Release Date: 4/11/2005

EPA-R5-2013-003300RR-54

Alan Murray
[redacted]
Exemption 6 [redacted]
06/20/2005 05:58 PM

To Timothy Drexler
cc
bcc
Subject Re: Superfund 101 Class

Hi Tim,

Right now I have about 15 that have said they would like to attend. Hopefully, more will reply soon. The class has been set for 4pm on June 28th in the Town Hall. I did tell Janet about the time and the place last week.

Cathi

PS. There are three copies of the TAP grant signed by PINES in the hands of Brown or NIPSCO as of last week.

EPA-R5-2013-003300RR-55

Alan Murray
Exemption 6 ption 6
06/29/2005 06:51 AM

To Timothy Drexler, Janet Pope
cc
bcc
Subject Superfund 101

Tim & Janet,

Hope you made it home okay last night. Thanks again for the class. I found it interesting as I'm sure the other participants did.

Could you send me 4 sets of the course material for the PINES Board members that could not attend last night? I failed to ask you last night, which would have been the most convenient way.

Thanks,
Cathi

EPA-R5-2013-003300RR-56

Timothy Drexler/R5/USEPA/US
06/29/2005 11:56 AM

To Larry Silvestri
cc
bcc
Subject Re: Runoff from the 520 dump

Hi Larry:

Thanks a lot for the pictures. Would it be possible to send them to me as attachments rather than embeding them in the email messages? Can you also reduce the pixal density a bit? They don't need to be very big for my purposes.

Again, I appreciate the input.

Tim Drexler
312-353-4367

Larry Silvestri <[redacted]>

[redacted]
06/29/2005 07:01 AM

To
Subject Runoff from the 520 dump

This is a picture of the west gate to the 520 Dump, taken from the road facing east.
There appears to be erosion from water runoff under the gate on the lower left.
There is a grey powder left from the runoff.

EPA-R5-2013-003300RR-57

Charles Norris
<cnorris@geo-hydro.com>
07/25/2005 05:50 PM

To Timothy Drexler
cc asenn, dsullivan, vblumenfeld, Exemption 6
bcc
Subject Pines TAP consultant

Mr. Drexler,

I have been retained by PINES to provide them technical assistance through the RCRA process at Town of Pines. I'm coming on board a bit far into the process and would like to begin getting caught up as quickly as possible. There are a couple of elements toward that end that I thought you could guide me toward, or direct me to those who can.

1) Where is the process as of today? The progress reports I've seen are a bit sketchy. I believe the work plan is at least in draft stage? How do I arrange to get a copy? Are there any technical meetings in the near future it may be worth my attending, on the work plan or other issues? Is there a published calendar?

2) To whom should I direct requests for information, particularly raw data like monitoring analyses, well constructions, head measurements, conductivity tests, etc.? Relevant publications and site/project reports? Alternatively, is there a central repository from which I can download the information?

3) I asked Cathi Murray for contacts of parties that are involved and she gave me your contact information and that of Ali Senn (ENSR), Dan Sullivan (NiSource), and Valerie Blumenfeld (Brown). I think it's generally appropriate that I usually communicate with all of you simulaneously, but whom do I use for the "To" and whom for the "Cc"?

I'll have lots more questions, but I'll hold off until I'm sure of the proper chains of communication.
--
Chuck

Charles H. Norris
Geo-Hydro, Inc.
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-58

[redacted]
Exemption 6
08/09/2005 06:25 AM

To Timothy Drexler
cc Nancy Kolasa, Jan Nona, Cathi Murray
bcc
Subject Re: Runoff from the 520 dump

Tim,
Could you give us status on the Pine's 520 dump?
What will be done about the discharge into Brown Ditch?
Larry Silvestri
[redacted]
Exemption 6
Exemption 6
Exemption 6

On Jun 29, 2005, at 11:56 AM, Drexler.Timothy@epamail.epa.gov wrote:

> Hi Larry:
>
> Thanks a lot for the pictures. Would it be possible to send them to me
> as attachments rather than embeding them in the email messages? Can
> you
> also reduce the pixal density a bit? They don't need to be very big
> for
> my purposes.
>
> Again, I appreciate the input.
>
> Tim Drexler
> 312-353-4367

EPA-R5-2013-003300RR-59

Larry Silvestri
Exemption 6
08/11/2005 04:00 PM

To Timothy Drexler
cc Cathi Murray, Jan Nona, Nancy Kolasa
bcc
Subject Fwd: Runoff from the 520 dump

Begin forwarded message:

> From: Larry Silvestri <Exemption 6>
> Date: August 9, 2005 6:25:54 AM CDT
> To: Drexler.Timothy@epamail.epa.gov
> Cc: Cathi Murray <Exemption 6 Exemption 6>, Jan Nona
> <Exer Exemption 6>, Nancy Kolasa <Exemption 6 on 6>
> Subject: Re: Runoff from the 520 dump
>
> Tim,
> Could you give us status on the Pine's 520 dump?
> What will be done about the discharge into Brown Ditch?
> Larry Silvestri
> Exemption 6
> Exemption 6
> Exemption 6
>
> On Jun 29, 2005, at 11:56 AM, Drexler.Timothy@epamail.epa.gov wrote:
>
>> Hi Larry:
>>
>> Thanks a lot for the pictures. Would it be possible to send them to
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>> as attachments rather than embeding them in the email messages? Can
>> you
>> also reduce the pixal density a bit? They don't need to be very big
>> for
>> my purposes.
>>
>> Again, I appreciate the input.
>>
>> Tim Drexler
>> 312-353-4367
>

EPA-R5-2013-003300RR-60

Timothy Drexler/R5/USEPA/US
08/12/2005 12:32 PM

To Larry Silvestri
cc Cathi Murray, Nancy Kolasa, Jan Nona
bcc
Subject Re: Fwd: Runoff from the 520 dump

Hi Larry:

I've done some checking on the Yard 520 "pond" and have the following information. The pond is permited to discharge to Brown Ditch via an IDEM National Pollution Discharge Elimination System (NPDES) permit # INR00Y003. The responsible party is required to visually inspect the discharge on a semi-annual basis. According to IDEM, they are in compliance with the permit. The contact at IDEM regarding the permit is Allison Beumer. Her phone number is (317) 233-0202. The pond is not considered a wetland since it was manmade.

That being said, that area of discharge for both surface water and groundwater is of great interest to all of us anyway. As you can imagine, we view that the pathway by groundwater and surface water (even if the surface discharge to Brown Ditch were to be closed, a significant amount of groundwater from the area of Yard 520 may also be making its way to Brown Ditch and potentially then to IDNL) are important to study. That area will loom large in the remedial investigation.

I hope that this is helpful. Please contact me if you would like to talk about this more.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-5J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.7191
Larry Silvestri <[redacted]>

Larry Silvestri
[redacted]
08/11/2005 04:00 PM

To
Subject Fwd: Runoff from the 520 dump

Begin forwarded message:

> From: Larry Silvestri <[redacted]>
> Date: August 9, 2005 6:25:54 AM CDT
> To: Drexler.Timothy@epamail.epa.gov
> Cc: Cathi Murray <[redacted]>, Jan Nona
> <[redacted]>, Nancy Kolasa <[redacted]>
> Subject: Re: Runoff from the 520 dump
>
> Tim,
> Could you give us status on the Pine's 520 dump?
> What will be done about the discharge into Brown Ditch?

> Larry Silvestri
> [redacted]
> [redacted]
> [redacted]
>
> On Jun 29, 2005, at 11:56 AM, Drexler.Timothy@epamail.epa.gov wrote:
>
>> Hi Larry:
>>
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>> as attachments rather than embeding them in the email messages? Can
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>>
>> Again, I appreciate the input.
>>
>> Tim Drexler
>> 312-353-4367
>

EPA-R5-2013-003300RR-61

Larry Silvestri
Exemption 6
08/12/2005 12:37 PM

To Timothy Drexler
cc
bcc
Subject Re: Runoff from the 520 dump

Tim,
Thank you very much.
I hope they give you some vacation,
or at least a raise.
Larry

On Aug 12, 2005, at 12:32 PM, Drexler.Timothy@epamail.epa.gov wrote:

> Hi Larry:
>
> I've done some checking on the Yard 520 "pond" and have the following
> information. The pond is permited to discharge to Brown Ditch via an
> IDEM National Pollution Discharge Elimination System (NPDES) permit #
> INR00Y003. The responsible party is required to visually inspect the
> discharge on a semi-annual basis. According to IDEM, they are in
> compliance with the permit. The contact at IDEM regarding the permit
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> considered a wetland since it was manmade.
>
> That being said, that area of discharge for both surface water and
> groundwater is of great interest to all of us anyway. As you can
> imagine, we view that the pathway by groundwater and surface water
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> if the surface discharge to Brown Ditch were to be closed, a
> significant
> amount of groundwater from the area of Yard 520 may also be making its
> way to Brown Ditch and potentially then to IDNL) are important to
> study.
> That area will loom large in the remedial investigation.
>
> I hope that this is helpful. Please contact me if you would like to
> talk about this more.
>
> Tim Drexler
> Remedial Project Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-5J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
> fax: 312.886.7191
>
>
>
> Larry Silvestri
> <Exemption 6
> Exemption 6>
> To
> 08/11/2005 04:00 Timothy Drexler/R5/USEPA/US@EPA

> PM cc
> Cathi Murray
> <[redacted]>, Jan
> Nona <[redacted]>, Nancy
> Kolasa <[redacted]>
>
>
>
>
>
>
> Subject
> Fwd: Runoff from the 520 dump
>
>
>
>
>
>
>
>
> Begin forwarded message:
>
>> From: Larry Silvestri <[redacted]>
>> Date: August 9, 2005 6:25:54 AM CDT
>> To: Drexler.Timothy@epamail.epa.gov
>> Cc: Cathi Murray <[redacted]>, Jan Nona
>> <[redacted]>, Nancy Kolasa <[redacted]>
>> Subject: Re: Runoff from the 520 dump
>>
>> Tim,
>> Could you give us status on the Pine's 520 dump?
>> What will be done about the discharge into Brown Ditch?
>> Larry Silvestri
>> [redacted]
>> [redacted]
>> Michigan City
>>
>> On Jun 29, 2005, at 11:56 AM, Drexler.Timothy@epamail.epa.gov wrote:
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>>> Hi Larry:
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>>> Thanks a lot for the pictures. Would it be possible to send them to
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>>> as attachments rather than embeding them in the email messages? Can
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>>> also reduce the pixal density a bit? They don't need to be very big
>>> for
>>> my purposes.
>>>
>>> Again, I appreciate the input.
>>>
>>> Tim Drexler
>>> 312-353-4367
>>
>
>
>

EPA-R5-2013-003300RR-62

Larry Silvestri
Exemption 6
08/18/2005 07:50 AM

To Timothy Drexler
cc
bcc
Subject Re: Runoff from the 520 dump

Tim,
On August 5, IDEM "issued a Supplemental Closure/Post-Closure Plan Approval for the Yard 520 RWS II."
http://www.in.gov/idem/land/permits/notices/yard_per.html
http://www.in.gov/idem/land/permits/notices/yard_nod.html
Do you think that IDEM or Brown need to do better monitoring of Brown Ditch and testing of the pond?
Larry Silvestri
Exemption 6
Exemption 6
Michigan City, IN
46360

On Aug 12, 2005, at 12:32 PM, Drexler.Timothy@epamail.epa.gov wrote:

> Hi Larry:
>
> I've done some checking on the Yard 520 "pond" and have the following
> information. The pond is permited to discharge to Brown Ditch via an
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> That area will loom large in the remedial investigation.
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> talk about this more.
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> Tim Drexler
> Remedial Project Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-5J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
> fax: 312.886.7191

>
>
>
> Larry Silvestri
> <[redacted]
> [redacted]>
> To
> 08/11/2005 04:00 Timothy Drexler/R5/USEPA/US@EPA
> PM cc
> Cathi Murray
> <[redacted]>, Jan
> Nona <[redacted]>, Nancy
> Kolasa <[redacted]>
>
>
>
>
>
>
> Subject
> Fwd: Runoff from the 520 dump
>
>
>
>
>
>
>
>
> Begin forwarded message:
>
>> From: Larry Silvestri <[redacted]>
>> Date: August 9, 2005 6:25:54 AM CDT
>> To: Drexler.Timothy@epamail.epa.gov
>> Cc: Cathi Murray <[redacted]>, Jan Nona
>> <[redacted]>, Nancy Kolasa <[redacted]>
>> Subject: Re: Runoff from the 520 dump
>>
>> Tim,
>> Could you give us status on the Pine's 520 dump?
>> What will be done about the discharge into Brown Ditch?
>> Larry Silvestri
>> [redacted]
>> [redacted]
>> Michigan City
>>
>> On Jun 29, 2005, at 11:56 AM, Drexler.Timothy@epamail.epa.gov wrote:
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>>> my purposes.
>>>
>>> Again, I appreciate the input.
>>>
>>> Tim Drexler

>>> 312-353-4367
>>
>
>
>

EPA-R5-2013-003300RR-63

Timothy Drexler/R5/USEPA/US
08/18/2005 09:00 AM

To Larry Silvestri
cc
bcc
Subject Re: Runoff from the 520 dump

Hi Larry:

I'm not in a position right now to have an opinion on the amount of monitoring that is necessary in Brown Ditch. By EPA regulations we have to complete the remedial investigation. That investigation, by design, will include human health and ecological risk assessments. When the workplan is complete (which should be very soon) we will make that document public. You should take the time to review it. You will see that there are areas, as I mentioned in my last email, that we are very interested in. We all recognize the potential pathway that Brown Ditch represents. Any impact must be quantified before we can talk about what may be needed to address that impact. We will look not only at groundwater and surface water, but also the sediment of the ditch going into the IDNL.

It is not a quick process, but it is the design that we have to implement. If you'd like more information on the actual regulations, I can get you information on the process.

Sorry I can't be more informative.

Tim Drexler

Larry Silvestri <[redacted]>

Larry Silvestri
[redacted]
08/18/2005 07:50 AM

To
Subject Re: Runoff from the 520 dump

Tim,
On August 5, IDEM "issued a Supplemental Closure/Post-Closure Plan Approval for the Yard 520 RWS II."
http://www.in.gov/idem/land/permits/notices/yard_per.html
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Do you think that IDEM or Brown need to do better monitoring of Brown Ditch and testing of the pond?
Larry Silvestri
[redacted]

On Aug 12, 2005, at 12:32 PM, Drexler.Timothy@epamail.epa.gov wrote:

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> way to Brown Ditch and potentially then to IDNL) are important to
> study.
> That area will loom large in the remedial investigation.
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> I hope that this is helpful. Please contact me if you would like to
> talk about this more.
>
> Tim Drexler
> Remedial Project Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-5J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
> fax: 312.886.7191
>
>
>
> Larry Silvestri
> <[redacted]
> [redacted]>
>
> 08/11/2005 04:00 PM

To
Timothy Drexler/R5/USEPA/US@EPA
cc
Cathi Murray
<[redacted]>, Jan
Nona <[redacted]>, Nancy
Kolasa <[redacted]>

Subject
Fwd: Runoff from the 520 dump

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> Begin forwarded message:
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>> From: Larry Silvestri <[redacted]>
>> Date: August 9, 2005 6:25:54 AM CDT
>> To: Drexler.Timothy@epamail.epa.gov
>> Cc: Cathi Murray <[redacted]>, Jan Nona
>> <[redacted]>, Nancy Kolasa <[redacted]>
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>>> 312-353-4367
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EPA-R5-2013-003300RR-64

Larry Silvestri
Exemption 6
08/18/2005 10:04 AM

To abeumer
cc Timothy Drexler
bcc
Subject INR500009 and INR00Y003

Allison,

Here is a US EPA link that concerns the Yard 520 and the town of Pines.
http://www.epa.gov/region5/sites/pines/

Here is a notice of approval of Supplemental Closure/Post-Closure Plan for the Yard 520, where NPDES permits INR00Y003 and INR500009 concern.
http://www.in.gov/idem/land/permits/notices/yard_per.html

Following is a quote from the notice that lists chemicals to be tested in monitoring wells. I think that it would make sense to also test for these chemicals in Brown Ditch and the Yard 520 pond also.
"
All ground water monitoring wells that constitute the facility's monitoring well system must have individual water samples collected and analyzed for contaminants during April and October every year. These wells have been identified as follows; MW-1, MW-6, MW-7, MW-8, MW-10, MW-11, MW-13S, MW-13D, MW-14S, and MW-14D. Each sample must be analyzed for the following Phase I parameters:

1 Arsenic (Dissolved)
2 Barium (Dissolved)
3 Boron (Dissolved)
4 Cadmium (Dissolved)
5 Chloride
6 Chromium (Dissolved)
7 Fluoride
8 Field pH
9 Field specific conductance
10 Lead (Dissolved)
11 Mercury (Dissolved)
12 Selenium (Dissolved)
13 Silver (Dissolved)
14 Sodium (Dissolved)
15 Sulfate
16 Manganese (Dissolved)
17 Nitrate
18 Total Dissolved Solids

Additionally, if the facility is in Phase II monitoring, each sample must be analyzed for the following Phase II parameters:

1 Phase I parameters
2 Copper (Dissolved)
3 Cyanide (Total)
4 Iron (Dissolved)
5 Molybdenum (Dissolved)
6 Nickel (Dissolved)
7 Potassium (Dissolved)
8 Sulfide (total)
9 Zinc (Dissolved)

"

Larry Silvestri

Exemption 6

Exemption 6

Exemption 6

EPA-R5-2013-003300RR-65

Alan Murray
Exemption 6 ption 6
08/18/2005 02:51 PM

To dsullivan
cc Janet Pope, Timothy Drexler, Exemption 6, vblumenfeld
bcc
Subject Technical Assistance Plan Letter 8/9/05

Mr. Sullivan,

Please find attached the signed copy of the TAP application. In regard to your request for a specific identification of the Project Manager. P.I.N.E.S. as a group is the Project Manager. I have also attached a copy of the list of members that we provided you with at our July 21, 2005 meeting. At that time we explained that because we are all volunteers, and have many other responsibilities outside of the P.I.N.E.S., we are making a group effort for the TAP management. The request for the advanced payment will be forthcoming.

Could you please clarify your question about the use of personnel and interactions among the board and others.

Finally, we have contacted our technical advisor for the conflict of interest statement that you are requesting. We will forward it to you as soon as it is ready.

Please contact me if you have any further questions.

Sincerely,

Cathi Murray
Exemption 6
Exemption 6 Exemption 6

scan.pdf

EPA-R5-2013-003300RR-66

Timothy Drexler/R5/USEPA/US
09/13/2005 08:50 AM

To Alan Murray
cc
bcc
Subject Re: Work Plan

Hi Cathi:

We are scheduling the public meeting for Thursday, October 6th. Janet Pope will be making the arrangements.

We will be receiving the work plan this Friday, September 16th. I will mail you a copy as soon as we receive it. Also, FYI, some sampling in Yard 520 will begin next week. I will be observing on Monday and probably Tuesday as well. I believe that Kevin Herron will also be there part of the time.

-Tim

Alan Murray <[redacted]>

Alan Murray
[redacted]
09/12/2005 09:46 PM

To
Subject Work Plan

Hi Tim,

When can we expect to have the work plan? Also, have you set a firm date for the meeting you were trying to schedule? You may have, and I have missed the email.

Thanks,
Cathi

EPA-R5-2013-003300RR-67

Timothy Drexler/R5/USEPA/US
09/27/2005 08:13 AM

To '[redacted]'
cc
bcc
Subject Re: Dunes Baptist Church

Hi Jan:

I called Rev. Geckler at the number you gave me, got his machine and left a message to call me. I haven't heard from him. I'll try again today.

I spoke to Ken about this and what we feel is that the reverend should call his well driller to come out and have a look as a first pass. A driller should have a good idea whether the church's well problem is due to scaling, infilling by peat, or something unusual. I'll keep trying to call, though to see if I can reach him.

Hope you're doing well. We've got a meeting at the Michigan City Library on Thursday, Oct. 6th to talk about the future sampling. Maybe see you there?

-Tim

'[redacted]' <[redacted]>

"r.nona" <r.nona@comcast.net>
09/27/2005 01:50 AM

To
Subject Dunes Baptist Church

Tim: Have you been able to contact anyone from the Church yet?

jan nona
----- Original Message -----
From: [redacted]
To: Tim Drexler
Sent: Saturday, September 03, 2005 7:24 AM
Subject: Dunes Baptist Church

How the devil are you. Hope you have had an enjoyable summer.

Some time ago, the minister of the [redacted], gave me a sample of some material that has been clogging the "point" of their well. At the time I sent the sample to somebody to look at so I don't have anymore. It is a very fine black substance. Didn't detect any odor. We didn't have $ for testing so I just let it go unfortunately.

Don't know if they are part of the RIFS but I feel it is something that should be investigated.

You can contact Rev. Samuel D. Geckler at [redacted]. or [redacted].

jan nona

EPA-R5-2013-003300RR-68

"r.nona"
Exemption 6
09/27/2005 08:31 AM

To Timothy Drexler
cc
bcc
Subject Re: Dunes Baptist Church

Tim: Thanks for the follow-up on this. The material really looked strange. It was a sandy type substance but black as though it had been infused with dark oil or something but no odor as I said before. Shouldn't be surprised by anything we find out here tho should we.

I'll try for 10-6 - however, my husband is in the hosp in Chi. and running back and forth there is wearing me out quite frankly.

Take care and have a happy beautiful fall leaf season.

jan nona
----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "Exemptio..." <Exer Exemption 6>
Sent: Tuesday, September 27, 2005 8:13 AM
Subject: Re: Dunes Baptist Church

> Hi Jan:
>
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> left a message to call me. I haven't heard from him. I'll try again
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> call his well driller to come out and have a look as a first pass. A
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> -Tim
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>
> "Exemptio..."
> <Exemption 6.
> net>
> To
> 09/27/2005 01:50 Timothy Drexler/R5/USEPA/US@EPA
> AM cc
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> Subject
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> jan nona
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> --
> No virus found in this incoming message.
> Checked by AVG Anti-Virus.
> Version: 7.0.344 / Virus Database: 267.11.7/112 - Release Date: 9/26/2005
>
>

EPA-R5-2013-003300RR-69

Larry Silvestri
[redacted]
10/10/2005 05:17 PM

To Timothy Drexler
cc
bcc
Subject Re: Runoff from the 520 dump

Tim,

Is the workplan complete?
Is Brown Ditch included in that plan?
Is this plan on line?

Thank you for your help,
Larry Silvestri
[redacted]

On Aug 18, 2005, at 9:00 AM, Drexler.Timothy@epamail.epa.gov wrote:

> Hi Larry:
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> Michigan City, IN
> 46360
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>> Tim Drexler
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>> Superfund Division
>> United States Environmental Protection Agency

>> 77 W. Jackson Blvd., SR-5J
>> Chicago, Illinois 60604-3590
>>
>> phone: 312.353.4367
>> fax: 312.886.7191
>>
>>
>>
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>> <[redacted]
>> [redacted]>
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EPA-R5-2013-003300RR-70

Timothy Drexler/R5/USEPA/US
10/11/2005 08:42 AM

To lbradley, eperry
cc dsullivan, vblumenfeld, Exemption 6, peggy
bcc
Subject Fw: private wells for Pines Site

Hi Lisa:

I've just received this email message from Peggy Richardson with the names and phone numbers for private well sampling at the Pines Site.

Thanks, Peggy!

Tim Drexler

----- Forwarded by Timothy Drexler/R5/USEPA/US on 10/11/2005 08:34 AM -----

Peggy Richardson
Exemption 6
10/08/2005 07:47 AM
Please respond to
Exemption 6

To
Subject private wells

Hi Tim this is Peggy from the P.I.N.E.S. group, I was able to find the addresses in the work plan for the

private wells that are in the R/I. The names, addresses & telephone numbers listed below. Let me know if you get this

hope I have right e-mail address.

Exemption 6

Exemption 6

[redacted]

Exemption 6

EPA-R5-2013-003300RR-71

Timothy Drexler/R5/USEPA/US
10/11/2005 09:09 AM

To Larry Silvestri
cc
bcc
Subject Re: Runoff from the 520 dump

Hi Larry:

The workplan is complete. It should be on the Site website soon. We will also be sending a hard copy and CDs to the Michigan City Library and giving hard copies and CDs to the PINES Group.

You will see that Brown Ditch figures prominently in the investigation (13 sediment samples, 12 surface water sample locations).

Please let me know if you have any trouble getting a copy of the workplan to review.

Also, we had a public meeting last week. Were you aware of the meeting?

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-5J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.7191
Larry Silvestri <[redacted]>

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[redacted]
10/10/2005 05:17 PM

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>>>> 312-353-4367
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EPA-R5-2013-003300RR-72

Exemption 6

10/11/2005 09:55 AM

To Timothy Drexler
cc
bcc
Subject Re: Runoff from the 520 dump

Tim,

The Closure Plan does not mention testing of Brown Ditch, only ground water testing from monitor wells. I petitioned IDEM for administrative review and the first hearing is November 1. If the workplan provides for Brown Ditch surface water and sediment testing, I will withdraw my petition from IDEM. Can you confirm that Brown Ditch will be tested periodically?

Unfortunately, I was out of town last week, so I couldn't make it to the meeting.

Thanks again,
Larry

On Oct 11, 2005, at 9:09 AM, Drexler.Timothy@epamail.epa.gov wrote:

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>
> Tim Drexler
> Remedial Project Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-5J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
> fax: 312.886.7191
>
>
>
> Larry Silvestri
> <Exemption 6
> Exemption 6>
> To
> 10/10/2005 05:17 Timothy Drexler/R5/USEPA/US@EPA
> PM cc
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> Tim,
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> Is the workplan complete?
> Is Brown Ditch included in that plan?
> Is this plan on line?
>
> Thank you for your help,
> Larry Silvestri
> Exemption 6
> Exemption 6
> Michigan City, IN. 46360
>
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>
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>> Tim Drexler
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>> [redacted]>
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>> 08/18/2005 07:50 Timothy Drexler/R5/USEPA/US@EPA
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>> Re: Runoff from the 520 dump
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>>> Larry Silvestri
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>>> [redacted]>
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>> To
>>> 08/11/2005 04:00 Timothy Drexler/R5/USEPA/US@EPA
>>> PM
>> cc
>>> Cathi Murray
>>> <[redacted]>, Jan
>>> Nona <[redacted]>,
> Nancy
>>> Kolasa
> <[redacted]>
>>>
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>> Subject
>>> Fwd: Runoff from the 520 dump
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>>> Begin forwarded message:
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>>>> From: Larry Silvestri <[redacted]>
>>>> Date: August 9, 2005 6:25:54 AM CDT
>>>> To: Drexler.Timothy@epamail.epa.gov
>>>> Cc: Cathi Murray <[redacted]>, Jan Nona
>>>> <[redacted]>, Nancy Kolasa <[redacted]>
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>>>> [redacted]
>>>> [redacted]
>>>> [redacted]
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>>>>> 312-353-4367
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EPA-R5-2013-003300RR-73

Timothy Drexler/R5/USEPA/US
10/11/2005 10:20 AM

To Larry Silvestri
cc
bcc
Subject Re: Runoff from the 520 dump

Hi Larry:

EPA has approved the workplan. Sediment and surface water maps are attached. Pardon the lack of mapping information, but you can see the sampling locations. The sediment sampling will be a one-time sampling event. All of the surface water locations will be sampled at quarterly intervals for a period of one year. Hope this helps.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-5J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.7191

RI_surfwtr.jpg

RI_sed.jpg

Larry Silvestri <[redacted] Exemption 6 >

[redacted] Exemption 6
10/11/2005 09:55 AM

To

Subject Re: Runoff from the 520 dump

Tim,

The Closure Plan does not mention testing of Brown Ditch, only ground water testing from monitor wells. I petitioned IDEM for administrative review and the first hearing is November 1. If the workplan provides for Brown Ditch surface water and sediment testing, I will withdraw my petition from IDEM. Can you confirm that Brown Ditch will be tested periodically?

Unfortunately, I was out of town last week, so I couldn't make it to the meeting.

Thanks again,
Larry

On Oct 11, 2005, at 9:09 AM, Drexler.Timothy@epamail.epa.gov wrote:

> Hi Larry:
>

> The workplan is complete. It should be on the Site website soon. We
> will also be sending a hard copy and CDs to the Michigan City Library
> and giving hard copies and CDs to the PINES Group.
>
> You will see that Brown Ditch figures prominently in the investigation
> (13 sediment samples, 12 surface water sample locations).
>
> Please let me know if you have any trouble getting a copy of the
> workplan to review.
>
> Also, we had a public meeting last week. Were you aware of the
> meeting?
>
> Tim Drexler
> Remedial Project Manager
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> 77 W. Jackson Blvd., SR-5J
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>>>>
>>>

Cathi Murray
<[redacted]>, Jan
Nona <[redacted]>,

Kolasa

Fwd: Runoff from the 520 dump

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EPA-R5-2013-003300RR-74

Timothy Drexler/R5/USEPA/US
02/24/2006 11:17 AM

To Alan Murray
cc
bcc
Subject Groundwater/Surface Water Studies

Hi Cathi:

Surface water sampling will begin this spring. Groundwater monitoring wells are also to be installed beginning this spring. I don't believe that there have been any access issues with local residents. Have you heard of any? The water information will then be collected quarterly in order to develop seasonal trend variations. I will make sure that you are aware as wells are drilled and samples are collected. Do you think it would be a good idea to hold a public meeting about the well drilling and sampling effort?

Tim Drexler
Remedial Project Manager
Superfund Division
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Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.7191

EPA-R5-2013-003300RR-75

Alan Murray
[redacted] Exemption 6 ption 6
02/25/2006 07:18 AM

To Timothy Drexler
cc
bcc
Subject Re: Groundwater/Surface Water Studies

Hi Tim,

Yes, I think it would be a great idea to hold a public meeting about the well drilling and sample collection. Also, are there any soil sample reports yet? I do know that many samples were collected during the time they were installing the water lines.

Thank you,

Cathi

----- Original Message -----
From: Drexler.Timothy@epamail.epa.gov
To: Alan Murray
Sent: Friday, February 24, 2006 11:17 AM
Subject: Groundwater/Surface Water Studies

Hi Cathi:

Surface water sampling will begin this spring. Groundwater monitoring wells are also to be installed beginning this spring. I don't believe that there have been any access issues with local residents. Have you heard of any? The water information will then be collected quarterly in order to develop seasonal trend variations. I will make sure that you are aware as wells are drilled and samples are collected. Do you think it would be a good idea to hold a public meeting about the well drilling and sampling effort?

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Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.7191
=

EPA-R5-2013-003300RR-76

Timothy Drexler/R5/USEPA/US
02/25/2006 01:03 PM

To Alan Murray, Janet Pope
cc
bcc
Subject Re: Groundwater/Surface Water Studies

Hi Cathi:

I will talk to Janet Pope about a public meeting. How would the last week of March work? I can give an update on the sampling so far.

Tim Drexler
Remedial Project Manager
Superfund Division
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Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.7191

-----Alan Murray < Exemption 6 Exemption 6 > wrote: -----

To: Timothy Drexler/R5/USEPA/US@EPA
From: Alan Murray < Exemption 6 Exemption 6 >
Date: 02/25/2006 07:18AM
Subject: Re: Groundwater/Surface Water Studies

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Sent: Friday, February 24, 2006 11:17 AM
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phone: 312.353.4367
fax: 312.886.7191
=

EPA-R5-2013-003300RR-77

Alan Murray
Exemption 6 ption 6
02/26/2006 11:50 AM

To Timothy Drexler
cc
bcc
Subject Re: Groundwater/Surface Water Studies

Thanks, Tim. What about soil sampling?

----- Original Message -----
From: Drexler.Timothy@epamail.epa.gov
To: Alan Murray ; Pope.Janet@epamail.epa.gov
Sent: Saturday, February 25, 2006 1:03 PM
Subject: Re: Groundwater/Surface Water Studies

Hi Cathi:

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Tim Drexler
Remedial Project Manager
Superfund Division
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=

=

EPA-R5-2013-003300RR-78

Timothy Drexler/R5/USEPA/US
03/09/2006 08:58 AM

To [redacted], Janet Pope, kherron, dsullivan, lbradley, vblumenfeld, dale_engquist, scott_hicks, Bob_Daum
cc
bcc
Subject Scehduling Pines Site Public Meeting

Hi all:

It looks like March will not work for everyone. I will be in Lousiana working with Katrina assistance in early April. Please let me know as soon as you can which of these days (April 25, 26, 27) you could make a public meeting in Pines.

Thanks.

Tim Drexler
Remedial Project Manager
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phone: 312.353.4367
fax: 312.886.7191

EPA-R5-2013-003300RR-79

Timothy Drexler/R5/USEPA/US
04/26/2006 02:40 PM

To Charles Norris
cc Exemption 6
bcc
Subject Re: Follow-up

Hi Chuck:

Sorry for the delay in my response. I've been on travel until today. Attached is a draft document from the PRP that I received yesterday. The document concerns the geoprobe sampling that was conducted in Yard 520 as a part of the Yard 520 SAP. This is the only document that we have received from the PRP since the approval of the RI/FS SAP, except for the validated soil/CCB data. You are welcome to submit comments to me on the document, if you have the PINES group permission. I need the comments, however, by next Thursday, May 5th.

Remember that this is a draft document, Chuck, and will not be released to the public until approved by EPA. Please keep it tight.

Thanks.

Call me if you have any questions.

Tim Drexler
phone: 312.353.4367
fax: 312.886.7191

Pines AOC II - Yard 520 Report April 2006.pdf

Charles Norris <cnorris@geo-hydro.com>

Charles Norris <cnorris@geo-hydro.com>
04/26/2006 12:28 PM

To
Subject Follow-up

Tim,
I wanted to make sure you got my email of April 17 and that any response wasn't eaten by a filter somewhere.
--
Chuck

Charles H. Norris
Geo-Hydro, Inc.
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-80

Charles Norris
<cnorris@geo-hydro.com>
04/30/2006 07:22 PM

To Exemption 6
cc Timothy Drexler
bcc
Subject Geo-probe results assessment

Cathi,
I believe you were copied on an email when Tim Drexler sent me a file Pines AOC II - Yard 520 Report 2006.pdf.

He invited me to submit comments to him regarding the document, which he needs before Thursday's meeting in Michigan City, if I have permission of PINES. (Tim, is this because you expect to approve and release the document then? I'm unclear.)

I have some questions and concerns about it. If I have your permission, I would like to provide feedback on the document. Alternatively, since I didn't hear about the meeting in time to schedule attending myself, perhaps I can route questions and comments through you, although perhaps that's after approval and release instead of before.

Let me know, I'll be around all week.
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Chuck

Charles H. Norris
Geo-Hydro, Inc.
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-81

Timothy Drexler/R5/USEPA/US
05/01/2006 08:25 AM

To Charles Norris
cc Exemption 6
bcc
Subject Re: Geo-probe results assessment

Hi Chuck:

The timing for comments on the Yard 520 data is not based on the public meeting. I will be on vacation beginning May 6 and will be out of the office until May 30. I was hoping to finalize comments back to the PRP before I leave. After the document is then finalized and approved by EPA, it will become a part of the public record. Please send me your comments in written form, either from Chuck with PINES approval or from the PINES group. As it is still in draft form, the document will not be discussed at the meeting.

Please call or write back if you have any questions.

Thanks.

-Tim

Charles Norris <cnorris@geo-hydro.com>

Charles Norris <cnorris@geo-hydro.com>
04/30/2006 07:22 PM

To

Subject Geo-probe results assessment

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Denver CO 80206

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EPA-R5-2013-003300RR-82

Alan Murray
<[redacted] Exemption 6 [redacted]>
05/01/2006 05:32 PM

To Charles Norris
cc Timothy Drexler
bcc
Subject Re: Geo-probe results assessment

Chuck,

You have PINES permission to review and provide feedback on the document.

Cathi
----- Original Message -----
From: "Charles Norris" <cnorris@geo-hydro.com>
To: <[redacted] Exemption 6 Exemption 6 [redacted]>
Cc: <Drexler.Timothy@epamail.epa.gov>
Sent: Sunday, April 30, 2006 7:22 PM
Subject: Geo-probe results assessment

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EPA-R5-2013-003300RR-83

Charles Norris
<cnorris@geo-hydro.com>
05/02/2006 04:32 PM

To Timothy Drexler
cc Exemption 6
bcc
Subject Re: Geo-probe results assessment

Tim,

The following are my comments on first read of "Pines AOC II - Yard 520 Report April 2006.pdf" Due to your tight time frame I'm getting them out quickly. There may be other comments after I've read it another time or two, more closely.

The report should provide the borehole locations (x,y,z) and the depths from which the samples were collected. The Yard 520 FSP has an approximate map of proposed locations and a discussion of the anticipated depths of sampling, but that is not a substitute for making the implemented data available.

This sampling program, and other site sampling programs, require the ability to accurately distinguish between CCW/CCB and other soil-like materials, correctly recognized as a non-trivial task. The SMS and the various FSPs carefully use the term "suspected CCBs". That is a problem for background samples to be collected around the Pines area, and it is also a problem for the southern half of the Yard 520 landfill due to daily cover. The FSP specifically mentions the need for a geologic examination of the core to make sure only CCW/CCB is homogenized into the sample. If daily cover is also included, it would serve to dilute the chemistry of the waste. Presumably, the PRPs' consultants have developed, since publishing the SMS and FSPs, an identification protocol with which they are comfortable in distinguishing CCB/CCW from all other materials. That protocol should be identified and discussed as part of this report to provide confidence in the resulting discussions of the data. Further, it would be nice if the geologic descriptions of the cored soils were included with this report.

The Yard 520 FSP indicates there are to be 10 samples and a duplicate. The nomenclature of the data themselves indicate it likely there were 13 samples and a duplicate that may have been taken. If more samples were taken than the 10 required and reported, their analyses should also be part of the report. If the "001 through 003" samples do not exist or are other types of samples, some explanation should be provided in the report.

The Yard 520 FSP was designed to sample two vintages of wastes, those before and those after a switch sulfur management. The treatment and discussion of the results makes no attempt to investigate potential differences between these waste types. If there are differences, the proper investigation of the Pines area outside the landfill may require a consideration of the vintage of placed wastes as a variable in assessing potential risks. There should be an identification of which samples are of which vintage and an evaluation of spacial variations in the analytical results that (may) represent the vintage of generation.

The FSP specifies that the data analysis will include statistical analyses that are not included in the report, except for radionuclides. If the statistical data aren't included for non-radionuclides because

the data do not fit normal distributions, that should be expressly stated and the significance discussed; e.g., perhaps because the data are from two populations that are age-of-generation dependent. If the data for each contaminant class are normally distributed, both individual results and statistical assessments should be part of the report.

(On a related matter, since only shallow samples were to be collected according to the FSP, has anyone thought to verify that the crown of the south half of the landfill does, in fact, represent waste of varying ages and that the crown isn't an added topographic "finish" that represents only newer waste?)

The FSPs call for the collection of background samples from the Pines Area against which the landfill waste data are to be compared. Specifically, the Yard 520 FSP lists 25 background samples to be collected (10 from roadways, 10 from non-roadways, and 5 from wetlands) from areas "that are not known to contain suspected CCBs". [Aside: it would have been better to have had the FSP worded to say, "known not to contain suspected CCBs", since as structured the results will always be subject of dispute as to representativeness as valid background]. The landfill wastes are not compared to these background samples in this report. There is, in fact, no mention of these background samples in the discussion of the landfill wastes. Until the background soil samples have been collected, analyzed, and the results compared, recommendations regarding the need for subsequent sampling in the Pines Area are not appropriate and are not consistent with the FSPs that have been accepted.

I was caught by the magnitude of the difference between the human health and ecological screening standards being used for PCDDs/PCDFs. The standards being used imply a 5000x lower sensitivity of humans to these compounds than other mammals and birds in the ecology. If there is a biological basis for that degree of difference, it needs to be brought out and discussed. If the difference is strictly based on divergent regulatory decisions and precedent that doesn't have a biological basis of comparison, that needs to be acknowledged and discussed. As it stands now, the difference won't engender public confidence in decisions that are made based on it.

I'm uncomfortable with some of the assessment/discussion in the section on radionuclides. A significant element of the dismissal of the risks for the three radionuclides with 95% UCLs that exceed the respective PRGs is the assumption that the cancer risk is linearly dependent upon the concentration. I haven't run the equations myself in several years, so my memory may be faulty and I don't have time to check it out myself before Thursday. Presumably, someone there at EPA can quickly check. But, it seems to me that the dose:cancer-risk is not linear. I'm also uncomfortable with the approach that the potential risk from multiple radionuclides is simply the additive risks of each as though it were the sole agent. Again, I don't have time between now and Thursday to dig into this but maybe someone there can verify that there is no synergism or feed back that operates. Finally, I'm uncomfortable with the ease with which the authors slide from a potential risk of 1 in 1,000,000 to 3 in 10,000 as being equivalently acceptable, based upon USEPA consideration from a single CERCLA site. It would be worth making sure this isn't taken out of context.

Those are the major substantive things I saw first time through. From a stylistic approach, I don't see the need for revisiting all of the literature discussed in the SMS and the FSPs. It's been discussed twice. At issue is not what people have been able to put into the

literature in the past. At issue is what is the chemistry of the wastes in the south half of Yard 520. Further, including it makes it difficult to focus on what's from the site and to filter the extraneous commenting. Finally, the last two sentences in the lead paragraph of the introduction are overstated with respect to information available in this report and may not even be accurate. At present, the reader does not have confidence that the PRPs' consultants are able to distinguish waste in the landfill from daily cover and, therefore, that only waste was analyzed. The samples themselves are homogenization of the entire selected portion of the core deemed waste, not soil, so it isn't worst-case, it is an average. Finally, this sampling protocol looks only at waste since the late 1980s and provide no information relative to the composition of CCW/CCB from the 1960s, '79s, and early '80s. It is an untested presumption that earlier operations and coal sources produced combustion products that were no worse than what has been tested.

Have a good vacation and I'll talk with you when I get back.

Chuck

Charles H. Norris
Geo-Hydro, Inc.
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-84

Charles Norris
<cnorris@geo-hydro.com>
05/02/2006 06:33 PM

To Alan Murray
cc Timothy Drexler
bcc
Subject Re: Geo-probe results assessment

> Is it possible for you to condense this into several sentences that the lay person can understand?

Cathi,

Eventually, yes; in fact, that ultimately is my job under the TAP.

I copied my comments to you because I knew you'd read the report after Tim sent it to you. You asked for some feedback, so I thought I'd keep you in the loop with exchanges between me and EPA.

However, before I distill it for PINES, I think it would be best to wait until there is a final version of the report. Remember, Tim said this was not yet approved and, hopefully, it will see some significant changes. Since it is my understanding this report is not going to be a topic at the meeting Thursday, let's let my comments be digested and see what finally gets approved. Then I'll explain what the final document says and means, rather than this draft.

Chuck

Charles H. Norris
Geo-Hydro, Inc.
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-85

Timothy Drexler/R5/USEPA/US
05/03/2006 07:54 AM

To Charles Norris
cc Alan Murray
bcc
Subject Re: Geo-probe results assessment

Thanks for that response, Chuck. As with any draft document, the final version could be very different from what we are reviewing now and only the final version counts.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071
Charles Norris <cnorris@geo-hydro.com>

Charles Norris <cnorris@geo-hydro.com>
05/02/2006 06:33 PM

To
Subject Re: Geo-probe results assessment

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Chuck

Charles H. Norris
Geo-Hydro, Inc.
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-86

"[redacted]"
[redacted]
07/27/2006 03:10 AM

To Kenneth Theisen, Timothy Drexler, Kevin Herron
cc
bcc
Subject Yard 520

What are they doing there. When I was asked about the activity there I told everyone I thought they were getting ready to cap the "overrun" of flyash that had occurred along the north side along Hwy. 20. Now, yesterday, I see they have a large pile of what appears to be wood chips.

Comments?????

jan nona

EPA-R5-2013-003300RR-87

Charles Norris
<cnorris@geo-hydro.com>
10/02/2006 10:59 AM

To Timothy Drexler, Cathi Murray
cc
bcc
Subject Information Loop

Tim,

If you could either directly send me - or forward through Cathi - any electronic documents that are sent out (e.g., the maps of locations that are mentioned below) I would really appreciate it. Thanks in advance,

Chuck

> ----- Original Message ----- From: <Drexler.Timothy@epamail.epa.gov>
> To: <scott_hicks@nps.gov>; <Bob_Daum@nps.gov>;
<Johnson.Mark@epamail.epa.gov>; <Colledge.Michelle@epamail.epa.gov>;
<[redacted]>; <[redacted]>
> Sent: Monday, October 02, 2006 8:48 AM
> Subject: Fw: Pines AOC II -- Notification for RI Field Program -- 2nd
Quarter Sampling
>
>
>> Hi all:
>>
>> For your information.
>>
>> -Tim Drexler
>>
>>
>>
>>
>> ----- Forwarded by Timothy Drexler/R5/USEPA/US on 10/02/2006 08:45 AM
>> -----
>>
>> "Perry,
>> Elizabeth"
>> <EPerry@ensr.aec
>> om.com> To
>> Timothy Drexler/R5/USEPA/US@EPA,
>> 09/29/2006 04:43 KEVIN HERRON
>> PM <KHERRON@idem.in.gov>
>> cc
>> "Bradley, Lisa"
>> <lbradley@ensr.aecom.com>,
>> "DeJesus, Caryn"
>> <cdejesus@ensr.aecom.com>
>>
>>
>>
>>
>>
>>
>> Subject
>> FW: Pines AOC II -- Notification
>> for RI Field Program -- 2nd
>> Quarter Sampling

>>
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>>
>> Dear Tim and Kevin,
>>
>>
>> This email provides notification to the USEPA and IDEM of our intent to
>> conduct field work for the Remedial Investigation for the Pines Area of
>> Investigation starting on October 16, 2006. Our planned schedule is to
>> perform surface water and groundwater gauging on October 16 and 17.
>> Starting October 18, we plan to start the second sampling event, which
>> will consist of sampling monitoring wells, private wells, sediment, and
>> surface water. Maps of surveyed sample locations will be sent to you
>> via email prior to the start of the sampling program.
>>
>>
>> Please contact Lisa Bradley or me if you have any questions.
>>
>>
>> Elizabeth
>>
>>
>> A. Elizabeth Perry, P.G.
>> Senior Hydrogeologist
>> ENSR
>> Westford, MA, USA
>> tel: 978-589-3167
>> fax: 978-589-3100

--
Chuck

Charles H. Norris
Geo-Hydro, Inc.
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-88

Timothy Drexler/R5/USEPA/US
11/08/2006 04:41 PM

To kherron
cc Exemption 6
bcc
Subject MW wells removed during new capping operations at Yard 520?

Hi Kevin:

Hope your trip down to Evansville went well.

Cathi had a question that I could not answer regarding the new northern extension to the cap on Yard 520. Were any monitoring wells removed during that operation? If so, were they re-located?

Thanks, in advance, for checking.

EPA-R5-2013-003300RR-89

Alan Murray
<[redacted]
Exemption 6
12/11/2006 02:42 PM

To Timothy Drexler
cc
bcc
Subject Monitoring wells

Hi Tim,

Just a quick question - I was looking at the maps in the RI for proposed monitoring wells . It appears that a well was to be located in the vicinity of Lawrence's junk yard. Was that well put in? If not, what is the reason that it was not put in? Was a well in a different location around that area drilled for the purposes of the proposed well?

Hope you had a good Thanksgiving!

Cathi Murray

EPA-R5-2013-003300RR-90

Timothy Drexler/R5/USEPA/US
01/11/2007 10:37 AM

To Alan Murray
cc cnorris
bcc
Subject Re: Monitoring wells

Hi Cathi:

Sorry for the delay in response. Hope you had a good holiday.

Monitoring well MW 113 is the location that is east of the Lawrence Landfill.along Ardendale. It is near the intersection of Ardendale and 1675 North. A few weeks ago we received the results from the first round of groundwater sampling conducted last August. Those were a part of the large monthly report file that I sent in December. Yesterday I received from ENSR the Excel version of that sampling data and it is attached to this message. There was nothing interesting in that particular well in the first round: boron at 73.5 ppb and molybdenum at .73 ppb.

Last week, ENSR conducted aquifer tests (slug tests) of the wells. Bob Kay our part-time US Geological Survey team member witnessed the work. He reported that it went well. Next week ENSR will begin the third round of groundwater sampling. I will be there part of the time to oversee that sample collection.

Please call or write me if you have any additional questions.

Tim Drexler

ProgressReportTable_RIQ1_WG_WP_WS 12-15-06.xls

Alan Murray < Exemption 6 Exemption 6 >

Alan Murray
< Exemption 6
12/11/2006 02:42 PM

To
Subject Monitoring wells

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Hope you had a good Thanksgiving!

Cathi Murray

EPA-R5-2013-003300RR-91

Exemption 6

03/05/2007 06:00 AM

To Timothy Drexler

cc

bcc

Subject Jan. 07 Progress Report

Hi Tim - How are things in your goofy world - same old stuff here in the Pines.

I've been looking at the progress report. One thing - if you ever have any trouble getting access agreements from specific individuals, please let us know (Peggy most specifically) and we'll try to be of some help.

Then, I've been trying to read Attachment A (way over my head). I have a couple of questions. Was this test commissioned by the EPA thru ENSR? Why? When the EPA was conducting the tests here, while arsenic was one of the constituents tested, it didn't appear to be your greatest concern. Molybdenum, boron and manganese were those most mentioned. If a comparison to the Pines situation was what you were going for, why feed the swine the arsenic in a solid form. Why not have them ingest it via a groundwater source that same as we have had to do here. While conducting these tests did they also try to get any testing done for the "big 3"?

Basically, I'm confused (even more so than usual). While I know we had some very high arsenic test results (specifically Vernier), I don't understand the current high interest.

Looking forward to hearing from you.

jan nona

EPA-R5-2013-003300RR-92

Exemption 6

03/06/2007 04:00 PM

To Timothy Drexler
cc
bcc
Subject Re: Jan. 07 Progress Report

Thanks for responding so quickly. I'll look forward to hearing from Mark - but once again it may be over my head. Are you saying the PRP's ordered this study? I'll look forward to also visiting with you when you do some testing later this month - anytime.

jan nona
----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "Exemptio..." <Exer Exemption 6>
Cc: <Johnson.Mark@epamail.epa.gov>
Sent: Monday, March 05, 2007 2:46 PM
Subject: Re: Jan. 07 Progress Report

> Hi Jan:
>
> Good to hear from you. I will pass on to ENSR your comment about access.
>
> Regarding the arsenic ingestion tests for bioavailability, I asked Mark
> Johnson to respond to your health-related questions. He should be
> getting back to you soon.
>
> To partially answer your questions, the tests weren't commissioned by
> EPA, but EPA did accept the method to get information on ingestion of
> CCB's. We are requiring the PRP's to study the potential health effects
> from drinking, eating, inhaling, and rubbing the stuff on your skin. The
> swine tests are for the eating part. The samples, numbers TP026 and
> TP041, were taken along East Johns near Idaho and Ardendale between
> Pinney and Rt. 20, respectively, where we had higher arsenic hits in the
> soil. There is a map and more sampling information in the June 16, 2006
> monthly report. I've attached that to this note.
>
> I'm trying to schedule a public meeting in April. As soon as we can get
> a date set, I'll let you know. Otherwise, maybe I'll see you when they
> do more soil sampling later this month.
>
> -Tim
>
>
> (See attached file: Pines AOC II - Progress Report 6-15-06.pdf)
>
>
>
>
>
> "Exemptio..."
> <Exemption 6.
> net>
> To
> 03/05/2007 06:00 Timothy Drexler/R5/USEPA/US@EPA
> AM cc

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> "big 3"?
>
> Basically, I'm confused (even more so than usual). While I know we had
> some very high arsenic test results (specifically Vernier), I don't
> understand the current high interest.
>
> Looking forward to hearing from you.
>
> jan nona

--

No virus found in this incoming message.
Checked by AVG Free Edition.
Version: 7.5.446 / Virus Database: 268.18.7/711 - Release Date: 3/5/2007
9:41 AM

EPA-R5-2013-003300RR-93

Timothy Drexler/R5/USEPA/US
04/09/2007 08:19 AM

To kherron
cc
bcc
Subject Fw: Yard 520 erosion

Hi Kevin:

A note from Jan.

Tim

----- Forwarded by Timothy Drexler/R5/USEPA/US on 04/09/2007 08:19 AM -----

[redacted]
Exemption 6
04/08/2007 08:12 AM

To
Subject Yard 520 erosion

Is anybody looking into the serious erosion currently taking place on the north side of Yard 520? It really looks very bad.

jan nona

EPA-R5-2013-003300RR-94

Timothy Drexler/R5/USEPA/US
04/09/2007 09:13 AM

To Alan Murray
cc kherron, Kenneth Theisen
bcc
Subject Re: Fw: Yard 520

Hi Cathi:

Thanks for the heads-up. I have passed the photos on to Kevin Herron for follow up, since Yard 520 is regulated by IDEM. Jan Nona also sent me a note about erosion of the cap. I plan to be in the area next week to take a look also. As for surface water running into basements as a result of the cap extension to the north, the USGS maps that I've reviewed indicate that surface water would still flow toward Brown Ditch.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071
Alan Murray < Exemption 6 Exemption 6 >

Alan Murray
< Exemption 6 Exemption 6 [redacted]
04/07/2007 08:03 AM

To
Subject Fw: Yard 520

Tim,

Thought you might be interested in how the new cap on Yard 520 is doing. This is only part of the picture. The erosion is occurring all around the cap. Also, a resident on Walnut has reported that her basement has been constantly full of water since the capping. Could it be that the runoff water has nowhere else to go but across the highway and into residents basements ?

Cathi

----- Original Message -----
From: Tom Anderson
To: Exempti...
Cc: Chuck Norris ; lisa evans ; brian wright ; Charlotte Read ; nancy kolasa ; Cathi Murray ; hkuss@idem.IN.gov ; mwiseman@nirpc.org
Sent: Friday, April 06, 2007 10:46 AM
Subject: Yard 520

Jan:

Attached are photos showing the horrible erosion at Yard 520. I am trying to get someone to do a site

investigation.

Tom[attachment "4-3-2007-47.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "4-3-2007-48.jpg" deleted by Timothy Drexler/R5/USEPA/US]

EPA-R5-2013-003300RR-95

"HERRON, KEVIN" <KHERRON@idem.IN.gov>
04/09/2007 10:14 AM

To "[redacted]", Timothy Drexler, Kenneth Theisen
cc "HERRON, KEVIN", "OERTEL, BRUCE", "OSBORN, REX"
bcc
Subject RE: Yard 520 erosion

Jan,

Yes, IDEM staff have been dealing with this issue for over a week. I have forwarded information to Tim that you probably have already received or will be receiving soon from him on a recent site visit by IDEM staff. I may be in the area next week to observe some of the planned sampling activities and will check the landfill while present. I did make a note to the IDEM staff in Solid Waste Permitting last Fall that erosion would likely be a problem if it was very wet before vegetation could be established. For northern Indiana it was a relatively mild winter and very wet. It is my understanding that several residents are having trouble with water in their basements. I have recommended regular site visits/inspections until erosion is under control and vegetation can be established.

Kevin

From: [redacted] [mailto:[redacted]]
Sent: Sunday, April 08, 2007 9:12 AM
To: Drexler.Timothy@epamail.epa.gov; ken theisen; HERRON, KEVIN
Subject: Yard 520 erosion

Is anybody looking into the serious erosion currently taking place on the north side of Yard 520? It really looks very bad.

jan nona

EPA-R5-2013-003300RR-96

Exemption 6

04/09/2007 11:29 PM

To "HERRON, KEVIN", Timothy Drexler, Kenneth Theisen
cc "HERRON, KEVIN", "OERTEL, BRUCE", "OSBORN, REX"
bcc
Subject Re: Yard 520 erosion

Kevin: Thanks for the information. I will appreciate you keeping me informed of the progress.

jan nona

----- Original Message -----
From: HERRON, KEVIN
To: Exempti... ; Drexler.Timothy@epamail.epa.gov ; ken theisen
Cc: HERRON, KEVIN ; OERTEL, BRUCE ; OSBORN, REX
Sent: Monday, April 09, 2007 10:14 AM
Subject: RE: Yard 520 erosion

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Subject: Yard 520 erosion

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jan nona

No virus found in this incoming message.
Checked by AVG Free Edition.
Version: 7.5.446 / Virus Database: 269.0.0/752 - Release Date: 4/8/2007 8:34 PM

EPA-R5-2013-003300RR-97

Timothy Drexler/R5/USEPA/US
04/12/2007 03:07 PM

To Exemption 6
cc Kenneth Theisen, Charles Gebien
bcc
Subject Fw: Town of Pines Roads Response

Hi Cathi:

I spoke to Ken with regards to your issue with the local roads. EPA will not be requiring any additional work from the Pines Site responsible parties along those lines. EPA requires that contractors warrant their work for one year, which includes the installation of the municipal water lines. EPA's removal program asked the Pines contractor, D&M, to go back on two occasions to supplement the original road work. The contractor actually performed some repairs on the roads and right-a-ways long after the one year time period. In addition, on two occasions the D&M foreman toured the site with Council representative Vanessa Sick and the township maintenance person Dan Fries. The foreman and Ms. Sick agreed what repairs were needed to gain the Township's acceptance and the supplemental work was performed. We therefore consider the erosion problems that are apparent at this time maintenance issues.

The removal construction project was completed in accordance with agency policies and guidelines and is considered closed. The roads were inspected by the appropriate official before EPA gave the contractor the "completion certificate".There will be no further requests to the responsible parties by EPA with regard to the municipal water service project.

I'm sorry if you are disappointed with this portion of the Site results. EPA will continue to work with the community and the P.I.N.E.S. Group to complete the remedial investigation and feasibility study and ultimate decisions regarding the Pines Site.

Sincerely,

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

The Council person who now might be the council President is Vanessa Sick
The road crew.....(the guy on the dump truck) is Dan Fries

I'm guessing these e-mails are coming from the Mr.....not cathi.....just a hunch

He's probably out of work and has nothing else to do.....the so*

Alan Murray <Exemption 6 Exemption 6>

Alan Murray
Exemption 6 Exemption 6

04/12/2007 07:20 AM

To

Subject Fw: Town of Pines Roads

Gentlemen,

Please do not ignore this situation. There are still many residents who's lawns have not ever grown back as well. We were assured that the RP's would be made to put things back to the way they were found. Still our roads continue to fall apart due to poor repairs and our lawns are turning to mud due to the carelessness of the RP's. I look forward to your response to this matter.

Thank you,
Cathi Murray

----- Original Message -----
From: Alan Murray
To: Tim Drexler ; Theisen.Kenneth@epamail.epa.gov ; Gebien.Charles@epamail.epa.gov
Sent: Monday, April 02, 2007 1:27 PM
Subject: Town of Pines Roads

Hello Gentlemen,

Again I am imploring you to insist that our town roads be repaired and restored to the way they were BEFORE the water project. I will remind you that 2nd Place had been recently repaved prior to the water line. I am again attaching photos of the mess on our roads.

Thank you,
Cathi Murray

----- Original Message -----
From: Alan Murray
To: Theisen.Kenneth@epamail.epa.gov
Cc: Tim Drexler
Sent: Saturday, January 20, 2007 12:30 PM
Subject: Picture from Microsoft Digital Image

Ken,

Attached are pictures of the condition of our roads from August 2006. These areas continue to deteriorate with each season. Second place was repaved to about Carolina in 2003. The repair job done on it after the water pipe installation is awful as the pictures show. Can you really believe that our roads were repaired and left in the condition they were found before the water work ? Should the council have to deal with the project manager to get our roads restored when the contract states that everything will be left in the condition it was found or in better condition ? Shouldn't your representatives be arguing this point and making the RP's fulfill the signed agreement? This is just another example of the RP's attitude toward our town and it's residents of carelessness and disregard. Not to mention EPA's ineffectual response to the residents concerns!
A list of where the pictures were taken follows.

Cathi Murray

Exemption 6

[redacted]

Exemption 6

[attachment "Town Roads 002.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 003.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 004.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 005.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 006.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 007.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 008.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 009.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 010.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 011.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 012.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 013.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 014.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 015.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 016.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 017.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 018.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 019.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 020.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 021.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 022.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 023.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 024.jpg" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Town Roads 025.jpg" deleted by Timothy Drexler/R5/USEPA/US]

EPA-R5-2013-003300RR-98

Exemption 6

05/04/2007 12:26 PM

To Timothy Drexler, Kenneth Theisen

cc "Bud Prast", "Peggy Richardson", "Paul Kysel", "Cathi Murray", "Ellen Becker", "tom anderson", "brian wright"

bcc

Subject Yard 520 Erosion Problems

Tom Anderson of Save the Dunes asked that I forward the following to you. Can the EPA take any action if needed?

From Tom Anderson, Save the Dunes Council, May 4, 2007:

I talked with Bill Burns, IDEM today, Friday May 4, 2007. He inspected Yard 520 (Brown Landfill) on April 4 and said there was no leachate leaving the site. He saw the erosion problem.

He said he talked with Val Blumerfeld, representing Barry Brown. He said they talked again last weekend about it and Weaver Boos was out along with another contractor.

Bill said Val told IDEM they would fix the problems "as soon as they can".

He said he has not notified EPA.

jan nona

EPA-R5-2013-003300RR-99

Timothy Drexler/R5/USEPA/US
05/04/2007 03:42 PM

To "Exemp..."
cc
bcc
Subject Re: Yard 520 Erosion Problems

Hi Jan:

EPA can't take an action on a State administered landfill Site due to erosion issues if it doesn't impact the Site contaminants. When I walked around over there, I didn't see anything like that. I did talk to Valerie Blumenfeld myself earlier this week while I was overseeing soil sampling for the Pines Site . I discussed with her the complaint. She said that a crew would be out there soon to fix the problem. That's about the best I can do. Hopefully, by the public meeting (which is tentatively scheduled for Thursday, June 14th, so Kevin can make it) Kevin can give us an update on how well the work went.

-Tim

"Exempt..." < Exe Exemption 6 >

Exemption 6
05/04/2007 12:26 PM

To
Subject Yard 520 Erosion Problems

Tom Anderson of Save the Dunes asked that I forward the following to you. Can the EPA take any action if needed?

From Tom Anderson, Save the Dunes Council, May 4, 2007:

I talked with Bill Burns, IDEM today, Friday May 4, 2007. He inspected Yard 520 (Brown Landfill) on April 4 and said there was no leachate leaving the site. He saw the erosion problem.

He said he talked with Val Blumerfeld, representing Barry Brown. He said they talked again last weekend about it and Weaver Boos was out along with another contractor.

Bill said Val told IDEM they would fix the problems "as soon as they can".

He said he has not notified EPA.

jan nona

EPA-R5-2013-003300RR-100

[redacted]

05/04/2007 03:48 PM

To Timothy Drexler
cc
bcc
Subject Re: Yard 520 Erosion Problems

Thanks for the update. In my message from Kevin, he claimed it was not his responsibility - that I should contact Melessia Downham. I did this but haven't heard back from her. At least now, thanks to you, I know "a crew will be there to fix the problem". I'll continue to keep my eye out for progress.

jan nona
----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "[redacted]" <[redacted]>
Sent: Friday, May 04, 2007 3:42 PM
Subject: Re: Yard 520 Erosion Problems

> Hi Jan:
>
> EPA can't take an action on a State administered landfill Site due to
> erosion issues if it doesn't impact the Site contaminants. When I walked
> around over there, I didn't see anything like that. I did talk to
> Valerie Blumenfeld myself earlier this week while I was overseeing soil
> sampling for the Pines Site. I discussed with her the complaint. She
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> about the best I can do. Hopefully, by the public meeting (which is
> tentatively scheduled for Thursday, June 14th, so Kevin can make it)
> Kevin can give us an update on how well the work went.
>
> -Tim
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>
> "[redacted]"
> <[redacted].
> net>
> To
> 05/04/2007 12:26 PM Timothy Drexler/R5/USEPA/US@EPA,
> Kenneth Theisen/R5/USEPA/US@EPA
> cc
> "Bud Prast" <[redacted]>,
> "Peggy Richardson"
> <[redacted]>, "Paul Kysel"
> <[redacted]>, "Cathi
> Murray"
> <[redacted]>, "Ellen
> Becker"
> <[redacted]>, "tom
> anderson" <std@savedunes.org>,
> "brian wright"
> <bwright@hecweb.org>
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> jan nona
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> --
> No virus found in this incoming message.
> Checked by AVG Free Edition.
> Version: 7.5.467 / Virus Database: 269.6.2/787 - Release Date: 5/3/2007
> 2:11 PM
>
>

EPA-R5-2013-003300RR-101

Paul Kysel
[redacted] Exemption 6
05/22/2007 06:20 PM

To Timothy Drexler

cc Chuck NorrisH2Oconsultant, [redacted]

bcc

Subject P.I.N.E.S. Group communication from Executive Board

Good afternoon Tim. You may not remember me but I am now the VP of the Executive Board of P.I.N.E.S. At our most recent executive board meeting held on 5/17/07 it was decided by unanimous vote, to have me direct to you an electronic copy of the attached document - created at our direction by our TAP Grant consultant, Chuck Norris of Geo-hydro, entitled: Comments on Pines Area of Investigation Planning Documents and to notify you that it is our desire to ask EPA to plan to address the issues / points raised within this report at the next proposed public meeting (which we understand is tentatively scheduled for June 14th).

We ask for this discussion in the spirit of cooperation and feel it is necessary to flesh out these points so that we can best serve our community in the role that is ours to play in this situation. Given that a home is ultimately only as strong as its foundation, or a chain as strong as its weakest link - we feel after studying Mr. Norris' report that some significant problems exist with the agreement that is guiding all current EPA actions and the public needs to understand the inherent weaknesses and problems that will serve to undermine all efforts to eventually close out the problems that exist in the Pines area.

Our new secretary, Larry Silvestri, has, at the executive boards unanimous direction, sent hard copies of this same document, via certified mail, to you, Val Blumenthal - @ Brown, and Dan Sullivan @ Nipsco with a brief cover letter to you asking you please be prepared to address the issues raised at the next public meeting.

Tim, I am about to leave town for the next 14 days and will be unavailable from 5/24 to 6/8/07.

Once you have a solid date set for the June meeting please let our board know so that we might arrange for Chuck Norris to make necessary travel arrangements to be in attendance representing our interests.

Take care,

Paul Kysel
[redacted] Exemption 6
Home [redacted]
Cell # [redacted] Exemption 6

Add some color. Personalize your inbox with your favorite colors. Try it! Summary doc from Chuck Norris.pdf

EPA-R5-2013-003300RR-102

Larry Silvestri
Exemption 6
05/31/2007 06:24 PM

To Timothy Drexler

cc Ellen Becker, nancy kolasa, Janet Pope, Alan Murray, peggy, Exemption 6, Larry Silvestri, Exemptio..., Paul Kysel

bcc

Subject PINES Minutes May 17, 2007

Tim,
As you may already know, I am the new secretary of the P.I.N.E.S.
I read the TAP and learned that I send you the meeting minutes.
Here are the minutes from our last (and my first) meeting.
Larry Silvestri
Exemption 6
Exemption 6
Exemption 6

P.I.N.E.S Executive Board met on Thursday, May 17, 2007.

The meeting was called to order at 7:00 p.m. by President Bud Prast.

Members Present: Bud Prast, Paul Kysel, Peggy Richardson, and Diane Yagelski
Also Present: Nancy Kolasa, Larry Silvestri

A quorum was noted present.

Bud asked if NIPSCO requested the findings from Chuck Norris of Geo-Hydro, Inc. before their payment.

Paul thought that Chuck Norris' Summary of the Site Management Strategy, Field Sampling, and Human Health Risk Assessment Plan was the layman's guide that he requested. If NIPSCO needs confirmation of work before payment, then that Summary should be sufficient. There is an EPA meeting on June 14. We need to ask questions taken from Chuck Norris' summary. We need to get Chuck Norris here to meet with us the evening before the meeting. According to Chuck's Summary Cover Letter, that information is intended for distribution to the Town of Pines and the public.

Peggy asked if NIPSCO has a right to see GEO's work.

Paul said yes, these are the results of the work and NIPSCO needs to answer.

The board discussed GEO's invoices. Diane and Peggy are treasure and they signed $45,000 for work from Chuck. Need to make sure that he gets paid for the submitted invoices.

Peggy said that we will have to pay Chuck when he arrives, for his flight, car rental, meals, etc.

* Paul made a motion that, "We ask Chuck Norris to come here the day before the EPA meeting for a PINES Executive Board Meeting, and to stay here to attend the EPA meeting. Chuck Norris' expenses will be paid from the $4,500.00 TAP Grant."

The motion passed unanimously.

* Paul made a motion that, "We send the Geo Summary Document via certified mail to Tim Drexler of EPA, and that we CC Dan Sullivan of NIPSCO and Val Blumenfeld of Brown. We draft a cover letter requesting that the EPA address all the issues raised in the GEO Summary. We first email our Cover Letter and the GEO Summary to Tim Drexler and Brian Wright.
The motion passed unanimously.

* Paul made a motion to add Larry Silvestri as a new member to the PINES board, and that Larry Silvestri shall assume the duties of secretary.
The motion passed unanimously.

The Board discussed testing 80 homes for Boron and Molybdnium. Need to test because the plume may have changed direction.

Larry Silvestri will write a draft of the cover letter to send Chuck Norris Summary to EPA, NIPSCO and Brown. Paul will provide the addresses.

Paul made the motion supported by the majority and President Bud Prast declared the meeting adjourned.

EPA-R5-2013-003300RR-103

Larry Silvestri
[redacted]
06/02/2007 05:54 PM

To Timothy Drexler
cc [redacted], Janet Pope, peggy, [redacted], Chuck NorrisH2Oconsultant, [redacted], [redacted], [redacted], Paul Kysel
bcc
Subject Re: P.I.N.E.S. Group communication from Executive Board

Tim,
See you at 5:30.
Larry Silvestri
[redacted]

On May 31, 2007, at 10:05 AM, Drexler.Timothy@epamail.epa.gov wrote:

> Hi Paul:
>
> Thanks for the note and for the information from Mr. Norris. The
> public
> meeting will be on June 14th at 6:30 pm in the Michigan City Public
> Library. Janet Pope and I have scheduled the library meeting room at
> 5:30 and would like to have a meeting with the P.I.N.E.S. Board at that
> time in order to discuss TAP agreement progress. I hope that you can
> all
> make a pre-meeting at that time. If not, Janet and I could meet for a
> bit after the public meeting.
>
> Tim Drexler
> Remedial Project Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-6J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
> fax: 312.886.4071
>
>
>
> Paul Kysel
> <[redacted]
> [redacted] To
> 05/22/2007 06:20 Timothy Drexler/R5/USEPA/US@EPA
> PM cc
> Chuck NorrisH2Oconsultant
> <cnorris@geo-hydro.com>,
> <[redacted]>,
> <[redacted]>,
> <[redacted]>,
> <[redacted]>,
> <[redacted]>,
> <[redacted]>,
> <[redacted]>
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> Once you have a solid date set for the June meeting please let our
> board
> know so that we might arrange for Chuck Norris to make necessary travel
> arrangements to be in attendance representing our interests.
>
> Take care,
>
> Paul Kysel
> Exemption 6 otion 6
> Home #: Exemption 6
> Cell #: Exemption 6
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> Add some color. Personalize your inbox with your favorite colors. Try
> it!(See attached file: Summary doc from Chuck Norris.pdf)<Summary doc
> from Chuck Norris.pdf>

EPA-R5-2013-003300RR-104

Paul Kysel
<[redacted]
06/15/2007 08:30 AM

To Timothy Drexler

cc [redacted], Chuck NorrisH2Oconsultant, [redacted], peggy, silvestri, Janet Pope

bcc

Subject RE: P.I.N.E.S. Group communication from Executive Board

Good morning Tim - thanks so very much for making your self available to continue the meeting last night past the library's closure time. I think the dialog was needed and greatly assisted.

Something that was brought up last night during the public meeting was later discussed further when we parted company - this pertained to the comments made by some present that since the provision of municipal water they have seen a dramatic increase in standing water in yards, water entering basements, water overwhelming septic tanks, etc. Here is our concern:

Is it possible that the introduction of municipal water into the local area (by way of waste water being added to the local water table through septic system processing, watering of lawns, etc) has upset the previously existing balance of available water in the local water table / aquifer and what was being drawn out for consumption by residential wells versus what could be handled by the local area for drainage, septic system processing / drainage fields, etc and that the resulting consequences are beginning to be seen as properties that were historically dry are becoming saturated, basements are flooding, septic systems are filling with water, etc?

If this is a possibility, then we feel it this merits EPA evaluation & attention and if verified (or even suspected) then the potentially responsible parties must also yet bear the responsibility for this new problem as well. If indeed this is occurring, at what point will there exist another health crisis in the neighborhood, created by the inability of local septic systems from being able to safely dispose of waste? Would the folks who are reporting some of the problems noted above pass a simple County Health Dept. perk test for a septic system?

Tim, I don't want to sound like chicken little, but at the same time I don't want EPA to miss a potentially developing related problem, additionally if the underlying aquifer is now filling with more water than the surrounding land area can handle efficiently, a side issue I would imagine would also be that the concentrations of contaminants previously found will drop, but not due to anything good - just that they are being diluted further by the increase in available water.

Can you please let us know your thoughts on these points?

Again, thanks so much for your time and patience with us.

Paul Kysel - P.I.N.E.S. VP

> Subject: Re: P.I.N.E.S. Group communication from Executive Board
> To: [redacted]
> CC: [redacted]; cnorris@geo-hydro.com; [redacted]

[redacted] Exemption 6 ; [redacted] Exemption 6 ; Pope.Janet@epamail.epa.gov
> From: Drexler.Timothy@epamail.epa.gov
> Date: Thu, 31 May 2007 10:05:41 -0500
>
> Hi Paul:
>
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> meeting will be on June 14th at 6:30 pm in the Michigan City Public
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> Tim Drexler
> Remedial Project Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-6J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
> fax: 312.886.4071
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> Paul Kysel
> <[redacted] Exemptio... ıption 6
> [redacted] Exemptio...
[redacted] To
> 05/22/2007 06:20 Timothy Drexler/R5/USEPA/US@EPA
> PM cc
> Chuck NorrisH2Oconsultant
> <cnorris@geo-hydro.com>,
> <[redacted] Exemption 6 Exemption 6 >,
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> Subject
> P.I.N.E.S. Group communication
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> Take care,
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> Paul Kysel
> [redacted]
> Home #: [redacted]
> Cell #: [redacted]
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>
> Add some color. Personalize your inbox with your favorite colors. Try
> it!(See attached file: Summary doc from Chuck Norris.pdf)

Change is good. See what's different about Windows Live Hotmail. Check it out!

EPA-R5-2013-003300RR-105

Larry Silvestri
Exemption 6

06/23/2007 07:20 PM

To Timothy Drexler
cc nancy kolasa, Exem... Nona, Paul Kysel, Peggy Richardson
bcc
Subject PINES Access Agreement

Tim,

I am going to draft a letter to those residents who responded negatively, or did not respond at all, to your request for access to their property.

If I may, I would like to read the access agreement letter that they received. That way, I can rephrase your request and not change the intent. Would you please reply with an attached copy of their letter?

Thank you,
Larry SIlvestri
Exemption 6

EPA-R5-2013-003300RR-106

Timothy Drexler/R5/USEPA/US
06/25/2007 11:09 AM

To lbradley
cc
bcc
Subject Fw: PINES Access Agreement

Hi Lisa:

Thie P.I.N.E.S. group would like to help out with the access agreements. Could someone get back to Larry with an electronic version of the form letter?

-Tim

----- Forwarded by Timothy Drexler/R5/USEPA/US on 06/25/2007 11:07 AM -----

Larry Silvestri
Exemption 6
06/23/2007 07:20 PM

To
Subject PINES Access Agreement

Tim,

I am going to draft a letter to those residents who responded negatively, or did not respond at all, to your request for access to their property.

If I may, I would like to read the access agreement letter that they received. That way, I can rephrase your request and not change the intent. Would you please reply with an attached copy of their letter?

Thank you,
Larry SIlvestri
Exemption 6

EPA-R5-2013-003300RR-107

"Bradley, Lisa"
<lbradley@ensr.aecom.com>
06/29/2007 09:58 AM

To "Larry Silvestri"
cc [redacted], Timothy Drexler, "DeJesus, Caryn"
bcc
Subject RE: Pines - Access Files

Hi Larry!

Yes, please have any access agreements sent to the following:

Tina Santos
ENSR
2 Technology Park Drive
Westford, MA 01886

Tina is the person here who is doing all the administrative tracking for us. Any questions can be directed to Caryn or me. We have been providing the residents with self-addressed stamped envelopes for return of the agreements (though in the middle of our efforts, the post office increased the first class postage on us!).

Thanks! :) LIAS

Lisa JN Bradley, Ph.D., DABT
Senior Toxicologist
ENSR
2 Technology Park Drive
Westford, MA 01886
978-589-3059 (direct)
978-846-3463 (cell)
866-758-4856 (fax)
lbradley@ensr.aecom.com
www.ensr.aecom.com
978-589-3000

From: Larry Silvestri [mailto:[redacted]]
Sent: Friday, June 29, 2007 8:30 AM
To: Bradley, Lisa
Cc: [redacted]; Drexler.Timothy@epamail.epa.gov
Subject: Re: Pines - Access Files

Lisa,

We are first calling these residents on your list. Those who we can't reach and persuade by phone, we will mail. Do you want the signed agreements to be returned to your address at 2 Technology Park Drive?

Larry SIlvestri
[redacted]

On Jun 26, 2007, at 3:33 PM, Bradley, Lisa wrote:

Nancy -

Thank you so much for volunteering additional help with our efforts to obtain access for additional work on the Pines Area of Investigation project. Attached is the template for our letter that we have sent to all homeowners identified for this work. As you know, ENSR is continuing to make progress on obtaining the access agreements, so I would request that you coordinate your efforts very closely with Caryn DeJesus (we do appreciate that you two have such a good working relationship!). Her contact info, as well as mine, is below. I'm cc:ing Larry Silvestri as he also requested the letter template, as well as the remaining access agreements needed, through Tim Drexler. Larry - hopefully this version of the missing agreements list meets your needs - we tried to format it so that it is legible for you when it prints!

Thank you again!

:) LISA Project Manager

<<MissingAgreements_062607.pdf>> <<CCB-VI_FormLetter.doc>>

_____

Lisa JN Bradley, Ph.D., DABT
Senior Toxicologist
ENSR
2 Technology Park Drive
Westford, MA 01886
978-589-3059 (direct)
978-846-3463 (cell)
866-758-4856 (fax)
lbradley@ensr.aecom.com
www.ensr.aecom.com
978-589-3000

Caryn DeJesus
Section Manager
ENSR
2 Technology Park Drive
Westford, MA 01886
978-589-3407 (Direct)
978-589-3282 (Fax)
www.ensr.aecom.com

<MissingAgreements_062607.pdf><CCB-VI_FormLetter.doc>

EPA-R5-2013-003300RR-108

Charles Norris
<cnorris@geo-hydro.com>
08/28/2007 01:27 PM

To Timothy Drexler
cc silvestri, peggy, Exemp... , Exemption 6 , Exemption 6 ;
bcc
Subject Re: Historical CCB color at Pines

Tim,
When we were in Town of Pines in June, Mark and I picked up four samples of soils that, based upon my experience, are likely CCWs. Two are from the neighborhood and two from along the west edge of Poplar Road, west of Yard 520, in the general vicinity of the leachate seeps. I would be happy to send you splits of these samples if you'd like. I qualify the identification with "likely" because I know of no way to confirm a distinction of some CCWs from other sediments/soils of similar color and texture short of x-ray diffraction. X-ray confirmation has surprised me both ways, by the way.
--
Chuck

Charles H. Norris
Geo-Hydro, Inc.
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-109

"Mark Hutson"
<[redacted]@geo-hydro.com>
08/28/2007 01:47 PM

To: Timothy Drexler, silvestri, peggy, [redacted], [redacted], cnorris
cc:
bcc:
Subject: RE: Historical CCB color at Pines

Tim
In addition to what Chuck had to say, some of the light gray materials that we picked-up along the side streets and in area where the leachate seeps were flowing into the ditch contained small particles of unburned coal .

Mark

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Tuesday, August 28, 2007 11:24 AM
To: [redacted]; [redacted]; [redacted]; [redacted]; cnorris@geo-hydro.com; [redacted]@geo-hydro.com
Subject: Historical CCB color at Pines

Hi all:

I got this email message from ENSR following a discussion I had last week with ENSR and IDEM regarding describing the CCBs that are anticipated in Pines area residential properties. If you have any information to the contrary, please let me know ASAP. Otherwise the description process will be relatively straightforward.

Thanks.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

(See attached file: Memo-Tan_CCBs.pdf)

EPA-R5-2013-003300RR-110

Timothy Drexler/R5/USEPA/US
08/28/2007 02:09 PM

To "Mark Hutson", cnorris
cc
bcc
Subject RE: Historical CCB color at Pines

Hi Mark and Chuck:

Could you call me when you can at 312-353-4367?

-Tim

"Mark Hutson" <[redacted]@geo-hydro.com>

"Mark Hutson" <[redacted]@geo-hydro.com>
08/28/2007 01:47 PM

To
Subject RE: Historical CCB color at Pines

Tim
In addition to what Chuck had to say, some of the light gray materials that we picked-up along the side streets and in area where the leachate seeps were flowing into the ditch contained small particles of unburned coal .

Mark

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From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Tuesday, August 28, 2007 11:24 AM
To: [redacted]; [redacted]; [redacted]; [redacted]; cnorris@geo-hydro.com; [redacted]@geo-hydro.com
Subject: Historical CCB color at Pines

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fax: 312.886.4071

(See attached file: Memo-Tan_CCBs.pdf)

EPA-R5-2013-003300RR-111

Larry Silvestri
Exemption 6
08/29/2007 09:53 AM

To Timothy Drexler
cc Larry Silvestri, Peggy Richardson, Cathi Murray, Exemptio..., Exem... Nona, Charles Norris
bcc
Subject Fwd: Historical CCB color at Pines

Tim,

Reliance upon soil color for CCB identification is not reliable.

1.) Here is the quote from SMS Appendix F:
"Town of Pines Town Board Meeting Notes (May 6, 1975), received from USEPA May 11, 2004 "The town board is using the ash on Birch Street south of 20 and along Railroad Ave. to the County Line; to fill Henry between Louisiana Ave. and Ardendale Ave.; to extend E. Johns Ave. to Columbia; and to join E. John Ave. with Idaho Ave. and Florida Ave." "
This reference only verifies that ash was used as fill on those stated streets, not the color or source.

2.) And here is the quote from SMS Vol II D-3:
"NIPSCO's Michigan City Generating Station switches from Illinois Basin coals to Powder River coals (high sulfur low calcium to low sulfur high calcium) in 1992 (K. Strnatka of NIPSCO, personal communication, 2004) "

3.) However, on the top of this same page SMS Vol II D-3, there is a table that lists sources of wastes that include fly ash from MC NIPSCO, as well as from Bailly NIPSCO and DM NIPSCO. The color of those CCB's are not known.

4.) Furthermore, the reliance on 30 year old memory of Brown Inc. personnel is not reliable.

5.) Regardless, cited evidence is contradicted by recent observations by GEO-Hydro hydrologists.
Charles H. Norris:
"in Town of Pines in June, Mark and I picked up four samples of soils that, based upon my experience, are likely CCWs."
And Mark Huston:
"some of the light gray materials that
we picked-up along the side streets and in area where the leachate seeps were flowing into the ditch contained small particles of unburned coal."

Larry Silvestri
Exemption 6

Begin forwarded message:

> From: Drexler.Timothy@epamail.epa.gov
> Date: August 28, 2007 12:24:10 PM CDT
> To: Exemption 6, Exemption 6,
> Exemption 6 Exemption 6, Exemption 6 Exemption 6, cnorris@geo-hydro.com,
> Exemption 6 @geo-hydro.com
> Subject: Historical CCB color at Pines

>
>
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> Thanks.
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> Tim Drexler
> Remedial Project Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-6J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
> fax: 312.886.4071
>

> (See attached file: Memo-Tan_CCBs.pdf) Memo-Tan_CCBs.pdf

EPA-R5-2013-003300RR-112

Timothy Drexler/R5/USEPA/US
08/29/2007 10:22 AM

To Larry Silvestri
cc Cathi Murray, Charles Norris, [redacted], Peggy Richardson, [redacted] Nona, Larry Silvestri
bcc
Subject Re: Fwd: Historical CCB color at Pines

Hi Larry:

Please give Chuck a call. I had a conversation with him and Mark Hutson yesterday regarding this issue after I sent my email message. Based on the information I have, including that conversation, we should be able to use color and other physical properties as an indicator of CCBs in the neighborhood. I saw the cores from both the north and south cells of Yard 520. Those cores confirm ENSR's descriptions and Chuck's observations. The older CCBs in the area, including those in the neighborhood, are light grey to black and from clay to gravel sized. The newer CCB that appears to be only in the south cell of Yard 520 is tan in color and clay-sized containing dark grey to black grains. We will take a conservative approach and describe any fine-grained light grey soils as CCB's in addition to the more obvious dark grey to black CCBs.

I will be on site for most of next week Tuesday to Friday to oversee ENSR's descriptions. Chuck told me that he may also be in the area to observe. Please feel free to call me to discuss.

Tim Drexler

Larry Silvestri <[redacted]>

Larry Silvestri
[redacted]
08/29/2007 09:53 AM

To
Subject Fwd: Historical CCB color at Pines

Tim,

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Charles H. Norris:
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we picked-up along the side streets and in area where the leachate seeps were flowing into the ditch contained small particles of unburned coal."

Larry Silvestri
[redacted]

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> From: Drexler.Timothy@epamail.epa.gov
> Date: August 28, 2007 12:24:10 PM CDT
> To: [redacted], [redacted],
> [redacted], [redacted], cnorris@geo-hydro.com,
> [redacted]@geo-hydro.com
> Subject: Historical CCB color at Pines
>
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> Thanks.
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> Tim Drexler
> Remedial Project Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-6J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
> fax: 312.886.4071
>

> (See attached file: Memo-Tan_CCBs.pdf) Memo-Tan_CCBs.pdf

EPA-R5-2013-003300RR-113

"Mark Hutson"
<[redacted]@geo-hydro.com>
08/29/2007 11:20 AM

To "'Larry Silvestri'", Timothy Drexler
cc "'Peggy Richardson'", "'Cathi Murray'", "[redacted] Nona'", "'Charles Norris'"
bcc
Subject RE: Historical CCB color at Pines

Larry and All,

After we responded to Tim's e-mail yesterday he asked to talk to Chuck and I. We had a phone call later in the afternoon which resulted in Tim saying that he will be out there next week and he will assume that anything that is not the natural tan sand that one typically sees out there is CCB until they can prove otherwise. We agreed that was an appropriate way to proceed.

We also discussed the groundwater model that the respondents will be doing. They are initially going to be doing a flow model that will simulate the migration of groundwater beneath the area. This model will be used to track the flow paths of particles of water so they can evaluate where water flowing from Yard 520 and other outlying areas would be expected to flow. We asked if the flow model will be set-up in a manner to allow it to be used to evaluate the possibility that supplying residents with city water could have the effect of raising the water table and causing the wet basement problems that some residents are experiencing. He indicated that he would bring this up to the respondents up front so that the model would be set-up to allow this evaluation.

By the way, the comments you provided were very good. Keep up the good work.

Mark

-----Original Message-----
From: Larry Silvestri [mailto:[redacted]]
Sent: Wednesday, August 29, 2007 8:54 AM
To: Drexler.Timothy@epamail.epa.gov
Cc: Larry Silvestri; Peggy Richardson; Cathi Murray; [redacted]@geo-hydro.com; [redacted] Nona; Charles Norris
Subject: Fwd: Historical CCB color at Pines

Tim,

Reliance upon soil color for CCB identification is not reliable.

1.) Here is the quote from SMS Appendix F:
"Town of Pines Town Board Meeting Notes (May 6, 1975), received from USEPA May 11, 2004 "The town board is using the ash on Birch Street south of 20 and along Railroad Ave. to the County Line; to fill Henry between Louisiana Ave. and Ardendale Ave.; to extend E. Johns Ave. to Columbia; and to join E. John Ave. with Idaho Ave. and Florida Ave." "
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"some of the light gray materials that
we picked-up along the side streets and in area where the leachate seeps
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Larry Silvestri
Exemption 6

Begin forwarded message:

> **From:** Drexler.Timothy@epamail.epa.gov
> **Date:** August 28, 2007 12:24:10 PM CDT
> **To:** Exemption 6, Exemption 6, Exe Exemption 6, Exemption 6 Exemption 6, cnorris@geo-hydro.com, Exemption 6@geo-hydro.com
> **Subject: Historical CCB color at Pines**
>
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> Thanks.
>
> Tim Drexler

Remedial Project Manager
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Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

(See attached file: Memo-Tan_CCBs.pdf)

EPA-R5-2013-003300RR-114

Timothy Drexler/R5/USEPA/US
09/18/2007 09:56 AM

To [redacted], peggy, silvestri, [redacted], [redacted], [redacted], [redacted], cnorris, vblumenfeld, dsullivan
cc lbradley, Janet Pope, Joan Tanaka
bcc
Subject Notification to Pines Township residents of discontinuing of bottled water

Hi everyone:

For your files, attached please find an example of the letters that will be sent this week to the eight residents that live south of road 1675 North in the Pines Township regarding discontinuing bottled water service. I first announced the discontinuation during the June 14, 2007 public meeting. This letter follows up on that announcement.

Please call me if you have any questions.

Tim Drexler
phone: 312.353.4367

bottled_wtr_discont_2.doc

EPA-R5-2013-003300RR-115

"Mark Hutson"
<Exemption 6@geo-hydro.com>
09/18/2007 10:54 AM

To Timothy Drexler
cc
bcc
Subject RE: Notification to Pines Township residents of discontinuing of bottled water

Tim

Was there any documentation produced that summarizes how you came to the conclusion that those wells are not affected by ash? I'm guessing that we'll be asked about it. I was wondering if we know that there are not scattered ash fill deposits south of 1675 that are leaking through fractured till?

Thanks
Mark

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Tuesday, September 18, 2007 8:56 AM
To: Exemption 6 Exemption 6; Exemption 6; Exemption 6;
Exemption 6 Exemption 6; Exemption 6 Exemption 6; Exemption 6 Exemption 6;
Exemption 6@geo-hydro.com; cnorris@geo-hydro.com; vblumenfeld@bibtc.com;
dsullivan@nisource.com
Cc: lbradley@ensr.com; Pope.Janet@epamail.epa.gov;
Tanaka.Joan@epamail.epa.gov
Subject: Notification to Pines Township residents of discontinuing of bottled water

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Please call me if you have any questions.

Tim Drexler
phone: 312.353.4367

(See attached file: bottled_wtr_discont_2.doc)

EPA-R5-2013-003300RR-116

Timothy Drexler/R5/USEPA/US
09/19/2007 02:02 PM

To "Mark Hutson"
cc Bob Kay
bcc
Subject RE: Notification to Pines Township residents of discontinuing of bottled water

Hi Mark:

First, a clarification. [redacted]

[redacted]

There are a few lines of evidence that remove the ground water wells in the area south of [redacted] First, well information shows that there is no usable shallow aquifer this far south (see the "Areal Extent of Surficial Aquifer" map generated by ENSR). In a location just north of the viaduct the sand thickness is down to 3 ft. You should also have copies of the cross-sections showing the surficial sand pinchout. We have no record of flyash deposits south of those well locations. Groundwater flow is to the north. There is also no reason to invoke a mechanism that relys on the possibility of an undocumented flyash deposit in the south area that, through fractures in the underlying till, is contaminating wells in the lower aquifer. We already know that the lower aquifer that is used for drinking water has natural mineralization, which includes boron and molybdenum, at levels we found some southern wells. The isotopic study of the Pines Grade School and other wells that USGS performed showed that the boron was naturally occuring. Finally, we have a year of sampling data for PW009, PW012, PW013, and MW113. All of the boron and molybdenum analyses have come out well below our screening values.

I don't have a valid reason for continuing to require the PRPs to provide bottled water to the far south area.

I hope this is helpful, Mark. Please call me if we need to discuss more.

-Tim

"Mark Hutson" <[redacted]@geo-hydro.com>

"Mark Hutson" <[redacted]@geo-hydro.com>
09/18/2007 10:54 AM

To
Subject RE: Notification to Pines Township residents of discontinuing of bottled water

Tim

Was there any documentation produced that summarizes how you came to the conclusion that those wells are not affected by ash? I'm guessing that we'll be asked about it. I was wondering if we know that there are not scattered ash fill deposits south of 1675 that are leaking through fractured till?

Thanks
Mark

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[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Tuesday, September 18, 2007 8:56 AM
To: [redacted]; [redacted]; [redacted]; [redacted]; [redacted]; [redacted]; [redacted]@geo-hydro.com; cnorris@geo-hydro.com; vblumenfeld@bibtc.com; dsullivan@nisource.com
Cc: lbradley@ensr.com; Pope.Janet@epamail.epa.gov; Tanaka.Joan@epamail.epa.gov
Subject: Notification to Pines Township residents of discontinuing of bottled water

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Tim Drexler
phone: 312.353.4367

(See attached file: bottled_wtr_discont_2.doc)

EPA-R5-2013-003300RR-117

"Mark Hutson"
<[redacted]@geo-hydro.com>
09/21/2007 12:31 PM

To Timothy Drexler
cc
bcc
Subject RE: Notification to Pines Township residents of discontinuing of bottled water

Thanks Tim
I'm sure this will help when the topic comes up. The lingering question in the back of my mind is whether there really are no fly ash deposits to the south or if they just haven't been documented. We, and I'm sure you too, probably run into contaminants that migrate through fractured tills fairly frequently. Maybe the citizens will be able to tell me that they don't know of ash deposits down south. I'll see what I can find out.

I hope things are going well with you.
Have a nice weekend.
Mark

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Wednesday, September 19, 2007 1:03 PM
To: Mark Hutson
Cc: kay.bob@epamail.epa.gov
Subject: RE: Notification to Pines Township residents of discontinuing of bottled water

Hi Mark:

First, a clarification. [redacted]

There are a few lines of evidence that remove the ground water wells in the area south of 1675. First, well information shows that there is no usable shallow aquifer this far south (see the "Areal Extent of Surficial Aquifer" map generated by ENSR). In a location just north of the viaduct the sand thickness is down to 3 ft. You should also have copies of the cross-sections showing the surficial sand pinchout. We have no record of flyash deposits south of those well locations. Groundwater flow is to the north. There is also no reason to invoke a mechanism that relys on the possibility of an undocumented flyash deposit in the south area that, through fractures in the underlying till, is contaminating wells in the lower aquifer. We already know that the lower aquifer that is used for drinking water has natural mineralization, which includes boron and molybdenum, at levels we found some southern wells. The isotopic study of the Pines Grade School and other wells that USGS performed showed that the boron was naturally occuring. Finally, we have a year of sampling data for PW009, PW012, PW013, and MW113. All of the boron and molybdenum analyses have come out well below our screening values.

I don't have a valid reason for continuing to require the PRPs to provide

bottled water to the far south area.

I hope this is helpful, Mark. Please call me if we need to discuss more.

-Tim

"Mark Hutson"
<[redacted]@geo-hydro.com>

09/18/2007 10:54 AM

To: Timothy Drexler/R5/USEPA/US@EPA

cc:

Subject: RE: Notification to Pines Township residents of discontinuing of bottled water

Tim

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Sent: Tuesday, September 18, 2007 8:56 AM
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Cc: lbradley@ensr.com; Pope.Janet@epamail.epa.gov; Tanaka.Joan@epamail.epa.gov
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Tim Drexler
phone: 312.353.4367

(See attached file: bottled_wtr_discont_2.doc)

EPA-R5-2013-003300RR-118

Timothy Drexler/R5/USEPA/US
09/21/2007 12:49 PM

To "Mark Hutson"
cc
bcc
Subject RE: Notification to Pines Township residents of discontinuing of bottled water

Thanks, Mark. Obviously, all of this is still (pardon the pun) fluid. If I get information that gives me reason to go a different direction, I will. At this point, though, we have canvassed the locals and their records, sent inspectors out, and done some spot sampling. I have to go with what we have right now.

take care.

Tim

"Mark Hutson" <Exemption 6@geo-hydro.com>

"Mark Hutson" <Exemption 6@geo-hydro.com>
09/21/2007 12:31 PM

To
Subject RE: Notification to Pines Township residents of discontinuing of bottled water

Thanks Tim
I'm sure this will help when the topic comes up. The lingering question in the back of my mind is whether there really are no fly ash deposits to the south or if they just haven't been documented. We, and I'm sure you too, probably run into contaminants that migrate through fractured tills fairly frequently. Maybe the citizens will be able to tell me that they don't know of ash deposits down south. I'll see what I can find out.

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Exemption 6

[redacted]

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-Tim

"Mark Hutson"
<[redacted]@geo-hydro.com>

09/18/2007 10:54 AM

To
Timothy Drexler/R5/USEPA/US@EPA

cc

Subject
RE: Notification to Pines Township residents of discontinuing of bottled water

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Cc: lbradley@ensr.com; Pope.Janet@epamail.epa.gov; Tanaka.Joan@epamail.epa.gov
Subject: Notification to Pines Township residents of discontinuing of bottled water

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For your files, attached please find an example of the letters that will be sent this week to the eight residents that live south of road 1675 North in the Pines Township regarding discontinuing bottled water service. I first announced the discontinuation during the June 14, 2007 public meeting. This letter follows up on that announcement.

Please call me if you have any questions.

Tim Drexler
phone: 312.353.4367

(See attached file: bottled_wtr_discont_2.doc)

EPA-R5-2013-003300RR-119

"Mark Hutson"
<Exemption 6 @geo-hydro.com>
09/21/2007 01:05 PM

To Timothy Drexler
cc
bcc
Subject RE: Notification to Pines Township residents of discontinuing of bottled water

Tim

Oh good, it makes me feel better to know that there has been some checking done.
I appreciate your efforts.

The PINES group has a new member (Larry Jensen) who is a health physicist, apparently an ex-EPA employee, who is interested in the Yard 520 and background radionuclide characterization. The group has asked us to look at his concerns and pass on to you those that we think need some clarification. I'll be sending the questions to you shortly.

Mark

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Friday, September 21, 2007 11:49 AM
To: Mark Hutson
Subject: RE: Notification to Pines Township residents of discontinuing of bottled water

Thanks, Mark. Obviously, all of this is still (pardon the pun) fluid. If I get information that gives me reason to go a different direction, I will. At this point, though, we have canvassed the locals and their records, sent inspectors out, and done some spot sampling. I have to go with what we have right now.

take care.

Tim

"Mark Hutson"
<Exemption 6 @geo-hydro.com>
09/21/2007 12:31 PM

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject
RE: Notification to Pines
Township residents of
discontinuing of bottled water

Thanks Tim
I'm sure this will help when the topic comes up. The lingering question in the back of my mind is whether there really are no fly ash deposits to the south or if they just haven't been documented. We, and I'm sure you too,
probably run into contaminants that migrate through fractured tills fairly frequently. Maybe the citizens will be able to tell me that they don't know of ash deposits down south. I'll see what I can find out.

I hope things are going well with you.
Have a nice weekend.
Mark

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Wednesday, September 19, 2007 1:03 PM
To: Mark Hutson
Cc: kay.bob@epamail.epa.gov
Subject: RE: Notification to Pines Township residents of discontinuing of bottled water

Hi Mark:

First, a clarification. [redacted]

Exemption 6

[redacted]

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have come out well below our screening values.

I don't have a valid reason for continuing to require the PRPs to provide bottled water to the far south area.

I hope this is helpful, Mark. Please call me if we need to discuss more.

-Tim

"Mark Hutson"
<[redacted]@geo-hydro.com>

09/18/2007 10:54 AM

To: Timothy Drexler/R5/USEPA/US@EPA

cc:

Subject: RE: Notification to Pines Township residents of discontinuing of bottled water

Tim

Was there any documentation produced that summarizes how you came to the conclusion that those wells are not affected by ash? I'm guessing that we'll be asked about it. I was wondering if we know that there are not scattered ash fill deposits south of 1675 that are leaking through fractured till?

Thanks
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[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Tuesday, September 18, 2007 8:56 AM
To: [redacted]; [redacted]; [redacted]; [redacted]; [redacted]; [redacted]; [redacted]@geo-hydro.com; cnorris@geo-hydro.com; vblumenfeld@bibtc.com; dsullivan@nisource.com
Cc: lbradley@ensr.com; Pope.Janet@epamail.epa.gov; Tanaka.Joan@epamail.epa.gov
Subject: Notification to Pines Township residents of discontinuing of

bottled water

Hi everyone:

For your files, attached please find an example of the letters that will be sent this week to the eight residents that live south of road Exemption 6 in the Pines Township regarding discontinuing bottled water service. I first announced the discontinuation during the June 14, 2007 public meeting. This letter follows up on that announcement.

Please call me if you have any questions.

Tim Drexler
phone: 312.353.4367

(See attached file: bottled_wtr_discont_2.doc)

EPA-R5-2013-003300RR-120

Timothy Drexler/R5/USEPA/US
09/21/2007 01:22 PM

To "Mark Hutson"
cc
bcc
Subject RE: Notification to Pines Township residents of discontinuing of bottled water

No problem, Mark.

"Mark Hutson" <[redacted]@geo-hydro.com>

"Mark Hutson" <[redacted]@geo-hydro.com>
09/21/2007 01:20 PM

To
Subject RE: Notification to Pines Township residents of discontinuing of bottled water

Tim

The group asked us to send the comments to you, so if you don't mind, I'll go ahead and send them to you and you can forward them to Gene or ENSR or whoever. I' haven't met Larry myself, so I don't know how much direct interaction he wants to have.

Thanks
Mark

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Friday, September 21, 2007 12:15 PM
To: Mark Hutson
Cc: Jablonowski.Eugene@epamail.epa.gov
Subject: RE: Notification to Pines Township residents of discontinuing of bottled water

Thanks, Mark. I know Larry very well. You can tell him from me that since I don't personally know beans about radionuclides he can contact Gene Jablonowski directly, if he wishes. Gene helped me with that aspect of our review of ENSR documents. We sent an initial rad report that ENSR generated back to them with a number of comments. ENSR will have to wait until the conclusion of the soil evaluation to revise and update that document.

-Tim

"Mark Hutson"
<[redacted]@geo-hydro.com>
09/21/2007 01:05

To
Timothy Drexler/R5/USEPA/US@EPA

PM cc

Subject
RE: Notification to Pines
Township residents of
discontinuing of bottled water

Tim

Oh good, it makes me feel better to know that there has been some checking done. I appreciate your efforts.

The PINES group has a new member (Larry Jensen) who is a health physicist, apparently an ex-EPA employee, who is interested in the Yard 520 and background radionuclide characterization. The group has asked us to look at his concerns and pass on to you those that we think need some clarification. I'll be sending the questions to you shortly.

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take care.

Tim

"Mark Hutson"
<[redacted]@geo-hyd
ro.com>

To

09/21/2007 12:31 PM Timothy Drexler/R5/USEPA/US@EPA

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Sent: Wednesday, September 19, 2007 1:03 PM
To: Mark Hutson
Cc: kay.bob@epamail.epa.gov
Subject: RE: Notification to Pines Township residents of discontinuing of bottled water

Hi Mark:

First, a clarification. [redacted]

Exemption 6

[redacted]

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I don't have a valid reason for continuing to require the PRPs to provide bottled water to the far south area.

I hope this is helpful, Mark. Please call me if we need to discuss more.

-Tim

"Mark Hutson"
<[redacted]@geo-hydro.com>

09/18/2007 10:54 AM

To: Timothy Drexler/R5/USEPA/US@EPA

cc:

Subject: RE: Notification to Pines Township residents of discontinuing of bottled water

Tim

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Thanks
Mark

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From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]

Sent: Tuesday, September 18, 2007 8:56 AM
To: [redacted]@geo-hydro.com; cnorris@geo-hydro.com; vblumenfeld@bibtc.com; dsullivan@nisource.com
Cc: lbradley@ensr.com; Pope.Janet@epamail.epa.gov; Tanaka.Joan@epamail.epa.gov
Subject: Notification to Pines Township residents of discontinuing of bottled water

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Please call me if you have any questions.

Tim Drexler
phone: 312.353.4367

(See attached file: bottled_wtr_discont_2.doc)

EPA-R5-2013-003300RR-121

"Mark Hutson"
<[redacted]@geo-hydro.com>
Exemption 6
09/24/2007 03:56 PM

To Timothy Drexler
cc cnorris
bcc
Subject RE: Notification to Pines Township residents of discontinuing of bottled water

Tim

Two more question on this. Did the USGS ever publish a report on that boron theory they had?
I saw a video tape of that public meeting where the guy from the USGS talked about the boron and if I remember correctly the presentation brought up several more questions than answers. I've been hoping that a report would come out so we could more easily assess the validity of their observations. If there is a problem with USGS data they may have decided not to put out a formal report.

Are analytical results from the 8 residence wells readily available somewhere? We'd like to take a look at the chemistry and see what we're really talking about for the people who may start drinking the water.

Thanks Again
Mark

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[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Wednesday, September 19, 2007 1:03 PM
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Cc: kay.bob@epamail.epa.gov
Subject: RE: Notification to Pines Township residents of discontinuing of bottled water

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Exemption 6

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"Mark Hutson"
<[redacted]@geo-hydro.com>

09/18/2007 10:54 AM

To: Timothy Drexler/R5/USEPA/US@EPA

cc:

Subject: RE: Notification to Pines Township residents of discontinuing of bottled water

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Sent: Tuesday, September 18, 2007 8:56 AM
To: [redacted]

[redacted]@geo-hydro.com; cnorris@geo-hydro.com; vblumenfeld@bibtc.com; dsullivan@nisource.com
Cc: lbradley@ensr.com; Pope.Janet@epamail.epa.gov; Tanaka.Joan@epamail.epa.gov
Subject: Notification to Pines Township residents of discontinuing of bottled water

Hi everyone:

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Please call me if you have any questions.

Tim Drexler
phone: 312.353.4367

(See attached file: bottled_wtr_discont_2.doc)

EPA-R5-2013-003300RR-122

Timothy Drexler/R5/USEPA/US
09/25/2007 11:51 AM

To "Mark Hutson"
cc
bcc
Subject RE: Notification to Pines Township residents of discontinuing of bottled water

Hi Mark:

In response to your email messages, I checked this morning with Bob Kay and the USGS document is at the printer and should be available any day now. The USGS provide profuse apologies at their significant delay. You should have all of the ground water sampling in residential wells that were selected as a part of the Remedial Investigation. There was some additional sampling done in 2003 and earlier. I'm not sure if you would like that older data but PINES should have all of that in their database already. Let me know if they do not. The following addresses received letters regarding bottled water:

Exemption 6

Let me know if you need any additional information, Mark. As for the rad questions, I forwarded them on to our rad person to assist me with a response. I do not know what his availability is yet to work on this. I will let you know as soon as I have discussed the request with him on an estimate for our response.

Tim

"Mark Hutson" <Exemption 6@geo-hydro.com>

"Mark Hutson" <Exemption 6@geo-hydro.com>
09/24/2007 03:56 PM

To
Subject RE: Notification to Pines Township residents of discontinuing of bottled water

Tim

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I saw a video tape of that public meeting where the guy from the USGS talked about the boron and if I remember correctly the presentation brought up several more questions than answers. I've been hoping that a report would come out so we could more easily assess the validity of their observations. If there is a problem with USGS data they may have decided not to put out a formal report.

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Thanks Again

Mark

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[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Wednesday, September 19, 2007 1:03 PM
To: Mark Hutson
Cc: kay.bob@epamail.epa.gov
Subject: RE: Notification to Pines Township residents of discontinuing of bottled water

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First, a clarification. [redacted]

Exemption 6

[redacted]

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-Tim

"Mark Hutson"
<[redacted]@geo-hydro.com>
09/18/2007 10:54 AM

To Timothy Drexler/R5/USEPA/US@EPA
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Subject
RE: Notification to Pines
Township residents of
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Sent: Tuesday, September 18, 2007 8:56 AM
To: Exemption 6 Exemption 6; Exemption 6; Exemption 6;
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dsullivan@nisource.com
Cc: lbradley@ensr.com; Pope.Janet@epamail.epa.gov;
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Tim Drexler
phone: 312.353.4367

(See attached file: bottled_wtr_discont_2.doc)

EPA-R5-2013-003300RR-123

"Mark Hutson"
<[redacted]@geo-hydro.com>
09/25/2007 02:08 PM

To Timothy Drexler
cc
bcc
Subject RE: Notification to Pines Township residents of discontinuing of bottled water

Tim

I see the data from the sampling that has been conducted but I need a secret decoder ring to tell me which sample (i.e.; PW003, PW004, PW006, etc) is from what address.
Can you help me decipher that information?

Thanks,
Mark

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Tuesday, September 25, 2007 10:52 AM
To: Mark Hutson
Subject: RE: Notification to Pines Township residents of discontinuing of bottled water

Hi Mark:

In response to your email messages, I checked this morning with Bob Kay and the USGS document is at the printer and should be available any day now. The USGS provide profuse apologies at their significant delay. You should have all of the ground water sampling in residential wells that were selected as a part of the Remedial Investigation. There was some additional sampling done in 2003 and earlier. I'm not sure if you would like that older data but PINES should have all of that in their database already. Let me know if they do not. The following addresses received letters regarding bottled water:

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09/24/2007 03:56 PM

To
Timothy Drexler/R5/USEPA/US@EPA

cc
<cnorris@geo-hydro.com>

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RE: Notification to Pines Township residents of discontinuing of bottled water

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09/18/2007 10:54 AM

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Tim Drexler
phone: 312.353.4367

(See attached file: bottled_wtr_discont_2.doc)

EPA-R5-2013-003300RR-124

Timothy Drexler/R5/USEPA/US
09/26/2007 01:25 PM

To "Mark Hutson"
cc
bcc
Subject RE: Notification to Pines Township residents of discontinuing of bottled water

Hi Mark:

Attached is your decoder ring. Be sure to drink your Ovaltine.

-Tim

Private_Wells.pdf

"Mark Hutson" <Exemption 6@geo-hydro.com>

"Mark Hutson" <Exemption 6@geo-hydro.com>
09/25/2007 02:08 PM

To
Subject RE: Notification to Pines Township residents of discontinuing of bottled water

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[redacted]
Exemption 6

Let me know if you need any additional information, Mark. As for the rad questions, I forwarded them on to our rad person to assist me with a response. I do not know what his availability is yet to work on this. I will let you know as soon as I have discussed the request with him on an estimate for our response.

Tim

"Mark Hutson"
<[redacted]@geo-hydro.com>
Exemption 6

09/24/2007 03:56 PM

To
Timothy Drexler/R5/USEPA/US@EPA

cc
<cnorris@geo-hydro.com>

Subject
RE: Notification to Pines Township residents of discontinuing of bottled water

Tim

Two more question on this. Did the USGS ever publish a report on that boron theory they had? I saw a video tape of that public meeting where the guy from the USGS talked about the boron and if I remember correctly the presentation brought up several more questions than answers. I've been hoping that a report would come out so we could more easily assess the validity of their observations. If there is a problem with USGS data they may have decided not to put out a formal report.

Are analytical results from the 8 residence wells readily available

somewhere? We'd like to take a look at the chemistry and see what we're really talking about for the people who may start drinking the water.

Thanks Again
Mark

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Wednesday, September 19, 2007 1:03 PM
To: Mark Hutson
Cc: kay.bob@epamail.epa.gov
Subject: RE: Notification to Pines Township residents of discontinuing of bottled water

Hi Mark:

First, a clarification. [redacted]

Exemption 6

[redacted]

There are a few lines of evidence that remove the ground water wells in the area south of Exempti... First, well information shows that there is no usable shallow aquifer this far south (see the "Areal Extent of Surficial Aquifer" map generated by ENSR). In a location just north of the viaduct the sand thickness is down to 3 ft. You should also have copies of the cross-sections showing the surficial sand pinchout. We have no record of flyash deposits south of those well locations. Groundwater flow is to the north. There is also no reason to invoke a mechanism that relys on the possibility of an undocumented flyash deposit in the south area that, through fractures in the underlying till, is contaminating wells in the lower aquifer. We already know that the lower aquifer that is used for drinking water has natural mineralization, which includes boron and molybdenum, at levels we found some southern wells. The isotopic study of the Pines Grade School and other wells that USGS performed showed that the boron was naturally occuring. Finally, we have a year of sampling data for PW009, PW012, PW013, and MW113. All of the boron and molybdenum analyses have come out well below our screening values.

I don't have a valid reason for continuing to require the PRPs to provide bottled water to the far south area.

I hope this is helpful, Mark. Please call me if we need to discuss more.

-Tim

"Mark Hutson"
<Exemption 6 @geo-hydro.com>
09/18/2007 10:54

To
Timothy Drexler/R5/USEPA/US@EPA

AM cc

Subject
RE: Notification to Pines
Township residents of
discontinuing of bottled water

Tim

Was there any documentation produced that summarizes how you came to the conclusion that those wells are not affected by ash? I'm guessing that we'll be asked about it. I was wondering if we know that there are not scattered ash fill deposits south of 1675 that are leaking through fractured till?

Thanks
Mark

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Tuesday, September 18, 2007 8:56 AM
To: Exemption 6 Exemption 6; Exemption 6; Exemption 6;
Exemption 6 Exemption 6; Exemption 6 Exemption 6; Exemption 6 Exemption 6;
Exemption 6 @geo-hydro.com; cnorris@geo-hydro.com; vblumenfeld@bibtc.com;
dsullivan@nisource.com
Cc: lbradley@ensr.com; Pope.Janet@epamail.epa.gov;
Tanaka.Joan@epamail.epa.gov
Subject: Notification to Pines Township residents of discontinuing of bottled water

Hi everyone:

For your files, attached please find an example of the letters that will be sent this week to the eight residents that live south of road 1675 North in the Pines Township regarding discontinuing bottled water service. I first announced the discontinuation during the June 14, 2007 public meeting. This letter follows up on that announcement.

Please call me if you have any questions.

Tim Drexler
phone: 312.353.4367

(See attached file: bottled_wtr_discont_2.doc)

EPA-R5-2013-003300RR-125

"Mark Hutson"
<[redacted]@geo-hydro.com>
09/26/2007 02:03 PM

To Timothy Drexler
cc
bcc
Subject RE: Notification to Pines Township residents of discontinuing of bottled water

Thanks Tim

I appreciate it. And wear my Red Ball jets!

Mark

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Wednesday, September 26, 2007 12:25 PM
To: Mark Hutson
Subject: RE: Notification to Pines Township residents of discontinuing of bottled water

Hi Mark:

Attached is your decoder ring. Be sure to drink your Ovaltine.

-Tim

(See attached file: Private_Wells.pdf)

"Mark Hutson"
<[redacted]@geo-hydro.com>
09/25/2007 02:08 PM

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject RE: Notification to Pines Township residents of discontinuing of bottled water

Tim

I see the data from the sampling that has been conducted but I need a secret decoder ring to tell me which sample (i.e.; PW003, PW004, PW006, etc) is from what address. Can you help me decipher that information?

Thanks,
Mark

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Tuesday, September 25, 2007 10:52 AM
To: Mark Hutson
Subject: RE: Notification to Pines Township residents of discontinuing of bottled water

Hi Mark:

In response to your email messages, I checked this morning with Bob Kay and the USGS document is at the printer and should be available any day now. The USGS provide profuse apologies at their significant delay. You should have all of the ground water sampling in residential wells that were selected as a part of the Remedial Investigation. There was some additional sampling done in 2003 and earlier. I'm not sure if you would like that older data but PINES should have all of that in their database already. Let me know if they do not. The following addresses received letters regarding bottled water:

[redacted] Exemption 6

Let me know if you need any additional information, Mark. As for the rad questions, I forwarded them on to our rad person to assist me with a response. I do not know what his availability is yet to work on this. I will let you know as soon as I have discussed the request with him on an estimate for our response.

Tim

"Mark Hutson"
<[redacted] Exemption 6 @geo-hydro.com>

To

09/24/2007 03:56 PM

Timothy Drexler/R5/USEPA/US@EPA

cc <cnorris@geo-hydro.com>

Subject RE: Notification to Pines Township residents of discontinuing of bottled water

Tim

Two more question on this. Did the USGS ever publish a report on that boron theory they had? I saw a video tape of that public meeting where the guy from the USGS talked about the boron and if I remember correctly the presentation brought up several more questions than answers. I've been hoping that a report would come out so we could more easily assess the validity of their observations. If there is a problem with USGS data they may have decided not to put out a formal report.

Are analytical results from the 8 residence wells readily available somewhere? We'd like to take a look at the chemistry and see what we're really talking about for the people who may start drinking the water.

Thanks Again
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[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Wednesday, September 19, 2007 1:03 PM
To: Mark Hutson
Cc: kay.bob@epamail.epa.gov
Subject: RE: Notification to Pines Township residents of discontinuing of bottled water

Hi Mark:

First, a clarification. [redacted]

Exemption 6

[redacted]

There are a few lines of evidence that remove the ground water wells in the area south of [redacted] First, well information shows that there is no usable

shallow aquifer this far south (see the "Areal Extent of Surficial Aquifer" map generated by ENSR). In a location just north of the viaduct the sand thickness is down to 3 ft. You should also have copies of the cross-sections showing the surficial sand pinchout. We have no record of flyash deposits south of those well locations. Groundwater flow is to the north. There is also no reason to invoke a mechanism that relys on the possibility of an undocumented flyash deposit in the south area that, through fractures in the underlying till, is contaminating wells in the lower aquifer. We already know that the lower aquifer that is used for drinking water has natural mineralization, which includes boron and molybdenum, at levels we found some southern wells. The isotopic study of the Pines Grade School and other wells that USGS performed showed that the boron was naturally occuring. Finally, we have a year of sampling data for PW009, PW012, PW013, and MW113. All of the boron and molybdenum analyses have come out well below our screening values.

I don't have a valid reason for continuing to require the PRPs to provide bottled water to the far south area.

I hope this is helpful, Mark. Please call me if we need to discuss more.

-Tim

"Mark Hutson"
<[redacted]@geo-hydro.com>

09/18/2007 10:54 AM

To
Timothy Drexler/R5/USEPA/US@EPA

cc

Subject
RE: Notification to Pines Township residents of discontinuing of bottled water

Tim

Was there any documentation produced that summarizes how you came to the conclusion that those wells are not affected by ash? I'm guessing that we'll be asked about it. I was wondering if we know that there are not scattered ash fill deposits south of 1675 that are leaking through fractured till?

Thanks

Mark

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Tuesday, September 18, 2007 8:56 AM
To: [redacted]; [redacted]; [redacted];
[redacted]; [redacted]; [redacted];
[redacted]@geo-hydro.com; cnorris@geo-hydro.com; vblumenfeld@bibtc.com;
dsullivan@nisource.com
Cc: lbradley@ensr.com; Pope.Janet@epamail.epa.gov;
Tanaka.Joan@epamail.epa.gov
Subject: Notification to Pines Township residents of discontinuing of
bottled water

Hi everyone:

For your files, attached please find an example of the letters that will be sent this week to the eight residents that live south of road 1675 North in the Pines Township regarding discontinuing bottled water service. I first announced the discontinuation during the June 14, 2007 public meeting. This letter follows up on that announcement.

Please call me if you have any questions.

Tim Drexler
phone: 312.353.4367

(See attached file: bottled_wtr_discont_2.doc)

EPA-R5-2013-003300RR-126

Larry Silvestri
Exemption 6
10/07/2007 12:24 PM

To Timothy Drexler
cc Charles Norris, Mark Hutson
bcc
Subject PINES water test and TAP

Tim,

There are quite a few Town of Pines area residents who would like their water tested before the end of RI/FS. Is there anything in the TAP agreement that would prohibit P.I.N.E.S. from raising donations, collecting water samples, and contracting the chemical tests?

Larry Silvestri
Exemption 6
Exemption 6
Exemption 6

EPA-R5-2013-003300RR-127

Larry Silvestri
Exemption 6
10/09/2007 08:31 AM

To D.Sullivan, Timothy Drexler, Val Blumenfeld
cc Ellen Becker, Nancy Kolasa, Alan Murray, Exemption 6, Larry Silvestri, Peggy Richardson, Exem... Nona, Charles Norris, Exemptio... Paul Kysel
bcc
Subject Re: PINES TAP Request for Distribution

Dan,
Thank you for processing the Request for Distribution.
I attached PINES meeting minutes for October and the Progress report.
We did not meet in September.
Larry SIlvestri
PINES Secretary
Exemption 6

Progress 2007-10-09.pdf

Minutes 2007-10-06.doc

On Oct 8, 2007, at 4:20 PM, DSullivan@NiSource.com wrote:

> Larry - We have reviewed the information in the Request for
> Disbursement of
> Sept. 24 and are arranging for a check to submitted directly to
> Geo-Hydro
> (as requested in the RFD) in the amount of $3,329.28. Also, can you
> please
> forward meeting notes from the September P.I.N.E.S. meeting when they
> are
> available?
>
> Please advise if you have questions or require additional information.
>
> Dan
>
>
> Dan Sullivan
> NiSource Environmental Health & Safety
> (219) 647-5248

EPA-R5-2013-003300RR-128

Timothy Drexler/R5/USEPA/US
10/09/2007 02:00 PM

To Larry Silvestri
cc kherron, Janet Pope, Larry Johnson
bcc
Subject Re: PINES water test and TAP

Hi Larry:

The RI/FS only covers work to be performed by the potentially responsible parties (PRPs). Any other party that wishes to collect information for any reason is certainly welcome to do so. An issue may arise if you're planning on using your technical advisors, though. Read over the terms of the TAP agreement to make sure that you are not at odds with that document. If you decide to perform your own sampling with your own money using the technical expert that is also involved in the TAP, I would recommend that you make the PRPs aware of your plans so that there is no confusion or legal issue later. If there are actions you need to take to ensure that you can distinguish TAP-related and non TAP-related work, you should address them now, before you take this action.

Also understand that any data collected by another party would not be included in the RI/FS due to the requirements of quality control, etc. However, if some CCB-related information that we are not already aware of were to be discovered, we would look at whether to require the PRPs to perform additional investigations to follow up. Again, that's CCB-related and not septic, natural mineralization, or other potential water quality issues. Please call me if you would like to discuss this more.

Tim Drexler

Larry Silvestri <[redacted]>

Larry Silvestri
[redacted]
10/07/2007 12:24 PM

To
Subject PINES water test and TAP

Tim,

There are quite a few Town of Pines area residents who would like their water tested before the end of RI/FS. Is there anything in the TAP agreement that would prohibit P.I.N.E.S. from raising donations, collecting water samples, and contracting the chemical tests?

Larry Silvestri
[redacted]

EPA-R5-2013-003300RR-129

"Peggy Richardson "

Exemption 6

10/24/2007 08:08 AM

To KENNETH THEISEN

cc Timothy Drexler

bcc

Subject

Hi Ken, here is a list of homes that consented to be tested.

Exemption 6

I'm trying to get two more homes on the block , have contacted the landlord to come and sign the form.

EPA-R5-2013-003300RR-130

Larry Silvestri
Exemption 6
11/11/2007 08:14 AM

To Timothy Drexler
cc
bcc
Subject Fwd: Pines Minutes and Progress Report as Text and MSWord

Tim,
I am resending this to you.
Your email didn't get through yesterday.
Larry Silvestri
Exemption 6

Begin forwarded message:

> From: Larry Silvestri <Exemption 6>
> Date: November 10, 2007 4:15:49 PM CST
> To: D.Sullivan <dsullivan@nisource.com>, Val Blumenfeld
> <vblumenfeld@bibtc.com>, Exemption 6 Exemption 6, Peggy Richardson
> <Exemption 6>, pkysel@amcomp.com,
> Drexler.Timothy@epamail.epa.gov, Exemption 6 Nona <Exer Exemption 6>
> Cc: Charles Norris <cnorris@geo-hydro.com>, Mark Hutson
> <Exemption 6@geo-hydro.com>
> Subject: Pines Minutes and Progress Report as Text and MSWord
>
> Minutes ==========
>
> P.I.N.E.S Executive Board met on Thursday November 1, 2007, 7:00pm
>
> Members Present:
> Vice President Paul Kisel
> Treasurers Diane Yegelski and Peggy Richardson
> Secretary Larry Silvestri
> Helen Molinaro,
> Nancy Kolasa
>
> Discussed web site progress. Diane Britton had pneumonia, so she was
> off sick. She has not come up with a price yet. According to Bud
> Prast, her firewall blocks jpg files, so she will need any digital
> photos on CD. According to a TAP document, $1,500 is allocated for
> that purpose. Larry will follow-up on that.
>
> The latest Request for Distribution was mailed and e-mailed today.
> This bill was for GEO-HYDRO services from September 1 to September 30.
> After this invoice $33866.33 has been paid, and $16,133.67 will be
> left of the $50,000 TAP.
>
> Diane asked if anyone knew about the digging along Ardendale, north of
> US-20. There is a big pipe there. Nobody knew anything about it.
>
> We will begin to do more water testing. We expect to get samples in
> January. Need to send out letters soon. Diane has a check toward the
> water testing. Peggy will ask if it how we should handle that money.
>
> Meeting adjourned at 750pm.
>
>

>
> Progress Report ==========
>
> TAP MONTHLY PROGRESS REPORT
>
> Date: November
10, 2007
> Report Number:
> Report Period: October 2007
>
> Site: Pines Area
of Investigation
> Recipient:
> Recipient Group Representative: P.I.N.E.S. Secretary Larry
Silvestri
> Technical Advisor: Geo-Hydro Inc., Charles
H. Norris
>
>
> PROGRESS ACHIEVED:
>
> PINES Website almost complete
>
> DIFFICULTIES ENCOUNTERED:
>
> None
>
> PERCENT OF PROJECT COMPLETED TO DATE:
>
> 90%
>
> MATERIALS PRODUCED THIS MONTH:
>
> None
>
> ACTIVITY ANTICIPATED IN NEXT MONTH:
>
> Completion of WEB Site
> P.I.N.E.S. Meeting December 6, 2007
> Begin water testing
>
>

Minutes 2007-11-1.doc Progress 2007-11-10.doc

EPA-R5-2013-003300RR-131

Timothy Drexler/R5/USEPA/US
11/20/2007 01:21 PM

To "Peggy Richardson"
cc Kenneth Theisen
bcc
Subject Re: Sample Results

Hi Peggy:

I just wanted to let you know that I received the results of the sampling that Ken conducted. We did not detect any of the organic chemicals in any of the wells sampled. I will be following up with letters to everyone that was sampled. Feel free to contact me if you have any questions.

I hope that you have a great Thanksgiving.

-Tim Drexler

EPA-R5-2013-003300RR-132

"Peggy Richardson "
Exemption 6
11/26/2007 09:34 AM

To Timothy Drexler
cc
bcc
Subject Re: Sample Results

Hi Tim, I was wondering if the house that had high levels of contaminants was the same or if the levels were up. Also what are the chances of it leaching in time if the contaminant is still there. Would it be possible for the P.I.N.E.S. group to get a copy of these test results?

Also if that house has high levels what is going to happen ,or is it just going to be something that gets pushed under the rug. I don't think that it just went away. I don't want to sound ugly but the contaminant surely is still there. Peggy Richardson

-----Original Message-----

\

From: <Drexler.Timothy@epamail.epa.gov>
Sent 11/20/2007 1:21:25 PM
To: "Peggy Richardson" <Exemption 6>
Cc: Theisen.Kenneth@epamail.epa.gov
Subject: Re: Sample Results

Hi Peggy:

I just wanted to let you know that I received the results of the sampling that Ken conducted. We did not detect any of the organic chemicals in any of the wells sampled. I will be following up with letters to everyone that was sampled. Feel free to contact me if you have any questions.

I hope that you have a great Thanksgiving.

-Tim Drexler

EPA-R5-2013-003300RR-133

Timothy Drexler/R5/USEPA/US
11/28/2007 08:16 AM

To "Peggy Richardson"
cc
bcc
Subject Re: Sample Results

Hi Peggy:

Sorry it took me so long to respond. I hope you had a good Thanksgiving.

None of the houses sampled had any indication of any organic contaminants that we tested. We tested for the pentachlorophenol that had a positive result at Exemption 6 and lots of other similar chemicals. We came up with nothing in any of the wells tested, even that house. I can mail you an electronic copy of the results. Should I mail it to you or someone else with P.I.N.E.S.?

As for what happens next, we don't have a reason to continue investigating. Ken went radially away from the house for quite a distance collecting samples and not only didn't find anything at the suspect house, he also found nothing in any of the neighbors. We are left with the possibility that it was a lab error the first time. As we discussed on the phone, it was VERY peculiar to get a hit of pentachlorophenol. That none of the neighbors had any indication was also strange. We are frankly relieved that you do not have another problem. But, please feel free to call or write me to discuss this more. I'll wait for your instructions before mailing the results.

Talk to you soon.

Tim Drexler

"Peggy Richardson" < Exemption 6 >

"Peggy Richardson "
Exemption 6
11/26/2007 09:34 AM

To
Subject Re: Sample Results

Hi Tim, I was wondering if the house that had high levels of contaminants was the same or if the levels were up. Also what are the chances of it leaching in time if the contaminant is still there. Would it be possible for the P.I.N.E.S. group to get a copy of these test results?

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-----Original Message-----

\

From: <Drexler.Timothy@epamail.epa.gov>
Sent 11/20/2007 1:21:25 PM
To: "Peggy Richardson" <[redacted]>
Cc: Theisen.Kenneth@epamail.epa.gov
Subject: Re: Sample Results

Hi Peggy:

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I hope that you have a great Thanksgiving.

-Tim Drexler

EPA-R5-2013-003300RR-134

"[redacted]"
[redacted] Exemption 6
11/29/2007 07:18 AM

To Timothy Drexler
cc
bcc
Subject Re: Sample Results

Hi Tim, thanks for the information on the water tests, you can send me the results and I will make sure the P.I.N.E.S. group gets a copy. Thanks Peggy Richardson

-----Original Message-----
From: <Drexler.Timothy@epamail.epa.gov>
Sent 11/28/2007 8:16:06 AM
To: "Peggy Richardson" <[redacted] Exemption 6>
Subject: Re: Sample Results

Hi Peggy:

Sorry it took me so long to respond. I hope you had a good Thanksgiving.

None of the houses sampled had any indication of any organic contaminants that we tested. We tested for the pentachlorophenol that had a positive result at [redacted] Exemption 6 and lots of other similar chemicals. We came up with nothing in any of the wells tested, even that house. I can mail you an electronic copy of the results. Should I mail it to you or someone else with P.I.N.E.S.?

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I'll wait for your instructions before mailing the results.

Talk to you soon.

Tim Drexler

"Peggy Richardson" <[redacted]>

To Timothy Drexler/R5/USEPA/US@EPA

11/26/2007 09:34 AM

cc

Subject Re: Sample Results

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just going to be something that gets pushed under the rug. I don't think
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letters to everyone that was sampled. Feel free to contact me if you
have any questions.

I hope that you have a great Thanksgiving.

-Tim Drexler

EPA-R5-2013-003300RR-135

Larry Silvestri
Exemption 6
12/14/2007 12:12 PM

To Nancy Kolasa, Exemptio..., Cathi Murray, Ellen Becker, Peggy Richardson, larry_silvestri, Exem... Nona, Exemption 6
cc Val Blumenfeld, Timothy Drexler, D.Sullivan
bcc

Subject P.I.N.E.S. Minutes for December 12, 2007

P.I.N.E.S. Executive Board met on Thursday December 12, 2007, 7:00pm

Members Present:
President Bud Prast
Secretary Larry Silvestri
Helen Molinaro
Nancy Kolasa

Larry Silvestri demonstrated a completed web site. Bud Prast says that Diane Britton has a web site. Nancy Kolasa moved that a decision be made at the next meeting and all agreed.

Nancy Kolasa reported that Peggy Richardson and Jan Nona sent some suspected fly ash samples to Geo-Hydro for determination.

The remainder of the meeting was devoted to the water testing planned for mid January.
We stuffed approximately 85 envelopes with letters announcing this next round of testing. Meanwhile, we made the following plans.
1.) Residents receive empty sample bottles on or around Friday, January 11 and drop off filled bottles on Monday, January 14.
2.) Tentative plan was made that residents will come to the Fire Station for drop-off. Pick-up location needs to be determined before we mail the letters.
3.) Suggested pick-up locations are either the fire station or possibly one or two of our houses, or might deliver empty bottles door to door.
4.) Need to call Peggy Richardson on pick-up location and payment to testing lab. Some money was donated and there is money at Hoosier Environmental Council that is left over from a grant. That money will go directly to testing lab.
5,) Remainder of cost shall be paid by the residents. Money from residents will be collected at the time of drop-off at the Fire Station and residents will be given receipts.
6.) Larry Silvestri will call lab and make arrangements. Also call treasurers Peggy Richardson and Diane Egilske about payment to testing lab from grant and donation.
7.) Mail the announcement letters after above arrangements are finalized.

Next meeting was planned for Thursday, January 3, 2008.

Meeting adjourned at 8:10pm.

Minutes 2007-12-12.doc

EPA-R5-2013-003300RR-136

Timothy Drexler/R5/USEPA/US
12/18/2007 08:45 AM

To "Peggy Richardson"
cc
bcc
Subject Re: Samples

Great! Thanks for letting me know you got it, Peggy.

For your information, I'll be in Pines tomorrow to oversee some soil coring work to be performed by ENSR. They will be sampling soils beneath flyash in response to the questions raised at the last public meeting . If I don't see you, I hope that you and your family also have a great holiday.

-Tim

"Peggy Richardson" <[redacted]>

"Peggy Richardson "
[redacted]
12/18/2007 08:28 AM

To
Subject Samples

Hi Tim,

I received the CD today on the water tests,thanks so much.

Hope you have a great holiday and Happy New Year.

Talk to you soon, Peggy

EPA-R5-2013-003300RR-137

Larry Silvestri
Exemption 6
12/18/2007 11:56 AM

To Timothy Drexler

cc Mark Hutson, rush, Bob_Daum, Nancy Kolasa, Cathi Murray, Peggy Richardson, Exemption 6, kherron, Dale Engquist, pete_penoyer, Exem... Nona, Ruthanne Slamka, Charles Norris, scott_hicks, Exemptio..., Paul Kysel

bcc

Subject Re: Pines AOC II Progress Report 12-17-07

All,

I would like to comment that visual inspection of soil is not reliable because it is difficult or impossible to distinguish the local natural soils from materials that were dumped in the neighborhood of yard 520. According to the Site Management Strategy Volume 2 Appendix D Page D-3, a variety of material was dumped at Yard 520, including ash from 3 different NIPSCO plants, 2 sources from Bethlehem Steel and various sources of construction debris and tires. Any of this waste may have been mixed and there may have been mixing of waste with natural soils as well, making visual inspection unreliable. According to SMS Vol 2 Appendix L Page L-5, "40,000 cubic yards of a mixture of fly ash and boiler bottom ash" were deposited in 4 different areas. These waste deposits are not necessarily accessible from the surface of the ground and may be deep under natural soils. Furthermore, it may be unreliable to say with certainty what the natural soil of the area looks like, since it may be mixed with other soils or wastes at any depth.

The above references can be found at the bottom of this page:
http://www.epa.gov/region5/sites/pines/pinessms200501.htm

Recently, I found several mounds of grey-tan powder, located west of the 520 dump, a few hundred feet west of Birch Street, and a few hundred feet north of Brown Ditch. These mounds are about 10 feet high. The mounds look like ash, but it is difficult to tell without a reliable test.

Here is a link to a topo map that should have a cursor at the approximate location, latitude 41.67547 longitude -86.96324:
http://www.topozone.com/map.asp?lat=41.67547&lon=
-86.96324&s=48&size=m&u=4&datum=nad83&layer=DRG25

Larry Silvestri
Exemption 6
Exemption 6
Michigan City, IN 46360

On Dec 18, 2007, at 8:14 AM, Drexler.Timothy@epamail.epa.gov wrote:
>
> ----- Forwarded by Timothy Drexler/R5/USEPA/US on 12/18/2007 08:13 AM
> -----
>
> "Gleason,
> Shannon"
> <sgleason@ensr.a
> ecom.com> To
> Timothy Drexler/R5/USEPA/US@EPA,
> 12/17/2007 08:09 <kherron@idem.in.gov>,

> PM <kherron@dem.state.in.us>
> cc
> "Bradley, Lisa"
> <lbradley@ensr.aecom.com>
>
> Subject
> RE: Pines AOC II Progress Report
> 12-17-07
>
> Greetings!
>
> Attached please find the November 2007 Progress Report for AOC II for
> the Pines Area of Investigation.
>
> Please feel free to contact me if you have any questions.
>
> :) LAIS
>
> <<Pines AOC II - Progress Report 12-17-07.pdf>>
>
> _____
>
> Lisa JN Bradley, Ph.D., DABT
> Senior Toxicologist
> ENSR
> 2 Technology Park Drive
> Westford, MA 01886
> 978-589-3059 (direct)
> 978-846-3463 (cell)
> 866-758-4856 (fax)
> lbradley@ensr.aecom.com
>
> www.ensr.aecom.com
>
> 978-589-3000(See attached file: Pines AOC II - Progress Report
> 12-17-07.pdf)<Pines AOC II - Progress Report 12-17-07.pdf>

EPA-R5-2013-003300RR-138

Larry Silvestri
Exemption 6
01/06/2008 03:45 PM

To Nancy Kolasa, Exemptio..., Cathi Murray, Ellen Becker, Peggy Richardson, larry_silvestri, Exem... Nona, Exemption 6
cc D.Sullivan, Timothy Drexler, Val Blumenfeld
bcc
Subject P.I.N.E.S. Minutes for January 3, 2008

P.I.N.E.S. Executive Board met on Thursday January 3, 2008, 7:00pm

Members Present:
President Bud Prast
Treasurer Peggy Richardson
Secretary Larry Silvestri
Helen Molinaro
Nancy Kolasa

We stuffed approximately 85 envelopes with a second round of letters providing residents on private wells with additional information and instructions for water testing. We also corrected addresses for some letters that were returned.

We made the following plans.
1.) Larry Silvestri will call test lab and make arrangements for pick up of empty bottles.
2.) Nancy Kolasa will pick up empty bottles Monday.
3.) We neet to copy or create instruction sheets to include with empty bottles.
4.) Bud Prast and Larry Silvestri, and anyone else who has time, will deliver empty
empty bottles with instructions to the residents.
5.) Residents receive empty bottles between Tuesday, January 7 and Sunday, January 13.
6.) Residents drop off filled bottles on Monday, January 14 at the Fire Station between
6:00am and 12:00 Noon.

Bud Prast demonstrated Diane Britton's web site. Diane Britton will charge $500.00 plus $25.00 per update. Nancy Kolasa demonstrated Larry Silvestri's free web site. There was again a postponement of a decision on a web site until the next meeting.

Next meeting was planned for Monday, January 14, 2008 at the Fire Station.
Following that, the February meeting will take place after the test results are done.

Meeting adjourned at 8:25pm.

Minutes 2008-1-3.doc

EPA-R5-2013-003300RR-139

Timothy Drexler/R5/USEPA/US
01/07/2008 07:34 AM

To eperry
cc
bcc
Subject Fw: Permission Forms

Hi Elizabeth:

The P.I.N.E.S. group said that they would chase down some location owners. Could you forward them an electronic version of the access form?

-Tim

----- Forwarded by Timothy Drexler/R5/USEPA/US on 01/07/2008 07:33 AM -----

[redacted] Exemption 6
01/05/2008 11:03 AM

To
Subject Permission Forms

Tim,

Could you email me a permission form for ENSR soil testing?
I'll print a few and get them signed.

Larry Silvestri
[redacted] Exemption 6

EPA-R5-2013-003300RR-140

Larry Silvestri
Exemption 6
01/07/2008 10:00 AM

To Lisa Bradley
cc Timothy Drexler
bcc
Subject Pines Suspect Flyash

Lisa,

Tim said that you needed addresses of locations that we suspect that flyash was used as fill.
These are two locations that have been discussed:

Pine School
1594 North 500 East
Michigan City, Indiana 46360
Sally Roberts, Principal
Debi Downs, Secretary
(P): 219.873.2114
(F): 219.873.2213
http://www.mapquest.com/maps/map.adp?country=US&countryid=US&addtohistory=&searchtab=address&searchtype=address&address=1594+N.+500+E.&city=Michigan+City&state=IN&zipcode=46360&search=++Search++

Islamic Center Of Michigan City
1606 N 500 E
Michigan City, IN 46360
voice: (219) 879-9667
http://www.mapquest.com/maps/map.adp?searchtype=address&country=US&addtohistory=&searchtab=home&formtype=address&popflag=0&latitude=&longitude=&name=&phone=&level=&cat=&address=1607+N+500+E&city=&state=in&zipcode=46360

And today, I received a call from a resident about this location.
Flyash may have been used as fill under Railroad Ave., at and near this address:
Exemption 6.
http://www.mapquest.com/maps/map.adp?searchtype=address&country=US&addtohistory=&searchtab=home&formtype=address&popflag=0&latitude=&longitude=&name=&phone=&level=&cat=&address=664+E+South+Railroad+Ave.&city=&state=in&zipcode=46360

Larry Silvestri
Exemption 6
Exemption 6
Exemption 6

EPA-R5-2013-003300RR-141

"Bradley, Lisa"
<lbradley@ensr.aecom.com>
01/07/2008 05:16 PM

To "Larry Silvestri"
cc Timothy Drexler
bcc
Subject RE: Pines Suspect Flyash

Larry –

I have a question for you about the last location. On my map, there are only two residences on [redacted] Exemption 6 Can you clarify which address you are referring to? If you have the owner's name and contact info, that would help as well.

Thanks so much! :) LIAS

Lisa JN Bradley, Ph.D., DABT
Senior Toxicologist
ENSR
2 Technology Park Drive
Westford, MA 01886
978-589-3059 (direct)
978-846-3463 (cell)
866-758-4856 (fax)
lbradley@ensr.aecom.com
www.ensr.aecom.com
978-589-3000

From: Larry Silvestri [mailto: [redacted] Exemption 6]
Sent: Monday, January 07, 2008 11:00 AM
To: Bradley, Lisa
Cc: Drexler.Timothy@epamail.epa.gov
Subject: Pines Suspect Flyash

Lisa,

Tim said that you needed addresses of locations that we suspect that flyash was used as fill. These are two locations that have been discussed:

Pine School
1594 North 500 East
Michigan City, Indiana 46360
Sally Roberts, Principal
Debi Downs, Secretary
(P): 219.873.2114
(F): 219.873.2213
http://www.mapquest.com/maps/map.adp?country=US&countryid=US&addtohistory=&searchtab=address&searchtype=address&address=1594+N.+500+E.&city=Michigan+City&state=IN&zipcode=46360&search=++Search++

Islamic Center Of Michigan City
1606 N 500 E
Michigan City, IN 46360
voice: (219) 879-9667
http://www.mapquest.com/maps/map.adp?searchtype=address&country=US&addtohistory=&searchtab=home&formtype=address&popflag=0&latitude=&longitude=&name=&phone=&level=&cat=&address=1607+N+500+E&city=&state=in&zipcode=46360

And today, I received a call from a resident about this location.
Flyash may have been used as fill under Railroad Ave., at and near this address:
[redacted] Exemption 6
http://www.mapquest.com/maps/map.adp?searchtype=address&country=US&addtohistory=&searchtab=home&formtype=address&popflag=0&latitude=&longitude=&name=&phone=&level=&cat=&address=664+E+South+Railroad+Ave.&city=&state=in&zipcode=46360

Larry Silvestri
[redacted] Exemption 6
[redacted] Exemption 6
[redacted] Exemption 6

EPA-R5-2013-003300RR-142

Timothy Drexler/R5/USEPA/US
01/08/2008 08:51 AM

To Larry Silvestri
cc
bcc
Subject Re: Pines Suspect Flyash

Hi Larry:

After reviewing the Site outline, the Mosque and School are outside of the Site boundaries. ENSR is not required to include them in their investigation. They will, however, work on obtaining the property on Railroad Ave. Please call me if you have any questions.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071
Larry Silvestri <[redacted]>

Larry Silvestri <silvestri@ameritech.net>
01/07/2008 10:00 AM

To
Subject Pines Suspect Flyash

Lisa,

Tim said that you needed addresses of locations that we suspect that flyash was used as fill.
These are two locations that have been discussed:

Pine School
1594 North 500 East
Michigan City, Indiana 46360
Sally Roberts, Principal
Debi Downs, Secretary
(P): 219.873.2114
(F): 219.873.2213
http://www.mapquest.com/maps/map.adp?country=US&countryid=US&addtohistory=&searchtab=address&searchtype=address&address=1594+N.+500+E.&city=Michigan+City&state=IN&zipcode=46360&search=++Search++

Islamic Center Of Michigan City
1606 N 500 E
Michigan City, IN 46360
voice: (219) 879-9667
http://www.mapquest.com/maps/map.adp?searchtype=address&country=US&addtohistory=&searchtab=home&formtype=address&popflag=0&latitude=&longitude=&name=&phone=&level=&cat=&address=1607+N+500+E&city=&state=in&zipcode=46360

And today, I received a call from a resident about this location.
Flyash may have been used as fill under Railroad Ave., at and near this address:
[redacted].
http://www.mapquest.com/maps/map.adp?searchtype=address&country=US&addtohistory=&searchtab=home&formtype=address&popflag=0&latitude=&longitude=&name=&phone=&level=&cat=&address=664+E+South+Railroad+Ave.&city=&state=in&zipcode=46360

Larry Silvestri
[redacted]

EPA-R5-2013-003300RR-143

Larry Silvestri
Exemption 6
01/08/2008 09:22 AM

To Timothy Drexler
cc Janet Pope, Larry Johnson, vblumenfeld, lbradley, dsullivan
bcc
Subject Re: P.I.N.E.S. Meeting Notes: Pines Site

Tim,
In the future, we will only transmit TAP-related discussions from our meeting minutes.
Thanks,
Larry

On Jan 8, 2008, at 9:09 AM, Drexler.Timothy@epamail.epa.gov wrote:

>
> Larry:
>
>
> You included discussion in your P.I.N.E.S. meeting notes on the
> collection of new Site-related data. We appreciate that you are making
> both EPA and the Pines Site potentially responsible parties aware of
> this activity. However, because Site-related sampling activitiy cannot
> utilize TAP funds, a discussion of that activity is not appropriate in
> TAP meeting notes to EPA and the PRPs. In addition, please remember
> that
> the purpose of the TAP is to provide funding "...to hire independent
> technical advisors to help interpret Pines Area of Investigation
> documents developed under the RI/FS...". That purpose is outlined in
> (1)
> the April 5, 2004 Administrative Order on Consent between EPA and the
> potentially responsible parties (PRPs) for the Pines Site and (2) the
> June 18, 2005 Technical Assistance Plan Agreement between the
> P.I.N.E.S.
> and the Site PRPs. No portion of TAP funds can be used for the
> "generation of new primary data such as well drilling and testing..."
> Likewise, your technical advisor was contracted by you to interpret
> Site-related data and not to perform any activities related to the
> planning, collection, or interpretation of new data. Make sure that you
> keep all TAP-related activities distinct and separate from any other
> activities of the P.I.N.E.S.
>
> Thanks again, Larry. Please contact me if you have any questions.
>
>
>
> Tim Drexler
> Remedial Project Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-6J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
> fax: 312.886.4071
>

EPA-R5-2013-003300RR-144

Larry Silvestri
[redacted]
01/11/2008 10:49 AM

To Timothy Drexler

cc kherron, Janet Pope, pete_penover, Larry Johnson, scott_hicks, Peggy Richardson, [redacted], Larry Silvestri, Bob_Daum, Ruthanne Slamka, Val Blumenfeld, [redacted], [redacted] Nona, lbradley, Paul Kysel, Cathi Murray, D.Sullivan, Dale Enquist, eperry

bcc

Subject Suspect flyash locations

Tim,

PINES members, Jan Nona and Peggy Richardson took samples of suspect flyash from [redacted] between Laporte/Porter County Line Road and 625E.

Samples 1-5 were taken from the roadside along an 0.6 mile east-west length centered approx on lat=41.66604 lon=-86.94274.
http://www.topozone.com/map.asp?lat=41.66604&lon=
-86.94274&size=l&datum=nad83&layer=DRG25

Samples 6-11 were taken the roadside along a 500 foot east-west length centered on lat=41.66604 and lon=-86.93462.
http://www.topozone.com/map.asp?lat=41.66604&lon=
-86.93462&size=l&datum=nad83&layer=DRG25

I examined the samples with a 20x hand magnifier.
Samples appear to contain black glass made up of very small spheres, drops, rods and threads.
Samples also contain grey material that falls apart in water but does not cloud the water, leaves the water clear, possibly flyash.
There is also peppery dark grains that may be unburned coal.
The samples are composed of these materials in varying proportions.

As I said before, the Islamic Center at address, 1606 North 500E, is also highly suspect, and very likely that the property was filled with flyash.

Regardless that these locations are outside the Area of Investigation, I think that the EPA should find someone more qualified than myself to examine these samples.

Larry Silvestri
[redacted]

EPA-R5-2013-003300RR-145

Timothy Drexler/R5/USEPA/US
01/15/2008 10:42 AM

To Larry Silvestri
cc Cathi Murray, Bob_Daum, [redacted], [redacted], Janet Pope, kherron, Paul Kysel, Peggy Richardson, Ruthanne Slamka, [redacted] Nona, scott_hicks
bcc
Subject Re: Suspect flyash locations

Hi Larry:

Sorry I didn't respond sooner. I was out of the office yesterday.

I just finished getting an update from ENSR with regard to the ongoing soil visual inspections. They have received access agreements from both the Meeks property on Railroad Ave. and the Brown property located adjacent to Yard 520 that you mention in your email message to me. ENSR expects to compete their field work by the end of this week. I checked the location of the two areas outlined in your January 11 email message. They are both outside of the Site Area identified in the Order to the Potentially Responsible Parties. Regarding any follow-up with those and any other areas, EPA will wait until the Remedial Investigation Report is finalized. That document will help EPA determine what risks may be posed by flyash in the Site area and could be used as a basis to evaluate other areas, if needed.

Once field work is complete, in accordance with the Order, ENSR will have 90 days to produce a draft RI Report for EPA review. I hope that, like me, you are looking forward to the project progressing to the next step; taking the data we have collected over the long course of this investigation and determining possible next steps.

Please call or write if you have any additional questions.

Tim Drexler

Larry Silvestri <[redacted]>

Larry Silvestri <silvestri@ameritech.net>
01/11/2008 10:49 AM

To
Subject Suspect flyash locations

Tim,

PINES members, Jan Nona and Peggy Richardson took samples of suspect flyash from [redacted], between Laporte/Porter County Line Road and 625E.

Samples 1-5 were taken from the roadside along an 0.6 mile east-west length centered approx on lat=41.66604 lon=-86.94274.
http://www.topozone.com/map.asp?lat=41.66604&lon=
-86.94274&size=l&datum=nad83&layer=DRG25

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Regardless that these locations are outside the Area of Investigation, I think that the EPA should find someone more qualified than myself to examine these samples.

Larry Silvestri
[redacted]
Exemption 6

EPA-R5-2013-003300RR-146

Timothy Drexler/R5/USEPA/US
01/15/2008 01:31 PM

To [redacted], peggy, silvestri, [redacted], [redacted], [redacted], Bob_Daum, scott_hicks
cc [redacted], cnorris
bcc
Subject Fw: Pines AOC II Progress Report 1-15-08

----- Forwarded by Timothy Drexler/R5/USEPA/US on 01/15/2008 01:30 PM -----

"Gleason, Shannon" <sgleason@ensr.aecom.com>
01/15/2008 01:26 PM

To
Subject RE: Pines AOC II Progress Report 1-15-08

Greetings!

Attached please find the December 2007 Progress Report for AOC II for the Pines Area of Investigation.

Please feel free to contact me if you have any questions.

:) LAIS

<<Pines AOC II - Progress Report 1-15-08.pdf>>

Lisa JN Bradley, Ph.D., DABT

Senior Toxicologist

ENSR

2 Technology Park Drive

Westford, MA 01886

978-589-3059 (direct)

978-846-3463 (cell)

866-758-4856 (fax)

lbradley@ensr.aecom.com

www.ensr.aecom.com

978-589-3000 Pines AOC II - Progress Report 1-15-08.pdf

EPA-R5-2013-003300RR-147

Larry Silvestri
Exemption 6
01/16/2008 07:44 AM

To Timothy Drexler

cc Bob_Daum, Janet Pope, Peggy Richardson, Cathi Murray, Exemption 6 kherron, Exem... Nona, Ruthanne Slamka, scott_hicks, Exemptio... Paul Kysel

bcc

Subject Re: Suspect flyash locations

Tim,

Part of the purpose of the RI is to determine natural background levels of constituents in the Area of Investigation. If there are undiscovered flyash locations that are in the vicinity of the Area of Investigation, then this report will establish a natural background containing mistakenly high levels of constituents.

According to the RI/FS Volume 5, Human Health Risk Assessment Work Plan:
"Upgradient and other background samples collected in the vicinity of the Area of Investigation will provide information on levels of constituents typical for various media in the local area. Area of Investigation conditions will be compared to local background conditions. If Area of Investigation concentrations of constituents are representative of or consistent with background concentrations, they will not be included in risk calculations."
There are also similar references in Volume 6, Ecological Risk Assessment.

If the Remedial Investigation Report is finalized with artificially high background conditions, then existing risks posed by flyash in the Site Area will not be included in further studies and remediation.

Thanks,
Larry Silvestri
PINES

On Jan 15, 2008, at 10:42 AM, Drexler.Timothy@epamail.epa.gov wrote:

> Hi Larry:
>
> Sorry I didn't respond sooner. I was out of the office yesterday.
>
> I just finished getting an update from ENSR with regard to the ongoing
> soil visual inspections. They have received access agreements from both
> the Meeks property on Railroad Ave. and the Brown property located
> adjacent to Yard 520 that you mention in your email message to me. ENSR
> expects to compete their field work by the end of this week. I checked
> the location of the two areas outlined in your January 11 email
> message.
> They are both outside of the Site Area identified in the Order to the
> Potentially Responsible Parties. Regarding any follow-up with those and
> any other areas, EPA will wait until the Remedial Investigation Report
> is finalized. That document will help EPA determine what risks may be
> posed by flyash in the Site area and could be used as a basis to
> evaluate other areas, if needed.
>

> Once field work is complete, in accordance with the Order, ENSR will
> have 90 days to produce a draft RI Report for EPA review. I hope that,
> like me, you are looking forward to the project progressing to the next
> step; taking the data we have collected over the long course of this
> investigation and determining possible next steps.
>
> Please call or write if you have any additional questions.
>
>
> Tim Drexler
>
>
>
>
>
>
>
> Larry Silvestri
> <[redacted]
> >
> To
> 01/11/2008 10:49 Timothy Drexler/R5/USEPA/US@EPA
> AM cc
> kherron@idem.in.gov, Janet
> Pope/R5/USEPA/US@EPA,
> pete_penoyer@nps.gov, Larry
> Johnson/R5/USEPA/US@EPA,
> scott_hicks@nps.gov, Peggy
> Richardson
> <[redacted]>,
> [redacted], Larry
> Silvestri
> <[redacted]>,
> Bob_Daum@nps.gov, Ruthanne Slamka
> <Ruthanne_Slamka@nps.gov>, Val
> Blumenfeld
> <vblumenfeld@bibtc.com>,
> [redacted], [redacted] Nona
> <[redacted]>,
> lbradley@ensr.com, Paul Kysel
> <[redacted]>, Cathi
> Murray <[redacted]>,
> D.Sullivan
> <dsullivan@nisource.com>, Dale
> Enquist <dbengquist[redacted]>,
> eperry@ensr.com
>
>
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>
> Subject
> Suspect flyash locations
>
>
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>
>
>

> Tim,
>
> PINES members, Jan Nona and Peggy Richardson took samples of suspect
> flyash from [redacted] Exemption 6, between Laporte/Porter County
> Line Road and 625E.
>
> Samples 1-5 were taken from the roadside along an 0.6 mile east-west
> length centered approx on lat=41.66604 lon=-86.94274.
> http://www.topozone.com/map.asp?lat=41.66604&lon=
> -86.94274&size=l&datum=nad83&layer=DRG25
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> Samples 6-11 were taken the roadside along a 500 foot east-west length
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> centered on lat=41.66604 and lon=-86.93462.
> http://www.topozone.com/map.asp?lat=41.66604&lon=
> -86.93462&size=l&datum=nad83&layer=DRG25
>
> I examined the samples with a 20x hand magnifier.
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> Samples also contain grey material that falls apart in water but does
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> The samples are composed of these materials in varying proportions.
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> As I said before, the Islamic Center at address, 1606 North 500E, is
> also highly suspect, and very likely that the property was filled with
> flyash.
>
> Regardless that these locations are outside the Area of Investigation,
> I think that the EPA should find someone more qualified than myself to
> examine these samples.
>
> Larry Silvestri
> [redacted] Exemption 6
> [redacted] Exemption 6
> [redacted] Exemption 6
>
>
>

EPA-R5-2013-003300RR-148

Timothy Drexler/R5/USEPA/US
01/17/2008 06:07 PM

To Larry Silvestri
cc Cathi Murray, Bob_Daum, [redacted], [redacted], Janet Pope, kherron, Paul Kysel, Peggy Richardson, Ruthanne Slamka, [redacted] Nona, scott_hicks
bcc
Subject Re: Suspect flyash locations

Hi Larry:

The development of background information is separate and distinct from the visual soil investigation conducted by ENSR over the past few months. The visual inspection information is to be used for the development of human health and ecological risk information related to the amount and location of CCB's near residences and in ecological habitat. We need to develop central tendencies and maximum exposure. I made sure that the residences of maximum exposure were collected. I witnessed that collection and was satisfied that ENSR was conservative in their estimations.

Background soil samples were collected April 30-May 1, 2007. I witnessed all of the soil that was collected for background. I inspected all of the soil samples that were collected. None of it was collected in very close proximity to roads and I was satisfied that they were collected away from CCB areas. If, however, we get results from individual background samples that give us a reason to question them, they could be removed from the set.

Again, this recent effort is not related to the collection of background samples to determine concentrations.

I hope that helps your concern.

Tim Drexler

Larry Silvestri <[redacted]>

Larry Silvestri
[redacted]
01/16/2008 07:44 AM

To
Subject Re: Suspect flyash locations

Tim,

Part of the purpose of the RI is to determine natural background levels of constituents in the Area of Investigation. If there are undiscovered flyash locations that are in the vicinity of the Area of Investigation, then this report will establish a natural background containing mistakenly high levels of constituents.

According to the RI/FS Volume 5, Human Health Risk Assessment Work Plan:
"Upgradient and other background samples collected in the vicinity of the Area of Investigation will provide information on levels of constituents typical for various media in the local area. Area of Investigation conditions will be compared to local background conditions. If Area of Investigation concentrations of constituents

are representative of or consistent with background concentrations,
they will not be included in risk calculations."
There are also similar references in Volume 6, Ecological Risk
Assessment.

If the Remedial Investigation Report is finalized with artificially
high background conditions, then existing risks posed by flyash in the
Site Area will not be included in further studies and remediation.

Thanks,
Larry Silvestri
PINES

On Jan 15, 2008, at 10:42 AM, Drexler.Timothy@epamail.epa.gov wrote:

> Hi Larry:
>
> Sorry I didn't respond sooner. I was out of the office yesterday.
>
> I just finished getting an update from ENSR with regard to the ongoing
> soil visual inspections. They have received access agreements from both
> the Meeks property on Railroad Ave. and the Brown property located
> adjacent to Yard 520 that you mention in your email message to me. ENSR
> expects to compete their field work by the end of this week. I checked
> the location of the two areas outlined in your January 11 email
> message.
> They are both outside of the Site Area identified in the Order to the
> Potentially Responsible Parties. Regarding any follow-up with those and
> any other areas, EPA will wait until the Remedial Investigation Report
> is finalized. That document will help EPA determine what risks may be
> posed by flyash in the Site area and could be used as a basis to
> evaluate other areas, if needed.
>
> Once field work is complete, in accordance with the Order, ENSR will
> have 90 days to produce a draft RI Report for EPA review. I hope that,
> like me, you are looking forward to the project progressing to the next
> step; taking the data we have collected over the long course of this
> investigation and determining possible next steps.
>
> Please call or write if you have any additional questions.
>
>
> Tim Drexler
>
>
>
>
>
>
> Larry Silvestri
> <Exemption 6
> Exemption 6>
> To
> 01/11/2008 10:49 Timothy Drexler/R5/USEPA/US@EPA
> AM cc
> kherron@idem.in.gov, Janet
> Pope/R5/USEPA/US@EPA,
> pete_penoyer@nps.gov, Larry
> Johnson/R5/USEPA/US@EPA,
> scott_hicks@nps.gov, Peggy

> Richardson
> <[redacted]>,
> [redacted], Larry
> Silvestri
> <[redacted]>,
> Bob_Daum@nps.gov, Ruthanne Slamka
> <Ruthanne_Slamka@nps.gov>, Val
> Blumenfeld
> <vblumenfeld@bibtc.com>,
> [redacted], [redacted] Nona
> <[redacted]>,
> lbradley@ensr.com, Paul Kysel
> <[redacted]>, Cathi
> Murray <[redacted]>,
> D.Sullivan
> <dsullivan@nisource.com>, Dale
> Enquist <dbengquist[redacted]>,
> eperry@ensr.com
>
>
>
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>
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>
>
> Subject
> Suspect flyash locations
>
>
>
>
>
>
> Tim,
>
> PINES members, Jan Nona and Peggy Richardson took samples of suspect
> flyash from [redacted], between Laporte/Porter County
> Line Road and 625E.
>
> Samples 1-5 were taken from the roadside along an 0.6 mile east-west
> length centered approx on lat=41.66604 lon=-86.94274.
> http://www.topozone.com/map.asp?lat=41.66604&lon=
> -86.94274&size=l&datum=nad83&layer=DRG25
>
> Samples 6-11 were taken the roadside along a 500 foot east-west length
>
> centered on lat=41.66604 and lon=-86.93462.
> http://www.topozone.com/map.asp?lat=41.66604&lon=
> -86.93462&size=l&datum=nad83&layer=DRG25
>
> I examined the samples with a 20x hand magnifier.
> Samples appear to contain black glass made up of very small spheres,
> drops, rods and threads.
> Samples also contain grey material that falls apart in water but does
> not cloud the water, leaves the water clear, possibly flyash.
> There is also peppery dark grains that may be unburned coal.
> The samples are composed of these materials in varying proportions.
>
> As I said before, the Islamic Center at address, 1606 North 500E, is
> also highly suspect, and very likely that the property was filled with

> flyash.
>
> Regardless that these locations are outside the Area of Investigation,
> I think that the EPA should find someone more qualified than myself to
> examine these samples.
>
> Larry Silvestri
> [redacted] Exemption 6
> [redacted] Exemption 6
> Michigan City, IN 46360
>
>
>

EPA-R5-2013-003300RR-149

Charles Norris
<cnorris@geo-hydro.com>
01/30/2008 12:33 PM

To Larry Silvestri
cc Timothy Drexler, Mark Hutson
bcc
Subject Conference call

Larry,
It looks like Friday will work with Tim Drexler for all topics except (probably) the rad question(s). He's open to any time and we can use GHI's conference line. Mark and I are similarly flexible, so what time works for the PINES people who want to participate.
--
Chuck

Charles H. Norris
Geo-Hydro, Inc.
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-150

Timothy Drexler/R5/USEPA/US
02/01/2008 03:05 PM

To "Bradley, Lisa"
cc [redacted], peggy, silvestri, [redacted], [redacted], [redacted], "Perry, Elizabeth", pete_penoyer, kherron, Bob_Daum, scott_hicks, dale_engquist, dsullivan, vblumenfeld, EUGENE JABLONOWSKI
bcc
Subject Re: Extension of Pines RI Due Date

Hi Lisa:

This message confirms our phone conversation yesterday regarding additional background sample analysis. The due date for the RI Report is extended 30 days from the original April 17, 2008 date in order for the background soil samples to be analyzed to establish Site-specific radiological background. EPA had offered to perform the analyses at no charge. The Pines Site PRPs have decided that they will utilize their own laboratory and perform the analysis in accordance with the Site's approved QAPP. EPA has no objection.

I look forward to the RI Report.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071
"Perry, Elizabeth" <EPerry@ensr.aecom.com>

"Perry, Elizabeth" <EPerry@ensr.aecom.com>
01/18/2008 03:08 PM

To
Subject Pines RI

Tim and Kevin - This is to let you know we finished the visual inspections of suspected CCBs in the Pines Area of Investigation today. Based on the schedules in AOC II and the RI/FS Work Plan, the draft RI Report is due to you in 90 days, or April 17, 2008.

Please feel free to call if you have any questions!
Elizabeth

A. Elizabeth Perry, P.G.
Senior Hydrogeologist
ENSR
Westford, MA, USA
tel: 978-589-3167
fax: 978-589-3100

EPA-R5-2013-003300RR-151

Larry Silvestri
Exemption 6
02/02/2008 10:47 AM

To Larry Silvestri, Charles Norris, Mark Hutson, Timothy Drexler, Exem... Nona, Larry and Rosemary, Kim Ferraro
cc
bcc
Subject Notes from the conference call

All,
These are my notes from our conference call.
I attached the notes as a word document and also pasted the identical notes as text.
Please look at them and let me know if you would like anything added, deleted or corrected.
If everyone agrees that they are alright, I'll have them made public per the TAP agreement.
Thanks to everyone for participating,
Larry Silvestri
Exemption 6

==========

On Friday morning, February 1st 2008, there was a conference call with EPA Project Manager Tim Drexler, concerning the Yard 520 Remedial Investigation. The conference call included Jan Nona, Mark Huston & Chuck Norris of Geo-Hydro, Larry Jensen who is an expert in radionuclide, Kim Ferraro the NW Regional President of HEC, and myself. There were several issues that were discussed concerning the closing stages of the Remedial Investigation.

Larry Jensen explained to Tim that he had concerns about the level of radiation that is being accepted as a natural background for the Pines Area of Investigation. Based upon evidence and reasoning, Tim Drexler agreed to a 30-day extension for completion of the Remedial Investigation to perform soil testing from samples that have been already been collected from within the area of investigation. Larry Jensen pointed out that the sandy soil in the Pines Area of Investigation has a lower level of natural radiation than other areas. He also noted that he found data deviations of soil samples for radioisotopes. He noted that uranium 238, uranium 234, and radium 226 seemed to deviate from the detected polonium levels.

We asked about the probable flyash fill at 1600N and the Islamic Center, and if the end of the Remedial Investigation would preclude testing those areas that are outside the Area of Investigation. He said that the final Remedial Investigation document would allow for uncertainty and leave open the prospect for further investigation. He also said that examination of data might show that there are multiple groundwater plumes, and if they are a risk to human health they will be addressed.

Tim Drexler also answered several other questions.

Q: How can a natural background level for chemicals of potential concern be established if it is based on soil samples taken from areas that are probably contaminated? For example, since arsenic is a contaminant in flyash, wouldn't there be an unnaturally high level of

arsenic throughout the entire area of investigation left over from dust blown off delivery trucks and from uncovered piles of flyash? Furthermore, wouldn't that arsenic have leached into the groundwater and flowed throughout the Area of Investigation? While this contamination might not be at a high level everywhere, wouldn't it skew the natural background measurements against which actual contamination would be measured?
A: Tim responded that he was present at many of the background samplings and he is confident that they were conducted correctly and that they were collected far enough away from any possible contamination.

Q: It is perceived that this Remedial Investigation is more complicated than other superfund remedial investigations and that there are more adjustment factors that restrict contaminants from being considered risks to human health.
A: This is not more complicated than other Remedial Investigations.

Q: Why does the Remedial Investigation for the East Chicago Indiana Harbor and Ship Canal Confined Disposal Facility use a meteorological factor of 350 days that a person living or working near that disposal facility might be exposed to pollutants, whereas Remedial Investigation for the Pines Area of Investigation uses a meteorological factor of only 250 days that a resident may be exposed? Why such a large difference when the climate is identical?
A: Tim was not involved in the Indiana Harbor Remedial Investigation and couldn't say why they used that number.

Q: Why does the Pines Area of Investigation Remedial Investigation use "Surface Area and Soil to Skin Adherence Factors?" Are there other Remedial Investigations that include this in calculations? The Pines Area of Investigation Remedial Investigation assumes that a child has a smaller surface area and will therefore be less exposed to contamination than an adult. Shouldn't the risk to a child be greater because while they are growing, they absorb more chemicals and minerals than a grown adult?
A: Dermal contact is a small factor in absorbing contaminants. Inhalation and ingestion are the main pathways for contaminants into a human body.

==========

ConfCall.doc

EPA-R5-2013-003300RR-152

Larry Silvestri
Exemption 6
02/02/2008 07:10 PM

To Larry Silvestri, Kim Ferraro, Mark Hutson, Timothy Drexler, Exem... Nona, Larry and Rosemary, Charles Norris
cc
bcc
Subject Fwd: Notes from the conference call

All,

I eliminated the unreferenced and weakly referenced pronoun "he."
Thank you, Chuck.
The updated version is in text below, and also as an identical attached word document.
If anyone can see anything that they would like changed let me know.
Otherwise, I will make it public after the next PINES meeting, Thursday February 7th.

Larry Silvestri
Exemption 6

Begin forwarded message:

> From: Charles Norris <cnorris@geo-hydro.com>
> Date: February 2, 2008 11:23:56 AM CST
> To: Larry Silvestri <Exemption 6>
> Subject: Re: Notes from the conference call
>
> Larry,
> I think you did a good job of capturing the conversation. There are a
> few places where "he" may be ambiguous and using "Tim" or "Drexler"
> may help clarify.
> --
> Chuck
>
> Charles H. Norris
> Geo-Hydro, Inc.
> 1928 E 14th Avenue
> Denver CO 80206
>
> (303) 322-3171
>

On Friday morning, February 1st 2008, there was a conference call with EPA Project Manager Tim Drexler, concerning the Yard 520 Remedial Investigation. The conference call included Jan Nona, Mark Huston & Chuck Norris of Geo-Hydro, Larry Jensen who is an expert in radionuclide, Kim Ferraro the NW Regional President of HEC, and myself. There were several issues that were discussed concerning the closing stages of the Remedial Investigation.

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Jensen pointed out that the sandy soil in the Pines Area of Investigation has a lower level of natural radiation than other areas. Larry Jensen also noted that he found data deviations of soil samples for radioisotopes, and noted that uranium 238, uranium 234, and radium 226 seemed to deviate from the detected polonium levels.

We asked Tim about the probable flyash fill at 1600N and the Islamic Center, and if the end of the Remedial Investigation would preclude testing those areas that are outside the Area of Investigation. Tim said that the final Remedial Investigation document would allow for uncertainty and leave open the prospect for further investigation. Tim also said that examination of data might show that there are multiple groundwater plumes, and if they are a risk to human health they will be addressed.

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A: Tim responded that he was present at many of the background samplings and he is confident that they were conducted correctly and that they were collected far enough away from any possible contamination.

Q: It is perceived that this Remedial Investigation is more complicated than other superfund remedial investigations and that there are more adjustment factors that restrict contaminants from being considered risks to human health.
A: Tim said that this is not more complicated than other Remedial Investigations.

Q: Why does the Remedial Investigation for the East Chicago Indiana Harbor and Ship Canal Confined Disposal Facility use a meteorological factor of 350 days that a person living or working near that disposal facility might be exposed to pollutants, whereas Remedial Investigation for the Pines Area of Investigation uses a meteorological factor of only 250 days that a resident may be exposed? Why such a large difference when the climate is identical?
A: Tim said that he was not involved in the Indiana Harbor Remedial Investigation and couldn't say why they used that number.

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A: Tim stated that dermal contact is a small factor in absorbing contaminants. Inhalation and ingestion are the main pathways for contaminants into a human body.

ConfCall.doc

EPA-R5-2013-003300RR-153

[redacted]
Exemption 6
02/08/2008 08:14 PM

To Ellen Becker, Nancy Kolasa, Cathi Murray, Exemption 6, Peggy Richardson, Exem... Nona, larry_silvestri, Exemption 6, Exemptio..., Paul Kysel
cc Val Blumenfeld, Timothy Drexler, D.Sullivan
bcc
Subject P.I.N.E.S. Minutes for February 7, 2008

P.I.N.E.S. Minutes for February 7, 2008
As Text and attached MSWord Document

==========

P.I.N.E.S. Executive Board met on Thursday February 7, 2008

Members Present:
President Bud Prast
Co-Treasurer Peggy Richardson
Co-Treasurer Diane Egilske
Secretary Larry Silvestri
Nancy Kolasa
Ellen Becker

The meeting was called to order at 7:00pm

Extension of Remedial Investigation was discussed. The due date for the RI Report is extended 30 days from the original April 17, 2008 date in order for the background soil samples to be analyzed to establish site-specific radiological background.

This 30-day extension was precipitated by a February 1st conference call that included Jan Nona, Mark Huston & Chuck Norris of Geo-Hydro, Certified Health Physicist Larry Jensen, NW Regional President of the Hoosier Environmental Council Kim Ferraro, and PINES Secretary Larry Silvestri. Tim Drexler stated that as the conference call was TAP related, PINES is required to communicate a summary of the call to the public.

It was decided to communicate the summary of the call on the new web site.

Two web sites were evaluated. A decision was made by unanimous vote to accept the web site at:
http://pineswater.org/

A Request For Distribution to reimburse costs of web site hosting, domain name and 150 announcement post cards will be signed by co-treasurers and then mailed to Brown, NIPSCO and EPA.

The web site will be announced to interested people in and around the Pines Area of Investigation via post cards, radio call-in programs, newspaper community events sections, email trees, and other methods.

Meeting adjourned at 8:35pm.

==========

Minutes 2008-2-7.doc

EPA-R5-2013-003300RR-154

Timothy Drexler/R5/USEPA/US
02/20/2008 02:38 PM

To Larry Silvestri
cc Charles Norris, Kim Ferraro, Mark Hutson, Larry and Rosemary, Exem... Nona, Larry Silvestri
bcc
Subject Re: Notes from the conference call

Hi Larry:

I apologize for not contacting you sooner. I was on another Site and then spent a week out of the office with the flu. Just to let you know, the flu shot doesn't help this year.

I have a few comments regarding the email messages you sent.

First, I need to comment on the conversation we had on February 1st:

1. Please check with Larry Jensen, but I'm nearly certain that he did not say "that the sandy soil in the Pines Area of Investigation has a lower level of natural radiation than other areas." He hypothesized that the background level may be lower due to sandy soil. I agreed with that possibility with respect to the dunal areas. But, due to the dunal and interdunal nature of the Pines, the lower areas could have finer-grained material with higher natural radiation. I don't think Larry disagreed with that statement.

2. I was present at ALL, not many, of the background sample locations during collection.

3. With regard to the dermal contact question, I did preface my answer by saying that I am not a health professional. For more complete responses regarding dermal contact, I'm pretty sure I recommeded that you call Mark Johnson with ATSDR. His number is 312-353-3436.

WITH REGARD TO THE P.I.N.E.S. Website:

Larry, I stated during the call, the document entitiled "Evaluation of PAHs, PCDDs/PCDFs, and Radionuclide Data from Yard 520" was submitted by the PRP to EPA as a draft and is still draft pending edits that EPA requires from the PRPs and that we partially discussed. For that reason, please immediately remove that document from the website. Remember that the review of draft documents by P.I.N.E.S. is a privilege and not a right. None of us would like causing unnecessary misinformation headaches based on the release of deliberative draft documents. In fact, EPA has consistently withheld this particular document from Freedom of Information Act requests precisely because we do NOT consider the questions raised by the document resolved.

Thanks. Again, it was good talking to everyone. Please let me know of any other questions.

-Tim Drexler

Larry Silvestri <Exemption 6>

Larry Silvestri
Exemption 6
02/02/2008 10:47 AM

To Larry Silvestri <Exemption 6>, Charles Norris <cnorris@geo-hydro.com>, Mark Hutson <Exemptio...@geo-hydro.com>, Timothy

Drexler/R5/USEPA/US@EPA, [redacted] Nona
<[redacted]>, Larry and Rosemary
<[redacted]>, Kim Ferraro
<[redacted]>
cc

Subject Notes from the conference call

All,
These are my notes from our conference call.
I attached the notes as a word document and also pasted the identical notes as text.
Please look at them and let me know if you would like anything added, deleted or corrected.
If everyone agrees that they are alright, I'll have them made public per the TAP agreement.
Thanks to everyone for participating,
Larry Silvestri
[redacted]

==========

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We asked about the probable flyash fill at 1600N and the Islamic Center, and if the end of the Remedial Investigation would preclude testing those areas that are outside the Area of Investigation. He said that the final Remedial Investigation document would allow for uncertainty and leave open the prospect for further investigation. He also said that examination of data might show that there are multiple groundwater plumes, and if they are a risk to human health they will be addressed.

Tim Drexler also answered several other questions.

Q: How can a natural background level for chemicals of potential concern be established if it is based on soil samples taken from areas

that are probably contaminated? For example, since arsenic is a contaminant in flyash, wouldn't there be an unnaturally high level of arsenic throughout the entire area of investigation left over from dust blown off delivery trucks and from uncovered piles of flyash? Furthermore, wouldn't that arsenic have leached into the groundwater and flowed throughout the Area of Investigation? While this contamination might not be at a high level everywhere, wouldn't it skew the natural background measurements against which actual contamination would be measured?
A: Tim responded that he was present at many of the background samplings and he is confident that they were conducted correctly and that they were collected far enough away from any possible contamination.

Q: It is perceived that this Remedial Investigation is more complicated than other superfund remedial investigations and that there are more adjustment factors that restrict contaminants from being considered risks to human health.
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A: Dermal contact is a small factor in absorbing contaminants. Inhalation and ingestion are the main pathways for contaminants into a human body.

==========

ConfCall.doc

EPA-R5-2013-003300RR-155

Exemption 6

02/21/2008 02:38 PM

To Larry and Rosemary

cc Charles Norris, Mark Hutson, Timothy Drexler, Exem... Nona, Kim Ferraro

bcc

Subject Re: Notes from the conference call

All,

If there are no objections from anyone, I will make all of Tim's recommended changes.

Larry J, if you have a more accurate recollection of the conversation, please let me know. The website is not hard to change.

Tim, continue to keep us informed. I posted the "Evaluation of PAHs, PCDDs/PCDFs, and Radionuclide Data from Yard 520," in the spirit of the TAP's requirement that we inform the public. However, if there are any documents that you do not consider to be final drafts, please identify them so we do not make them public. In good faith, we still need to review draft documents with our technical experts. I assure you that we will respect their confidential nature.

Larry Silvestri
Exemption 6

On Feb 20, 2008, at 2:38 PM, Drexler.Timothy@epamail.epa.gov wrote:

> Hi Larry:
>
> I apologize for not contacting you sooner. I was on another Site and
> then spent a week out of the office with the flu. Just to let you know,
> the flu shot doesn't help this year.
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> I have a few comments regarding the email messages you sent.
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> any other questions.
>
> -Tim Drexler
>
>
>
>
>
> Larry Silvestri
> <[redacted]
> [redacted]>
>
> To
> 02/02/2008 10:47 Larry Silvestri
> AM <[redacted]>,
> Charles Norris
> <cnorris@geo-hydro.com>, Mark
> Hutson <[redacted]@geo-hydro.com>,
> Timothy Drexler/R5/USEPA/US@EPA,
> [redacted] Nona <[redacted]>,
> Larry and Rosemary
> <[redacted]>, Kim Ferraro
> <[redacted]>
>
> cc
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> Subject
> Notes from the conference call
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> Exemption 6
>
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> (See attached file: ConfCall.doc)
> <ConfCall.doc>

EPA-R5-2013-003300RR-156

[redacted]
Exemption 6
02/21/2008 03:39 PM

To Timothy Drexler
cc Kim Ferraro, Mark Hutson, Timothy Drexler, Larry and Rosemary, Exem... Nona, Charles Norris
bcc
Subject Re: Notes from the conference call

All,

If you do not see Tim's suggested changes to
http://www.pineswater.org/
then click reload / refresh.

If anyone can see anything else that is not accurate,
please let me know and I'll make the correction.
(After snow shoveling)

Thank you,
Larry Silvestri

On Feb 21, 2008, at 2:38 PM, Larry Silvestri wrote:

> All,
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> recommended changes.
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>> -Tim Drexler
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>>
>>
>>
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>> <[redacted]
>> [redacted]>
>>
>> To
>> 02/02/2008 10:47 AM
>> Larry Silvestri
>> <[redacted]>,
>> Charles Norris
>> <cnorris@geo-hydro.com>, Mark
>> Hutson <[redacted]@geo-hydro.com>,
>> Timothy Drexler/R5/USEPA/US@EPA,
>> [redacted] Nona
>> <[redacted]>,
>> Larry and Rosemary
>> <[redacted]>, Kim Ferraro
>> <[redacted]>
>>
>> cc

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>> (See attached file: ConfCall.doc)
>> <ConfCall.doc>
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EPA-R5-2013-003300RR-157

Timothy Drexler/R5/USEPA/US
02/21/2008 04:10 PM

To Larry Silvestri
cc Charles Norris, Kim Ferraro, Mark Hutson, Larry and Rosemary, Exem... Nona
bcc
Subject Re: Notes from the conference call

Thanks, Larry. I appreciate the changes.

Snow shovelling? Are you getting hit?

Don't work too hard. Talk to you soon.

-Tim

Larry Silvestri < Exemption 6 >

Exemption 6
02/21/2008 02:38 PM

To Larry and Rosemary < Exe... xemption 6 >
cc Charles Norris <cnorris@geo-hydro.com>, Mark Hutson < Exemptio... @geo-hydro.com>, Timothy Drexler/R5/USEPA/US@EPA, Exem... Nona < Exe Exemption 6 >, Kim Ferraro < Exemption 6 mption 6 >

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> 02/02/2008 10:47 AM Larry Silvestri
> <Exemption 6>,
> Charles Norris
> <cnorris@geo-hydro.com>, Mark

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> <ConfCall.doc>

EPA-R5-2013-003300RR-158

"Mark Hutson"
<[redacted]@geo-hydro.com>
03/20/2008 11:32 AM

To Timothy Drexler
cc cnorris
bcc
Subject RE: Pines AOC II Progress Report 3-17-08

Tim

"Analytical results from sampling of native soils beneath or downgradient from suspected CCBs were provided to the USEPA and IDEM on February 21, 2008."

I see in the analytical results are in. Can we get the data so we can take a look too?

Thanks,

Mark Hutson

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Tuesday, March 18, 2008 6:59 AM
To: pete_penoyer@nps.gov; kherron@idem.in.gov; Bob_Daum@nps.gov; scott_hicks@nps.gov; dale_engquist@nps.gov; [redacted]
Cc: [redacted]@geo-hydro.com; cnorris@geo-hydro.com
Subject: Fw: Pines AOC II Progress Report 3-17-08

----- Forwarded by Timothy Drexler/R5/USEPA/US on 03/18/2008 07:58 AM -----

"Gleason, Shannon" <sgleason@ensr.aecom.com>
03/17/2008 04:44 PM

To Timothy Drexler/R5/USEPA/US@EPA, <kherron@idem.in.gov>, <kherron@dem.state.in.us>
cc "Bradley, Lisa" <lbradley@ensr.aecom.com>, "Perry, Elizabeth" <EPerry@ensr.aecom.com>

Subject
FW: Pines AOC II Progress Report
3-17-08

Greetings!

Attached please find the February 2008 Progress Report for AOC II for the Pines Area of Investigation.

Please feel free to contact me if you have any questions.

:) LAIS

<<Pines AOC II - Progress Report 3-17-08.pdf>>

_____

Lisa JN Bradley, Ph.D., DABT

Senior Toxicologist

ENSR

2 Technology Park Drive

Westford, MA 01886

978-589-3059 (direct)

978-846-3463 (cell)

866-758-4856 (fax)

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www.ensr.aecom.com

978-589-3000(See attached file: Pines AOC II - Progress Report 3-17-08.pdf)

EPA-R5-2013-003300RR-159

Timothy Drexler/R5/USEPA/US
03/31/2008 02:46 PM

To "Mark Hutson"
cc
bcc
Subject RE: Pines AOC II Progress Report 3-17-08

Gee Mark:

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Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071
"Mark Hutson" <Exemption 6@geo-hydro.com>

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EPA-R5-2013-003300RR-160

"Mark Hutson"
<[redacted]@geo-hydro.com>
04/01/2008 03:30 PM

To Timothy Drexler
cc
bcc
Subject RE: Pines AOC II Progress Report 3-17-08

Tim

I thought that the data in in January monthly report was for a different purpose.
Weren't they going to be investigating the soils in the area of the old Pottery factory?

Mark

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Monday, March 31, 2008 1:47 PM
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04/02/2008 01:47 PM

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cc
bcc
Subject RE: Pines AOC II Progress Report 3-17-08

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Tim

"Mark Hutson" <Exemption 6@geo-hydro.com>

"Mark Hutson"
<Exemption 6@geo-hydro.com>
04/01/2008 03:30 PM

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject RE: Pines AOC II Progress Report 3-17-08

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Weren't they going to be investigating the soils in the area of the old Pottery factory?

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-----Original Message-----
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[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Monday, March 31, 2008 1:47 PM
To: Mark Hutson
Subject: RE: Pines AOC II Progress Report 3-17-08

Gee Mark:

Sorry it took me so long to get back to you. The results were included in the January 2008 monthly report we all received in February.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

"Mark Hutson"
<[redacted]@geo-hydro.com>

03/20/2008 11:32 AM

To
Timothy Drexler/R5/USEPA/US@EPA

cc
<cnorris@geo-hydro.com>

Subject
RE: Pines AOC II Progress Report 3-17-08

Tim

"Analytical results from sampling of native soils beneath or downgradient from suspected CCBs were provided to the USEPA and IDEM on February 21, 2008."

I see in the analytical results are in. Can we get the data so we can take a look too?

Thanks,

Mark Hutson

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Tuesday, March 18, 2008 6:59 AM
To: pete_penoyer@nps.gov; kherron@idem.in.gov; Bob_Daum@nps.gov; scott_hicks@nps.gov; dale_engquist@nps.gov; [redacted]; [redacted]; [redacted]; [redacted]; [redacted]

[redacted]; [redacted]
Cc: [redacted]@geo-hydro.com; cnorris@geo-hydro.com
Subject: Fw: Pines AOC II Progress Report 3-17-08

----- Forwarded by Timothy Drexler/R5/USEPA/US on 03/18/2008 07:58 AM -----

"Gleason, Shannon" <sgleason@ensr.aecom.com>

03/17/2008 04:44 PM

To
Timothy Drexler/R5/USEPA/US@EPA, <kherron@idem.in.gov>, <kherron@dem.state.in.us>

cc
"Bradley, Lisa" <lbradley@ensr.aecom.com>, "Perry, Elizabeth" <EPerry@ensr.aecom.com>

Subject
FW: Pines AOC II Progress Report 3-17-08

Greetings!

Attached please find the February 2008 Progress Report for AOC II for the Pines Area of Investigation.

Please feel free to contact me if you have any questions.

:) LAIS

<<Pines AOC II - Progress Report 3-17-08.pdf>>

_____

Lisa JN Bradley, Ph.D., DABT

Senior Toxicologist

ENSR

2 Technology Park Drive

Westford, MA 01886

978-589-3059 (direct)

978-846-3463 (cell)

866-758-4856 (fax)

lbradley@ensr.aecom.com

www.ensr.aecom.com

978-589-3000(See attached file: Pines AOC II - Progress Report 3-17-08.pdf)

EPA-R5-2013-003300RR-162

"Mark Hutson"
<Exemption 6@geo-hydro.com>
04/02/2008 02:26 PM

To Timothy Drexler
cc
bcc
Subject RE: Pines AOC II Progress Report 3-17-08

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I didn't realize that the plan had been changed. I thought that you were still planning to collect new data from the north side of the landfill.

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From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Wednesday, April 02, 2008 12:47 PM
To: Mark Hutson
Subject: RE: Pines AOC II Progress Report 3-17-08

Mark:

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"Mark Hutson"
<Exemption 6@geo-hydro.com>
04/01/2008 03:30 PM

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject
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Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

"Mark Hutson"
<[redacted]@geo-hydro.com>
03/20/2008 11:32 AM

To
Timothy Drexler/R5/USEPA/US@EPA
cc
<cnorris@geo-hydro.com>

Subject
RE: Pines AOC II Progress Report
3-17-08

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:) LAIS

<<Pines AOC II - Progress Report 3-17-08.pdf>>

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978-589-3000(See attached file: Pines AOC II - Progress Report 3-17-08.pdf)

EPA-R5-2013-003300RR-163

"Mark Hutson"
<Exemption 6@geo-hydro.com>
04/15/2008 04:33 PM

To Timothy Drexler
cc
bcc
Subject FW: Pines AOC II Progress Report 3-17-08

Hi Tim

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Were you going to send me the Weaver Boos data from the north side of the landfill? We'd still like to take a look at that data in conjunction with the new data that ENSR developed.

Thanks
Mark

-----Original Message-----
From: Mark Hutson [mailto:Exemption 6@geo-hydro.com]
Sent: Wednesday, April 02, 2008 1:27 PM
To: 'Drexler.Timothy@epamail.epa.gov'
Subject: RE: Pines AOC II Progress Report 3-17-08

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phone: 312.353.4367
fax: 312.886.4071

"Mark Hutson"
<[redacted]@geo-hydro.com>

03/20/2008 11:32 AM

To
Timothy Drexler/R5/USEPA/US@EPA

cc
<cnorris@geo-hydro.com>

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cc
"Bradley, Lisa" <lbradley@ensr.aecom.com>, "Perry, Elizabeth" <EPerry@ensr.aecom.com>

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EPA-R5-2013-003300RR-164

Timothy Drexler/R5/USEPA/US
04/15/2008 04:56 PM

To "Mark Hutson"
cc
bcc
Subject Re: FW: Pines AOC II Progress Report 3-17-08

Hi Mark:

Whoops. Sorry about that. I'll put it in the mail.

I heard you got some chinooks. That reminded me of when my wife and I first moved to Boulder in 1982. The weekend we were there househunting they recorded 120 mph winds on Table Mesa while we were staying with friends in Denver. Needless to say we were pretty impressed and, subsequently, bought on the north side of town.

-Tim

"Mark Hutson" <Exemption 6@geo-hydro.com>

"Mark Hutson"
<Exemption 6@geo-hydro.com>
04/15/2008 04:33 PM

To Timothy Drexler/R5/USEPA/US@EPA
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Subject FW: Pines AOC II Progress Report 3-17-08

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<[redacted]@geo-hydro.com>

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To
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Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

"Mark Hutson"
<[redacted]@geo-hydro.com>
03/20/2008 11:32 AM

To
Timothy Drexler/R5/USEPA/US@EPA
cc
<cnorris@geo-hydro.com>

Subject
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Cc: [redacted]@geo-hydro.com; cnorris@geo-hydro.com
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03/17/2008 04:44 PM		Timothy Drexler/R5/USEPA/US@EPA, <kherron@idem.in.gov>, <kherron@dem.state.in.us>
		cc
		"Bradley, Lisa" <lbradley@ensr.aecom.com>, "Perry, Elizabeth" <EPerry@ensr.aecom.com>
		Subject
		FW: Pines AOC II Progress Report 3-17-08

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978-589-3000(See attached file: Pines AOC II - Progress Report 3-17-08.pdf)

EPA-R5-2013-003300RR-165

Timothy Drexler/R5/USEPA/US
05/06/2008 10:04 AM

To lbradley
cc
bcc
Subject Fw: Emailing: DSC00615

Hi Lisa:

A couple of pictures from Peggy Richardson's well in Pines Township that you need to see. There are two more email messages. Please call me if you'd like to discuss.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

----- Forwarded by Timothy Drexler/R5/USEPA/US on 05/06/2008 10:02 AM -----

"r.nona"
Exemption 6
05/06/2008 10:00 AM

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject Emailing: DSC00615

Tim: I'm sending this one of three pictures at the request of Peggy Richardson. They are pictures of her well "point" or "screen", taken from Exemption 6 - next door to Peggy. This well is no more than 24 months old. The point is almost completely plugged with flyash. She has saved the point in case you want to look at it.

jan nona - for Peggy

The message is ready to be sent with the following file or link attachments:
DSC00615

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled. DSC00615.JPG

EPA-R5-2013-003300RR-166

Timothy Drexler/R5/USEPA/US
05/06/2008 10:05 AM

To lbradley
cc
bcc
Subject Fw: Emailing: DSC00616

----- Forwarded by Timothy Drexler/R5/USEPA/US on 05/06/2008 10:04 AM -----

"r.nona"
Exemption 6
05/06/2008 10:01 AM

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject Emailing: DSC00616

Picture #2 from Peggy

The message is ready to be sent with the following file or link attachments:
DSC00616

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EPA-R5-2013-003300RR-167

Timothy Drexler/R5/USEPA/US
05/06/2008 10:05 AM

To lbradley
cc
bcc
Subject Fw: Emailing: DSC00617

----- Forwarded by Timothy Drexler/R5/USEPA/US on 05/06/2008 10:05 AM -----

"r nona"
Exemption 6
05/06/2008 10:01 AM

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject Emailing: DSC00617

Final - picture #3.

The message is ready to be sent with the following file or link attachments:
DSC00617

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EPA-R5-2013-003300RR-168

"Bradley, Lisa"
<lbradley@ensr.aecom.com>
05/06/2008 10:12 AM

To Timothy Drexler
cc
bcc
Subject RE: Emailing: DSC00615

Thanks Tim - let me review and I will give you a call. Elizabeth is on vacation, but will be back in the office on Thursday, and she will be our best reviewer. :) LIAS

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Tuesday, May 06, 2008 11:05 AM
To: Bradley, Lisa
Subject: Fw: Emailing: DSC00615

Hi Lisa:

A couple of pictures from Peggy Richardson's well in Pines Township that you need to see. There are two more email messages. Please call me if you'd like to discuss.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071
----- Forwarded by Timothy Drexler/R5/USEPA/US on 05/06/2008 10:02 AM -----

"Exemptio..."
<Exemption 6.
net>
To
05/06/2008 10:00 AM Timothy Drexler/R5/USEPA/US@EPA
cc
Subject
Emailing: DSC00615

Tim: I'm sending this one of three pictures at the request of Peggy Richardson. They are pictures of her well "point" or "screen", taken from [redacted] - next door to Peggy. This well is no more than 24 months old. The point is almost completely plugged with flyash. She has saved the point in case you want to look at it.

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EPA-R5-2013-003300RR-169

Timothy Drexler/R5/USEPA/US
05/06/2008 10:39 AM

To "Bradley, Lisa"
cc
bcc
Subject RE: Emailing: DSC00615

Thanks, Lisa. I'm following up with a few questions to Peggy. How old is the house? Why did they pull the well and did she replace it? Does she have any additional information on the well. That sort of thing. If you all have any additional questions, let me know. I'll let you know of any response.

-Tim

"Bradley, Lisa" <lbradley@ensr.aecom.com>

"Bradley, Lisa" <lbradley@ensr.aecom.com>
05/06/2008 10:12 AM

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject RE: Emailing: DSC00615

Thanks Tim - let me review and I will give you a call. Elizabeth is on vacation, but will be back in the office on Thursday, and she will be our best reviewer. :) LIAS

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From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Tuesday, May 06, 2008 11:05 AM
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phone: 312.353.4367
fax: 312.886.4071
----- Forwarded by Timothy Drexler/R5/USEPA/US on 05/06/2008 10:02 AM -----

"[redacted]"
<[redacted].
net>

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Emailing: DSC00615

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EPA-R5-2013-003300RR-170

Timothy Drexler/R5/USEPA/US
05/06/2008 11:24 AM

To "Peggy Richardson"
cc
bcc
Subject Re: Well point

Thanks for the pictures, Peggy. No, I haven't received anything from you except the attached email message.

Tim

"Peggy Richardson" <[redacted] Exemption 6 >

"[redacted] Exemption 6 [redacted]
05/06/2008 11:10 AM

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject Well point

Hi Tim, did you get the e-mail I sent to you after the one you sent Jan,

I don't know if it went or not. Thanks Peggy Richardson

EPA-R5-2013-003300RR-171

"Peggy Richardson "
[redacted]
05/06/2008 11:30 AM

To Timothy Drexler
cc
bcc
Subject Re: Emailing: DSC00615

About two years ago we put down a new point, a couple of weeks ago

we weren't able to pull any water so we pulled the point back up to

clean it. I was sure surprised to see all the junk on that point it was all

black. Also the house was built in 1948. If you have anymore

questions just let me know. Thanks Peggy

-----Original Message-----
From: "[redacted]" <[redacted]>
Sent 05/06/2008 10:43:54 AM
To: "Peggy Richardson" <[redacted]>
Subject: Fw: Emailing: DSC00615

```
----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "[redacted]" <[redacted]>
Sent: Tuesday, May 06, 2008 10:07 AM
Subject: Re: Emailing: DSC00615


> Thanks a lot, Jan. Can Peggy send me any additional
information? Did she
> just pull the well for some reason? Was it clogged? Is there a
drillers
> log for the well or any other information? Did she replace it
with a new
> well?
>
> Tim Drexler
> Remedial Project Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-6J
> Chicago, Illinois 60604-3590
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>
> phone: 312.353.4367
> fax: 312.886.4071
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>
>
> "Exemption 6"
> <Exemption 6.
> net>
>
To
> 05/06/2008 10:00 Timothy
Drexler/R5/USEPA/US@EPA
> AM
cc
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Subject
> Emailing: DSC00615
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> Tim: I'm sending this one of three pictures at the request of
Peggy
> Richardson. They are pictures of her well "point" or "screen",
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> from Exemption 6 - next door to Peggy. This well is no more
than 24
> months old. The point is almost completely plugged with
flyash. She
> has saved the point in case you want to look at it.
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> jan nona - for Peggy
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> attachments:
> DSC00615
>

> Note: To protect against computer viruses, e-mail programs may prevent
> sending or receiving certain types of file attachments. Check your
> e-mail security settings to determine how attachments are handled.(See
> attached file: DSC00615.JPG)

No virus found in this incoming message.
Checked by AVG.
Version: 7.5.524 / Virus Database: 269.23.9/1416 - Release Date: 5/5/2008
5:11 PM

EPA-R5-2013-003300RR-172

Timothy Drexler/R5/USEPA/US
05/06/2008 11:43 AM

To lbradley
cc
bcc
Subject Fw: Emailing: DSC00615

Some additional information.

-Tim

----- Forwarded by Timothy Drexler/R5/USEPA/US on 05/06/2008 11:43 AM -----

"Peggy Richardson "
[redacted]
05/06/2008 11:30 AM

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject Re: Emailing: DSC00615

About two years ago we put down a new point, a couple of weeks ago we weren't able to pull any water so we pulled the point back up to clean it. I was sure surprised to see all the junk on that point it was all black. Also the house was built in 1948. If you have anymore questions just let me know. Thanks Peggy

-----Original Message-----
From: "[redacted]" <[redacted]>
Sent 05/06/2008 10:43:54 AM
To: "Peggy Richardson" <[redacted]>
Subject: Fw: Emailing: DSC00615

----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "[redacted]" <[redacted]>
Sent: Tuesday, May 06, 2008 10:07 AM
Subject: Re: Emailing: DSC00615

> Thanks a lot, Jan. Can Peggy send me any additional
information? Did she
> just pull the well for some reason? Was it clogged? Is there a
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> log for the well or any other information? Did she replace it
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> Tim Drexler
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No virus found in this incoming message.
Checked by AVG.
Version: 7.5.524 / Virus Database: 269.23.9/1416 - Release Date: 5/5/2008
5:11 PM

EPA-R5-2013-003300RR-173

Timothy Drexler/R5/USEPA/US
05/06/2008 11:45 AM

To "Peggy Richardson"
cc
bcc
Subject Re: Emailing: DSC00615

Thanks for the additional information, Peggy. I've passed your information on to ENSR. I will be discussing it with them.

Tim Drexler

"Peggy Richardson" <[redacted]>

"Peggy Richardson " <peggy@tory.adsnet.com>
05/06/2008 11:30 AM

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject Re: Emailing: DSC00615

About two years ago we put down a new point, a couple of weeks ago

we weren't able to pull any water so we pulled the point back up to

clean it. I was sure surprised to see all the junk on that point it was all

black. Also the house was built in 1948. If you have anymore

questions just let me know. Thanks Peggy

-----Original Message-----
From: "[redacted]" <[redacted]>
Sent 05/06/2008 10:43:54 AM
To: "Peggy Richardson" <[redacted]>
Subject: Fw: Emailing: DSC00615

----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "[redacted]" <[redacted]>
Sent: Tuesday, May 06, 2008 10:07 AM

Subject: Re: Emailing: DSC00615

> Thanks a lot, Jan. Can Peggy send me any additional
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> just pull the well for some reason? Was it clogged? Is there a
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Subject
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> attached file: DSC00615.JPG)

No virus found in this incoming message.
Checked by AVG.
Version: 7.5.524 / Virus Database: 269.23.9/1416 - Release Date: 5/5/2008
5:11 PM

EPA-R5-2013-003300RR-174

Timothy Drexler/R5/USEPA/US
05/06/2008 04:46 PM

To "Peggy Richardson"
cc
bcc
Subject Re: Emailing: DSC00615

Hi Peggy:

Did you keep the well point?

-Tim

"Peggy Richardson" <[redacted]>

"Peggy Richardson "
[redacted]
05/06/2008 11:30 AM

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject Re: Emailing: DSC00615

About two years ago we put down a new point, a couple of weeks ago we weren't able to pull any water so we pulled the point back up to clean it. I was sure surprised to see all the junk on that point it was all black. Also the house was built in 1948. If you have anymore questions just let me know. Thanks Peggy

-----Original Message-----
From: "[redacted]" <[redacted]>
Sent 05/06/2008 10:43:54 AM
To: "Peggy Richardson" <[redacted]>
Subject: Fw: Emailing: DSC00615

----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "[redacted]" <[redacted]>
Sent: Tuesday, May 06, 2008 10:07 AM

Subject: Re: Emailing: DSC00615

> Thanks a lot, Jan. Can Peggy send me any additional
information? Did she
> just pull the well for some reason? Was it clogged? Is there a
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> Tim Drexler
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Subject
> Emailing: DSC00615
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> Richardson. They are pictures of her well "point" or "screen", taken
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> jan nona - for Peggy
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No virus found in this incoming message.
Checked by AVG.
Version: 7.5.524 / Virus Database: 269.23.9/1416 - Release Date: 5/5/2008
5:11 PM

EPA-R5-2013-003300RR-175

"Peggy Richardson "
Exemption 6
05/06/2008 09:39 PM

To Timothy Drexler
cc
bcc
Subject Re: Emailing: DSC00615

Yes I did keep the well point.

Peggy

-----Original Message-----
From: <Drexler.Timothy@epamail.epa.gov>
Sent 05/06/2008 4:46:18 PM
To: "Peggy Richardson" <Exemption 6>
Subject: Re: Emailing: DSC00615

Hi Peggy:

Did you keep the well point?

-Tim

"Peggy Richardson" <Exemption 6 et.com>
05/06/2008 11:30 AM

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject

Re: Emailing: DSC00615

About two years ago we put down a new point, a couple of weeks ago

we weren't able to pull any water so we pulled the point back up to

clean it. I was sure surprised to see all the junk on that point it was
all

black. Also the house was built in 1948. If you have anymore

questions just let me know. Thanks Peggy

-----Original Message-----
From: "Exemption 6" <Exemption 6>
Sent 05/06/2008 10:43:54 AM
To: "Peggy Richardson" <Exemption 6>
Subject: Fw: Emailing: DSC00615

----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "Exemption 6" <Exemption 6>
Sent: Tuesday, May 06, 2008 10:07 AM
Subject: Re: Emailing: DSC00615

> Thanks a lot, Jan. Can Peggy send me any additional information? Did
she
> just pull the well for some reason? Was it clogged? Is there a drillers
> log for the well or any other information? Did she replace it with a

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> Tim Drexler
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> Chicago, Illinois 60604-3590
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> phone: 312.353.4367
> fax: 312.886.4071
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>
>
> "[redacted]"
> <[redacted].
> net>
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To
> 05/06/2008 10:00 Timothy
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> AM
cc
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Subject
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> Tim: I'm sending this one of three pictures at the request of
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> Richardson. They are pictures of her well "point" or "screen",
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> attached file: DSC00615.JPG)

No virus found in this incoming message.
Checked by AVG.
Version: 7.5.524 / Virus Database: 269.23.9/1416 - Release Date:
5/5/2008
5:11 PM

EPA-R5-2013-003300RR-176

Timothy Drexler/R5/USEPA/US
05/07/2008 10:35 AM

To "Peggy Richardson"
cc
bcc
Subject Re: Emailing: DSC00615

Could I make a quick visit to your place tomorrow morning (Thursday)?

-Tim

"Peggy Richardson" <[redacted]>

"Peggy Richardson"
[redacted]
05/06/2008 09:39 PM

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject Re: Emailing: DSC00615

Yes I did keep the well point.

Peggy

-----Original Message-----
From: <Drexler.Timothy@epamail.epa.gov>
Sent 05/06/2008 4:46:18 PM
To: "Peggy Richardson" <[redacted]>
Subject: Re: Emailing: DSC00615

Hi Peggy:

Did you keep the well point?

-Tim

"Peggy Richardson" <[redacted]
et.com>

To
Timothy
Drexler/R5/USEPA/US@EPA
05/06/2008 11:30
cc
AM

Subject
Re: Emailing: DSC00615

About two years ago we put down a new point, a couple of weeks ago

we weren't able to pull any water so we pulled the point back up to

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black. Also the house was built in 1948. If you have anymore

questions just let me know. Thanks Peggy

-----Original Message-----
From: "[redacted]" <[redacted]>
Sent 05/06/2008 10:43:54 AM
To: "Peggy Richardson" <[redacted]>
Subject: Fw: Emailing: DSC00615

----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "[redacted]" <[redacted]>
Sent: Tuesday, May 06, 2008 10:07 AM
Subject: Re: Emailing: DSC00615

> Thanks a lot, Jan. Can Peggy send me any additional
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> phone: 312.353.4367
> fax: 312.886.4071
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>
> "[redacted]"
> <[redacted].
> net>
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To
> 05/06/2008 10:00 Timothy
Drexler/R5/USEPA/US@EPA
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Subject
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No virus found in this incoming message.
Checked by AVG.
Version: 7.5.524 / Virus Database: 269.23.9/1416 - Release Date:
5/5/2008
5:11 PM

EPA-R5-2013-003300RR-177

"Peggy Richardson "
Exemption 6
05/07/2008 10:46 AM

To Timothy Drexler
cc
bcc
Subject Re: Emailing: DSC00615

Sure, about what time do you think you'll be able to stop by I'll make sure that I'm here. Are you going to take the

point with you or just look at it? Peggy
-----Original Message-----
From: <Drexler.Timothy@epamail.epa.gov>
Sent 05/07/2008 10:35:14 AM
To: "Peggy Richardson" <Exemption 6>
Subject: Re: Emailing: DSC00615

Could I make a quick visit to your place tomorrow morning (Thursday)?

-Tim

"Peggy Richardson" <Exemption 6
Exemption 6
To
Timothy Drexler/R5/USEPA/US@EPA
05/06/2008 09:39 PM
cc

Subject

Re: Emailing: DSC00615

Yes I did keep the well point.

Peggy

-----Original Message-----
From: <Drexler.Timothy@epamail.epa.gov>
Sent 05/06/2008 4:46:18 PM
To: "Peggy Richardson" <[redacted]>
Subject: Re: Emailing: DSC00615

Hi Peggy:

Did you keep the well point?

-Tim

"Peggy Richardson" <[redacted]>

To

Timothy Drexler/R5/USEPA/US@EPA

05/06/2008 11:30 AM

cc

Subject

Re: Emailing: DSC00615

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clean it. I was sure surprised to see all the junk on that point it was
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questions just let me know. Thanks Peggy

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From: "Exemption 6" <Exer Exemption 6>
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Subject: Fw: Emailing: DSC00615

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From: <Drexler.Timothy@epamail.epa.gov>
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Sent: Tuesday, May 06, 2008 10:07 AM
Subject: Re: Emailing: DSC00615

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> attached file: DSC00615.JPG)

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Version: 7.5.524 / Virus Database: 269.23.9/1416 - Release Date:
5/5/2008
5:11 PM

EPA-R5-2013-003300RR-178

Timothy Drexler/R5/USEPA/US
05/07/2008 11:06 AM

To "Peggy Richardson"
cc
bcc
Subject Re: Emailing: DSC00615

If its OK, I'd like to come by at about 10:30 am. I only need to look at the well point, take a few additional pictures, and see where the well was located. If you have any of the drillers information, that would be great also.

-Tim

"Peggy Richardson" <[redacted]>

"Peggy Richardson "
[redacted]
05/07/2008 10:46 AM

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject Re: Emailing: DSC00615

Sure, about what time do you think you'll be able to stop by I'll make sure that I'm here. Are you going to take the

point with you or just look at it? Peggy
-----Original Message-----
From: <Drexler.Timothy@epamail.epa.gov>
Sent 05/07/2008 10:35:14 AM
To: "Peggy Richardson" <[redacted]>
Subject: Re: Emailing: DSC00615

Could I make a quick visit to your place tomorrow morning (Thursday)?

-Tim

"Peggy

Richardson"
<[redacted]
[redacted]

To

Timothy
Drexler/R5/USEPA/US@EPA
05/06/2008 09:39
cc
PM

Subject

Re: Emailing: DSC00615

Yes I did keep the well point.

Peggy

-----Original Message-----
From: <Drexler.Timothy@epamail.epa.gov>
Sent 05/06/2008 4:46:18 PM
To: "Peggy Richardson" <[redacted]>
Subject: Re: Emailing: DSC00615

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-Tim

"Peggy
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<[redacted]
et.com>
To
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Drexler/R5/USEPA/US@EPA
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To: "Peggy Richardson" <[redacted]>

Subject: Fw: Emailing: DSC00615

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To: "Exemption 6" <Exemption 6>
Sent: Tuesday, May 06, 2008 10:07 AM
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> jan nona - for Peggy
>
>
> The message is ready to be sent with the following file or link
> attachments:
> DSC00615
>
> Note: To protect against computer viruses, e-mail programs may
prevent
> sending or receiving certain types of file attachments. Check
your
> e-mail security settings to determine how attachments are
handled.(See
> attached file: DSC00615.JPG)

No virus found in this incoming message.
Checked by AVG.
Version: 7.5.524 / Virus Database: 269.23.9/1416 - Release Date:
5/5/2008
5:11 PM

EPA-R5-2013-003300RR-179

Timothy Drexler/R5/USEPA/US
05/08/2008 04:45 PM

To "Peggy Richardson"
cc
bcc
Subject Re: Well Point

Hi Peggy:

Thanks again for the help today. Sorry I was so early. I thought of another question. The well has plugged with material since you installed it two years ago. Was the well used for drinking water purposes, yard purposes, or both, during that time?

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

EPA-R5-2013-003300RR-180

"Peggy Richardson "
[redacted] Exemption 6
05/08/2008 04:54 PM

To Timothy Drexler
cc
bcc
Subject Re: Well Point

Hi Tim,

The well was used for both, bathing, doing dishes, cleaning, but none of my family ever drank or cooked with it.

When my son lived there he had a water cooler along with the water supplied to all of us in the area.

Peggy

-----Original Message-----
From: <Drexler.Timothy@epamail.epa.gov>
Sent 05/08/2008 4:45:03 PM
To: "Peggy Richardson" <[redacted] Exemption 6>
Subject: Re: Well Point

Hi Peggy:

Thanks again for the help today. Sorry I was so early. I thought of
another question. The well has plugged with material since you installed
it two years ago. Was the well used for drinking water purposes, yard
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fax: 312.886.4071

EPA-R5-2013-003300RR-181

Timothy Drexler/R5/USEPA/US
05/08/2008 05:05 PM

To lbradley
cc eperry
bcc
Subject Fw: Well Point

----- Forwarded by Timothy Drexler/R5/USEPA/US on 05/08/2008 05:05 PM -----

"Peggy Richardson "
[redacted] *Exemption 6*
05/08/2008 04:54 PM

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject Re: Well Point

Hi Tim,

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Sent 05/08/2008 4:45:03 PM
To: "Peggy Richardson" <[redacted] *Exemption 6* >
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Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

EPA-R5-2013-003300RR-182

"Bradley, Lisa"
<lbradley@ensr.aecom.com>
05/08/2008 05:10 PM

To Timothy Drexler
cc
bcc
Subject RE: Well Point

Thanks Tim! :) LIAS

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Thursday, May 08, 2008 6:06 PM
To: Bradley, Lisa
Cc: Perry, Elizabeth
Subject: Fw: Well Point

----- Forwarded by Timothy Drexler/R5/USEPA/US on 05/08/2008 05:05 PM -----

"Peggy Richardson"
<[redacted]
05/08/2008 04:54 PM

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject Re: Well Point

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Sent 05/08/2008 4:45:03 PM
To: "Peggy Richardson" <[redacted]>
Subject: Re: Well Point

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fax: 312.886.4071

EPA-R5-2013-003300RR-183

"Perry, Elizabeth" <EPerry@ensr.aecom.com>
05/08/2008 07:14 PM

To Timothy Drexler
cc
bcc
Subject RE: Well Point

and after the water stops being supplied...?

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Thursday, May 08, 2008 6:06 PM
To: Bradley, Lisa
Cc: Perry, Elizabeth
Subject: Fw: Well Point

----- Forwarded by Timothy Drexler/R5/USEPA/US on 05/08/2008 05:05 PM -----

"Peggy Richardson"
[redacted]
Exemption 6
05/08/2008 04:54 PM

Timothy Drexler/R5/USEPA/US@EPA
cc

Subject
Re: Well Point

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phone: 312.353.4367
fax: 312.886.4071

EPA-R5-2013-003300RR-184

"r.nona"
Exemption 6
05/09/2008 10:32 AM

To Timothy Drexler
cc "Larry Silvestri", "Paul Kysel", "Peggy Richardson"
bcc
Subject rumor

I'm hearing a rumor that you are using 7000 ppb as the mcl for boron. Please tell me this rumor is not true.

WHY? 900 or 1000 has been the number since forever. Every publication out there says this. Every federal and state agency that I have been involved with use these numbers. This includes the CDC, ASTDR, IDEM and even, previously, the EPA. WHAT THE DEVIL IS GOING ON????? You are only creating totally mixed messages for regular citizens such as myself.

jan nona

EPA-R5-2013-003300RR-185

"r.nona"
Exemption 6
05/09/2008 03:31 PM

To Timothy Drexler
cc
bcc
Subject Re: rumor

I think that based on this info, we will be watching the risk assessment #s very carefully. It isn't right to go changing the rules in the middle of the stream so to speak.

jan nona
----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "Exemptio..." <Exer Exemption 6>
Sent: Friday, May 09, 2008 2:18 PM
Subject: Re: rumor

> Hi Jan:
>
> The potentially responsible parties for the Pines Site requested last
> year that EPA adjust our Site-related drinking water screening level
> concentrations to reflect changed EPA standards that went from 900 ppb
> to 7300 ppb for boron and 10 ppb to 180 ppb for molybdenum. I discussed
> that request and EPA's denial of it in the May 2007 public meeting
> presentation I gave in Michigan City.
>
> We have known about the proposed changes for years. For that reason
> whenever I wrote to a resident that had an exceedence of the old
> standard I added that "U.S. EPA is presently reviewing its guidance
> based on updated information. Nevertheless, for the time being, bottled
> water will be made available to you at no charge." EPA rejected, for
> now, the PRP request for a change because before a risk assessment is
> finished, if there is more than one contaminant, by default we multiply
> each contaminant risk screening level concentration by 0.1 (this
> conservatively assumes 10 contaminants). For boron that was 7300 x .1 =
> 730. For molybdenum it was 180 x .1 = 18. We just left it at 10 and 900
> pending the Site-specific risk assessment results. Once we have
> established the number of contaminants, a term called Contaminants of
> Potential Concern or "COPCs", we can determine what the final multiplier
> is and determine the final risk number. So, things are still a bit up in
> the air until approval of the risk assessment, which will come 60-days
> after approval of the Remedial Investigation Report.
>
> I hope that helped. I'm out next week, but please call or email me
> either today or the week of May 19th if you'd like to talk about this
> more. Or you can try Mark Johnson of ATSDR next week at 312-353-3436.
>
>
>
> Tim Drexler
>
>
>
>
>
> "Exemptio..."

> <[redacted] Exemption 6 >.
>
[redacted] Exemption 6 To
> 05/09/2008 10:32 Timothy Drexler/R5/USEPA/US@EPA
> AM cc
> "Larry Silvestri"
> <[redacted] Exemption 6 >, "Paul
> Kysel" <[redacted] Exemption 6 >,
> "Peggy Richardson"
> <[redacted] Exemption 6 >
>
>
>
>
>
>
>
>
> Subject
> rumor
>
>
>
>
>
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> myself.
>
> jan nona
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>
>
> --
> No virus found in this incoming message.
> Checked by AVG.
> Version: 7.5.524 / Virus Database: 269.23.11/1422 - Release Date: 5/8/2008
> 5:24 PM
>
>

EPA-R5-2013-003300RR-186

Timothy Drexler/R5/USEPA/US
05/19/2008 04:33 PM

To [redacted], peggy, silvestri, [redacted], [redacted], [redacted]
cc
bcc
Subject Remedial Investigation Report

Hi Larry:

ENSR, the contractor for the Pines Site potentially responsible parties, sent me an email message asking for the email addresses of technical reviewers of the draft Remedial Investigation Report. I forwarded Chuck Norris' email address to them and then told Chuck. Chuck should be able to download the draft document today. Also, ENSR would like to make a technical presentation of their results here in Chicago. I don't know though whether you would choose to send Chuck to the meeting with some of your remaining funds. I will be setting up a conference call for the meeting, though, because I'm sure that there will be other agency technical representatives who cannot attend personally.

Please confirm with me whether GeoHydro will be reviewing the RI Report, and whether they would attend the meeting, either in person or by phone. Remember also that the draft RI Report is just that, a draft. As a draft, it should not be shared with the general public. If you have any other questions, please give me a call.

Thanks, Larry.

Tim Drexler

EPA-R5-2013-003300RR-187

Larry Silvestri
Exemption 6

05/20/2008 12:50 PM

To Timothy Drexler

cc Mark Hutson, Bob_Daum, Larry and Rosemary, Larry Silvestri, Exem... Nona, Ruthanne Slamka, Tom Anderson, Charles Norris, Paul Kysel

bcc

Subject Re: Remedial Investigation Report

Tim,

GeoHydro will be reviewing the report.

I assure you that the draft will not be shared with the public.
However, as I understand there are only 30 days to comment on the draft.
Therefore, all interested parties need to have an opportunity to
examine it.

The short list of technical representatives needs to include:
Chuck Norris and Mark Hutson of GeoHydro,
Bob Daum and Ruthanne Slamka of the National Park Service,
Tom Anderson of Save the Dunes,
Paul Kysel, Jan Nona, Larry Jensen and myself of PINES.
Our emails are all on the CC list.

Thank you,
Larry SIlvestri
Exemption 6

On May 19, 2008, at 4:33 PM, Drexler.Timothy@epamail.epa.gov wrote:

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> Hi Larry:
>
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> other questions, please give me a call.
>
>
> Thanks, Larry.
>

> Tim Drexler
>

EPA-R5-2013-003300RR-188

Larry Silvestri
Exemption 6
05/20/2008 10:01 PM

To Charles Norris, Mark Hutson

cc Val Blumenfeld, Paul Kysel, Ellen Becker, Nancy Kolasa, Cathi Murray, Exemption 6, Peggy Richardson, Exemp... Nona, Timothy Drexler, Exemption 6, Exemptio..., D.Sullivan

bcc

Subject Formal request to review the materials

Chuck and Mark,

On behalf of PINES, People In Need of Environmental Safety, this email is a formal request that Geo-Hydro Inc. review the newly released draft Remedial Investigation Report and submit your comments. Furthermore, we request that you attend the ENSR Technical Presentation in Chicago.

Thank you,
PINES Secretary
Larry Silvestri
Exemption 6
Michigan City, IN 46360
Exemption 6

EPA-R5-2013-003300RR-189

Larry Silvestri
Exemption 6
05/20/2008 10:12 PM

To Timothy Drexler
cc Mark Hutson, Ellen Becker, Nancy Kolasa, Cathi Murray, Exemption 6, Peggy Richardson, Timothy Drexler, Exemp... Nona, Exemption 6, Charles Norris, Exemptio..., Paul Kysel
bcc
Subject Re: Remedial Investigation Report

Tim,

This is a very capable and impartial group of experts.
We are satisfied that Geo-Hydro is representing our interests.

Thanks,
Larry Silvestri

On May 20, 2008, at 1:48 PM, Drexler.Timothy@epamail.epa.gov wrote:

> Hi Larry:
>
> Below is the list of reviewers for the draft RI Report. Because it is
> draft, it is an extremely sensitive document and I have to limit the
> number of copies that are distributed. We have developed what we
> consider a very inclusive list for review. These are the folks, outside
> of the IDEM and EPA, that will have direct access to the download site.
>
> Bob Kay, US Gelogical Survey
> Edward Karecki, US Fish and Wildlife Service
> Mark Johnson, Agency for Toxic Substances and Disease Registry (ATSDR)
> Clayton Koher, ATSDR
> Michael Chezik, US Dept of the Interior
> Pete Penoyer, NPS
> Bob Daum, NPS
> Brenda Waters, NPS
> Carl Wodrich, IDNR
> Chuck Norris, GeoHydro
> Mark Hutson, GeoHydro
>
> Tim Drexler
> Remedial Project Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-6J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
> fax: 312.886.4071
>
>
>
> Larry Silvestri
> <Exemption 6
> Exemption 6>
> To
> 05/20/2008 12:50 Timothy Drexler/R5/USEPA/US@EPA
> PM cc

> Mark Hutson
> <[redacted]@geo-hydro.com>,
> Bob_Daum@nps.gov, Larry and
> Rosemary <[redacted]>,
> Larry Silvestri
> <[redacted]>, [redacted]
> Nona <[redacted]>,
> Ruthanne Slamka
> <Ruthanne_Slamka@nps.gov>, Tom
> Anderson <std@savedunes.org>,
> Charles Norris
> <cnorris@geo-hydro.com>, Paul
> Kysel <[redacted]>
>
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> Subject
> Re: Remedial Investigation Report
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> [redacted]
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>>
>> Thanks, Larry.
>>
>> Tim Drexler
>>
>
>
>

EPA-R5-2013-003300RR-190

Timothy Drexler/R5/USEPA/US
05/21/2008 08:03 AM

To Larry Silvestri
cc Janet Pope
bcc
Subject Re: Remedial Investigation Report

Thanks, Larry. I also think we have a pretty good group of reviewers. I look forward to their input.

I also see that you have asked GeoHydro to personally attend the meeting here in Chicago rather than participate via the coference line I will be setting up. EPA will not disapprove of this expenditure, but you may want to reconsider this use of funds. The RI Report is an important document, certainly, and a good review is necessary. But, face-to-face may not be necessary and there will be additional documents, including the Human Health and Ecologial Risk Assessment Reports and then the Feasibility Report, if it is needed, that will probably utilize some of your remaining funds. Let me know what you decide.

Thanks.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071
Larry Silvestri <[redacted]>

Larry Silvestri
[redacted]
05/20/2008 10:12 PM

To Timothy Drexler/R5/USEPA/US@EPA
cc Mark Hutson <[redacted]@geo-hydro.com>, Ellen Becker <[redacted]>, Nancy Kolasa <[redacted]>, Cathi Murray <[redacted]>, [redacted], Peggy Richardson <[redacted]>, Timothy Drexler/R5/USEPA/US@EPA, [redacted] Nona <[redacted]>, [redacted] Charles Norris <cnorris@geo-hydro.com>, [redacted], Paul Kysel <[redacted]>

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>
> Larry Silvestri
> <[redacted]
> [redacted]>
>
> 05/20/2008 12:50 PM

To
Timothy Drexler/R5/USEPA/US@EPA
cc
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Larry Silvestri
<[redacted]>, [redacted]
Nona <[redacted]>,
Ruthanne Slamka
<Ruthanne_Slamka@nps.gov>, Tom
Anderson <std@savedunes.org>,
Charles Norris
<cnorris@geo-hydro.com>, Paul
Kysel <[redacted]>

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>>

>>
>> Thanks, Larry.
>>
>> Tim Drexler
>>
>
>
>

EPA-R5-2013-003300RR-191

Charles Norris
<Chuck@Norris-Tudor.com>

05/23/2008 02:29 PM

To Timothy Drexler

cc Mark Hutson, Larry Silvestri

bcc

Subject PINES groundwater model

Tim,
Developing questions from reviewing the groundwater model report would be much easier and efficient if we could work with the actual model files (Electronic, rather than paper would be best.). Has EPA received its copy of the actual model, yet? And, if so, could we be provided with a CD with the actual model to assist our review on behalf of PINES?
--
Chuck

Charles H. Norris
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-192

Larry Silvestri
Exemption 6
05/23/2008 08:38 PM

To Timothy Drexler, Tom Anderson, Ellen Becker, Lisa Evans, Larry Silvestri, Larry and Rosemary, Exemption 6, Bob_Daum, Exemption 6, Ruthanne Slamka, Exemp... Nona, Peggy Richardson, Paul Kysel, Cathi Murray, Charles Norris, Mark Hutson, Exemption 6 Crayton, Kim Ferraro

cc mmastale

bcc

Subject Fwd: Soil samples

All,

Back in early April, Paul Kysel and I took five suspicious looking soil samples from the ground surface. They came from his property, and from property across the street, on Exemption 6 and between US-Hwy-20 and Exemption 6. This location is outside the Pines Area of Investigation and reportedly up-gradient of the groundwater flow from the Yard 520 Dump. Yet, Paul consistently has had elevated levels of Boron and Molybdenum in his well water. These elements are both signatures of the Town of Pines coal ash groundwater contamination.

We sent the soil samples to Maria Mastalerz, PH.D, a Coal Geologist at Indiana University. Professor Mastalerz has determined that the 2 soil samples from Paul's property and the 3 samples from across the street all contain between 1% and 20% coal ash. I have sufficient soil sample for anyone who wishes to examine the material themselves.

See the attachments:
1.) PDF Document of reflected light microscopy photographs of the samples titled, report for Silvestri.pdf
2.) Explanation of the photographs, method and interpretation in docx format titled, Petrographic characterization of samples.docx
3.) Same document as above converted to MSWord for those who can't open docx titled, Petrographic characterization of samples.doc
4.) My original letter to Maria Mastalerz, Ph.D. titled, MariaMastalerzSamples.doc

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On behalf of PINES, People In Need of Environmental Safety, we give our most sincere gratitude to Doctor Maria Mastalerz,
Larry Silvestri
Exemption 6
Exemption 6
Exemption 6

Begin forwarded message:

> From: "Mastalerz, Maria D" <mmastale@indiana.edu>
> Date: May 23, 2008 12:02:08 PM CDT
> To: "'Larry Silvestri'" <[redacted]>
> Subject: RE: Soil samples
>
> Dear Larry,
> I have looked at the samples and put a report in your envelope today.
> I send the same thing to you by E-mail as well.
> I hope this helps.
> Maria
>
> Maria Mastalerz, Ph.D.
> Indiana Geological Survey
> Indiana University
> Bloomington, IN, 47405-2208
> Tel: 812-855-9416
> Fax: 812-855-2862
> E-mail: mmastale@indiana.edu
> http://mypage.iu.edu/~mmastale/
>
>
>
> -----Original Message-----
> From: Larry Silvestri [mailto:[redacted]]
> Sent: Monday, May 12, 2008 7:26 PM
> To: Mastalerz, Maria D
> Subject: Soil samples
>
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> Thank you,
> Larry Silvestri
> PINES Secretary
> [redacted]
> http://www.pineswater.org/
>

Petrographic characterization of samples.doc Petrographic characterization of samples.docx report for Silvestri.pdf

MariaMastalerzSamples.doc

EPA-R5-2013-003300RR-193

Timothy Drexler/R5/USEPA/US
05/28/2008 07:40 AM

To eperry
cc cnorris
bcc
Subject Fw: PINES groundwater model

----- Forwarded by Timothy Drexler/R5/USEPA/US on 05/28/2008 07:39 AM -----

Charles Norris <Chuck@Norris-Tudor.com>
05/23/2008 02:29 PM

To Timothy Drexler/R5/USEPA/US@EPA
cc Mark Hutson <Exemption 6@geo-hydro.com>, Larry Silvestri <Exemption 6>

Subject PINES groundwater model

Tim,
Developing questions from reviewing the groundwater model report would be much easier and efficient if we could work with the actual model files (Electronic, rather than paper would be best.). Has EPA received its copy of the actual model, yet? And, if so, could we be provided with a CD with the actual model to assist our review on behalf of PINES?
--
Chuck

Charles H. Norris
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-194

"Peggy Richardson "
Exemption 6
05/29/2008 09:31 PM

To Timothy Drexler
cc
bcc
Subject Discussion

Hi Tim, if you could give me a call to discuss a few things that I have concerns about . I also talked to a lady that lives on Old Chicago Road she says that there is fly ash in her yard, you might want to talk to her also. Thanks Peggy

Exemption 6

EPA-R5-2013-003300RR-195

Timothy Drexler/R5/USEPA/US
05/30/2008 08:45 AM

To Larry Silvestri

cc Cathi Murray, Bob_Daum, Charles Norris, Ellen Becker, [redacted] Exemption 6, Kim Ferraro, [redacted] Exemption 6 Crayton, Mark Hutson, Paul Kysel, Peggy Richardson, Larry and Rosemary, Ruthanne Slamka, [redacted] Exem... Nona, [redacted] Exemption 6, Larry Silvestri, Tom Anderson, lbradley

bcc

Subject Re: Fwd: Soil samples

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Please feel free to call or write me if you have any additional questions.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071
Larry Silvestri <[redacted] Exemption 6>

Larry Silvestri
[redacted] Exemption 6
05/23/2008 08:38 PM

To Timothy Drexler/R5/USEPA/US@EPA, Tom Anderson <std@savedunes.org>, Ellen Becker <[redacted] Exemption 6 Exemption 6>, Lisa Evans <levans@earthjustice.org>, Larry Silvestri <[redacted] Exemption 6>, Larry and Rosemary <[redacted] Exe... xemption 6>, [redacted] Exemption 6 Exemption 6, Bob_Daum@nps.gov, [redacted] Exemption 6 ion 6, Ruthanne Slamka <Ruthanne_Slamka@nps.gov>, [redacted] Exemp... Nona <[redacted] Exe Exemption 6>, Peggy Richardson <[redacted] Exemption 6>, Paul Kysel <[redacted] Exemptio... ption 6>, Cathi Murray <[redacted] Exemption 6 Exemption 6>, Charles Norris <cnorris@geo-hydro.com>, Mark Hutson

<[redacted]@geo-hydro.com>, [redacted]
Crayton <[redacted]>, Kim Ferraro
<[redacted]>
cc mmastale@indiana.edu

Subject Fwd: Soil samples

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Larry Silvestri
[redacted]

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> From: "Mastalerz, Maria D" <mmastale@indiana.edu>
> Date: May 23, 2008 12:02:08 PM CDT
> To: "'Larry Silvestri'" <[redacted]>
> Subject: RE: Soil samples
>
> Dear Larry,
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> I hope this helps.
> Maria
>
> Maria Mastalerz, Ph.D.
> Indiana Geological Survey
> Indiana University
> Bloomington, IN, 47405-2208
> Tel: 812-855-9416
> Fax: 812-855-2862
> E-mail: mmastale@indiana.edu
> http://mypage.iu.edu/~mmastale/
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>
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> [redacted]
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[attachment "Petrographic characterization of samples.doc" deleted by Timothy Drexler/R5/USEPA/US] [attachment "Petrographic characterization of samples.docx" deleted by Timothy Drexler/R5/USEPA/US] [attachment "report for Silvestri.pdf" deleted by Timothy Drexler/R5/USEPA/US] [attachment "MariaMastalerzSamples.doc" deleted by Timothy Drexler/R5/USEPA/US]

EPA-R5-2013-003300RR-196

"Bradley, Lisa"
<lbradley@ensr.aecom.com>
05/30/2008 09:00 AM

To Timothy Drexler
cc
bcc
Subject RE: Fwd: Soil samples

Thank you for passing this along Tim! :) LASI

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Friday, May 30, 2008 9:46 AM
To: Larry Silvestri
Cc: Cathi Murray; Bob Daum@nps.gov; Charles Norris; Ellen Becker; [redacted] Exemption 6 [redacted] Exemption 6 [redacted]; Kim Ferraro; [redacted] Exemption 6 [redacted] Crayton; Mark Hutson; Paul Kysel; Peggy Richardson; Larry and Rosemary; Ruthanne Slamka; [redacted] Exemption 6 [redacted] Nona; [redacted] Exemption 6 [redacted] n 6 [redacted]; Larry Silvestri; Tom Anderson; Bradley, Lisa
Subject: Re: Fwd: Soil samples

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77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

Larry Silvestri
<[redacted]>

05/23/2008 08:38 PM

To
Timothy Drexler/R5/USEPA/US@EPA, Tom Anderson <std@savedunes.org>, Ellen Becker <[redacted]>, Lisa Evans <levans@earthjustice.org>, Larry Silvestri <[redacted]>, Larry and Rosemary <[redacted]>, [redacted], Bob_Daum@nps.gov, [redacted], Ruthanne Slamka <Ruthanne_Slamka@nps.gov>, [redacted] Nona <[redacted]>, Peggy Richardson <[redacted]>, Paul Kysel <[redacted]>, Cathi Murray <[redacted]>, Charles Norris <cnorris@geo-hydro.com>, Mark Hutson <[redacted]@geo-hydro.com>, [redacted] Crayton <[redacted]>, Kim Ferraro <[redacted]>

cc
mmastale@indiana.edu

Subject
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EPA-R5-2013-003300RR-197

Timothy Drexler/R5/USEPA/US
05/30/2008 09:06 AM

To lbradley
cc
bcc
Subject Fw: Soil samples

Here is the original message Lisa, with the reports, for your files.

-Tim
----- Forwarded by Timothy Drexler/R5/USEPA/US on 05/30/2008 09:05 AM -----

Larry Silvestri
[redacted]
05/23/2008 08:38 PM

To Timothy Drexler/R5/USEPA/US@EPA, Tom Anderson <std@savedunes.org>, Ellen Becker <[redacted]>, Lisa Evans <levans@earthjustice.org>, Larry Silvestri <[redacted]>, Larry and Rosemary <[redacted]>, [redacted], Bob_Daum@nps.gov, [redacted], Ruthanne Slamka <Ruthanne_Slamka@nps.gov>, [redacted], Nona <[redacted]>, Peggy Richardson <[redacted]>, Paul Kysel <[redacted]>, Cathi Murray <[redacted]>, Charles Norris <cnorris@geo-hydro.com>, Mark Hutson <[redacted]>, [redacted], Crayton <[redacted]>, Kim Ferraro <[redacted]>
cc mmastale@indiana.edu

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Larry Silvestri
[redacted] Exemption 6
[redacted] Exemption 6
Michigan City, IN 46360

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> Date: May 23, 2008 12:02:08 PM CDT
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MariaMastalerzSamples.doc

EPA-R5-2013-003300RR-198

"Bradley, Lisa"
<lbradley@ensr.aecom.com>
05/30/2008 09:11 AM

To Timothy Drexler
cc
bcc
Subject RE: Soil samples

Thanks again! :) LAIS

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Friday, May 30, 2008 10:07 AM
To: Bradley, Lisa
Subject: Fw: Soil samples

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-Tim
----- Forwarded by Timothy Drexler/R5/USEPA/US on 05/30/2008 09:05 AM

Larry Silvestri
<[redacted]>

05/23/2008 08:38 PM

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[redacted] Exemption 6
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EPA-R5-2013-003300RR-199

Larry Silvestri
Exemption 6
06/09/2008 07:38 AM

To Val Blumenfeld, Timothy Drexler, D.Sullivan

cc Mark Hutson, Ellen Becker, Nancy Kolasa, Cathi Murray, Exemption 6, Larry Silvestri, Peggy Richardson, Exemp... Nona, Exemption 6, Charles Norris, Exemptio..., Paul Kysel

bcc

Subject PINES Progress Report for June

TAP MONTHLY PROGRESS REPORT

Date: June 9, 2008
Report Number:
Report Period: May 2008 / June 2008
Site: Pines Area of Investigation
Recipient: People in Need Of Environmental Safety
Recipient Group Representative: P.I.N.E.S. Secretary Larry Silvestri
Technical Advisor: Geo-Hydro Inc., Charles H. Norris and Mark Hutson

PROGRESS ACHIEVED:
PINES collected soil samples from Paul Kysel's property at Exemption 6, and from property across his street. We sent these soil samples to Indiana University, Coal Geologist Maria Mastalerz. She examined the samples (at no charge) by reflected light microscopy and stated, "The type of anthropogenic particles suggests that they come mainly from coal combustion (e.g., glass cenospheres, spinel, isotropic char, all possible components of fly ash). Some particles have well developed anisotropic (coke-type) texture, and may come either from coke plants or coal-fired power plants." This location is outside the area of investigation and casts doubt on reliability of any assumptions related to natural background levels of coal related chemical contaminants. Peggy Richardson reported that Tim Drexler of the EPA identified material on her well point as flyash on May 8, 2008. Matt Laub from ENSR examined the material a few days later and told Peggy that the material is rust, not flyash. This contradiction casts doubt on the reliability of visual examination.

DIFFICULTIES ENCOUNTERED:
This progress is TAP related. See TAP: I. Definitions. The following definitions apply to this TAP: L. "Pines Area of Investigation" includes the area located in and near the Town of Pines in Porter County, Indiana, as depicted in Exhibit 3, and includes all locations where CCBs have or may have come to be located.

PERCENT OF PROJECT COMPLETED TO DATE:

MATERIALS PRODUCED THIS MONTH:
Updated web site with Paul Kysel's soil sample data.
http://www.pineswater.org/index_Soil_Samples.htm

ACTIVITY ANTICIPATED IN NEXT MONTH:
PINES Meeting

Progress 2008-6-10.doc

EPA-R5-2013-003300RR-200

Timothy Drexler/R5/USEPA/US
06/17/2008 02:03 PM

To peggy
cc Bob Kay, Exemptio...
bcc
Subject Fw: Richardson residence Well Material

Hi Peggy:

After viewing the screen again and observing the material under a microscope myself, I have to agree with Bob's conclusion. I should have looked more closely before I gave my opinion the first time. I'm sorry for my confusion.

Tim Drexler

----- Forwarded by Timothy Drexler/R5/USEPA/US on 06/17/2008 01:57 PM -----

Bob Kay/R5/USEPA/US
06/17/2008 01:46 PM

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject Pines Well Material

Tim--based on the visual anlaysis we did on the well screen material at the site last Friday and the microscope observation of the scrapings from the screen of that well earlier today it looks to me that the material from the well screen is sand grains in a matrix of iron or manganese oxide. None of it has the glassy, vesicular appearance of bottom ash.

Call if you have questions.

EPA-R5-2013-003300RR-201

"Paul Kysel"
<pkysel@live.com>
06/19/2008 07:54 PM

To Timothy Drexler
cc "Bud PrastPresPINES", "Cathi Murry", "Chuck NorrisH2Oconsultant", "Larry Silvestri", "Nancy Kolasa"
bcc
Subject PINES TAP Funds Assistance

Tim:

The PINES Board met with Mark Hutson on the evening of Thursday, June 8, 2008 to receive a briefing from Mark regarding his attendance and participation in the RI Draft Report meeting. As you know the PINES Board chose to incur the expense of Mark's travel and time so that we were adequately represented at what we felt was a critical meeting. It appears from Mark's comments that the Board was wise to include him. It appears his presence proved to be quite valuable, not only to the PINES, Town of Pines Community at large and also the EPA.

As we discussed with Mark the next steps and phases to the Superfund process, it struck the Board that we will likely exhaust our TAP funds before the process even begins to draw to a close - and perhaps at the most critical of times – as conclusions are being reached about the data sets that have been assembled. As the PINES Group was totally inexperienced in its role going into this TAP Grant process, we of course relied upon our consultants for their technical expertise and advice.

Geo-Hydro has been very responsive to our identified needs. They billed for their time conservatively, and they have donated their time as well. It now appears likely that we will exhaust all funds by the end of this year - when it appears certain that the process will continue well beyond it. We have reviewed the TAP Agreement and concluded that it does not readily provide a remedy for us; however we also seem to recall you stating on more than one occasion that additional funds may be obtained should we need them. Tim, would you please let us know if it may be possible to obtain additional TAP funding, and if not, what advice can you offer to us?

Our project mission - to represent and communicate to the affected community - will be seriously hampered should we not have continued access to the technical expertise that has proven to be so critical thus far – especially during the next most critical phases of the very process that will determine the remedies chosen and / or implemented.

We look forward to hearing from you and greatly appreciate your support.

Paul Kysel – VP PINES Board

EPA-R5-2013-003300RR-202

"r.nona"
Exemption 6
07/24/2008 03:09 PM

To Timothy Drexler
cc "Chuck Norris", "Mark Hutson", "Larry Silvestri", "Paul Kysel"
bcc
Subject monitoring wells

Is there any chance you have a map showing the location and identity numbers of the monitoring wells currently in place?

Then, do you know yet which ones will be put out of business when the RI is finished?

Then - who will be gathering the data and where will it be sent? Will anybody be assigned responsibility of analyzing the data?

Other than this, hope you are having one fantastic summer and getting a little vacation time in.

jan nona

EPA-R5-2013-003300RR-203

Timothy Drexler/R5/USEPA/US
07/29/2008 01:20 PM

To "Exemp..."
cc "Chuck Norris", "Mark Hutson", "Paul Kysel", "Larry Silvestri"
bcc
Subject Re: monitoring wells

Hi Jan:

Sorry for the delay. I was out of the office last week and then it took me a bit of time to figure out how to extract a single map from a pdf with a pile of maps in it. My summer is going well. I hope that you are enjoying yours also.

Here is your request with the monitoring wells identified.

With regard to the future of the monitoring well system, whether and which monitoring locations may remain will be determined when we get further along in the process. If risk is determined to be present at a level of concern, then it is possible that some of the wells will remain. If they remain, it would still be the responsibility of the PRPs to sample, analyze results and maintain the wells.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

RI_Tables_Figures 157.pdf

"Exempt..." <Exe Exemption 6>

Exemption 6
07/24/2008 03:09 PM

To Timothy Drexler/R5/USEPA/US@EPA
cc "Chuck Norris" <cnorris@geo-hydro.com>, "Mark Hutson" <Exemptio...@geo-hydro.com>, "Larry Silvestri" <Exemption 6>, "Paul Kysel" <Exemption 6>

Subject monitoring wells

Is there any chance you have a map showing the location and identity numbers of the monitoring wells currently in place?

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Then - who will be gathering the data and where will it be sent? Will anybody be assigned responsibility of

analyzing the data?

Other than this, hope you are having one fantastic summer and getting a little vacation time in.

jan nona

EPA-R5-2013-003300RR-204

"Mark Hutson"
<Exemption 6@geo-hydro.com>
07/30/2008 10:17 AM

To Timothy Drexler
cc
bcc
Subject RE: monitoring wells

Tim

How was the RAGBAI?

Mark

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Tuesday, July 29, 2008 12:21 PM
To: Exemption 6
Cc: Chuck Norris; Mark Hutson; Paul Kysel; Larry Silvestri
Subject: Re: monitoring wells

Hi Jan:

Sorry for the delay. I was out of the office last week and then it took me a bit of time to figure out how to extract a single map from a pdf with a pile of maps in it. My summer is going well. I hope that you are enjoying yours also.

Here is your request with the monitoring wells identified.

With regard to the future of the monitoring well system, whether and which monitoring locations may remain will be determined when we get further along in the process. If risk is determined to be present at a level of concern, then it is possible that some of the wells will remain. If they remain, it would still be the responsibility of the PRPs to sample, analyze results and maintain the wells.

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Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

(See attached file: RI_Tables_Figures 157.pdf)

"Exemptio..."
<Exemption 6.
net>
To
07/24/2008 03:09 Timothy Drexler/R5/USEPA/US@EPA

PM cc

"Chuck Norris" <cnorris@geo-hydro.com>, "Mark Hutson" <Exemption 6@geo-hydro.com>, "Larry Silvestri" <Exemption 6>, "Paul Kysel" <Exemption 6>

Subject monitoring wells

Is there any chance you have a map showing the location and identity numbers of the monitoring wells currently in place?

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Then - who will be gathering the data and where will it be sent? Will anybody be assigned responsibility of analyzing the data?

Other than this, hope you are having one fantastic summer and getting a little vacation time in.

jan nona

EPA-R5-2013-003300RR-205

Timothy Drexler/R5/USEPA/US
08/08/2008 08:32 AM

To silvestri
cc Larry Jensen
bcc EUGENE JABLONOWSKI
Subject Questions regarding Larry Jensen comments

Hi Larry:

We just had a couple of questions with regard to your comments. I have numbered Larry's bullets to help identify the ones for which we need clarification. To further identify the comment, I begin with the first few words of the comment, then our question.
They are as follows:

Background samples
#6: "U-238 background..." Please clarify with regard to 1 mg/kg. Why do you consider this cause for alarm?
#7: "U-235 backgrounds... " Why do you consider these anomalies? Are you saying that these have high variability for background?
#8: "U-238 and U-235 identical..." What is your reference (table number, document, etc.) for these samples?
#9: "The GEL Laboratories..." Again, please provide us with your reference document. We believe that these are soil samples..
#9: "Also, the Detection Limits..." The DLs don't appear high to us. What are you referencing?

Yard 520 Samples
#3: "There is no comparable..." What is the issue? What is the basis of the comment?
#3: "Some of these sites deviate..." Please explain the issue you are raising.
#5: :"For the one radium water..." We believe that GP004 was a soil sample. Where do your references to 20.58 pCi/L, 479 ug/L come from? What table and document? Where do you see gamma spec and ICPMS on the same samples?

Thanks for the help. Call me if you have any questions.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

EPA-R5-2013-003300RR-206

Laurence Silvestri
Exemption 6
08/08/2008 10:11 AM
Please respond to
Exemption 6

To Timothy Drexler
cc
bcc
Subject Re: Questions regarding Larry Jensen comments

Tim,

I'll talk to Larry Jensen and we'll get back to you.

Thanks,
Larry Silvestri
Exemption 6

--- On **Fri, 8/8/08, Drexler.Timothy@epamail.epa.gov** ***<Drexler.Timothy@epamail.epa.gov>*** wrote:
From: Drexler.Timothy@epamail.epa.gov <Drexler.Timothy@epamail.epa.gov>
Subject: Questions regarding Larry Jensen comments
To: Exemption 6
Cc: Jensen.Larry@epamail.epa.gov
Date: Friday, August 8, 2008, 9:32 AM

Hi Larry:

We just had a couple of questions with regard to your comments. I have
numbered Larry's bullets to help identify the ones for which we need
clarification. To further identify the comment, I begin with the first
few words of the comment, then our question.
They are as follows:

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saying that these have high variability for background?
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number, document, etc.) for these samples?

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us.
What are you referencing?

Yard 520 Samples
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of
the comment?
#3: "Some of these sites deviate..." Please explain the issue you are
raising.
#5: :"For the one radium water..." We believe that GP004 was a soil
sample. Where do your references to 20.58 pCi/L, 479 ug/L come from?
What table and document? Where do you see gamma spec and ICPMS on the
same samples?

Thanks for the help. Call me if you have any questions.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

EPA-R5-2013-003300RR-207

Timothy Drexler/R5/USEPA/US
08/13/2008 10:28 AM

To silvestri
cc
bcc
Subject Re: Questions regarding Larry Jensen comments

Hi Larry:

Any word from Larry with regard to our questions? We need to get our comments to the PRPs as soon as we can.

Thanks.

-Tim

Laurence Silvestri <[redacted]>

Laurence Silvestri
[redacted]
08/08/2008 10:11 AM
Please respond to
[redacted]

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject Re: Questions regarding Larry Jensen comments

Tim,

I'll talk to Larry Jensen and we'll get back to you.

Thanks,
Larry Silvestri
[redacted]

--- On **Fri, 8/8/08, Drexler.Timothy@epamail.epa.gov** ***<Drexler.Timothy@epamail.epa.gov>*** wrote:
From: Drexler.Timothy@epamail.epa.gov <Drexler.Timothy@epamail.epa.gov>
Subject: Questions regarding Larry Jensen comments
To: [redacted]
Cc: Jensen.Larry@epamail.epa.gov
Date: Friday, August 8, 2008, 9:32 AM

Hi Larry:

We just had a couple of questions with regard to your comments. I have
numbered Larry's bullets to help identify the ones for which we need
clarification. To further identify the comment, I begin with the first
few words of the comment, then our question.
They are as follows:

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reference document. We believe that these are soil samples..
#9: "Also, the Detection Limits..." The DLs don't appear high to
us.
What are you referencing?

Yard 520 Samples
#3: "There is no comparable..." What is the issue? What is the basis
of
the comment?
#3: "Some of these sites deviate..." Please explain the issue you are
raising.
#5: :"For the one radium water..." We believe that GP004 was a soil
sample. Where do your references to 20.58 pCi/L, 479 ug/L come from?
What table and document? Where do you see gamma spec and ICPMS on the
same samples?

Thanks for the help. Call me if you have any questions.

Tim Drexler

Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
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phone: 312.353.4367
fax: 312.886.4071

EPA-R5-2013-003300RR-208

Timothy Drexler/R5/USEPA/US
08/13/2008 10:39 AM

To silvestri
cc
bcc
Subject Re: Questions regarding Larry Jensen comments

Thanks for the update, Larry. If Larry has any questions tell him he can call me anytime.

-Tim

Laurence Silvestri <[redacted]>

Laurence Silvestri
[redacted]
08/13/2008 10:31 AM
Please respond to
[redacted]

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject Re: Questions regarding Larry Jensen comments

Tim,

Larry Jensen has been on vacation.
He is looking at your questions now.

Larry Silvesrtri
[redacted]

--- On **Wed, 8/13/08, Drexler.Timothy@epamail.epa.gov** ***<Drexler.Timothy@epamail.epa.gov>*** wrote:
From: Drexler.Timothy@epamail.epa.gov <Drexler.Timothy@epamail.epa.gov>
Subject: Re: Questions regarding Larry Jensen comments
To: [redacted]
Date: Wednesday, August 13, 2008, 11:28 AM

Hi Larry:

Any word from Larry with regard to our questions? We need to get our
comments to the PRPs as soon as we can.

Thanks.

-Tim

Laurence

Silvestri
<[redacted]>

To

Timothy

Drexler/R5/USEPA/US@EPA

08/08/2008 10:11

cc

AM

Please respond
to
silvestri@amerit
ech.net

Subject

Re: Questions regarding

Larry

Jensen comments

Tim,

I'll talk to Larry Jensen and we'll get back to you.

Thanks,

Larry Silvestri
[redacted]

--- On Fri, 8/8/08, Drexler.Timothy@epamail.epa.gov

<Drexler.Timothy@epamail.epa.gov> wrote:
From: Drexler.Timothy@epamail.epa.gov
<Drexler.Timothy@epamail.epa.gov>
Subject: Questions regarding Larry Jensen comments
To: [redacted] Exemption 6
Cc: Jensen.Larry@epamail.epa.gov
Date: Friday, August 8, 2008, 9:32 AM

Hi Larry:

We just had a couple of questions with regard to your comments. I have numbered Larry's bullets to help identify the ones for which we need clarification. To further identify the comment, I begin with the first few words of the comment, then our question. They are as follows:

Background samples
#6: "U-238 background..." Please clarify with regard to 1 mg/kg. Why do you consider this cause for alarm?

#7: "U-235 backgrounds... " Why do you consider these anomalies? Are you saying that these have high variability for background?
#8: "U-238 and U-235 identical..." What is your reference (table

number, document, etc.) for these samples?
#9: "The GEL Laboratories..." Again, please provide us with your

reference document. We believe that these are soil samples..
#9: "Also, the Detection Limits..." The DLs don't appear high to us. What are you referencing?

Yard 520 Samples
#3:
"There is no comparable..." What is the issue? What is the basis of

the comment?
#3: "Some of these sites deviate..." Please explain the issue you
are
raising.
#5: :"For the one radium water..." We believe that GP004 was a soil

sample. Where do your references to 20.58 pCi/L, 479 ug/L come from?
What table and document? Where do you see gamma spec and ICPMS on the
same samples?

Thanks for the help. Call me if you have any questions.

Tim Drexler
Remedial Project Manager
Superfund Division
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77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

EPA-R5-2013-003300RR-209

Exemption 6

08/19/2008 01:20 PM

Please respond to Exemption 6

To Mark Hutson
cc Timothy Drexler
bcc
Subject Re: FW: Pines Comments

Mark,

I spoke with Larry J this morning and he said he will finish in a couple of days.

Larry Silvestri
Exemption 6

--- On **Mon, 8/18/08, Mark Hutson** <Exemption 6***@geo-hydro.com***> wrote:
From: Mark Hutson <Exemption 6@geo-hydro.com>
Subject: FW: Pines Comments
To: "Larry Silvestri" <Exemption 6>
Date: Monday, August 18, 2008, 10:42 AM

Larry

FYI, EPA is waiting for a response from Larry before they send out their comments.

Mark

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Monday, August 18, 2008 7:00 AM
To: Mark Hutson
Subject: Re: Pines Comments

Hi Mark:

The
comments are consolidated, but we had some questions regarding Larry Jenson's comments. We sent a couple of questions to Larry last week and are
waiting for his response in order to go forward. I hope we get them this
week.

-Tim

"Mark Hutson"

<[redacted]@geo-hydro.com>

To

08/17/2008 03:21 PM

Timothy Drexler/R5/USEPA/US@EPA

cc

Subject

Pines Comments

Tim

Did your consolidated comments on the Pines RI go out yet?

Mark Hutson
Geo-Hydro,
Inc.
303-948-1417
[redacted]@geo-hydro.com

EPA-R5-2013-003300RR-210

Laurence Silvestri
[redacted]
08/22/2008 09:19 AM

To Timothy Drexler
cc [redacted], 'Chuck Norris', [redacted], [redacted]
bcc
Subject Fw: Questions regarding Larry Jensen comments

Responses to Questions by Tim Drexler

1. #6 "U-238 background..." Please clarify with regard to 1 mg/kg. Why do you consider this cause for alarm?

This is not an issue of alarm. Generally, one expects all background samples to be roughly equal numerically. When one is clearly not, then the question is why? After determining why, it may be that this outlier should be eliminated to get a true picture of background. I have plotted the U-238 data to show how SS018 clearly is different from the other sites. One point I missed in my original comments is that SS022 is also higher than most other sites.

2. #7 "U-235 backgrounds..." Why do you consider these anomalies? Are you saying that these have high variability for background?

The point of the comment, as in the response above, is that one data point stands out as different from the rest. The plot below shows this.

The resulting question to be answered is why, and further, is it an outlier that should be eliminated from the background set because it has some characteristic that does not apply to the rest of background.

3. #8 "U-238 and U-235 identical..." What is your reference (table number, document, etc.) for these samples?

This data was found in the tables headed

GEL Laboratories LLC
Metals
-1-
Inorganics Analysis Data Package
SDG No: 185248-2
Sample ID: 185256001
Sample ID: 185256002
Sample ID: 185256003

4. #9 “The GEL Laboratories...” Again, please provide us with your reference document. We believe that these are soil samples.

These data were found in the CD supplied to me in the section labeled “Pines AOC II – Yard 520 Report – Rev 1 – 5-19-08.” They appear to be in the Document titled “Evaluation of Data Collected Under the Yard 520 Sampling and Analysis Plan” and can be located as (Page 42 of 1529) through (Page 72 of 1529) which appears in the lower left corner of the page.

These are liquid data. I errored in referring to the 40 CFR 192 standards which are for soil. I should have referred to the National Primary Drinking Water Standards for radionuclides, 40 CFR 141.

5. “Also, the Detection Limits...” The DLs don't appear high to us. What are you referencing?

The point here is that the DL must be less than the standard by which the data is judged. In this way all data that exceeds the standard will be identified. Data which is higher than the standard but less than the DL could simply be labeled as less than the DL, giving a false impression that there is no data of concern. DL s should at least be lower than the radionuclide drinking water standards, but better yet they should be lower than background concentrations. The latter assures that levels greater than background will be identified so that decisions can be made if these are significantly greater than background.

For example, for Sample ID 202261002, the Radium-228 level is 8.33 pCi/l. Since the Total Radium (Ra-226 + Ra-228) concentration in the Drinking Water standards is 5 pCi/L, there might be an exceedence of the Drinking Water standards but this cannot be said with certainty because the DL is 16.2 pCi/L. All that can be said is that the data is less than the DL. If the DL was 4.2 pCi/L than it could truly be said that the data showed an exceedence.

6. Yard 520 Samples
#3 There is no comparable...” What is the issue? What is the basis of the comment?

40 CFR 192.12 and 40 CFR 192 Subpart D give radium cleanup standards (Ra-226 and Ra-228, respectively). There are no uranium or thorium concentration standards in 40 CFR 192. Thus, while radium data can be compared to the 40 CFR 192 standards there is no comparable way to judge uranium and/or thorium data. As a result, the data was compared to background levels. If data diverges substantially from background then there may be an issue of concern. At least there is an issue that needs further investigation.

7. #3 “Some of these sites deviate...” Please explain the issue you are raising.

If data greatly exceed levels considered to be background then there is a need for further investigation to determine why. In this case, some of the uranium data may be as much as 23

times background. Such large deviations from background could indicate contamination.

8. #5 "For the one radium water..." We believe that GP004 was a soil sample. Where do your references to 20.58 pCi/L, 479 ug/L come from? What table and document? Where do you see gamma spec and ICPMS on the same tables?

The data table you requested is copied just below.

The sum of Radium-226 + Radium-228 is 20.58 pCi/L. When conversions to ug/L are made for each uranium isotope, the sum of Uranium-234 + Uranium-235 + Uranium-238 is 479 ug/L.

The data table from which ICPMS water data was obtained follows.

The two uranium isotope concentrations, by ICPMS, listed here

Uranium-235 0.070 ug/L
Uranium-238 0.200 ug/L

which can be compared to the converted gamma spec uranium levels from the preceding calculation

Uranium-234 11.4 pCi/L converts to 0.001839 ug/L
Uranium-235 11.6 pCi/L converts to 5.273 ug/L
Uranium-238 161 pCi/L converts to 473.5 ug/L

Total 479 ug/L

It was believed that since both samples had the same Client Sample ID: GP0041CB092305B that this was the same water sample and that this was for GP004.

--- On **Fri, 8/8/08, Drexler.Timothy@epamail.epa.gov** ***<Drexler.Timothy@epamail.epa.gov>*** wrote:
From: Drexler.Timothy@epamail.epa.gov <Drexler.Timothy@epamail.epa.gov>
Subject: Questions regarding Larry Jensen comments
To: [redacted] Exemption 6
Cc: Jensen.Larry@epamail.epa.gov
Date: Friday, August 8, 2008, 9:32 AM

Hi Larry:

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numbered Larry's bullets to help identify the ones for which we need
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What are you
referencing?

Yard 520 Samples
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same samples?

Thanks for the help. Call me if you have any questions.

Tim Drexler
Remedial Project Manager
Superfund Division

United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

Yard 520 Responses 08212008.doc

EPA-R5-2013-003300RR-211

Timothy Drexler/R5/USEPA/US
08/22/2008 09:37 AM

To Laurence Silvestri
cc 'Chuck Norris', [redacted]
bcc EUGENE JABLONOWSKI
Subject Re: Fw: Questions regarding Larry Jensen comments

Thanks, Larry. And please thank Larry Jensen for me for his additional explanation. I hope to get the combined comments to ENSR today.

-Tim Drexler

Laurence Silvestri <[redacted]>

[redacted]
08/22/2008 09:19 AM

To Timothy Drexler/R5/USEPA/US@EPA
cc [redacted]@geo-hydro.com, 'Chuck Norris' <cnorris@geo-hydro.com>, [redacted]
Subject Fw: Questions regarding Larry Jensen comments

Responses to Questions by Tim Drexler

1. #6 "U-238 background..." Please clarify with regard to 1 mg/kg. Why do you consider this cause for alarm?

This is not an issue of alarm. Generally, one expects all background samples to be roughly equal numerically. When one is clearly not, then the question is why? After determining why, it may be that this outlier should be eliminated to get a true picture of background. I have plotted the U-238 data to show how SS018 clearly is different from the other sites. One point I missed in my original comments is that SS022 is also higher than most other sites.

2. #7 "U-235 backgrounds..." Why do you consider these anomalies? Are you saying that these have high variability for background?

The point of the comment, as in the response above, is that one data point stands out as different from the rest. The plot below shows this.

The resulting question to be answered is why, and further, is it an outlier that should be eliminated from the background set because it has some characteristic that does not apply to the rest of background.

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This data was found in the tables headed

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Metals
-1-
Inorganics Analysis Data Package
SDG No: 185248-2
Sample ID: 185256001
Sample ID: 185256002
Sample ID: 185256003

4. #9 "The GEL Laboratories..." Again, please provide us with your reference document. We believe that these are soil samples.

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These are liquid data. I errored in referring to the 40 CFR 192 standards which are for soil. I should have referred to the National Primary Drinking Water Standards for radionuclides, 40 CFR 141.

5. "Also, the Detection Limits..." The DLs don't appear high to us. What are you referencing?

The point here is that the DL must be less than the standard by which the data is judged. In this way all data that exceeds the standard will be identified. Data which is higher than the standard but less than the DL could simply be labeled as less than the DL, giving a false impression that there is no data of concern. DL s should at least be lower than the radionuclide drinking water standards, but better yet they should be lower than background concentrations. The latter assures that levels greater than background will be identified so that decisions can be made if these are significantly greater than background.

For example, for Sample ID 202261002, the Radium-228 level is 8.33 pCi/l. Since the Total Radium (Ra-226 + Ra-228) concentration in the Drinking Water standards is 5 pCi/L, there might be an exceedence of the Drinking Water standards but this cannot be said with certainty because the DL is 16.2 pCi/L. All that can be said is that the data is less than the DL. If the DL

was 4.2 pCi/L than it could truly be said that the data showed an exceedence.

6. Yard 520 Samples
#3 There is no comparable..." What is the issue? What is the basis of the comment?

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7. #3 "Some of these sites deviate..." Please explain the issue you are raising.

If data greatly exceed levels considered to be background then there is a need for further investigation to determine why. In this case, some of the uranium data may be as much as 23 times background. Such large deviations from background could indicate contamination.

8. #5 "For the one radium water..." We believe that GP004 was a soil sample. Where do your references to 20.58 pCi/L, 479 ug/L come from? What table and document? Where do you see gamma spec and ICPMS on the same tables?

The data table you requested is copied just below.

The sum of Radium-226 + Radium-228 is 20.58 pCi/L. When conversions to ug/L are made for each uranium isotope, the sum of Uranium-234 + Uranium-235 + Uranium-238 is
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Total 479 ug/L

It was believed that since both samples had the same Client Sample ID: GP0041CB092305B that this was the same water sample and that this was for GP004.

--- On **Fri, 8/8/08, Drexler.Timothy@epamail.epa.gov** ***<Drexler.Timothy@epamail.epa.gov>*** wrote:
From: Drexler.Timothy@epamail.epa.gov <Drexler.Timothy@epamail.epa.gov>
Subject: Questions regarding Larry Jensen comments
To: [redacted] Exemption 6
Cc: Jensen.Larry@epamail.epa.gov
Date: Friday, August 8, 2008, 9:32 AM

Hi Larry:

We just had a couple of questions with regard to your comments. I have
numbered Larry's bullets to help identify the ones for which we need
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They are as follows:

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What table and document? Where do you see gamma spec and ICPMS
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Thanks for the help. Call me if you have any questions.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

[attachment "Yard 520 Responses 08212008.doc" deleted by Timothy Drexler/R5/USEPA/US]

EPA-R5-2013-003300RR-212

Laurence Silvestri
Exemption 6
08/22/2008 09:51 AM
Please respond to
Exemption 6

To Exe...
cc Exemp... Exemptio... 'Chuck Norris', Exemptio...
bcc
Subject Fw: Re: Fw: Questions regarding Larry Jensen comments

Larry J,
I believe that your contribution will improve people's lives for many generations.
Thanks,
Larry S.

--- On **Fri, 8/22/08, Drexler.Timothy@epamail.epa.gov <*Drexler.Timothy@epamail.epa.gov*>** wrote:
From: Drexler.Timothy@epamail.epa.gov <Drexler.Timothy@epamail.epa.gov>
Subject: Re: Fw: Questions regarding Larry Jensen comments
To: "Laurence Silvestri" <Exemption 6>
Cc: "'Chuck Norris'" <cnorris@geo-hydro.com>, Exemption 6@geo-hydro.com, Exemption 6 ıption 6, Exe Exemption 6
Date: Friday, August 22, 2008, 10:37 AM

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-Tim
Drexler

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08/22/2008 09:19 AM

To Timothy Drexler/R5/USEPA/US@EPA
cc Exemption 6@geo-hydro.com, 'Chuck Norris' <cnorris@geo-hydro.com>, Exer Exemption 6 Exemption 6 ıption 6

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Inorganics Analysis Data Package
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From: Drexler.Timothy@epamail.epa.gov
<Drexler.Timothy@epamail.epa.gov>

Subject: Questions regarding Larry Jensen comments
To: [redacted] Exemption 6
Cc: Jensen.Larry@epamail.epa.gov
Date: Friday, August 8, 2008, 9:32 AM

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Thanks for the help. Call me if you have any questions.

Tim Drexler
Remedial Project Manager
Superfund Division

United States Environmental Protection Agency
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Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

EPA-R5-2013-003300RR-213

Laurence Silvestri
Exemption 6
08/23/2008 02:30 PM
Please respond to
Exemption 6

To Timothy Drexler
cc
bcc
Subject Fw: Re: Questions regarding Larry Jensen comments

Tim,

Apparently, some images of graphs and tables did not survive emailing in the attached word document.
I'll re-send Larry Jensen's answers to your questions as attached pdf files in the following emails.

Larry Silvestri

--- On **Sat, 8/23/08, Larry Jensen** < Exemp... emption 6 > wrote:
From: Larry Jensen < Exem... emption 6 >
Subject: Re: Questions regarding Larry Jensen comments
To: Exemption 6
Date: Saturday, August 23, 2008, 11:08 AM

Larry S

They were saved as .doc, namely Word documents, but since that didn't work, I'll send them as emails.

Larry J
----- Original Message -----
From: Laurence Silvestri
To: Larry Jensen
Sent: Saturday, August 23, 2008 9:47 AM
Subject: Re: Questions regarding Larry Jensen comments

Larry J,

Try to resend them as email attachments.
Maybe save them PDF documents?
I'll call you as soon as I get them.

If that doesn't work, I'll US Mail them to Tim if you drop them off by my house.

Larry S

--- On **Fri, 8/22/08, Larry Jensen** < Exemp... emption 6 > wrote:
From: Larry Jensen < Exem... emption 6 >

Subject: Re: Questions regarding Larry Jensen comments
To: "Laurence Silvestri" <[redacted]>
Date: Friday, August 22, 2008, 3:55 PM

Larry, looks like the graphs and tables I attached didn't go through, at least my copy doesn't have them. If they didn't, do you want me to send them to you on paper?

Larry

----- Original Message -----
From: Laurence Silvestri
To: Drexler.Timothy@epamail.epa.gov
Cc: [redacted]@geo-hydro.com ; 'Chuck Norris' ; [redacted] ; [redacted]
Sent: Friday, August 22, 2008 9:19 AM
Subject: Fw: Questions regarding Larry Jensen comments

Responses to Questions by Tim Drexler

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Thanks for the help. Call me if you have any questions.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

No virus found in this incoming message.
Checked by AVG - http://www.avg.com
Version: 8.0.138 / Virus Database: 270.6.6/1627 - Release Date: 8/22/2008 6:48 AM

No virus found in this incoming message.
Checked by AVG - http://www.avg.com
Version: 8.0.138 / Virus Database: 270.6.7/1629 - Release Date: 8/23/2008 1:16 PM

EPA-R5-2013-003300RR-214

EUGENE JABLONOWSKI /R5/USEPA/US

10/15/2008 01:34 PM

To Timothy Drexler

cc

bcc

Subject Larry's contact info

Larry Jensen
U.S. EPA Region 5 (retired)

work 312-886-5026 (retired)
mobile +1-312-969-6135 (retired)
home Exemption 6

work jensen.larry@epa.gov (retired)

Exemption 6

EPA-R5-2013-003300RR-215

Exe... Exemption 6

10/29/2008 03:00 PM

To Timothy Drexler

cc "Larry Silvestri", EUGENE JABLONOWSKI

bcc

Subject Re: Pines - Rad Sample Clarifications

Tim,

I have been reviewing the responses you emailed me. The second and third responses refer to memo PI013rad.rev in Appendix S of the RI report and the fourth response refers to memo PI014resub in Appendix S of the RI report. I was not able to locate either of these in the RI I have. Can you send me these? If so, I would be appreciative.

Also, the first response refers to blank samples SS003AS0043007B, SS012ASS043007B, and SS021ASS050107B. These were referenced to PI083, I believe to the section titled Laboratory Blanks/Equipment Blanks/Field Blanks. That section has a table that lists SS003AS0043037B, SS012ASS043007B, and SS021ASS050107B. Is the response that refers to blank sample SS003AS0043007B actually refering to blank sample SS003AS0043037B as in the table?

Thanks

Larry Jensen

----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: <Exempti... Exemption 6>
Cc: <Jablonowski.Eugene@epamail.epa.gov>
Sent: Thursday, October 16, 2008 10:12 AM
Subject: Fw: Pines - Rad Sample Clarifications

>
> Hi Larry:
>
> We have reviewed the attached draft responses and they appear adequate.
> Send me a note back if you'd like to have a conversation with Gene and
> me.
>
> Tim Drexler
> phone: 312.353.4367
>
>
>
> ----- Forwarded by Timothy Drexler/R5/USEPA/US on 10/16/2008 10:05 AM
> -----
>
> "Bradley, Lisa"
> <Lisa.Bradley@ae
> com.com>
> To
> 10/06/2008 02:49 Timothy Drexler/R5/USEPA/US@EPA

> PM cc
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>
> Subject
> FW: Pines - Rad Sample
> Clarifications
>
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>
>
> Tim - you had requested some additional information regarding the Rad
> Sample Clarifications we had sent you on 9/5. Our responses have been
> updated below. The original email is also provided here. Let me know
> if you need anything further. Thanks! :) LIAS
>
>
> _____
>
>
> Lisa JN Bradley, Ph.D., DABT
>
>
> Senior Toxicologist.
>
>
> ENSR
>
>
> 2 Technology Park Drive
>
>
> Westford, MA 01886
>
>
> 978-589-3059 (direct)
>
>
> 978-846-3463 (cell)
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>
> 866-758-4856 (fax))
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>
> lbradley@ensr.aecom.com
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>
> www.ensr.aecom.com
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>
> 978-589-3000
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>

> EPA Comment: The U-238 and U-235 background water concentrations were
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> GEL Laboratories LLC
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> Metals
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> -1-
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> Inorganics Analysis Data Package
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> SDG No: 185248-2
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> Sample ID: 185256001
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>
> Sample ID: 185256002
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> The associated radiological data package is GEL SDG 146464 and the
> associated ENSR data validation memo in Appendix S of the RI report is
> PI013rad.rev. The associated inorganic data package is CAS SDG R2527896
> and the associated ENSR data validation memo in Appendix S of the RI
> report is PI014resub.
>

>
> _____
> From: Bradley, Lisa
> Sent: Friday, September 05, 2008 3:55 PM
> To: 'Drexler.Timothy@epamail.epa.gov'
> Subject:. Pines - Rad Sample Clarifications
>
>
> Hi Tim!
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> As we discussed, the following are comments you provided about some of
> the rad sample results from the Yard 520 report, with our preliminary
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>
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>
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> Lisa JN Bradley, Ph.D., DABT
>
>
> Senior Toxicologist.
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>
> ENSR
>
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> refers to.

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No virus found in this incoming message.
Checked by AVG - http://www.avg.com
Version: 8.0.173 / Virus Database: 270.8.1/1728 - Release Date: 10/16/2008
7:38 AM

EPA-R5-2013-003300RR-216

Timothy Drexler/R5/USEPA/US
10/30/2008 09:14 AM

To EUGENE JABLONOWSKI
cc
bcc
Subject Re: Pines - Rad Sample Clarifications

Hi Gene:

Could you forward the information to Larry? I'm out of the office for the rest of this week.

Thanks.

-Tim

-----"Larry Jensen" <[redacted]> wrote: -----

To: Timothy Drexler/R5/USEPA/US@EPA
From: "Larry Jensen" <[redacted]>
Date: 10/29/2008 03:00PM
cc: "Larry Silvestri" <[redacted]>, EUGENE JABLONOWSKI/R5/USEPA/US@EPA
Subject: Re: Pines - Rad Sample Clarifications

Tim,

I have been reviewing the responses you emailed me. The second and third responses refer to memo PI013rad.rev in Appendix S of the RI report and the fourth response refers to memo PI014resub in Appendix S of the RI report. I was not able to locate either of these in the RI I have. Can you send me these? If so, I would be appreciative.

Also, the first response refers to blank samples SS003AS0043007B, SS012ASS043007B, and SS021ASS050107B. These were referenced to PI083, I believe to the section titled Laboratory Blanks/Equipment Blanks/Field Blanks. That section has a table that lists SS003AS0043037B, SS012ASS043007B, and SS021ASS050107B. Is the response that refers to blank sample SS003AS0043007B actually refering to blank sample SS003AS0043037B as in the table?

Thanks

Larry Jensen

----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: <[redacted]>
Cc: <Jablonowski.Eugene@epamail.epa.gov>
Sent: Thursday, October 16, 2008 10:12 AM
Subject: Fw: Pines - Rad Sample Clarifications

>
> Hi Larry:
>

> We have reviewed the attached draft responses and they appear adequate.
> Send me a note back if you'd like to have a conversation with Gene and
> me.
>
> Tim Drexler
> phone: 312.353.4367
>
>
>
> ----- Forwarded by Timothy Drexler/R5/USEPA/US on 10/16/2008 10:05 AM
> -----
>
> "Bradley, Lisa"
> <Lisa.Bradley@ae
> com.com>
> To
> 10/06/2008 02:49 Timothy Drexler/R5/USEPA/US@EPA
> PM cc
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> Subject
> FW: Pines - Rad Sample
> Clarifications
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>
> Tim - you had requested some additional information regarding the Rad
> Sample Clarifications we had sent you on 9/5. Our responses have been
> updated below. The original email is also provided here. Let me know
> if you need anything further. Thanks! :) LIAS
>
>
> _____
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>
> Lisa JN Bradley, Ph.D., DABT
>
>
> Senior Toxicologist.
>
>
> ENSR
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> From: Bradley, Lisa
> Sent: Friday, September 05, 2008 3:55 PM
> To: 'Drexler.Timothy@epamail.epa.gov'
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No virus found in this incoming message.
Checked by AVG - http://www.avg.com
Version: 8.0.173 / Virus Database: 270.8.1/1728 - Release Date: 10/16/2008
7:38 AM

EPA-R5-2013-003300RR-217

Laurence Silvestri
Exemption 6
11/05/2008 08:52 AM
Please respond to
Exemption 6

To Timothy Drexler
cc Exemption 6, Exemptio..., "'Chuck Norris'", Exemption 6, Exemption 6, Exemption 6, Exemptio..., Exemp...
bcc
Subject PINES RI-Report

Tim,

We haven't heard anything concerning completion of the RI-Report. Larry Jensen has forwarded emails about some unreferenced data from Appendix-S. We are also interested if new pieziometers have been installed in the landfill. There were many other issues that we raised in our comments to the RI-Draft.

We do not want to rush the process because we want a thorough remediation, but we do appreciate enlightenment of progress or activity.

Larry Silvestri
Exemption 6

EPA-R5-2013-003300RR-218

Timothy Drexler/R5/USEPA/US
11/05/2008 09:16 AM

To silvestri
cc [redacted] "'Chuck Norris'",
bcc
Subject Re: PINES RI-Report

Hi Larry:

Thanks for the email message. Sorry I haven't updated you. We recently completed conversations with ENSR, the contractors for the RI Report, on all of our combined comments. During those discussions ENSR proposed a way to resolve the many ground water mathematical modeling issues we all raised and we (EPA, IDEM, US Geological Survey, and US Park Service) agreed to their approach. Ground water modeling was a very big part of our problem with the first version of the RI Report. Right now they are adjusting that site ground water model. We all had a lot of comments on that model so they pretty much have to do it over again. I have given them until mid-December to complete the model and re-submit the RI Report to all of us. At that time I will give the document to all of the reviewers to see if it meets our requirements. If it does, EPA will approve the document and they will then have 60-days to deliver to us a draft of the Human Health and Ecological Risk Assessment for our review. That document, utilizing all of the results of the RI Report will become the basis for any additional actions, if needed.

We have not required any new well construction at this point. They must, however, honor all of the pertinent data we now have. We will analyze the model to see if there are any deficiencies in information that is necessary for decisions.

The email traffic with Larry is to clear up some of the comments with regard to radiological questions. We're working through those comments.

I hope that you all feel free to call or write me any time with any other questions. I'll try to be a better about giving you updates as things happen. Right now, as I mentioned, we're waiting on the RI Report revision due next month. I hope to keep the process moving as quickly as I can without short-changing any of these issues. I'm really glad that you are all staying this involved and hope you remain so in spite of the time this is all taking.

-Tim

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071
Laurence Silvestri <[redacted]>

Laurence Silvestri
[redacted]
11/05/2008 08:52 AM
Please respond to

To Timothy Drexler/R5/USEPA/US@EPA
cc [redacted]

Exemption 6

"'Chuck Norris'" <cnorris@geo-hydro.com>,
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Larry Silvestri
Exemption 6

EPA-R5-2013-003300RR-219

"Larry Jensen"
Exe... Exemption 6
11/06/2008 04:24 PM

To Timothy Drexler
cc "Larry Silvestri", EUGENE JABLONOWSKI
bcc
Subject Fw: Re: Pines - Rad Sample Clarifications

Tim,

Per your recent message,

I will be out of the office starting 10/23/2008 and will not return until 11/03/2008.

I will respond to your message when I return on Thursday afternoon. If you need to contact someone immediately, please call my supervisor, Joan Tanaka, at 312-353-5425.

I was emailing back to see if you were able to locate the missing documents.

Larry Jensen

----- Original Message -----
From: "Laurence Silvestri" <Exemption 6>
To: <Exer Exemption 6>; <Exemption 6 otion 6>; "mark hutson" <Exemption 6 @geo-hydro.com>
Cc: <Exempti... emption 6>
Sent: Friday, October 31, 2008 10:49 AM
Subject: Fw: Re: Pines - Rad Sample Clarifications

Paul Jan and Mark,

Larry Jensen emailed this to me the day before yesterday. As you see, he has been in communication with EPA. There are still questions concerning ENSR's answers to Larry J's comments. ENSR needs to reference these memos and samples with page numbers within the 3000+ page Appendices.

Also, I don't think that the Piezeometer issue has been resolved.

Larry S.

--- On Wed, 10/29/08, Larry Jensen <Exempti... emption 6> wrote:

> From: Larry Jensen <Exempti... emption 6>
> Subject: Re: Pines - Rad Sample Clarifications
> To: Drexler.Timothy@epamail.epa.gov
> Cc: "Larry Silvestri" <Exemption 6>,
> Jablonowski.Eugene@epamail.epa.gov
> Date: Wednesday, October 29, 2008, 4:00 PM
> Tim,
>
> I have been reviewing the responses you emailed me. The
> second and third

> responses refer to memo PI013rad.rev in Appendix S of the
> RI report and the
> fourth response refers to memo PI014resub in Appendix S of
> the RI report. I
> was not able to locate either of these in the RI I have.
> Can you send me
> these? If so, I would be appreciative.
>
> Also, the first response refers to blank samples
> SS003AS0043007B,
> SS012ASS043007B, and SS021ASS050107B. These were
> referenced to PI083, I
> believe to the section titled Laboratory Blanks/Equipment
> Blanks/Field
> Blanks. That section has a table that lists
> SS003AS0043037B,
> SS012ASS043007B, and SS021ASS050107B. Is the response
> that refers to blank
> sample SS003AS0043007B actually refering to blank sample
> SS003AS0043037B as
> in the table?
>
> Thanks
>
> Larry Jensen
>
>
>
>
> ----- Original Message -----
> From: <Drexler.Timothy@epamail.epa.gov>
> To: <Exempti... emption 6 >
> Cc: <Jablonowski.Eugene@epamail.epa.gov>
> Sent: Thursday, October 16, 2008 10:12 AM
> Subject: Fw: Pines - Rad Sample Clarifications
>
>
> >
> > Hi Larry:
> >
> > We have reviewed the attached draft responses and they
> appear adequate.
> > Send me a note back if you'd like to have a
> conversation with Gene and
> > me.
> >
> > Tim Drexler
> > phone: 312.353.4367
> >
> >
> >
> > ----- Forwarded by Timothy Drexler/R5/USEPA/US on
> 10/16/2008 10:05 AM
> > -----
> >
> > "Bradley, Lisa"
> > <Lisa.Bradley@ae
> > com.com>
> >
> To
> > 10/06/2008 02:49 Timothy

> Drexler/R5/USEPA/US@EPA
> > PM
> cc
> >
> >
> >
> >
> >
> >
> >
> >
> >
> >
> Subject
> > FW: Pines - Rad
> Sample
> > Clarifications
> >
> >
> >
> >
> >
> >
> > Tim - you had requested some additional information
> regarding the Rad
> > Sample Clarifications we had sent you on 9/5. Our
> responses have been
> > updated below. The original email is also provided
> here. Let me know
> > if you need anything further. Thanks! :) LIAS
> >
> >
> > _____
> >
> >
> > Lisa JN Bradley, Ph.D., DABT
> >
> >
> > Senior Toxicologist.
> >
> >
> > ENSR
> >
> >
> > 2 Technology Park Drive
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> > Westford, MA 01886
> >
> >
> > 978-589-3059 (direct)
> >
> >
> > 978-846-3463 (cell)
> >
> >
> > 866-758-4856 (fax))
> >
> >
> > lbradley@ensr.aecom.com
> >

> >
> > www.ensr.aecom.com
> >
> >
> > 978-589-3000
> >
> >
> > EPA Comment: The U-238 and U-235 background water
> concentrations were
> > identical across three samples:
> >
> >
> > GEL Laboratories LLC
> >
> >
> > Metals
> >
> >
> > -1-
> >
> >
> > Inorganics Analysis Data Package
> >
> >
> > SDG No: 185248-2
> >
> >
> > Sample ID: 185256001
> >
> >
> > Sample ID: 185256002
> >
> >
> > Sample ID: 185256003
> >
> >
> > Getting the exact concentration in each measurement is
> unexpected.
> > Determine the cause of these results and explain.
> >
> >
> > Response: The samples were aqueous equipment blank
> samples
> > (SS003AS0043007B, SS012ASS043007B, and
> SS021ASS050107B) associated with
> > the background soil samples. U-235 and U-238 were
> nondetect at 0.01
> > ug/L and 0.05 ug/L, respectively, in all three of
> these quality control
> > (QC) samples. In addition, the total uranium result,
> which was
> > calculated from the U-235 and U-238 analytical results
> was also
> > nondetect in these three QC samples. In general for
> aqueous samples,
> > the reported nondetect results would be identical
> since the results are
> > reported as nondetect at the Reporting Limit (RL).
> >
> >
> > The associated data package is GEL data package 185256

> (SDG 185248-2)
> > and the associated ENSR data validation memo in
> Appendix S of the RI
> > report is PI083.
> >
> >
> > EPA Comment: For the one radium water measurement
> made at GP004 by
> > gamma spectrometry, the Total Radium including
> background appears to be
> > 20.58 pCi/L or 4 times the drinking water standard.
> However, the
> > uncertainties are higher than the results, and the
> detection limits are
> > well above 5 pCi/L, the USEPA Total Radium drinking
> water standard.
> > These radium in water data are not usable. This sample
> should be
> > reanalyzed to ensure a useable detection limit.
> >
> >
> > Response: Sample GP004ICB092305B was the aqueous
> equipment blank sample
> > associated with the soil samples collected in
> September 2005. Ra-226
> > and Ra-228 were nondetect in this QC sample. The
> purpose of this QC
> > sample was to determine if proper decontamination
> procedures were
> > followed, which would then ensure that there was no
> “carry-over” between
> > sample locations. Based on the purpose of this
> aqueous QC sample,
> > comparing the nondetect radium results to the radium
> drinking water
> > standard would not be applicable to this report.
> >
> >
> > The associated data package is GEL SDG 146464 and the
> associated ENSR
> > data validation memo in Appendix S of the RI report is
> PI013rad.rev.
> >
> >
> > EPA Comment:. For the one uranium water measurement
> made at GP004 by
> > gamma spectrometry, the measurements were made in
> pCi/L. When
> > converted to ug/L, the Total Uranium level could be as
> high as 479 ug/L
> > or 16 times the drinking water standard for total
> uranium. Also, the
> > uncertainty is 3X the measurement result. Again, the
> uncertainties are
> > higher than the results, and the detection limits are
> well above 30
> > ug/L, the USEPA Total Uranium drinking water standard.
> These uranium in
> > water data are not usable. You should reanalyze to
> ensure a useable
> > detection limit. Also, please explain the reference

> levels (RLs)
> > provided in the water analysis results (such as 250
> pCi/L for U-238).
> >
> >
> > Response: Sample GP004ICB092305B was the aqueous
> equipment blank sample
> > associated with the soil samples collected in
> September 2005. U-234,
> > U-235, and U-238 were nondetect in this QC sample.
> The purpose of this
> > QC sample was to determine if proper decontamination
> procedures were
> > followed, which would then ensure that there was no
> "carry-over" between
> > sample locations. Based on the purpose of this
> aqueous QC sample,
> > comparing the nondetect uranium results to the total
> uranium drinking
> > water standard would not be applicable to this report.
> >
> >
> > The associated data package is GEL SDG 146464 and the
> associated ENSR
> > data validation memo in Appendix S of the RI report is
> PI013rad.rev.
> >
> >
> > EPA Comment:. The measurements for U-238 and U-235 by
> gamma
> > spectrometry are not comparable to the measurements by
> ICPMS. The U-238
> > and U-235 concentrations by gamma spectrometry, 473.5
> ug/L and 5.273
> > ug/L, respectively, are substantially different from
> the concentrations
> > by ICPMS, 0.200 ug/L and 0.070 ug/L, respectively.
> This appears to be
> > an issue with measurement uncertainties..
> >
> >
> > Response: If this comment applies to sample
> GP004ICB092305B, then this
> > was the aqueous equipment blank sample associated with
> the soil samples
> > collected in September 2005. The results for U-235,
> and U-238 were
> > nondetect in this QC sample. The purpose of this QC
> sample was to
> > determine if proper decontamination procedures were
> followed, which
> > would then ensure that there was no "carry-over"
> between sample
> > locations. Based on the purpose of this aqueous QC
> sample, comparing
> > the nondetect uranium results to the total uranium
> drinking water
> > standard would not be applicable to this report.
> >
> >
> > The associated radiological data package is GEL SDG

> 146464 and the
> > associated ENSR data validation memo in Appendix S of
> the RI report is
> > PI013rad.rev. The associated inorganic data package
> is CAS SDG R2527896
> > and the associated ENSR data validation memo in
> Appendix S of the RI
> > report is PI014resub.
> >
> >
> > _____
> > From: Bradley, Lisa
> > Sent: Friday, September 05, 2008 3:55 PM
> > To: 'Drexler.Timothy@epamail.epa.gov'
> > Subject:. Pines - Rad Sample Clarifications
> >
> >
> > Hi Tim!
> >
> >
> > As we discussed, the following are comments you
> provided about some of
> > the rad sample results from the Yard 520 report, with
> our preliminary
> > responses. Please let me know if you have any
> questions.
> >
> >
> > Thanks! :) LAIS
> >
> >
> > _____
> >
> >
> > Lisa JN Bradley, Ph.D., DABT
> >
> >
> > Senior Toxicologist.
> >
> >
> > ENSR
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> > 978-589-3059 (direct)
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> > 978-846-3463 (cell)
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> >
> >

> > www.ensr.aecom.com
> >
> >
> > 978-589-3000
> >
> >
> > EPA Comment: The U-238 and U-235 background water
> concentrations were
> > identical across three samples:
> >
> >
> > GEL Laboratories LLC
> >
> >
> > Metals
> >
> >
> > -1-
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> > Inorganics Analysis Data Package
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> > SDG No: 185248-2
> >
> >
> > Sample ID: 185256001
> >
> >
> > Sample ID: 185256002
> >
> >
> > Sample ID: 185256003
> >
> >
> > Getting the exact concentration in each measurement is
> unexpected.
> > Determine the cause of these results and explain.
> >
> >
> > Preliminary Response: The three samples listed were
> the aqueous
> > equipment blank samples (SS003AS0043007B,
> SS012ASS043007B, and
> > SS021ASS050107B) associated with the background soil
> samples. U-235 and
> > U-238 were nondetect at 0.01 pCi/L and 0.05 pCi/L,
> respectively, in all
> > three of these quality control (QC) samples. In
> addition, the total
> > uranium result, which was calculated from the U-235
> and U-238 analytical
> > results was also nondetect in these three QC samples.
> In general for
> > aqueous samples, the reported nondetect results would
> be identical since
> > the results are reported as nondetect at the Reporting
> Limit (RL).
> >
> >
> > EPA Comment: For the one radium water measurement made

> at GP004 by gamma
> > spectrometry, the Total Radium including background
> appears to be 20.58
> > pCi/L or 4 times the drinking water standard.
> However, the
> > uncertainties are higher than the results, and the
> detection limits are
> > well above 5 pCi/L, the USEPA Total Radium drinking
> water standard.
> > These radium in water data are not usable. This sample
> should be
> > reanalyzed to ensure a useable detection limit.
> >
> >
> > Preliminary Response: Sample GP004ICB092305B was the
> aqueous equipment
> > blank sample associated with the soil samples
> collected in September
> > 2005. Ra-226 and Ra-228 were nondetect in this QC
> sample. The purpose
> > of this QC sample was to determine if proper
> decontamination procedures
> > were followed, which would then ensure that there was
> no “carry-over”
> > between sample locations. Based on the purpose of
> this aqueous QC
> > sample, comparing the nondetect radium results to the
> radium drinking
> > water standard would not be applicable to this report.
> >
> >
> > EPA Comment: For the one uranium water measurement
> made at GP004 by
> > gamma spectrometry, the measurements were made in
> pCi/L.   When
> > converted to ug/L, the Total Uranium level could be as
> high as 479 ug/L
> > or 16 times the drinking water standard for total
> uranium. Also, the
> > uncertainty is 3X the measurement result. Again, the
> uncertainties are
> > higher than the results, and the detection limits are
> well above 30
> > ug/L, the USEPA Total Uranium drinking water standard.
> These uranium in
> > water data are not usable. You should reanalyze to
> ensure a useable
> > detection limit. Also, please explain the reference
> levels (RLs)
> > provided in the water analysis results (such as 250
> pCi/L for U-238).
> >
> >
> > Preliminary Response: Sample GP004ICB092305B was the
> aqueous equipment
> > blank sample associated with the soil samples
> collected in September
> > 2005. U-234, U-235, and U-238 were nondetect in this
> QC sample. The
> > purpose of this QC sample was to determine if proper
> decontamination

> > procedures were followed, which would then ensure that
> there was no
> > “carry-over” between sample locations. Based on
> the purpose of this
> > aqueous QC sample, comparing the nondetect uranium
> results to the total
> > uranium drinking water standard would not be
> applicable to this report.
> >
> >
> > EPA Comment: The measurements for U-238 and U-235 by
> gamma spectrometry
> > are not comparable to the measurements by ICPMS. The
> U-238 and U-235
> > concentrations by gamma spectrometry, 473.5 ug/L and
> 5.273 ug/L,
> > respectively, are substantially different from the
> concentrations by
> > ICPMS, 0.200 ug/L and 0.070 ug/L, respectively. This
> appears to be an
> > issue with measurement uncertainties.
> >
> >
> > Preliminary Response: Please indicate the sample IDs
> that this comment
> > refers to.
>
>
>

--
>
>
>
> No virus found in this incoming message.
> Checked by AVG - http://www.avg.com
> Version: 8.0.173 / Virus Database: 270.8.1/1728 - Release
> Date: 10/16/2008
> 7:38 AM

--

No virus found in this incoming message.
Checked by AVG - http://www.avg.com
Version: 8.0.175 / Virus Database: 270.8.5/1757 - Release Date: 10/30/2008
2:35 PM

EPA-R5-2013-003300RR-220

"Larry Jensen "
[redacted] Exe... :xemption 6
11/13/2008 07:54 AM

To Timothy Drexler
cc "Larry Silvestri", EUGENE JABLONOWSKI
bcc
Subject Missing substantiations

Mr. Drexler,

On October 29, 2008, I sent you a request for memorandums missing in the RI Report for the Pines project. I received an email back from you that said you would return to the office November 3 and would respond to me by November 6. Not having heard from you on November 6, I sent a followup email request. I would appreciate receiving the missing memorandums and receiving a clarification if there was an error in either your October 16, 2008, email responses or an error in the lab memorandum. Your prompt assistance will allow me to complete my review of your responses.

Sincerely,

Larry Jensen

EPA-R5-2013-003300RR-221

Exemption 6

12/03/2008 11:41 AM

Please respond to

Exemption 6

To Timothy Drexler

cc Exemp..., Exemptio..., Exemptio..., peggy, hutson, Exemption 6

bcc

Subject Background soil sample coordinates

Tim,

We've been looking for the coordinates of the Background Surface Soil Sample Locations. The attached pdf document is a map of these locations. We would like to have the exact coordinates.

We did find other test locations in this document:
Town of Pines Groundwater Superfund Site Chemical Analysis Data
CERCLA ID: INN000508071
Data Provided By: ENSR
Compiled On: July 31, 2007
However, all coordinates in that document are given in, "State Plane - Indiana West Zone." We need coordinates in latitude and longitude.

Thanks,
Larry Silvestri

RI_Tables_Figures_Page155_Backround.pdf

EPA-R5-2013-003300RR-222

"Larry Jensen "
[redacted] Exe... Exemption 6
12/03/2008 05:20 PM

To Timothy Drexler
cc "Larry Silvestri", EUGENE JABLONOWSKI, Ekugene
bcc
Subject PINES comment responses

Attached are my responses to your clarifications of October 16, 2008, and to the additional information you provided on November 21,2008.

Larry Jensen Responses 120408.doc

EPA-R5-2013-003300RR-223

Timothy Drexler/R5/USEPA/US
12/04/2008 08:28 AM

To lbradley, eperry
cc EUGENE JABLONOWSKI
bcc
Subject Fw: PINES comment responses

Hi Lisa:

Do you have a response to Larry Jensen's attached comments?

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

----- Forwarded by Timothy Drexler/R5/USEPA/US on 12/04/2008 08:27 AM -----

"Larry Jensen"
[redacted]
12/03/2008 05:20 PM

To Timothy Drexler/R5/USEPA/US@EPA
cc "Larry Silvestri" <[redacted]>, EUGENE JABLONOWSKI/R5/USEPA/US@EPA, <Ekugene@epamail.epa.gov>

Subject PINES comment responses

Attached are my responses to your clarifications of October 16, 2008, and to the additional information you provided on November 21,2008.

Larry Jensen Responses 120408.doc

EPA-R5-2013-003300RR-224

"Bradley, Lisa"
<Lisa.Bradley@aecom.com>
12/04/2008 08:37 AM

To Timothy Drexler, "Perry, Elizabeth"
cc EUGENE JABLONOWSKI
bcc
Subject RE: PINES comment responses

Thanks Tim. We will look into these. :) LIAS

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Thursday, December 04, 2008 9:28 AM
To: Bradley, Lisa; Perry, Elizabeth
Cc: Jablonowski.Eugene@epamail.epa.gov
Subject: Fw: PINES comment responses

Hi Lisa:

Do you have a response to Larry Jensen's attached comments?

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071
----- Forwarded by Timothy Drexler/R5/USEPA/US on 12/04/2008 08:27 AM

"Larry Jensen"
<[redacted] Exemption 6
[redacted] Exemption 6
12/03/2008 05:20 PM

To
Timothy Drexler/R5/USEPA/US@EPA
cc
"Larry Silvestri"
<[redacted] Exemption 6>, EUGENE JABLONOWSKI/R5/USEPA/US@EPA, <Ekugene@epamail.epa.gov>

Subject
PINES comment responses

Attached are my responses to your clarifications of October 16, 2008, and to the additional information you provided on November 21,2008.

Larry Jensen(See attached file: Responses 120408.doc)

EPA-R5-2013-003300RR-225

[redacted]
12/05/2008 02:25 PM
Please respond to
[redacted]

To Timothy Drexler
cc [redacted], [redacted], [redacted], peggy, hutson, [redacted]
bcc
Subject Re: Background soil sample coordinates

Tim,
I opened the revised RI Report and found that Appendix G has mailing address locations of the background soil sample locations.
Thanks,
Larry Silvestri

--- On **Wed, 12/3/08, Laurence Silvestri** <[redacted]> wrote:
From: Laurence Silvestri <[redacted]>
Subject: Background soil sample coordinates
To: Drexler.Timothy@epamail.epa.gov
Cc: [redacted], [redacted], [redacted], [redacted],
"hutson" <[redacted]@geo-hydro.com>, [redacted]
Date: Wednesday, December 3, 2008, 12:41 PM

Tim,

We've been looking for the coordinates of the Background Surface Soil Sample Locations. The attached pdf document is a map of these locations. We would like to have the exact coordinates.

We did find other test locations in this document:
Town of Pines Groundwater Superfund Site Chemical Analysis Data
CERCLA ID: INN000508071
Data Provided By: ENSR
Compiled On: July 31, 2007
However, all coordinates in that document are given in, "State Plane - Indiana West Zone." We need coordinates in latitude and longitude.

Thanks,
Larry Silvestri

EPA-R5-2013-003300RR-226

Laurence Silvestri
[redacted]
12/07/2008 10:30 AM
Please respond to
[redacted]

To Timothy Drexler
cc [redacted], [redacted], [redacted]
bcc
Subject PINES Revised RI

Tim,

I downloaded the Revised RI Report.
Is this a second draft, subject to review?
Can we share this with the public?

We appreciate that you have spent a lot of time and performed a lot of work.
Thank you,
Larry Silvestri

EPA-R5-2013-003300RR-227

Timothy Drexler/R5/USEPA/US
12/08/2008 07:49 AM

To silvestri
cc [redacted]
bcc
Subject Re: PINES Revised RI

Hi Larry:

To answer your questions in order; Yes....Yes.....No. Until a document has been approved by the EPA it is not a public document. Draft documents that are released to the public confuse them and lead to a lot of unnecessary explanations from us. Imagine if the first version were released. It read like a final version so anyone reading it could interpret it as being approved. We all need to review this to insure that ENSR has incorporated the comments to our satisfaction before it is approved and released. P.I.N.E.S., as the designated community group, has a special standing and is a part of the review process. Please keep the document within your review group. Call me if you'd like to talk about this more.

Happy reading.

-Tim

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071
Laurence Silvestri <[redacted]>

Laurence Silvestri
[redacted]
12/07/2008 10:30 AM
Please respond to [redacted]

To Timothy Drexler/R5/USEPA/US@EPA
cc [redacted]
Subject PINES Revised RI

Tim,

I downloaded the Revised RI Report.
Is this a second draft, subject to review?
Can we share this with the public?

We appreciate that you have spent a lot of time and performed a lot of work.

Thank you,
Larry Silvestri

EPA-R5-2013-003300RR-228

Laurence Silvestri
Exemption 6
12/08/2008 09:03 AM
Please respond to
Exemption 6

To Timothy Drexler
cc Exemptio... Exempti... Exemp...
bcc
Subject Re: PINES Revised RI

Tim,
Thank you.
We understand.
Larry

--- On **Mon, 12/8/08, Drexler.Timothy@epamail.epa.gov <*Drexler.Timothy@epamail.epa.gov*>** wrote:
From: Drexler.Timothy@epamail.epa.gov <Drexler.Timothy@epamail.epa.gov>
Subject: Re: PINES Revised RI
To: Exemption 6
Cc: Exemption 6 Exemption 6, Exemption 6 ıption 6, Exe Exemption 6
Date: Monday, December 8, 2008, 8:49 AM

Hi Larry:

To answer your questions in order; Yes....Yes.....No. Until a document has been approved by the EPA it is not a public document. Draft documents that are released to the public confuse them and lead to a lot of unnecessary explanations from us. Imagine if the first version were released. It read like a
final version so anyone reading it could
interpret it as being approved. We all need to review this to insure that ENSR has incorporated the comments to our satisfaction before it is approved and released. P.I.N.E.S., as the designated community group, has a special standing and is a part of the review process. Please keep the document within your review group. Call me if you'd like to talk about this more.

Happy reading.

-Tim

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

Laurence Silvestri
<Exemption 6
Exemption 6>

12/07/2008 10:30 AM

Please respond to
Exemption 6

To
Timothy Drexler/R5/USEPA/US@EPA

cc
Exer Exemption 6,
Exemption 6 ption 6,
Exemption 6 Exemption 6

Subject
PINES Revised RI

Tim,

I downloaded the Revised RI Report.
Is this a second draft, subject to review?
Can we share this with the public?

We appreciate that you have spent a lot of time and performed a lot of work.
Thank you,
Larry Silvestri

EPA-R5-2013-003300RR-229

Laurence Silvestri
Exemption 6

12/08/2008 04:01 PM

Please respond to
Exemption 6

To Timothy Drexler, '[redacted]'
cc Chuck Norris, nancy kolasa, Mark Hutson, Paul Kysel, [redacted], peggy
bcc
Subject Re: PINES' technical assistants

Tim,

I just talked to Chuck Norris. Geo Hydro has not been included among the list of recipients. It is very important they be kept in the loop. PINES is placed into a serious disadvantage otherwise.

If there is a period of time for submitting comments on the Revised RI Report, could you restart that clock from t that Geo Hydro will be added to the distribution list and after they receive their information? Please let us know the comment period will begin and end.

Thanks,
Larry Silvestri
Exemption 6

--- On **Fri, 11/7/08,** [redacted] <[redacted]> wrote:
From: [redacted] <[redacted]>
Subject: Re: PINES
To: Drexler.Timothy@epamail.epa.gov
Cc: "Chuck Norris" <cnorris@geo-hydro.com>, "nancy kolasa" <[redacted]>, "Mark Hutson" <[redacted]@geo-hydro.com>, "Paul Kysel" <[redacted]>, "Larry Silvestri" <[redacted]>
Date: Friday, November 7, 2008, 9:34 AM

THANK YOU!!!!

jan
----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "[redacted]" <[redacted]>
Cc: "Chuck Norris" <cnorris@geo-hydro.com>; "nancy kolasa"
<[redacted]>; "Mark Hutson"
<[redacted]@geo-hydro.com>; "Paul
Kysel" <[redacted]>; "Larry Silvestri"
<[redacted]>
Sent: Friday, November 07, 2008 8:29 AM
Subject: Re: PINES

> Glad to hear, Jan. When the revised RI Report comes out, I'll make sure
> that they are on the list.

>
> -Tim
>
>
>
> Tim Drexler
> Remedial Project
 Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-6J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
> fax: 312.886.4071
>
>
>
> "[redacted]"
> <[redacted].
> net>
> To
> 11/07/2008 05:38 Timothy Drexler/R5/USEPA/US@EPA
> AM "Chuck Norris"
> <cnorris@geo-hydro.com>, "Mark
> Hutson"<[redacted]@geo-hydro.com>,
> "Paul Kysel"<[redacted]>,
> "Larry Silvestri"
> <[redacted]>,"nancy
>
 kolasa"<[redacted]>
>
> Subject
> PINES
>
>
> Tim: fyi - Geo-Hydro (Chuck Norris and Mark Hutson) continues to be the
> technical advisor to the PINES group. Just wanted to be sure there are
> no misunderstandings on this score. Be very sure to keep them in the
> "loop".
>
> Thanks
> jan nona
>

No virus found in this incoming message.

Checked by AVG - http://www.avg.com
Version: 8.0.175 / Virus Database: 270.9.0/1772 - Release Date: 11/6/2008
8:23 PM

EPA-R5-2013-003300RR-230

Timothy Drexler/R5/USEPA/US
12/09/2008 07:45 AM

To kherron, silvestri, cnorris, Afif Marouf, EDWARD KARECKI, Mark Johnson, Clayton Koher, kay.bob, EUGENE JABLONOWSKI, pete_penoyer, brenda_waters

cc

bcc

Subject Pines Site Revised RI Report

Hi everyone:

You should all now have copies of the Pines Site revised RI Report from ENSR (Chuck, you have been added to the list and should have received a notice). If you have not been able to download the documents, call me ASAP. I need your comments on this new version by Friday Jan. 9th. If you would like to schedule a conference call sometime in December to discuss the document, please let me know and I'll set up a date, time, and conference lines. I will be out of the office, however, from Dec. 24th to Jan. 6th.

Thanks again for your assistance in this review. I appreciate your help.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

EPA-R5-2013-003300RR-231

Laurence Silvestri
Exemption 6

12/12/2008 09:44 AM

Please respond to
Exemption 6

To Timothy Drexler

cc Exemption 6, Exemptio..., "'Chuck Norris'", Exemption 6, Exemption 6, Exemption 6, mark hutson, Exemptio..., peggy, Exemp..., Exe...

bcc

Subject RI Revisions not in good faith

Tim,

I looked through the first two pages of the EPA comments and compared them to the Draft and Revised RI Reports. ENSR has responded to some comments by simply changing the wording, but not the meaning. Some responses do not address the issue raised by the comment, but instead discuss an unrelated topic. Some of the comments have not been addressed at all. I have

not found any comments that have been addressed fully and honestly. ENSR is exhausting our resources by forcing us to find errors in the Draft RI Report and then re-find the same errors in the (Un)-Revised RI Report. ENSR is not dealing in good faith to make corrections in response to the comments.

For these reasons, PINES needs and deserves additional TAP money.

Larry Silvestri
Exemption 6

EPA-R5-2013-003300RR-232

Timothy Drexler/R5/USEPA/US
12/15/2008 09:15 AM

To silvestri
cc [redacted] peggy, [redacted]
bcc
Subject Re: RI Revisions not in good faith

Thanks for the note, Larry. We have been working on this issue. I hope to have more information for you soon.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071
Laurence Silvestri <[redacted]>

Laurence Silvestri
[redacted]
12/12/2008 09:44 AM
Please respond to [redacted]

To Timothy Drexler/R5/USEPA/US@EPA
cc [redacted] "'Chuck Norris'" <cnorris@geo-hydro.com>, [redacted] mark hutson <[redacted]@geo-hydro.com>, [redacted]
Subject RI Revisions not in good faith

Tim,

I looked through the first two pages of the EPA comments and compared them to the Draft and Revised RI Reports. ENSR has responded to some comments by simply changing the wording, but not the meaning. Some responses do not address the issue raised by the comment, but instead discuss an unrelated topic. Some of the comments have not been addressed at all. I have not found any comments that have been addressed fully and honestly. ENSR is exhausting our resources by forcing us to find errors in the Draft RI Report and then re-find the same errors in the (Un)-Revised RI Report. ENSR is not dealing in good faith to make corrections in response to the comments.

For these reasons, PINES needs and deserves additional TAP money.

Larry Silvestri
Exemption 6

EPA-R5-2013-003300RR-233

"Larry Jensen "
[redacted]
12/15/2008 10:48 AM

To Timothy Drexler
cc
bcc
Subject Re: RI Revisions not in good faith

Thanks, Tim.

Larry
----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: <[redacted]>
Cc: <[redacted]>; <[redacted]>;
<[redacted]>; <[redacted]>;
<[redacted]>; <[redacted]>; <[redacted]>;
<[redacted]>; <[redacted]>
Sent: Monday, December 15, 2008 9:15 AM
Subject: Re: RI Revisions not in good faith

> Thanks for the note, Larry. We have been working on this issue. I hope
> to have more information for you soon.
>
> Tim Drexler
> Remedial Project Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-6J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
> fax: 312.886.4071
>
>
>
> Laurence
> Silvestri
> <[redacted]>
> 12/12/2008 09:44
> AM
>
>
> Please respond
> to
> silvestri@amerit
> ech.net

To
Timothy Drexler/R5/USEPA/US@EPA
cc
[redacted], "'Chuck
Norris'"
<cnorris@geo-hydro.com>,
[redacted], mark
hutson <[redacted]@geo-hydro.com>,
[redacted]

>
>
>
>
>
Subject
> RI Revisions not in good faith
>
>
>
>
>
>
>
> Tim,
>
> I looked through the first two pages of the EPA comments and compared
> them to the Draft and Revised RI Reports. ENSR has responded to some
> comments by simply changing the wording, but not the meaning. Some
> responses do not address the issue raised by the comment, but instead
> discuss an unrelated topic. Some of the comments have not been
> addressed at all. I have not found any comments that have been
> addressed fully and honestly. ENSR is exhausting our resources by
> forcing us to find errors in the Draft RI Report and then re-find the
> same errors in the (Un)-Revised RI Report. ENSR is not dealing in good
> faith to make corrections in response to the comments.
>
> For these reasons, PINES needs and deserves additional TAP money.
>
> Larry Silvestri
> Exemption 6
>
>
>
>
>

--

No virus found in this incoming message.
Checked by AVG - http://www.avg.com
Version: 8.0.176 / Virus Database: 270.9.18/1849 - Release Date: 12/15/2008
9:01 AM

EPA-R5-2013-003300RR-234

"Bradley, Lisa"
<Lisa.Bradley@aecom.com>

12/15/2008 03:19 PM

To Timothy Drexler

cc

bcc

Subject FW: PINES comment responses

Hi Tim! Below are our responses to Larry Jensen's additional comments. Please let me know if you need anything further! :) LAIS

Lisa JN Bradley, Ph.D., DABT
Senior Toxicologist
AECOM Environment
D 978-589-3059
C 978-846-3463
lisa.bradley@aecom.com

AECOM
2 Technology Park Drive
Westford, MA 01886
T 978-589-3000
F 866-758-4856

EPA Comment #211: For the one radium...

The response that this was an aqueous equipment blank clarifies why the concentrations were so high and resolves that issue.

However, there was no response on why the uncertainties were higher than the measured result

Ra-226	8.48 +/- 12.3 pCi/L
Ra-228	12.1 +/- 16.4 pCi/L

The results could be much higher than that expected for a blank. Why does this not result in unusable data?

Response: These results are nondetect, since they are below their minimum detectable activities (MDAs). However, the uncertainties for these results are higher than typically expected. A number of reasons contributed to the high uncertainties for these nondetect results, including sample size and counting time. A one 1-L sample container was collected, and the laboratory analyzed a 500 mL aliquot, which is consistent with the SOP. The sample was counted for 8 hours versus the maximum of 16 hours. Since the laboratory met the QAPP requirement for blanks of reporting results less than the MDA, the laboratory was not requested to reanalyze the equipment blank sample, and the results are considered usable.

EPA Comment #212: For the one uranium...

The response that this was an aqueous equipment blank clarifies why the concentrations were so high and resolves that issue.

However, there was no response on why the fact that the uncertainties were higher than the measured results

U-234	11.4 +/- 12.4 pCi/L

U-235 11.6 +/- 28.1 pCi/L
U-238 161 +/- 346 pCi/L

The results could be much higher than that expected for a blank. Why does this not result in unusable data?

Response: See response above for comment 211.

EPA Comment: The measurements for U-238...

It is understood that Client Sample ID: GP004ICB092305B is a blank. It is assumed that the same sample was analyzed by both gamma spectroscopy and by ICP-MS. It is not clear why, when uranium concentrations by gamma spectroscopy are converted from pCi/L to ug/L, they do not compare to
ICP-MS concentrations.

	Gamma Spectroscopy	ICP-MS
U-235	(11.6 pCi/L) 5.273 ug/L	0.070 ug/L
U-238	(161 pCi/L) 473.5 ug/L	0.200 ug/L

This issue is not yet resolved.

Response: For sample GP004ICB092305B, the gamma spectroscopy data was reported in GEL SDG 146464 and the ICP/MS uranium data was reported in GEL SDG 156641.

This conversion would be appropriate if applied to a detected result. However, these blank results are reported as not detected by both methods. The intended use of the blank was to verify that the sampling tools were decontaminated properly thus, the blank reporting limits for the two methods were based on the associated soil sample reporting limits and not based on comparing the results from the two methods. Since the results from both analytical methods are nondetect at different reporting limits, a comparison between the nondetect activities and nondetect mass results is not applicable.

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Thursday, December 04, 2008 9:28 AM
To: Bradley, Lisa; Perry, Elizabeth
Cc: Jablonowski.Eugene@epamail.epa.gov
Subject: Fw: PINES comment responses

Hi Lisa:

Do you have a response to Larry Jensen's attached comments?

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071
----- Forwarded by Timothy Drexler/R5/USEPA/US on 12/04/2008 08:27 AM -----

"Larry Jensen"
<[redacted]
et>

12/03/2008 05:20 PM

To
Timothy Drexler/R5/USEPA/US@EPA
cc
"Larry Silvestri"
<[redacted]>, EUGENE JABLONOWSKI/R5/USEPA/US@EPA, <Ekugene@epamail.epa.gov>

Subject
PINES comment responses

Attached are my responses to your clarifications of October 16, 2008, and to the additional information you provided on November 21,2008.

Larry Jensen(See attached file: Responses 120408.doc)

Responses 120408.doc

EPA-R5-2013-003300RR-235

Laurence Silvestri
Exemption 6
12/18/2008 04:58 PM
Please respond to
Exemption 6

To Timothy Drexler
cc Exemption 6, Exemptio..., Exemption 6, Exemption 6, Exemption 6, Exemptio..., peggy, Exe..., Exem...
bcc
Subject Re: RI Revisions not in good faith

Tim,

I found ENSR's responses to the USEPA Comments.

Look on page 3,210 of the Appendix. It is the last section, Appendix "BB."

ENSR's Response to Comments should have been incorporated directly into the Revised RI Report as corrections, with an index to those corrections. The title "Revised RI Report" is misleading because most of the errors are left unchanged. Moreover, other revisions that have been made are in attached documents. Burying the Response to Comments at the end of thousands of pages suggests that ENSR is deliberately trying to make the task of proof-reading impossible.

I would be surprised if anyone on the EPA distribution list is even aware that Appendix BB exists. If not, they need to be told before the review period ends on January 9.

Larry Silvestri
Exemption 6

--- On **Mon, 12/15/08, Drexler.Timothy@epamail.epa.gov** ***<Drexler.Timothy@epamail.epa.gov>*** wrote:
From: Drexler.Timothy@epamail.epa.gov <Drexler.Timothy@epamail.epa.gov>
Subject: Re: RI Revisions not in good faith
To: Exemption 6
Cc: Exemption 6 Exemption 6, Exemption 6 Exemption 6, Exemption 6 Exemption 6, Exemption 6 Exemption 6, Exemption 6 ion 6, Exemption 6 ption 6, Exemption 6, Exem... emption 6, Exe Exemption 6
Date: Monday, December 15, 2008, 10:15 AM

Thanks for the note, Larry. We have been working on this issue. I hope to have more information for you soon.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367

fax: 312.886.4071

Laurence Silvestri <[redacted]>

12/12/2008 09:44 AM

[redacted],

"'Chuck Norris'" <cnorris@geo-hydro.com>, [redacted], mark hutson <[redacted]@geo-hydro.com>, [redacted]

Please respond to silvestri@amerit ech.net

To Timothy Drexler/R5/USEPA/US@EPA

cc

Subject RI Revisions not in good faith

Tim,

I looked through the first two pages of the EPA comments and compared them to the Draft and Revised RI Reports. ENSR has responded to some comments by simply changing the wording, but not the meaning. Some responses do not address the issue raised by the comment, but instead

discuss an unrelated topic. Some of the comments have not been addressed at all. I have not found any comments that have been addressed fully and honestly. ENSR is exhausting our resources by forcing us to find errors in the Draft RI Report and then re-find the same errors in the (Un)-Revised RI Report. ENSR is not dealing in good faith to make corrections in response to the comments.

For these reasons, PINES needs and deserves additional TAP money.

Larry Silvestri
Exemption 6

EPA-R5-2013-003300RR-236

Laurence Silvestri
[redacted]
12/31/2008 09:02 AM
Please respond to
[redacted]

To Timothy Drexler
cc Bob_Daum, Pete_Penoyer, Bob Kay, silvestri, kherron, EDWARD KARECKI, Afif Marouf, Michelle Colledge, Mark Johnson, Clayton Koher, [redacted], cnorris
bcc
Subject Fw: Background Soil Samples

Tim,

PINES would like to have our experts, Mark Hutson and Chuck Norris, examine the following soil samples at their office.
SS015, SS016, SS018, SS022, SS024 and SS025

These samples were all taken from either private property or from within the Indiana Dunes National Lakeshore. As we do not have permission from the property owners or permits from the National Lakeshore, we cannot legally collect samples from these locations. Furthermore, the location descriptions are not useful. For example, location of SS022 is identified in Appendix G page 315 as being, "South of Yard 520."

If the Remedial Investigation Report is based on science, then it must be verifiable and reproducible. Therefore, we would like you to provide Geo-Hydro with those soil samples and their chain of custody documentation. If possible, we would also like to know the coordinates if they were recorded from a global positioning device or the exact location by any method. Then, if we can obtain the proper permissions, and after the snow clears, we will re-verify those soil samples.

Larry Silvestri
PINES Secretary
[redacted]

--- On **Mon, 12/29/08, Mark Hutson** <[redacted]***@geo-hydro.com***> wrote:
From: Mark Hutson <[redacted]@geo-hydro.com>
Subject: Background Soil Samples
To: "Larry Silvestri" <[redacted]>
Cc: cnorris@geo-hydro.com
Date: Monday, December 29, 2008, 12:37 PM

Larry

Data plots of the background soil results show that these samples lie well outside of the range of the rest of the background soils. I'd like to look at them to see if we can visually identify CCW at these locations.

Of particular interest are the following locations

SS015
SS016
SS018
SS022
SS024
SS025

Mark

Mark Hutson
Geo-Hydro, Inc.
303-948-1417
Exempti...@geo-hydro.com

EPA-R5-2013-003300RR-237

Laurence Silvestri
Exemption 6
01/08/2009 08:25 AM
Please respond to
Exemption 6

To Timothy Drexler
cc Exemptio... Exemp...
bcc
Subject Fw: Background Soil Samples

Tim,

Paul Kysel and Jan Nona are trying to get a permit to collect soil samples from three locations in the Indiana Dunes National Lakeshore. The Lakeshore wants more precise locations before they will issue a permit. They want to check if there are archeological resources that might be impacted.

The locations are SS015, SS016 and SS025.

There are three other locations outside the Lakeshore that we are interested in, SS018, SS022 and SS024.

Would you let us know exactly where these soil samples were taken from?

Larry Silvestri
Exemption 6

--- On **Mon, 12/29/08, Mark Hutson** <Exemption 6***@geo-hydro.com***> wrote:
From: Mark Hutson <Exemption 6@geo-hydro.com>
Subject: Background Soil Samples
To: "Larry Silvestri" <Exemption 6>
Cc: cnorris@geo-hydro.com
Date: Monday, December 29, 2008, 12:37 PM

Larry

I am wondering if anyone has made any progress in finding and collecting surface soil samples from the background soil sampling locations? Of particular interest are the following locations
SS015
SS016
SS018
SS022
SS024
SS025

Data plots of the background soil results show that these samples lie well outside of the range of the rest of the background soils. If we can get baggies of soils from these locations, I'd like to look at them to see if we can visually identify CCW at these locations. This could potentially

impact the background data set against which they are comparing the other samples.

Mark

Mark Hutson
Geo-Hydro, Inc.
303-948-1417
[redacted]@geo-hydro.com

EPA-R5-2013-003300RR-238

Laurence Silvestri
Exemption 6
01/08/2009 03:54 PM
Please respond to
Exemption 6

To Timothy Drexler
cc
bcc
Subject Re: Fw: Background Soil Samples

Tim,

Thank you for the spread sheet.
We would still like to examine the ENSR soil samples.
How do I convert State Plane to Latitude and Longitude?

Thanks,
Larry

--- On **Thu, 1/8/09, Drexler.Timothy@epamail.epa.gov** ***<Drexler.Timothy@epamail.epa.gov>*** wrote:
From: Drexler.Timothy@epamail.epa.gov <Drexler.Timothy@epamail.epa.gov>
Subject: Re: Fw: Background Soil Samples
To: Exemption 6
Cc: Exemption 6 ption 6, Exe Exemption 6
Date: Thursday, January 8, 2009, 3:17 PM

Hi Larry:

Attached is a spreadsheet of the soil sampling locations. The locational data is in Indiana State Plane coordinates. Let me know if you have any questions on the file.

Are you no longer requesting the ENSR soil samples?

-Tim

(See attached file: data_request_010809.xls)

Laurence Silvestri
<Exemption 6
Exemption 6>
01/08/2009 08:25 AM

To Timothy Drexler/R5/USEPA/US@EPA
cc Exemption 6 ption 6, Exer Exemption 6

Please respond
to
[redacted]

Subject
Fw: Background Soil Samples

Tim,

Paul Kysel and Jan Nona are trying to get a permit to collect soil samples from three locations in the Indiana Dunes National Lakeshore. The Lakeshore wants more precise locations before they will issue a permit. They want to check if there are archeological resources that might be impacted.

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Larry Silvestri
[redacted]

--- On Mon, 12/29/08, Mark Hutson <[redacted]@geo-hydro.com> wrote:
From: Mark Hutson <[redacted]@geo-hydro.com>
Subject: Background Soil Samples
To: "Larry Silvestri" <[redacted]>

Cc: cnorris@geo-hydro.com
Date: Monday, December 29, 2008, 12:37 PM

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SS018

SS022
SS024
SS025

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Mark

Mark Hutson
Geo-Hydro, Inc.
303-948-1417
Exemption 6@geo-hydro.com

EPA-R5-2013-003300RR-239

"Mark Hutson"
<[redacted]@geo-hydro.com>
01/08/2009 05:51 PM

To Timothy Drexler
cc
bcc
Subject RE: Conference call to discuss Pines Site Revised RI Report

Tim

I'm wondering if you have made any progress in attempting to obtain the executable files for the groundwater model. The lack of detail in the modeling appendix leaves me wondering how anyone can do a meaningful review of what ENSR has done. In response to all the questions about the model that we had last time it appears that they have taken out any specificity at all, including the table that originally clued us in to the problems last time.

Thanks,
Mark Hutson

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Thursday, January 08, 2009 11:01 AM
To: Karecki.Edward@epamail.epa.gov; Johnson.Mark@epamail.epa.gov;
[redacted]; Koher.Clayton@epamail.epa.gov;
Pete_Penoyer@nps.gov; [redacted]@geo-hydro.com; kherron@idem.in.gov;
Colledge.Michelle@epamail.epa.gov; cnorris@geo-hydro.com;
Marouf.Afif@epamail.epa.gov; kay.bob@epamail.epa.gov; Brenda_Waters@nps.gov;
Bob_Daum@nps.gov
Subject: Re: Conference call to discuss Pines Site Revised RI Report

Hi all:

We are set for a conference call next Thursday, January 15, at 10 am central time to discuss the revised Pines Site RI Report. The call-in number is 866-299-3188, then 3128862343. Have a great week. Talk to you then.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

Timothy
Drexler/R5/USEPA
/US To
Brenda_Waters@nps.gov, Clayton

01/06/2009 12:01 PM

Koher/R5/USEPA/US@EPA, cnorris@geo-hydro.com, [redacted], Pete_Penoyer@nps.gov, [redacted]@geo-hydro.com, Michelle Colledge/R5/USEPA/US@EPA, Mark Johnson/R5/USEPA/US@EPA, kherron@idem.in.gov, Afif Marouf/R5/USEPA/US@EPA, EDWARD KARECKI/R5/USEPA/US@EPA, Bob Kay/R5/USEPA/US@EPA, Bob_Daum@nps.gov

cc

Subject

Re: Conference call to discuss Pines Site Revised RI Report (Document link: Timothy Drexler)

Hi everyone:

Happy New Year! I hope that you all had a great holiday season.

I'd like to schedule a conference call to discuss comments on the revised Pines Site RI Report. Please let me know as soon as possible your availability for Thursday, January 15th at 10 am central time. Also let me know your availability the rest of that day and the afternoon of Friday the 16th in case Thursday at 10 am does not work for some.

Thanks. Talk to you soon.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

Brenda_Waters@nps.gov

12/23/2008 01:29 PM

To

Timothy Drexler/R5/USEPA/US@EPA

cc

Bob_Daum@nps.gov, cnorris@geo-hydro.com, Michelle Colledge/R5/USEPA/US@EPA, Mark Johnson/R5/USEPA/US@EPA, EDWARD

KARECKI/R5/USEPA/US@EPA, Bob Kay/R5/USEPA/US@EPA, kherron@idem.in.gov, Clayton Koher/R5/USEPA/US@EPA, Afif Marouf/R5/USEPA/US@EPA, [redacted]@geo-hydro.com, Pete_Penoyer@nps.gov, [redacted]

Subject
Re: Request for extension of review period for the Pines Site Revised RI Report

Tim,

Thank you for granting the extension. We are available for a conference call anytime on Jan. 15 or 16 or before noon on Jan. 14.

Happy Holidays!

Brenda

****
Brenda Waters
Assistant Chief of Natural Resources
Indiana Dunes National Lakeshore
1100 N Mineral Springs Road
Porter, IN 46304
Office: (219) 395-1552
Fax: (219) 395-1588
****

Drexler.Timothy@epamail.epa.gov

To: Brenda_Waters@nps.gov

cc: Bob_Daum@nps.gov, Pete_Penoyer@nps.gov, kay.bob@epamail.epa.gov, [redacted], kherron@idem.in.gov, Karecki.Edward@epamail.epa.gov, Marouf.Afif@epamail.epa.gov, Colledge.Michelle@epamail.epa.gov,

12/22/2008 04:11 PM CST

Johnson.Mark@epamail.epa.gov, Koher.Clayton@epamail.epa.gov,
Exemption 6 @geo-hydro.com,
cnorris@geo-hydro.com

Subject: Re: Request for extension of review period for the Pines Site Revised RI Report

Hi all:

NPS has requested an extension for their review time on the Pines Site revised RI Report. EPA grants that request to Jan. 23rd. EPA will then compile those comments to send back to the PRP. Please let me know your availability from January 14-16th for a conference call to discuss comments on the Report.

I will be out of the office from Dec. 24th to Jan. 6th. I hope that you all have a great holiday season and Happy New Year's. I look forward to talking to you in early 2009.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

Brenda_Waters@nps.gov

12/17/2008 01:08 PM

To
Timothy Drexler/R5/USEPA/US@EPA

cc
Bob_Daum@nps.gov, Pete_Penoyer@nps.gov

Subject
Re: Request for extension of review period for the Pines Site Revised RI Report

Tim,

Could we have at least two weeks extension (from the original date of January 9) to January 23 for our review comments in to EPA with a conference call to discuss RI Report among stakeholders around January 15? Thank you for your consideration.

Sincerely,

Brenda

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Drexler.Timothy@epam

ail.epa.gov To:
Brenda_Waters@nps.gov

cc: Bob_Daum@nps.gov,
Pete_Penoyer@nps.gov

12/17/2008 08:14 AM Subject: Re: Request
for extension of review period for the Pines Site Revised RI
CST Report

Thanks, Brenda. How much additional time do you need?

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

Brenda_Waters@np

s.gov

12/17/2008 07:55 AM

To
Timothy Drexler/R5/USEPA/US@EPA

cc
Pete_Penoyer@nps.gov,
Bob_Daum@nps.gov

Subject
Request for extension of review period for the Pines Site Revised RI Report

Tim,

Please consider this our request for an extension of the review period for the Pines Site Revised RI Report. We are working through the revisions but need extra time with the holidays to complete our review. We would also suggest that the conference call among stakeholders to discuss the RI report be delayed until Jan. 09.

Thank you for your consideration.

Sincerely,
Brenda

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Fax: (219) 395-1588
****

EPA-R5-2013-003300RR-240

Timothy Drexler/R5/USEPA/US
01/09/2009 02:46 PM

To lbradley
cc eperry, kay.bob
bcc
Subject Fw: Conference call to discuss Pines Site Revised RI Report

Hi Elizabeth:

Can you get us these files?

-Tim

----- Forwarded by Timothy Drexler/R5/USEPA/US on 01/09/2009 02:46 PM -----

"Mark Hutson "
<[redacted]@geo-hydro.com>
01/08/2009 05:51 PM

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject RE: Conference call to discuss Pines Site Revised RI Report

Tim

I'm wondering if you have made any progress in attempting to obtain the executable files for the groundwater model. The lack of detail in the modeling appendix leaves me wondering how anyone can do a meaningful review of what ENSR has done. In response to all the questions about the model that we had last time it appears that they have taken out any specificity at all, including the table that originally clued us in to the problems last time.

Thanks,
Mark Hutson

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Thursday, January 08, 2009 11:01 AM
To: Karecki.Edward@epamail.epa.gov; Johnson.Mark@epamail.epa.gov;
[redacted]; Koher.Clayton@epamail.epa.gov;
Pete_Penoyer@nps.gov; [redacted]@geo-hydro.com; kherron@idem.in.gov;
Colledge.Michelle@epamail.epa.gov; cnorris@geo-hydro.com;
Marouf.Afif@epamail.epa.gov; kay.bob@epamail.epa.gov; Brenda_Waters@nps.gov;
Bob_Daum@nps.gov
Subject: Re: Conference call to discuss Pines Site Revised RI Report

Hi all:

We are set for a conference call next Thursday, January 15, at 10 am central time to discuss the revised Pines Site RI Report. The call-in number is 866-299-3188, then 3128862343. Have a great week. Talk to you then.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

Timothy Drexler/R5/USEPA/US
01/06/2009 12:01 PM

To
Brenda_Waters@nps.gov, Clayton Koher/R5/USEPA/US@EPA, cnorris@geo-hydro.com, [redacted], Pete_Penoyer@nps.gov, [redacted]@geo-hydro.com, Michelle Colledge/R5/USEPA/US@EPA, Mark Johnson/R5/USEPA/US@EPA, kherron@idem.in.gov, Afif Marouf/R5/USEPA/US@EPA, EDWARD KARECKI/R5/USEPA/US@EPA, Bob Kay/R5/USEPA/US@EPA, Bob_Daum@nps.gov

cc

Subject
Re: Conference call to discuss Pines Site Revised RI Report (Document link: Timothy Drexler)

Hi everyone:

Happy New Year! I hope that you all had a great holiday season.

I'd like to schedule a conference call to discuss comments on the revised Pines Site RI Report. Please let me know as soon as possible your availability for Thursday, January 15th at 10 am central time. Also let me know your availability the rest of that day and the afternoon of Friday the 16th in case Thursday at 10 am does not work for some.

Thanks. Talk to you soon.

Tim Drexler

Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

Brenda_Waters@nps.gov

12/23/2008 01:29 PM

To
Timothy Drexler/R5/USEPA/US@EPA

cc
Bob_Daum@nps.gov, cnorris@geo-hydro.com, Michelle Colledge/R5/USEPA/US@EPA, Mark Johnson/R5/USEPA/US@EPA, EDWARD KARECKI/R5/USEPA/US@EPA, Bob Kay/R5/USEPA/US@EPA, kherron@idem.in.gov, Clayton Koher/R5/USEPA/US@EPA, Afif Marouf/R5/USEPA/US@EPA, [redacted]@geo-hydro.com, Pete Penover@nps.gov, [redacted]

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cc: Bob_Daum@nps.gov,
Pete_Penoyer@nps.gov, kay.bob@epamail.epa.gov,

12/22/2008 04:11 PM [redacted], Exemption 6
kherron@idem.in.gov, Karecki.Edward@epamail.epa.gov,
CST
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Drexler.Timothy@epamail.epa.gov

12/17/2008 08:14 AM CST

To: Brenda_Waters@nps.gov

cc: Bob_Daum@nps.gov, Pete_Penoyer@nps.gov

Subject: Re: Request for extension of review period for the Pines Site Revised RI Report

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Brenda_Waters@nps.gov

12/17/2008 07:55 AM

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cc
Pete_Penoyer@nps.gov, Bob_Daum@nps.gov

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****

EPA-R5-2013-003300RR-241

Timothy Drexler/R5/USEPA/US
01/14/2009 09:37 AM

To silvestri
cc
bcc
Subject Re: Fw: Background Soil Samples

Hi Larry:

Attached is the same spreadsheet with the locational information in decimal lat/long. I'm still checking on the possibility of getting the ENSR-collected samples.

-Tim Drexler

data_request_coords_011409.xls

Laurence Silvestri <[redacted]>

Laurence Silvestri
[redacted]
01/08/2009 03:54 PM
Please respond to
[redacted]

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject Re: Fw: Background Soil Samples

Tim,

Thank you for the spread sheet.
We would still like to examine the ENSR soil samples.
How do I convert State Plane to Latitude and Longitude?

Thanks,
Larry

--- On **Thu, 1/8/09, Drexler.Timothy@epamail.epa.gov** ***<Drexler.Timothy@epamail.epa.gov>*** wrote:
From: Drexler.Timothy@epamail.epa.gov <Drexler.Timothy@epamail.epa.gov>
Subject: Re: Fw: Background Soil Samples

To: [redacted]
Cc: [redacted], [redacted]
Date: Thursday, January 8, 2009, 3:17 PM

Hi Larry:

Attached is a spreadsheet of the soil sampling locations. The locational
data is in Indiana State Plane coordinates. Let me know if you have any
questions on the file.

Are you no longer requesting the ENSR soil samples?

-Tim

(See attached file: data_request_010809.xls)

Laurence Silvestri <[redacted]>
01/08/2009 08:25 AM

To: Timothy Drexler/R5/USEPA/US@EPA

cc: [redacted], [redacted]

[redacted]

Subject: Fw: Background Soil Samples

Tim,

Paul Kysel and Jan Nona are trying to get a permit to collect soil samples from three locations in the Indiana Dunes National Lakeshore. The Lakeshore wants more precise locations before they will issue a permit. They want to check if there are archeological resources that might be impacted.

The locations are SS015, SS016 and SS025.

There are three other locations outside the Lakeshore that we are interested in, SS018, SS022 and SS024.

Would you let us know exactly where these soil samples were taken from?

Larry Silvestri
Exemption 6

--- On Mon, 12/29/08, Mark Hutson <Exemption 6@geo-hydro.com> wrote:
From: Mark Hutson <Exemption 6@geo-hydro.com>
Subject: Background Soil Samples
To: "Larry Silvestri" <Exemption 6>

Cc: cnorris@geo-hydro.com
Date: Monday, December 29, 2008, 12:37 PM

Larry

I am wondering if anyone has made any progress in finding and collecting surface soil samples from the background soil sampling locations? Of particular interest are the following locations
SS015
SS016
SS018
SS022
SS024
SS025

Data plots of the background soil results show that these samples lie well outside of the range of the rest of the background soils.

If we
can get baggies of soils from these locations, I'd like to
look at
them to see if we can visually identify CCW at these
locations. This
could potentially impact the background data set against which
they
are comparing the other samples.

Mark

Mark Hutson
Geo-Hydro, Inc.
303-948-1417
Exemption 6@geo-hydro.com

EPA-R5-2013-003300RR-242

Laurence Silvestri
[redacted]
01/14/2009 01:48 PM
Please respond to
[redacted]

To Timothy Drexler
cc
bcc
Subject Re: Fw: Background Soil Samples

Thanks,
Larry

--- On **Wed, 1/14/09, Drexler.Timothy@epamail.epa.gov <*Drexler.Timothy@epamail.epa.gov*>** wrote:
From: Drexler.Timothy@epamail.epa.gov <Drexler.Timothy@epamail.epa.gov>
Subject: Re: Fw: Background Soil Samples
To: [redacted]
Date: Wednesday, January 14, 2009, 10:37 AM

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(See attached file: data_request_coords_011409.xls)

Laurence

Silvestri
<[redacted]>

To
Timothy Drexler/R5/USEPA/US@EPA

01/08/2009 03:54 PM

cc

[redacted]

Subject
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From: Drexler.Timothy@epamail.epa.gov
<Drexler.Timothy@epamail.epa.gov>
Subject: Re: Fw: Background Soil Samples
To: [redacted] Exemption 6
Cc: [redacted] Exemption 6 Exemption 6 , [redacted] Exemption 6 Exemption 6
Date: Thursday, January 8, 2009, 3:17 PM

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Laurence

Silvestri

<Exemption 6

Exemption 6>

To

Timothy Drexler/R5/USEPA/US@EPA

01/08/2009 08:25

cc

AM

Exemption 6 ption 6,

Exer Exemption 6

Please respond

to

Exemption 6

Subject

Fw: Background Soil Samples

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Mark

Mark Hutson

Geo-Hydro, Inc.

303-948-1417

Exemption 6 @geo-hydro.com

EPA-R5-2013-003300RR-243

Exemption 6

02/27/2009 08:54 AM

To Timothy Drexler

cc

bcc

Subject Health Risk Assessment

Tim: After talking to you the other day, I felt reassured that the Health Risk Assessment was to be of the highest EPA standards. Then, a little research came up with the following from the feasibility study work plan. Very disturbing. Is this to be the basis for the "highest EPA standards". If so, it quite frankly "sucks". Pines area residents are once again being thrown to the wolves with no protection. Please reassure me that this will NOT be the plan and assumptions for the upcoming assessment.

jan nona

The following quotes are from:
Remedial Investigation/Feasibility Study Work Plan
Pines Area of Investigation AOC II Docket No. V-W-'04-C-784
Volume 5 Human Health Risk Assessment Work Plan
ENSR Corporation September 16, 2005 Document Number 01776-020-156
http://www.epa.gov/region5/sites/pines/pinesrifsworkplan200509.htm

"Fish ingestion is not expected to be a significant pathway for young children (aged 0 to 6). Data show that roughly 50% of children aged 0 to 9 years of age ingest little to no fish (USPEA, 1997a). Roughly 97% of children aged 0 to 9 years ingest less than 20 grams of fish per day (USEPA, 1997a). These statistics are for total fish consumption (freshwater, saltwater, and shellfish). Young and older children consume less than 3 grams of freshwater finfish per day based on the data in Table 10-6 of the EFH (USEPA, 1997a). USEPA Region I also concluded that this pathway is unlikely to occur with any degree of frequency for young children(USEPA, 2004a)."
(Page 5-4)

"A meteorological factor is generally used to account for the fraction of the year during which exposure to constituents at the ground surface may occur (Sheehan et al., 1991; USEPA, 1989a). It is reasonable to assume that direct contact with soil or CCBs or intrusive activities will not occur for residential receptors during inclement weather, i.e., when it is raining or snowing, when the ground is wet or frozen, or when snow or ice (32 degrees F) are covering the ground. .... Thus it is assumed that exposure to CCBs will not occur for the residential receptor 29.8% of the assumed days of exposure (exposure frequency) due to weather restrictions. This results in an exposure frequency of 245.9 (rounded up to 250) days per year for the RME residential scenario and 164.4 (rounded up to 165) days per year for the CTE residential scenario."
(Page 5-5 and 5-6)

"Two exposure scenarios, the Reasonable Maximum Exposure (RME) and the Central Tendency Exposure (CTE) will be evaluated for each receptor. The RME scenario is intended to provide an upper-bound estimate of potential risk while the CTE is intended to provide a more typical or

average estimate of potential risk."
(Page 1-4)

"For the adult resident, it is assumed that the head, hands, forearms, and lower legs are exposed for CCB contact. For the child resident, it is assumed that head, hands, forearms, lower legs, and feet are exposed for CCB and sediment exposure. Table 8 presents the 50 th percentile surface areas for those body parts for an adult resident (5,700 cm 2) and Table 9 presents the 50th percentile surface area for a child resident (2,800 cm 2)."
(Page 5-6)

The following is a quote from:
Health Risks Within EPA's Safety Levels
Confined Disposal Facility, Indiana Harbor and Shipping Canal
East Chicago, Indiana December 2006
http://www.epa.gov/region5/sites/indianaharbor/

"Scientists performing the risk assessment wanted to estimate maximum exposures to pollution from the CDF that a person might have so they made the following assumptions about people living or working near the disposal facility:
• 30 years of possible exposure to pollutants from the CDF for adult residents (30 years is the operating life of the CDF)
• 350 days per year of exposure
• Daily consumption of vegetables from a home garden and fish from local waterways"

Here is why Pines Human Health Risk Assessment will be derailed. ENSER says that children in Pines don't eat fish, have smaller surface area for chemical exposure, don't go out in bad weather, don't eat home garden food and that Pines residents are only exposed 165 days per year. Can't find any EPA study anywhere besides the PINES that minimizes human risk like this. For example, EPA says that East Chicago residents are exposed 350 days per year. Is the weather better in East Chicago? Don't Pines residents have gardens? It goes on and on.

EPA-R5-2013-003300RR-244

Timothy Drexler/R5/USEPA/US
03/03/2009 03:18 PM

To "Exemp..."
cc Mark Johnson
bcc
Subject Re: Possible contamination problem

Jan:

I've passed this information on to folks in Ken's old section to check about the road construction soil. I'll get back to you regardless of what I find out.

With regard to your risk assessment comments, I can't argue about the language that is in the Pines Site work plan. The document was thoroughly reviewed and revised to incorporate the comments of our health folks. One significant difference between the risk assessment you reference and the Pines Site is that the Indiana Harbor risk assessment primarily had to do with air emissions. Snow and bad weather can keep folks from contact with fly ash, but it can't keep them from breathing. The much larger number of days has to do with contaminants being released from the sediment piles into the air. Also, exposure to fish that could be caught in Brown Ditch downstream from Yard 52 has been retained as a pathway, but we have to make realistic appraisals at each specific site. Brown Ditch is not like Indiana Harbor. I'll have to check regarding the gardening pathway.

Also, If you'd like to talk to some of the health folks that reviewed the document before it was finalized, I can give you some phone numbers. You can call Mark Johnson, whom you've met, at 312-353-3436.

-Tim

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• 350 days per year of exposure
• Daily consumption of vegetables from a home garden and fish from local waterways"

Here is why Pines Human Health Risk Assessment will be derailed. ENSER says that children in Pines don't eat fish, have smaller surface area for chemical exposure, don't go out in bad weather, don't eat home garden food and that Pines residents are only exposed 165 days per year. Can't

find any EPA study anywhere besides the PINES that minimizes human risk like this. For example, EPA says that East Chicago residents are exposed 350 days per year. Is the weather better in East Chicago? Don't Pines residents have gardens? It goes on and on.

EPA-R5-2013-003300RR-245

[redacted] Exemption 6

03/09/2009 12:24 PM

To Timothy Drexler

cc

bcc

Subject Health Risk Assessment

I continue to be concerned. Did talk to Mark Johnson as you suggested. He indicated they would only come back to the issue if requested by EPA. From what I've recently read in the work plan, enough attention wasn't paid to the details. What I'm looking for is some vehicle that will protect our interests in the Health Risk Assessment process. If your health people thought they did that originally, maybe they need to take another look. Even an average resident with little education in these matters can see that the responsible parties have come to the conclusion long ago that the municipal water installation solved all the problems and no further remediation is needed. Now they are trying to pick and choose some of the facts that support this. Just one example is ENSR's use of a meteorological factor to mathematically reduce a resident's exposure to contamination. We have done some research and can find NO other examples where a residential "receptor" assumed to be exposed to contamination for only 165 days per year. In other words, ENSR continues to make sure they protect the people who are paying them and not the affected residents in the Pines area. The following is a SMALL sample of the many documents we found that assume residents are exposed either 350 or 365 days. A lot of these were published by your very own EPA and some from the CDC's ATSDR.

Preliminary Remediation Goals | Handbook
exposure employs an averaging time of 70 years (i.e., 70 years Å~ 365 days/year). ... for exposure from the ingestion of soil and ingestion of water exposure pathways: ... age intervals for a resident under current Superfund Guidance (EPA 1989, 1991, 2004)
epa.gov/oswer/riskassessment/sghandbook/prgs.htm

On-site residential exposure scenario Exposure to Soil
Jan 3, 2006 ... Exposure to Soil, Groundwater and Homegrown Produce ... Ingestion of homegrown produce pathway ... 365 days/year 70 years
rais.ornl.gov/homepage/tm/for_ag.shtml

ATSDR - PHA- OKLAHOMA REFINING COMPANY
Many residents worked at the Oklahoma Refining Company refinery during its operation ... OSDH and EPA have also evaluated human exposure pathways of concern ... chronic (365 days or more).
www.atsdr.cdc.gov/HAC/PHA/oklahoma/okl_p2.html

DEPARTMENT OF THE AIR FORCE
Current and future potential exposure pathways were identified for onbase personnel ... AT = Averaging Time (Default for cancer effects = 70 years x 365 days/year) ...
airforcemedicine.afms.mil/idc/groups/public/documents/afms/ctb_021368.pdf

Human Health Risk Assessment Protocol for Hazardous Waste Combustion Facilities, Support Materials
"6.4 EXPOSURE FREQUENCY
The HHRAP assumes that the receptors in each recommended exposure scenario are exposed to

all of the scenario-specific exposure pathways 350 days per year (U.S. EPA 1989e; 1991b; 1991d). This assumption is based on the protective estimate that all receptors spend a maximum of 2 weeks away from the exposure scenario location selected in Section 4.3."
(Chapter 6, Page 6-19)
http://www.epa.gov/epawaste/hazard/tsd/td/combust/riskvol.htm#volume1

Exposure Parameter Values Used For CKD Risk Assessment
Appendix A
"Ingestion of Contaminated Drinking Water 350 Days/Year"
(Page 2)
"Ingestion of Contaminated soil (Child) 350 Days/Year"
(Page 3)
www.epa.gov/waste/nonhaz/industrial/special/ckd/ckd/ckd-100/app-a-c.pdf

PUBLIC HEALTH ASSESSMENT
TRACY DEFENSE DEPOT
(a/k/a DEFENSE DISTRIBUTION REGION WEST TRACY ARMY)
TRACY, SAN JOAQUIN COUNTY, CALIFORNIA
APPENDIX C: Estimated Exposures and Health Effects
"ATSDR used the following equation to estimate an exposure dose for ingestion of water:
....
Exposure frequency, or number of exposure events per year of exposure (7 days per week x 50 weeks or 350 days per year)"
http://www.atsdr.cdc.gov/hac/pha/tracy/tdd_p4.html

ATSDR - Health Consultation - Fort Monmouth, Evans Area
When evaluating exposure pathways, ATSDR identifies whether exposure to ..... Exposure frequency (EF), 350 days/year, Assumes resident not home total of two .... EPA recommends using the upper reference point of 2 (mg/kg/day)-1 for soil ...
www.atsdr.cdc.gov/HAC/PHA/fortmonmouth/fme_p1.html - 94k -

Journal of Geochemical Exploration : Evaluation of human exposure
Thus, the daily intake of rice by the local residents from the Myungbong mine area .... Exposure frequency, EF, days/year, 350, US EPA, 1997. Averaging time, AT .... The HQ value for As via soil and water exposure pathways was all < 0.1 ...
linkinghub.elsevier.com/retrieve/pii/S0375674207000568 - Similar pages
by JS Lee - 2008

NON-CANCER HEALTH RISK ASSESSMENT
The EF factor used for this study is 350 days in a year since resident adults
www.springerlink.com/index/M716386656412246.pdf

Effective and Safe Waste Management:
by Robert L. Jolley, Rhoda G. M. Wang - 1993 - Technology & Engineering - 387 pages
For the RME case for this pathway, it also is assumed that the resident ingests water from his own well 350 days/year for a 30-year period. ...

Guidance
Sep 10, 2008
Table 3.1a Selection of Exposure Pathways -- Onsite ..... exposure frequency for recreational receptors is 350 days/year. 3.3.2.1 Residents ... The EPA default soil ingestion rate of 480 mg/day is used in this scenario. ...
www.deq.virginia.gov/vrprisk/raguide.html

On-site residential exposure scenario Exposure to Soil
Jan 3, 2006
Ingestion of homegrown produce pathway ... CPF = Contaminated plant fraction, 0.25 (resident) 1.0 (agriculture), EPA 1998 pg. 6-6. ED = exposure ... EF = Exposure frequency, 350 days/year, OSWER Directive (EPA 1991b) ...
rais.ornl.gov/homepage/tm/for_ag.shtml

Cumulative Health Risk Study - ENSR
File Format: PDF/Adobe Acrobat - View as HTML
via all potential exposure pathways. 350 day/yr.
ccgovernment.carr.org/ccg/pubworks/sw-future/docs/study-exposure.pdf

DEQ RRD Operational Memorandum No. 1
Dec 10, 2004
EF (Exposure frequency). = 350 days/year (residential)
www.deq.state.mi.us/documents/deq-rrd-OpMemo_1-Attachment3DrinkingWaterCriteriaTechnicalSupportDocument.pdf

Again, I'm hoping to protect our residents - not NIPSCO/BROWN AND ENSR.

jan nona

EPA-R5-2013-003300RR-246

Timothy Drexler/R5/USEPA/US
03/20/2009 07:31 AM

To "Mark Hutson"
cc
bcc
Subject Re: FW: Pines groundwater modeling files

Their issue all along with distributing the model files has been potential misuse of their model . I read through their cover letter and didn't see anything that struck me as unreasonable. Obviously we're all doing this to review the work an not to take their model, manipulate it somehow to make them look bad, and give it to the newspapers or someone else. Like I said, I didn't see anything in their letter that I had any objection to if it gets all of you the files quicker. If you read it any other way and have objections, please call me so that we can talk about it. I haven't brought our attorney into this, but if you feel its important, I can get him.

-Tim

"Mark Hutson" <[redacted]@geo-hydro.com>

"Mark Hutson"
<[redacted]@geo-hydro.com>
03/19/2009 06:36 PM

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject FW: Pines groundwater modeling files

Tim

Does any of this strike you as a little overboard if the next (third iteration) of the model has nothing in it to hide?

Mark

-----Original Message-----
From: Perry, Elizabeth [mailto:Elizabeth.Perry@aecom.com]
Sent: Thursday, March 19, 2009 1:40 PM
To: pete_penoyer@nps.gov; cnorris@geo-hydro.com; [redacted]@geo-hydro.com
Cc: drexler.timothy@epamail.epa.gov; Bradley, Lisa
Subject: Pines groundwater modeling files

Gentlemen -

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Elizabeth

A. Elizabeth Perry, PG
Senior Hydrogeologist
AECOM Environment
tel: 978-589-3167

AECOM
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Westford, MA 01886
tel: 978-589-3000
fax: 978-589-3100
www.aecom.com

EPA-R5-2013-003300RR-247

Timothy Drexler/R5/USEPA/US
03/23/2009 08:55 AM

To silvestri
cc cnorris, Exemption 6, Larry Johnson
bcc
Subject Fw: Pines groundwater modeling files

Hi Larry:

The Pines Site PRPs are willing to share the computer files that have been requested by both the Park Service and Chuck Norris to perform a check of the PRP groundwater model. Prior to the release of the files, the PRP sent a note to us all asking us to ensure that we will not use the files for any purpose other than the review of their groundwater model. That note is attached to the bottom of this email message. I didn't have any particular problem with the language, but I did not have an attorney review. I then received an email message (below)from Chuck Norris that he does have a problem agreeing to the letter from the PRP. I'm sending this to you and to my attorney for review. Please read the original request from Elizabeth Perry below and let me know what P.I.N.E.S. position is on this matter. I hope to quickly also get a reading from my attorney. Please contact me when you are ready to discuss: 1) if you are OK with the letter, or, if needed 2) what modifications would satisfy P.I.N.E.S.

I'd like to quickly work this out so that Chuck gets what he needs to complete a review for you.

Thanks for your time, Larry.

-Tim Drexler

From Chuck Norris:

Tim,

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4) GHI cannot make commitments for PINES.

We have not yet forwarded AECOM's email to our clients with our views and recommendations. But, PINES would have to accept the terms, not GHI.

We believe that our involvement and review comments to date have

contributed to understanding (critical) deficiencies in the RI and the model, some that may have gone unnoticed without our involvement. Our only objectives are now and always have been to thoroughly understand the RI and model and provide the best possible comments for USEPA's consideration. The proposed restrictions are neither relevant nor necessary for accomplishing those objectives.

We will be contacting Ms Perry early next week indicating our position. In the meantime, if you contact your lawyers and wish to share their observations, we would be interested to hear them.

Have a nice weekend.

Chuck Norris and Mark Hutson

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

----- Forwarded by Timothy Drexler/R5/USEPA/US on 03/23/2009 07:55 AM -----

"Perry, Elizabeth" <Elizabeth.Perry@aecom.com>
03/19/2009 02:39 PM

To <pete_penoyer@nps.gov>, <cnorris@geo-hydro.com>, <[redacted]@geo-hydro.com>
cc Timothy Drexler/R5/USEPA/US@EPA, "Bradley, Lisa" <Lisa.Bradley@aecom.com>

Subject Pines groundwater modeling files

Gentlemen -

As requested and as a courtesy to facilitate your review of the draft groundwater model, we will be providing the electronic MODFLOW files for the draft groundwater model for the Pines Area of Investigation (hereinafter referred to as the "Information").

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EPA-R5-2013-003300RR-248

Laurence Silvestri
<silvestri@ameritech.net>
03/26/2009 12:48 PM

To Timothy Drexler
cc cnorris, Exemption 6, Larry Johnson
bcc
Subject Re: Fw: Pines groundwater modeling files

Tim,

PINES met on a conference call last night with our technical consultants, Chuck Norris and Mark Hutson of Geo-Hydro. We discussed the contract that AECOM asked our technical consultants, Geo-Hydro to sign. We decided that it would not be appropriate for them to enter into any contract beyond their agreement to technically assist PINES.

As you know, PINES has respected the sensitivity of all draft documents. We have never discussed any draft-form information outside of a few PINES members. The "Alternative Superfund Process" requires transparency. Information that is used to input into a groundwater modeling program is not more or less confidential than any other information from the draft documents.

Therefore, PINES asks the EPA and the Potential Responsible Parties to continue to share all information and methods concerning the Pines Area of Investigation with PINES' technical consultants. In particular, it is important that Geo-Hydro have all the groundwater data files as soon as possible so they can have time to examine them and develop comments.

Thank you,
Larry Silvestri
PINES Secretary

--- On **Mon, 3/23/09, Drexler.Timothy@epamail.epa.gov**
<Drexler.Timothy@epamail.epa.gov> wrote:

From: Drexler.Timothy@epamail.epa.gov <Drexler.Timothy@epamail.epa.gov>
Subject: Fw: Pines groundwater modeling files
To: Exemption 6
Cc: cnorris@geo-hydro.com, Exemption 6@geo-hydro.com, Johnson.Larry@epamail.epa.gov
Date: Monday, March 23, 2009, 9:55 AM

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Have a nice weekend.

Chuck Norris and Mark Hutson

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071
----- Forwarded by Timothy Drexler/R5/USEPA/US on 03/23/2009 07:55 AM -----

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03/19/2009 02:39 PM

To
<pete_penoyer@nps.gov>, <cnorris@geo-hydro.com>, <[redacted]@geo-hydro.com>

cc
Timothy Drexler/R5/USEPA/US@EPA, "Bradley, Lisa" <Lisa.Bradley@aecom.com>

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fax: 978-589-3100
www.aecom.com

EPA-R5-2013-003300RR-249

Timothy Drexler/R5/USEPA/US
03/26/2009 02:58 PM

To Laurence Silvestri
cc
bcc
Subject Re: Fw: Pines groundwater modeling files

Hi Larry:

Are you saying that P.I.N.E.S., and by inclusion, their Tech. Advisors can give an OK to the request for confidentiality of the model files that I forwarded to you? If so, just send me a note and I'll forward that to the contractor so that Chuck can get the files.

Thanks.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

-----Laurence Silvestri < Exemption 6 > wrote: -----

To: Timothy Drexler/R5/USEPA/US@EPA
From: Laurence Silvestri < Exemption 6 >
Date: 03/26/2009 12:48PM
cc: cnorris@geo-hydro.com, Exemption 6 @geo-hydro.com, Larry Johnson/R5/USEPA/US@EPA
Subject: Re: Fw: Pines groundwater modeling files

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Remedial Project Manager
Superfund Division

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EPA-R5-2013-003300RR-250

Laurence Silvestri
[redacted]
03/26/2009 09:31 PM

To Timothy Drexler
cc [redacted], [redacted], "'Chuck Norris'", [redacted], [redacted], [redacted], mark hutson, peggy, Paul Kysel, [redacted], [redacted]
bcc
Subject Re: Fw: Pines groundwater modeling files

Tim,

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Larry Silvestri
PINES Secretary

--- On **Thu, 3/26/09, Drexler.Timothy@epamail.epa.gov** ***<Drexler.Timothy@epamail.epa.gov>*** wrote:

From: Drexler.Timothy@epamail.epa.gov <Drexler.Timothy@epamail.epa.gov>
Subject: Re: Fw: Pines groundwater modeling files
To: "Laurence Silvestri" <[redacted]>
Date: Thursday, March 26, 2009, 3:58 PM

Hi Larry:

Are you saying that P.I.N.E.S., and by inclusion, their Tech. Advisors can give an OK to the request for confidentiality of the model files that I forwarded to you? If so, just send me a note and I'll forward that to the contractor so that Chuck can get the files.

Thanks.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J

Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071
-----Laurence Silvestri <[redacted]> wrote: -----

To: Timothy Drexler/R5/USEPA/US@EPA
From: Laurence Silvestri <[redacted]>
Date: 03/26/2009 12:48PM
cc: cnorris@geo-hydro.com, [redacted]@geo-hydro.com, Larry Johnson/R5/USEPA/US@EPA
Subject: Re: Fw: Pines groundwater modeling files

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Subject: Fw: Pines groundwater modeling files
To: [redacted]
Cc: cnorris@geo-hydro.com, [redacted]@geo-hydro.com, Johnson.Larry@epamail.epa.gov

Date: Monday, March 23, 2009, 9:55 AM

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Have a nice weekend.

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----- Forwarded by Timothy Drexler/R5/USEPA/US on 03/23/2009 07:55 AM -----

"Perry, Elizabeth" <Elizabeth.Perry@aecom.com>
03/19/2009 02:39 PM

To
< pete_penoyer@nps.gov >,
< cnorris@geo-hydro.com >,
< Exemption 6 @geo-hydro.com >

cc
Timothy Drexler/R5/USEPA/US@EPA,

"Bradley, Lisa"
< Lisa.Bradley@aecom.com >

Subject
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Elizabeth

A. Elizabeth Perry, PG
Senior Hydrogeologist
AECOM Environment
tel: 978-589-3167

AECOM
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Westford, MA 01886
tel: 978-589-3000
fax: 978-589-3100
www.aecom.com

EPA-R5-2013-003300RR-251

Laurence Silvestri
Exemption 6
03/29/2009 09:42 AM

To Janet Pope
cc Timothy Drexler, Larry Johnson
bcc
Subject Fw: Pines groundwater modeling files

Janet Pope
EPA Community Involvement Coordinator

Janet,

We need your assistance in obtaining groundwater-modeling files that are being used to prepare the Pines Remedial Investigation Report. The difficulty is that AECOM wants this process to take place in secrecy, while it is PINES' role to explain the process to the public.

According to the Technical Assistance Plan, the "U.S. EPA and Respondents believe that public participation will result in a better understanding of the investigative process implemented in an RI/FS." People In Need of Environmental Safety was selected by the EPA to be the "qualified community group" to receive funding intended to retain our own technical advisor. PINES hired technical advisors who are highly qualified and specialize in geology and hydrogeology, Chuck Norris and Mark Hutson of Geo-Hydro Inc.

Elizabeth Perry from AECOM has asked Geo-Hydro, "to agree not to distribute the Information in any way, manner or form to a third party" nor "use the Information to develop opinions to be presented to a third party, including, but not limited to running scenarios and presenting those scenarios to a third party." This is contrary to Geo-Hydro's responsibility to PINES. It is impossible for Geo-Hydro or PINES to agree to these conditions.

According to the TAP, "The technical advisor's main responsibility is to educate P.I.N.E.S. about the RI/FS procedures, processes, and results. Therefore, the technical advisor should devote most of his or her time to reviewing site-related documents and explaining those documents to the P.I.N.E.S."

Our technical advisors need access to information in order to fulfill their obligation under the TAP. Time is running out on the Remedial Investigation Process. It is very important that the groundwater modeling data be given to PINES' technical advisors who are expert in this field.

In your role as Community Involvement Coordinator would you please intervene in our behalf to have the groundwater modeling files released to Geo-Hydro?

Thank you,
Larry Silvestri
PINES Secretary

Exemption 6

From Chuck Norris:

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cc
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Pines groundwater modeling files

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www.aecom.com

EPA-R5-2013-003300RR-252

Timothy Drexler/R5/USEPA/US
03/30/2009 08:06 AM

To Laurence Silvestri
cc [redacted] "'Chuck Norris'", [redacted], mark hutson, peggy, Paul Kysel, [redacted]
bcc
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P.I.N.E.S. is represented by GeoHydro as their technical representatives. There is no distinction drawn by anyone between P.I.N.E.S. and their technical representatives.

Please call me when you can.

Tim Drexler
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Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071
Laurence Silvestri <[redacted]>

Laurence Silvestri
[redacted]
03/26/2009 09:31 PM

To Timothy Drexler/R5/USEPA/US@EPA
cc [redacted] "'Chuck Norris'" <cnorris@geo-hydro.com>, [redacted], mark hutson <[redacted]@geo-hydro.com>, [redacted], Paul Kysel <[redacted]>, [redacted]
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> Subject: Fw: Pines groundwater modeling files
> To: [redacted] Exemption 6
> Cc: cnorris@geo-hydro.com, [redacted] Exemption 6 @geo-hydro.com, Johnson.Larry@epamail.epa.gov
> Date: Monday, March 23, 2009, 9:55 AM
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EPA-R5-2013-003300RR-253

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[redacted]
03/30/2009 09:15 AM

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cc Timothy Drexler
bcc
Subject Fw: Re: Fw: Pines groundwater modeling files

All,

I talked to Tim on the phone. He said that AECOM will rewrite their memo to accomadate our concerns expressed in our emails. He also said that he will extend the RI so that Chuck an Mark have a reasonable time to look at the data

Larry

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Therefore, PINES asks the EPA and the Potential Responsible Parties to continue to share all information and methods concerning the Pines Area of Investigation with PINES' technical consultants. In particular, it is important that Geo-Hydro have all the groundwater data files as soon as possible so they can have time to examine them and develop comments.

Thank you,
Larry Silvestri
PINES Secretary

--- On Mon, 3/23/09, Drexler.Timothy@epamail.epa.gov <Drexler.Timothy@epamail.epa.gov> wrote:

From: Drexler.Timothy@epamail.epa.gov

<Drexler.Timothy@epamail.epa.gov>
Subject: Fw: Pines groundwater modeling files
To: Exemption 6
Cc: cnorris@geo-hydro.com, Exemption 6 @geo-hydro.com, Johnson.Larry@epamail.epa.gov
Date: Monday, March 23, 2009, 9:55 AM

Hi Larry:

The Pines Site PRPs are willing to share the computer files that have been requested by both the Park Service and Chuck Norris to perform a check of the PRP groundwater model. Prior to the release of the files, the PRP sent a note to us all asking us to ensure that we will not use the files for any purpose other than the review of their groundwater model. That note is attached to the bottom of this email message. I didn't have any particular problem with the language, but I did not have an attorney review. I then received an email message (below)from Chuck Norris that he does have a problem agreeing to the letter from the PRP.
I'm sending this to you and to my attorney for review. Please read the original request from Elizabeth Perry below and let me know what P.I.N.E.S. position is on this matter. I hope to quickly also get a reading from my attorney. Please contact me when you are ready to

discuss: 1) if you are OK with the letter, or, if needed 2) what modifications would satisfy P.I.N.E.S.

I'd like to quickly work this out so that Chuck gets what he needs to complete a review for you.

Thanks for your time, Larry.

-Tim Drexler

From Chuck Norris:

Tim,

We have have significant issues with the proposed terms of distribution
provided to us by AECOM. Among them are the following:

1) By omitting PINES from their e-mail, AECOM seems to suggest that
People in Need of Environmental Security (PINES) is viewed as a
problematic 'third-party' in the context of the email.

2) It is inappropriate for Geo-Hydro, Inc (GHI), a consultant to PINES,
to enter into a contract with AECOM, a consultant for the PRPs, no
matter how informal that contract.

3) We believe the conditions proposed by AECOM directly conflict with
the responsibilities of GHI under our Agreement with PINES, the TAP
agreement between the PRPs and PINES, and our individual obligations
under the Indiana professional geologist licensing statues and
regulations.

4) GHI cannot make commitments for PINES.

We have not yet forwarded AECOM's email to our clients with our views
and recommendations. But, PINES would have to accept the terms, not
GHI.

We believe that our involvement and review comments to date have
contributed to understanding (critical) deficiencies in the RI and the
model, some that may have gone unnoticed without our involvement. Our
only objectives are now and always have been to thoroughly

understand
the RI and model and provide the best possible comments for
USEPA's
consideration. The proposed restrictions are neither relevant
nor
necessary for accomplishing those objectives.

We will be contacting Ms Perry early next week indicating our
position.
In the meantime, if you contact your lawyers and wish to share
their
observations, we would be interested to hear them.

Have a nice weekend.

Chuck Norris and Mark Hutson

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071
----- Forwarded by Timothy Drexler/R5/USEPA/US on 03/23/2009
07:55 AM

"Perry,

Elizabeth"

<Elizabeth.Perry

@aecom.com>

To

< pete_penoyer@nps.gov >,

03/19/2009 02:39 < cnorris@geo-hydro.com >,

PM < Exemption 6 @geo-hydro.com >

cc

Timothy Drexler/R5/USEPA/US@EPA,
"Bradley, Lisa"

< Lisa.Bradley@aecom.com >

Subject
Pines groundwater modeling files

Gentlemen -

As requested and as a courtesy to facilitate your review of the draft groundwater model, we will be providing the electronic MODFLOW files for the draft groundwater model for the Pines Area of Investigation (hereinafter referred to as the “Information”).

While it is not uncommon for electronic files for models to be provided to a regulatory agency as part of the RI/FS process, it is uncommon for such files to be circulated beyond persons authorized for access, used for any purpose other than comment, or provided to the public. This means this situation is unique and requires us to take certain steps to ensure that the Information is not improperly disseminated or misused.

Therefore, we request that by receipt of this Information, you agree and understand that the Information (1) is in draft form, (2) has not been approved by USEPA, and (3) is being provided for internal discussion purposes only. Furthermore, you agree not to (1) distribute the Information in any way, manner or form to a third party; (2) use the Information for any purpose other than understanding the draft groundwater model for the Pines Area of Investigation; (3) use the Information to develop opinions to be presented to a third party,

including, but not limited to running scenarios and presenting those scenarios to a third party; and (4) in the case of the P.I.N.E.S Group, use the Information in a manner inconsistent with the TAP Agreement.

Upon your acknowledgement and acceptance by return e-mail of these terms and conditions of use, the Information will be sent to you.

We thank you for your understanding and appreciate your willingness not to use this Information for any purpose other than understanding the draft groundwater model for the Pines Area of Investigation. Please delete, or return without retaining any copies, the Information no later than the date set by USEPA to provide it with comments on the draft groundwater model.

Elizabeth

A. Elizabeth Perry, PG
Senior Hydrogeologist
AECOM Environment
tel: 978-589-3167

AECOM
2 Technology Park Drive
Westford, MA 01886
tel: 978-589-3000
fax: 978-589-3100
www.aecom.com

EPA-R5-2013-003300RR-254

[redacted]
03/30/2009 02:40 PM
Please respond to
[redacted]

To Timothy Drexler
cc [redacted] "'Chuck Norris'", [redacted], mark hutson, peggy, Paul Kysel, [redacted]
bcc
Subject Fw: Re: Fw: Pines groundwater modeling files

Tim,

I haven't heard back from everyone yet, but here is a list of most of the issuses that we have with AECOM's agreement:

1.) P.I.N.E.S. technical consultants can not enter into an agreement with anyone but P.I.N.E.S. regarding the Pines Area of Investigation.

2.) P.I.N.E.S. is not a third party. We are "authorized for access" and entitled to all information equal to the EPA, IDEM or the NPS.
3.) In order that P.I.N.E.S' technical advisors check and verify AECOM's results, it is necessary that they "run scenarios on the groundwater data," and they will arrive at different results if they find errors.

4.) We cannot "delete or return the information without retaining any copies," until we see that it is included in the final EPA sanctioned Remedial Investigation Report. We expect to see all information used to derive the final Remedial Investigation Report published in the final Remedial Investigation Report.

Thanks,
Larry Silvestri
[redacted]

--- On **Mon, 3/30/09, Drexler.Timothy@epamail.epa.gov** ***<Drexler.Timothy@epamail.epa.gov>*** wrote:

From: Drexler.Timothy@epamail.epa.gov <Drexler.Timothy@epamail.epa.gov>
Subject: Re: Fw: Pines groundwater modeling files
To: "Laurence Silvestri" <[redacted]>
Cc: [redacted], "'Chuck Norris'" <cnorris@geo-hydro.com>, [redacted], "mark hutson" <[redacted]@geo-hydro.com>, [redacted], "Paul Kysel" <[redacted]>, [redacted]
Date: Monday, March 30, 2009, 9:06 AM

Hi Larry:

Thanks for the response. I think that there is some confusion here. The reference to "third parties" means entities outside of the current reviewers. The reviewers currently are: 1) USEPA, 2) IDEM, 3) NPS, and 4) P.I.N.E.S.

P.I.N.E.S. is represented by GeoHydro as their technical representatives. There is no distinction drawn by anyone between P.I.N.E.S. and their technical representatives.

Please call me when you can.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071,

Laurence Silvestri <[redacted]> 03/26/2009 09:31 PM

To Timothy Drexler/R5/USEPA/US@EPA

cc [redacted], "'Chuck Norris'" <cnorris@geo-hydro.com>, [redacted], mark hutson <[redacted]@geo-hydro.com>, [redacted], Paul Kysel <[redacted]>, [redacted]

Subject
Re: Fw: Pines groundwater
modeling files

Tim,

We are saying that PINES and our technical advisers are not third parties. We are "authorized for access" to any and all information related to the Pines Area of Investigation equal to any other interested party, including the EPA, IDEM, NPS, ENSR or AECOM.

PINES and our technical consultant, Geo-Hydro, have respected the sensitivity of draft documents and we will continue to do so. However, our technical consultants have an obligation to provide PINES with any information that they become aware of and this is not negotiable.

We cannot sign or agree to these new conditions. If we continue to be excluded or stalled from the process and if information continues to be withheld we will have to seek help from our elected representatives.

Larry Silvestri
PINES Secretary

--- On Thu, 3/26/09, Drexler.Timothy@epamail.epa.gov
<Drexler.Timothy@epamail.epa.gov> wrote:

From: Drexler.Timothy@epamail.epa.gov
<Drexler.Timothy@epamail.epa.gov>
Subject: Re: Fw: Pines groundwater modeling files
To: "Laurence Silvestri" <[redacted]>
Date: Thursday, March 26, 2009, 3:58 PM

Hi Larry:

Are you saying that P.I.N.E.S., and by inclusion, their Tech. Advisors can give an OK to the request for confidentiality of the model files that I forwarded to you? If so, just send me a note and I'll forward that to the contractor so that Chuck can get the files.

Thanks.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

-----Laurence Silvestri <[redacted]> wrote: -----

To: Timothy Drexler/R5/USEPA/US@EPA
From: Laurence Silvestri <[redacted]>
Date: 03/26/2009 12:48PM
cc: cnorris@geo-hydro.com, [redacted]@geo-hydro.com, Larry Johnson/R5/USEPA/US@EPA
Subject: Re: Fw: Pines groundwater modeling files

Tim,

PINES met on a conference call last night with our technical consultants, Chuck Norris and Mark Hutson of Geo-Hydro. We discussed the contract that AECOM asked our technical consultants, Geo-Hydro to sign. We decided that it would not be appropriate for them to enter into any contract beyond their agreement to technically assist PINES.

As you know, PINES has respected the sensitivity of all draft documents. We have never discussed any draft-form information outside of a few PINES members. The "Alternative Superfund Process" requires transparency. Information that is used to input into a groundwater modeling program is not more or less confidential than any other information from the draft documents.

Therefore, PINES asks the EPA and the Potential Responsible Parties to

continue to share all information and methods concerning the Pines Area of Investigation with PINES' technical consultants. In particular, it is important that Geo-Hydro have all the groundwater data files as soon as possible so they can have time to examine them and develop comments.

Thank you,
Larry Silvestri
PINES Secretary

--- On Mon, 3/23/09, Drexler.Timothy@epamail.epa.gov <Drexler.Timothy@epamail.epa.gov> wrote:

> From: Drexler.Timothy@epamail.epa.gov <Drexler.Timothy@epamail.epa.gov>
> Subject: Fw: Pines groundwater modeling files
> To: Exemption 6
> Cc: cnorris@geo-hydro.com, Exemption 6 @geo-hydro.com, Johnson.Larry@epamail.epa.gov
> Date: Monday, March 23, 2009, 9:55 AM
>
> Hi Larry:
>
> The Pines Site PRPs are willing to share the computer files that have been requested by both the Park Service and Chuck Norris to perform a check of the PRP groundwater model. Prior to the release of the files, the PRP sent a note to us all asking us to ensure that we will not use the files for any purpose other than the review of their groundwater model. That note is attached to the bottom of this email message. I didn't have any particular problem with the language, but I did not have an attorney review. I then received an email message (below)from Chuck Norris that he does have a problem agreeing to the letter from the PRP.
> I'm sending this to you and to my attorney for review. Please read the

original request from Elizabeth Perry below and let me know what
P.I.N.E.S. position is on this matter. I hope to quickly also get
a
reading from my attorney. Please contact me when you are ready to

discuss: 1) if you are OK with the letter, or, if needed 2) what
modifications would satisfy P.I.N.E.S.

I'd like to quickly work this out so that Chuck gets what he
needs to
complete a review for you.

Thanks for your time, Larry.

-Tim Drexler

From Chuck Norris:

Tim,

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provided to us by AECOM. Among them are the following:

1) By omitting PINES from their e-mail, AECOM seems to suggest
that
People in Need of Environmental Security (PINES) is viewed as a
problematic 'third-party' in the context of the email.

2) It is inappropriate for Geo-Hydro, Inc (GHI), a consultant to
PINES,
to enter into a contract with AECOM, a consultant for the PRPs,
no
matter how informal that contract.

3) We believe the conditions proposed by AECOM directly conflict
with
the responsibilities of GHI under our Agreement with PINES, the
TAP
agreement between the PRPs and PINES, and our individual
obligations
under the Indiana professional geologist licensing statues and
regulations.

4) GHI cannot make commitments for PINES.

We have not yet forwarded AECOM's email to our clients with our views
and recommendations. But, PINES would have to accept the terms, not
GHI.

We believe that our involvement and review comments to date have
contributed to understanding (critical) deficiencies in the RI and the
model, some that may have gone unnoticed without our involvement. Our
only objectives are now and always have been to thoroughly understand
the RI and model and provide the best possible comments for USEPA's
consideration. The proposed restrictions are neither relevant nor
necessary for accomplishing those objectives.

We will be contacting Ms Perry early next week indicating our position.
In the meantime, if you contact your lawyers and wish to share their
observations, we would be interested to hear them.

Have a nice weekend.

Chuck Norris and Mark Hutson

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071
----- Forwarded by Timothy Drexler/R5/USEPA/US on 03/23/2009 07:55 AM

"Perry,

Elizabeth"

<Elizabeth.Perry

@aecom.com>

To

< pete_penoyer@nps.gov >,

03/19/2009 02:39 < cnorris@geo-hydro.com >,

PM < Exemption 6 @geo-hydro.com >

cc

Timothy Drexler/R5/USEPA/US@EPA,

"Bradley, Lisa"

< Lisa.Bradley@aecom.com >

Subject

Pines groundwater modeling files

Gentlemen -

As requested and as a courtesy to facilitate your review of the draft groundwater model, we will be providing the electronic MODFLOW files for

the draft groundwater model for the Pines Area of Investigation (hereinafter referred to as the "Information").

While it is not uncommon for electronic files for models to be provided to a regulatory agency as part of the RI/FS process, it is uncommon for such files to be circulated beyond persons authorized for access, used for any purpose other than comment, or provided to the public. This means this situation is unique and requires us to take certain steps to ensure that the Information is not improperly disseminated or misused.

Therefore, we request that by receipt of this Information, you agree and understand that the Information (1) is in draft form, (2) has not been approved by USEPA, and (3) is being provided for internal discussion purposes only. Furthermore, you agree not to (1) distribute the Information in any way, manner or form to a third party; (2) use the Information for any purpose other than understanding the draft groundwater model for the Pines Area of Investigation; (3) use the Information to develop opinions to be presented to a third party,

including, but not limited to running scenarios and presenting those scenarios to a third party; and (4) in the case of the P.I.N.E.S Group, use the Information in a manner inconsistent with the TAP Agreement.

Upon your acknowledgement and acceptance by return e-mail of these terms and conditions of use, the Information will be sent to you.

We thank you for your understanding and appreciate your willingness not to use this Information for any purpose other than understanding the

draft groundwater model for the Pines Area of Investigation. Please
delete, or return without retaining any copies, the Information no later
than the date set by USEPA to provide it with comments on the draft
groundwater model.

Elizabeth

A. Elizabeth Perry, PG
Senior Hydrogeologist
AECOM Environment
tel: 978-589-3167

AECOM
2 Technology Park Drive
Westford, MA 01886
tel: 978-589-3000
fax: 978-589-3100
www.aecom.com

EPA-R5-2013-003300RR-255

Exemption 6

03/31/2009 07:26 AM

To ElizabethPerry
cc Timothy Drexler, LisaBradley, Charles Norris, Exemption 6
bcc
Subject Re: Pines groundwater modeling files

Ms. Perry,

P.I.N.E.S. accepts your agreement with a request that we be permitted to delete, or return without retaining any copies, the information when we receive the USEPA approved Final Remedial Investigation Report. We would like to compare the information with any updates made to the final report. P.I.N.E.S. and Geo-Hydro have respected the confidentiality of all draft documents and we will continue to do so.

Please forward all groundwater model information to Geo-Hydro.

Thank you,
Larry Silvestri
(219)-874-3760

--- On **Mon, 3/30/09, Perry, Elizabeth <*Elizabeth.Perry@aecom.com*>** wrote:

From: Perry, Elizabeth <Elizabeth.Perry@aecom.com>
Subject: Pines groundwater modeling files
To: "Charles Norris" <cnorris@geo-hydro.com>, Exemption 6 @geo-hydro.com
Cc: Exemption 6, drexler.timothy@epamail.epa.gov, "Bradley, Lisa" <Lisa.Bradley@aecom.com>
Date: Monday, March 30, 2009, 6:08 PM

Gentlemen - We have discussed with USEPA clarification of our language concerning release of the groundwater modeling files for the Pines Area of Investigation, as presented below.

As requested and as a courtesy to facilitate your review of the draft groundwater model, we will be providing the electronic MODFLOW files for the draft groundwater model for the Pines Area of Investigation (hereinafter referred to as the “Information”).

While it is not uncommon for electronic files for models to be provided to a regulatory agency as part of the RI/FS process, it is uncommon for such files to be circulated beyond persons authorized for access, used for any purpose other than comment, or provided to the public. This means this situation is unique and requires us to take certain steps to ensure that the Information is not improperly disseminated or misused.

Therefore, we request that by receipt of this Information, you agree and understand that the Information (1) is in draft form, (2) has not been approved by USEPA, and (3) is being provided for internal discussion purposes only. Furthermore, you agree not to (1) distribute the Information in any way, manner or form to any party other than the
current reviewers (USEPA, IDEM, NPS, P.I.N.E.S.); (2) use the Information for any purpose other than

understanding the draft groundwater model for the Pines Area of Investigation; (3) use the Information to develop opinions to be presented to a party outside of the current reviewers, including, but not limited to running scenarios and presenting those scenarios to a party outside of the current reviewers; and (4) in the case of the P.I.N.E.S Group, use the Information in a manner inconsistent with the TAP Agreement.

Upon your acknowledgement and acceptance by return e-mail of these terms and conditions of use, the Information will be sent to you.

We thank you for your understanding and appreciate your willingness not to use this Information for any purpose other than understanding the draft groundwater model for the Pines Area of Investigation. Please delete, or return without retaining any copies, the Information no later than the date set by USEPA to provide it with comments on the draft groundwater model.

Elizabeth

A. Elizabeth Perry, PG
Senior Hydrogeologist
AECOM Environment
tel: 978-589-3167

AECOM
2 Technology Park Drive
Westford, MA 01886
tel: 978-589-3000
fax: 978-589-3100
www.aecom.com

EPA-R5-2013-003300RR-256

Charles Norris
<Chuck@Norris-Tudor.com>

04/02/2009 02:44 PM

To Timothy Drexler

cc "Perry, Elizabeth", Pete_Penoyer, Larry Silvestri, Mark Hutson

bcc

Subject Files from AECOM

Tim,

After a bit of trouble, I was able to successfully download late last night the files AECOM made available. I am working with those files now to determine their sufficiency to duplicate what we were reviewing on the webex presentation Tuesday. I have confirmed with Elizabeth that with the files sent, it will not be possible to display any information from the files sent on the base map(s) AECOM uses for a real-world reference of modeling input or output displays.

--
Chuck

Charles H. Norris
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-257

"Perry, Elizabeth" <Elizabeth.Perry@aecom.com>

04/02/2009 04:39 PM

To "Charles Norris", Timothy Drexler, Pete_Penoyer, "Larry Silvestri", "Mark Hutson"

cc

bcc

Subject RE: File inventory

Chuck - The cell-by-cell flow, head, and drawdown files are generated in binary format. So you're better off generating your own when you run the model.

For the Modpath files, we do not have them saved outside of our GMS interface. We'll look into generating at least the input file for you, so you can run the same pathlines.

Elizabeth

-----Original Message-----
From: Charles Norris [mailto:Chuck@Norris-Tudor.com]
Sent: Thursday, April 02, 2009 5:47 PM
To: Perry, Elizabeth; Drexler.Timothy@epamail.epa.gov; Pete_Penoyer@nps.gov; Larry Silvestri; Mark Hutson
Subject: File inventory

Elizabeth,
Based upon my review of what we downloaded, in addition to the base map,

we are missing the following input/output files to allow us to duplicate

and work with your results:

*.hed
*.drw
*.ccf

and the necessary i/o files to duplicate your particle tracking (e.g., *.hff)

Please correct me if those files are among those you've sent.
--
Chuck

Charles H. Norris
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-258

Charles Norris
<Chuck@Norris-Tudor.com>

04/02/2009 04:47 PM

To "Perry, Elizabeth", Timothy Drexler, Pete_Penoyer, Larry Silvestri, Mark Hutson

cc

bcc

Subject File inventory

Elizabeth,
Based upon my review of what we downloaded, in addition to the base map, we are missing the following input/output files to allow us to duplicate and work with your results:

*.hed
*.drw
*.ccf

and the necessary i/o files to duplicate your particle tracking (e.g., *.hff)

Please correct me if those files are among those you've sent.
--
Chuck

Charles H. Norris
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-259

"Mark Hutson"
<Exemption 6@geo-hydro.com>
04/02/2009 05:24 PM

To '"Perry, Elizabeth"', '"Charles Norris"', Timothy Drexler
cc Pete_Penoyer, '"Larry Silvestri"'
bcc
Subject RE: Files from AECOM

Elizabeth

I'm not sure what programs the extensions on these files refer to, but if they are GIS files ArcMap doesn't recognize them.

Mark

-----Original Message-----
From: Perry, Elizabeth [mailto:Elizabeth.Perry@aecom.com]
Sent: Thursday, April 02, 2009 3:33 PM
To: Charles Norris; Drexler.Timothy@epamail.epa.gov
Cc: Pete_Penoyer@nps.gov; Larry Silvestri; Mark Hutson
Subject: RE: Files from AECOM

Chuck - I think you misunderstood my previous email. What I said is that a basemap is not one of the Modflow files, and that we would work on getting you something as a basemap. Hopefully, that's what's attached. But since I'm not a GIS user, I can't verify that!

In addition, one could obtain USGS topographic and other geographic-based maps for free on-line, for example, at:

http://www.indiana.edu/~gisdata/

Elizabeth

-----Original Message-----
From: Charles Norris [mailto:Chuck@Norris-Tudor.com]
Sent: Thursday, April 02, 2009 3:45 PM
To: Drexler.Timothy@epamail.epa.gov
Cc: Perry, Elizabeth; Pete_Penoyer@nps.gov; Larry Silvestri; Mark Hutson
Subject: Files from AECOM

Tim,

After a bit of trouble, I was able to successfully download late last night the files AECOM made available. I am working with those files now

to determine their sufficiency to duplicate what we were reviewing on the webex presentation Tuesday. I have confirmed with Elizabeth that with the files sent, it will not be possible to display any information from the files sent on the base map(s) AECOM uses for a real-world reference of modeling input or output displays.
--
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1928 E 14th Avenue

Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-260

"Perry, Elizabeth"
<Elizabeth.Perry@aecom.com
>

04/03/2009 09:05 AM

To "Charles Norris"
cc Timothy Drexler, "Bradley, Lisa"
bcc
Subject RE: Files from AECOM

Chuck, I think it might be better to try to work through some of this on the phone. I left a voice mail at your office, but in case you aren't going to be there to get it today, please give me a call here.
978-589-3167

Thanks!
Elizabeth

-----Original Message-----
From: Charles Norris [mailto:Chuck@Norris-Tudor.com]
Sent: Friday, April 03, 2009 11:14 AM
To: Perry, Elizabeth
Cc: Drexler.Timothy@epamail.epa.gov; Pete_Penoyer@nps.gov; Larry Silvestri; Mark Hutson
Subject: Re: Files from AECOM

> In addition, one could obtain USGS topographic and other
> geographic-based maps for free on-line, for example, at:

Elizabeth,
The problem lies with registering the model against a base map identically to the way AECOM has, so no extraneous concerns develop model vs "reality". If I work with what you're using, a whole class of concerns needn't arise.

Thanks for the files. But to be sure, I understand. Are these files you sent either your base map or at least ones that are geographically oriented, referenced, scaled, stretched, etc., identically to your base map? (I'm not fluent in GIS, either, but I want to make sure I'm looking

at a base map feature under my model cells that is identical to what you

see looking under the same cells.
--
Chuck

Charles H. Norris
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-261

Charles Norris
<Chuck@Norris-Tudor.com>
04/03/2009 10:13 AM

To "Perry, Elizabeth"
cc Timothy Drexler, Pete_Penoyer, Larry Silvestri, Mark Hutson
bcc
Subject Re: Files from AECOM

> In addition, one could obtain USGS topographic and other
> geographic-based maps for free on-line, for example, at:

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(303) 322-3171

EPA-R5-2013-003300RR-262

Charles Norris
<Chuck@Norris-Tudor.com>
04/03/2009 10:35 AM

To "Perry, Elizabeth"
cc Timothy Drexler, Pete_Penoyer, Larry Silvestri, Mark Hutson
bcc
Subject Re: File inventory

Elizabeth,
The first check to using someone else's model, and before offering comments on it, is to run the model and compare it to the output the developer produces. If that comparison show my compute and their computer system produces identical output from identical input, that avoids a long list of spitting contests. And, if I show that I duplicate your base case exactly on my system, then it at least implies that were you to run a scenario I execute, you would reproduce those results exactly.

I notice there is another email in line with files attached. If that is not the output files, I'd still like them. I don't use GMS, but I suspect they can be exported the files in an askii format that is universally readable. If they are those files, thank you.
--
Chuck

Charles H. Norris
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-263

Charles Norris
<Chuck@Norris-Tudor.com>
04/03/2009 12:57 PM

To "Perry, Elizabeth"
cc Timothy Drexler, "Bradley, Lisa", Mark Hutson
bcc
Subject Re: Files from AECOM

Elizabeth,
I won't be back in my office until next Thursday. I have access to email on this account episodically during the day, but, since downloading the files from your system, no access to my company account on this computer. (No one seems to be able to determine why, but if everyone has their downloads and your people "expire" the site, maybe that will toggle this computer somehow and free it up.) Luckily, the company account still works in Denver and Mark has been forwarding things to me on this account.

I'm not sure what needs to be worked out. I don't explore someone else's model until I know I can duplicate their results. Given the level of distrust evidenced by someone on your end, I would have expected AECOM to have insisted on such a test for your benefit, as well. Until I have your output files, particularly the heads, I can't verify my computer generates the same output from identical input. And, without that verification, I can't defend any tests I run or scenarios I may try, and any comments offered USEPA based upon such runs have no meaning.

I understand that binary output files can be touch moving from system to system. As I pointed out earlier, if you have a system that reads those binary files, you probably can simply export them as ascii files. If not, you should be able to reset your output control file to generate them as asc ii files and rerun it.

I'm headed out to my work site. There is a phone there that I sometimes can hear ringing, (630) 627-7306. You may try to call there after about 1:00 pm your time, if you need to talk. Let it keep ringing.
--
Chuck

Charles H. Norris
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-264

Charles Norris
<Chuck@Norris-Tudor.com>
04/06/2009 01:10 PM

To "Perry, Elizabeth"
cc Timothy Drexler, Pete_Penoyer, Larry Silvestri, Mark Hutson
bcc
Subject Re: Files from AECOM

Elizabeth,

If you sent the head files last Friday, I didn't receive them. If not please continue to use this email address.

I don't seem to find a file with the locations of the various head observation points and associated observations. If the are in there and I'm overlooking them, please help guide me. If they're not there, please send them.
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Denver CO 80206

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EPA-R5-2013-003300RR-265

Charles Norris
<cnorris@geo-hydro.com>

04/06/2009 02:04 PM

To Timothy Drexler

cc Pete_Penoyer, "HERRON, KEVIN", Larry Silvestri, Bob Kay, Mark Hutson

bcc

Subject Comment deadline on draft RI Report

Tim,

Did you mean a comment deadline on March draft model for a (subsequent) draft RI Report? That's what I'm trying to work on.

The only draft RI Report I'm aware of dates back to December and the modeling changes by mid-March render parts of that out of date, so presumably we all need revised version upon which to comment. But, if that revision is in the offing, and there aren't going to be (potential) subsequent changes to the model based upon reviewer comments in the works, of what purpose is my current model review?

I can stop reviewing the groundwater model and focus on comments for a draft RI report, but we'll have to get a revised draft RI Report upon which to comment.

--
Chuck

Charles H. Norris
Geo-Hydro, Inc.
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-266

Charles Norris
<Chuck@Norris-Tudor.com>

04/06/2009 02:09 PM

To "Perry, Elizabeth"

cc Timothy Drexler, Pete_Penoyer, Larry Silvestri, Mark Hutson, "Bradley, Lisa"

bcc

Subject Re: Files from AECOM

Elizabeth,
If you can't distribute any way other than LeapFfile, send my notice to the geohydro account that is locked up and hopefully it will let me get it. Then send a non-associated email to this account telling me about it. I can't afford to lose access to both accounts.

The *.hob files don't appear to have screened intervals indicated, or other depth reference for the listed heads. Or am I missing something?
--
Chuck

Charles H. Norris
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-267

"Perry, Elizabeth"
<Elizabeth.Perry@aecom.com
>

04/06/2009 02:45 PM

To "Charles Norris"

cc Timothy Drexler, Pete_Penoyer, "Larry Silvestri", "Mark Hutson", "Bradley, Lisa"

bcc

Subject RE: Files from AECOM

Chuck - We didn't use the screened interval option with the head observations. The layer each well is located in, based on the screen mid-point, is provided in the HOB file. Screened intervals are shown on Tables in the RI. Elizabeth

-----Original Message-----
From: Charles Norris [mailto:Chuck@Norris-Tudor.com]
Sent: Monday, April 06, 2009 3:10 PM
To: Perry, Elizabeth
Cc: Drexler.Timothy@epamail.epa.gov; Pete_Penoyer@nps.gov; Larry Silvestri; Mark Hutson; Bradley, Lisa
Subject: Re: Files from AECOM

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Charles H. Norris
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-268

Pete_Penoyer@nps.gov

04/07/2009 06:25 PM

To "Perry, Elizabeth"

cc "Charles Norris", Timothy Drexler, "Bradley, Lisa", "Mark Hutson", "Larry Silvestri", brenda_waters, kherron, EDWARD KARECKI, cnorris, EUGENE JABLONOWSKI, Bob Kay

bcc

Subject RE: Files from AECOM

Elizabeth,

In Paula's and my review of the model today we noted the following:

To the immediate NW of Yard 520, Layer 4 of the model (color coded light Blue in GMS under Yard 520 and about 10 to 15 feet thick as subsoil aquifer) this layer transitions abruptly to the dark red color code (due to increased hydraulic conductivity outside Yard 520) but thins dramatically to a foot or less while Layer 2 expands in thickness dramatically [20 or more(?) feet thick] apparently at the expense of the other 3 layers (all with the same Kh and Kv denoted by dark red cell layers). Thus the transmissivity of Layer 4 in this NW area is reduced significantly which would greatly limit flow in this direction. This appears to be an arbitrary reduction in thickness/transmissivity in this NW direction in Layer 4. Because the contamination from CCBs is moved vertically in Yard 520 from Layers 1, 2, and 3 of CCBs down to Layer 4 before leaving the north boundary of the site, the following questions are raised as to the sensitivity of the flow model to this thickness change (thinning in the NW direction) in Layer 4 where the contaminants are constrained to occur and move horizontally from Yard 520.

1) does thickness variation of the model layers have any effect on flow paths and how did you arrive at the layer thicknesses in the first place? (for example, if you arbitrarily expanded the thickness of layer 4 (instead of Layer 2) at the expense of layers 2 and 3 in this NW area would flow/particle tracking change (is there a way to know/confirm this without trying to do it with a model rerun?)

2) does the model restrict in any way flow or communication across layers when one layer effectively is pinched out in the layering as you have depicted but both adjacent layers (including the one pinching out/thinning abruptly) have a) the same Kv & Kh? b) same Kv but different Kh c) same Kh but different Kv .... as it appears all three of these conditions occur at one place or another within the model grid.

3) Was there a reason you chose not to digitize the current true topography of Weaver-Boos for the Yard 520 site and substitute in for the dated and incorrect DEM topography (USGS) which shows the pre-Yard 520 wetland (low) in place of the landfill topographic mounds. It is my understanding that MODFLOW does not need the true topography to calibrate heads and depict flow paths (water table heads can be above the ground surface and the calibration will work just fine). However in GMS viewing, the thickness variation which appears quite strange and rather arbitrary coupled with the incorrect topography (the landfill topo high is depicted as a wetland low in 3-D viewing), makes it rather difficult to make any sense of what may be going on in the internal workings or where the real model sensitivities lie and from which boundary (top or bottom) layer thicknesses are referenced.

4) If I understood it correctly, the basis for the AECOM model's

determination of a strong downward gradient at Yard 520 (model derived) with an approximately 9 foot head differential based on the water table/head elevation of 526' inferred for PZ-001 location and the elevation head midway in the subsoil aquifer (617 ft.) depicted in cross section D - D' for April 2007, was the contrast in Kv between the overlying CCBs (Layers 1, 2, and 3 @ 0.0003 ft./day - model derived) and the underlying Yard 520 Subsoils (Layer 4 @ 0.02 ft./day - also model derived) from the best calibration fit. These contrasting Kv values achieve the 2 orders of magnitude necessary as you referenced in Freeze and Cherry (1979) for flow to be almost vertical in the overlying aquitard (CCBs). Presumably, that would mean that as the Kv contrast approached 0 (Kv's approached equality), no head differential would be expected (i.e. little or no model derived downward flow in this latter case) and most/all of the flow in both layers would be horizontal? Thus, where model layers 2 and 3 are saturated at the Yard 520 north boundary, contaminant particles would leave the site and be subject to gradients in these layers observed in the NW area should there be little or no downward vertical gradient at Yard 520?

5) The RI Report and modelling covered an unusually wet year/period (Aug. 2006 to July 2007) when 50.6 inches of precipitation occurred. This is 11.1 inches above the normal (39.5"/yr.). Recent studies on the performance of clay caps/barriers indicate deterioration with age and after only 5 or fewer years, percolation through the cap may increase from approximately 1 to 4% of annual precipitation (design criteria based on 1 x 10E(-7) Kv to 10 to 26% of annual precipitation due to cap exposure over time to freeze-thaw and wet-dry cycles and biotic activities (plant roots and animal burrowing) (Albright, Benson et al., 2006). Applying a reasonably conservative (20% of annual precipitation) as the recharge value to the 20+ year old Yard 520 cap and thus increasing meteoric water infiltration to CCBs (i.e. one that would also increase heads and a water budget based flow from Yard 520) based on the high precipitation year observed during the model period would be 20% of the 50.6 inches or 10.12 inches/yr.. This is over 10 times the value used by AECOM in arriving at a model calibration best fit (0.97"/yr.). This latter value used by AECOM only correlates well with the initial hydraulic conductivity design criteria for a clay cap of 1 x 10 E(-7) cm/sec.. This suggests the model should be recalibrated with this input parameter fixed to determine the effect on model derived K values which also appear anomalously low in the best calibration fit determination (to heads) and would allow for higher model derived K values using the higher Yard 520 recharge. With this more realistic recharge value fixed as input and the CCB K values derived from that, a model fit with more reasonable CCB K-values than the extremely low values provided to date that are inconsistent with published values for unconsolidated Class F CCBs should be apparent. The model derived "strong downward vertical gradients" may well disappear as Kvs of the CCBs (up to 2.8 x 10E(-1) ft./day per previously circulated literature) approach or surpass those of the Yard 520 subsoil.

Are there short but accurate answers to these questions we can apply in our review of this model further?

Thanks,
Pete

Peter E. Penoyer
Hydrologist, WRD
1201 Oakridge Dr., Ste. 250
Ft. Collins, CO 80525
Ph 970-225-3535

Fax 970-225-9965
email: pete_penoyer@nps.gov

|---------+---------->
| "Perry, Elizabeth" <Elizabeth.Perry@aecom.com>
| 04/06/2009 01:51 PM AST
|---------+---------->

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| To: "Charles Norris" <Chuck@Norris-Tudor.com>
|
| cc: <Drexler.Timothy@epamail.epa.gov>, <Pete_Penoyer@nps.gov>, "Larry Silvestri" <[redacted]>, |
| "Mark Hutson" <[redacted]@geo-hydro.com>, "Bradley, Lisa" <Lisa.Bradley@aecom.com> |
| Subject: RE: Files from AECOM
|

>----------
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Chuck - We've re-run the output file to include the head values. I'm going to send it out by LeapFile, because it's a very large file.

The head observations are in the *hob file. I notice that the well IDs are not provided in the file, but it looks like the order of the observations matches the order of the wells listed on our Table 4-2.

Elizabeth

-----Original Message-----
From: Charles Norris [mailto:Chuck@Norris-Tudor.com]
Sent: Monday, April 06, 2009 2:10 PM
To: Perry, Elizabeth
Cc: Drexler.Timothy@epamail.epa.gov; Pete_Penoyer@nps.gov; Larry Silvestri; Mark Hutson
Subject: Re: Files from AECOM

Elizabeth,

If you sent the head files last Friday, I didn't receive them. If not please continue to use this email address.

I don't seem to find a file with the locations of the various head observation points and associated observations. If the are in there and

I'm overlooking them, please help guide me. If they're not there, please send them.
--

Chuck

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(303) 322-3171

EPA-R5-2013-003300RR-269

Timothy Drexler/R5/USEPA/US
04/08/2009 10:41 AM

To "Mark Hutson"
cc "Charles Norris", "Pete Penoyer ", kay.bob, EUGENE JABLONOWSKI, silvestri, brenda_waters, EDWARD KARECKI, Mark Johnson
bcc
Subject RE: Pine Site GW model

Hi Mark:

Since you are only now receiving the files you need, I would like to ask all reviewers to please send me your draft RI Report comments that are NOT related to the gw model by the April 16th date and then send me comments on the new gw model by April 23rd. That way I can begin the process of integrating comments into a response to AECOM and then finish that work when I receive the remainder of the comments.

I hope this works for everyone. If this does not work for anybody, please call me as soon as you can so that we can set up a conference call to discuss some other approach. I appreciate everyone helping me work through this process.

-Tim

"Mark Hutson" <Exemption 6@geo-hydro.com>

"Mark Hutson "
<Exemption 6@geo-hydro.com>
04/08/2009 10:12 AM

To Timothy Drexler/R5/USEPA/US@EPA
cc "Charles Norris" <cnorris@geo-hydro.com>, "Pete Penoyer " <pete_penoyer@nps.gov>

Subject RE: Pine Site GW model

Tim

I just talked with Chuck on his cell phone. He is traveling back home today and will be back in the office tomorrow. At this point he thinks that he has enough information from AECOM and other sources to reconstruct the model but it will require some manual input. Chuck said that he will get back with you tomorrow after he had an opportunity to work on it some more.

Are we still expected to provide comments on the revised RI before the basics of groundwater flow are understood?

Mark

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov

[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Wednesday, April 08, 2009 7:45 AM
To: pete_penoyer@nps.gov; Exemption 6 @geo-hydro.com; cnorris@geo-hydro.com
Subject: Pine Site GW model

Does everyone now have what they needed for review of the model?

EPA-R5-2013-003300RR-270

Timothy Drexler/R5/USEPA/US
04/08/2009 01:20 PM

To "Mark Hutson"
cc brenda_waters, "Charles Norris", EDWARD KARECKI, EUGENE JABLONOWSKI, kay.bob, Mark Johnson, "Pete Penoyer ", silvestri
bcc
Subject RE: Pine Site GW model

Hi all:

A clarification. I meant for the 16th due date to be all comments that are not gw model related, which probably includes most ground water comments.

Thanks.

Tim

Timothy Drexler/R5/USEPA/US

Timothy Drexler/R5/USEPA/US
04/08/2009 10:41 AM

To "Mark Hutson" <[redacted]@geo-hydro.com>
cc "Charles Norris" <cnorris@geo-hydro.com>, "Pete Penoyer " <pete_penoyer@nps.gov>, kay.bob@epamail.epa.gov@EPA, EUGENE JABLONOWSKI/R5/USEPA/US@EPA, [redacted], brenda_waters@nps.gov, EDWARD KARECKI/R5/USEPA/US@EPA, Mark Johnson/R5/USEPA/US@EPA
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04/08/2009 10:12 AM

To Timothy Drexler/R5/USEPA/US@EPA
cc "Charles Norris" <cnorris@geo-hydro.com>, "Pete Penoyer "

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Subject: Pine Site GW model

Does everyone now have what they needed for review of the model?

EPA-R5-2013-003300RR-271

Pete_Penoyer@nps.gov
04/08/2009 06:30 PM

To Timothy Drexler
cc brenda_waters, "Charles Norris", EUGENE JABLONOWSKI, Mark Johnson, EDWARD KARECKI, Bob Kay, "Mark Hutson", silvestri, Paula_Cutillo
bcc
Subject RE: Pine Site GW model

Hi Tim,

Paula has a very limited time to review the model with me as she works for another branch and is on loan to this project intermittently for brief periods only. We are hoping that Geo-Hydro will be able to actually rerun the AECOM groundwater model from the files they were provided to obtain a calibration fit to a water table configuration and contouring that better fits the actual heads in the wells. Machine generated contours while unbiased are still of low credibility in areas of insufficient/poor control and because opposition to installing wells through a landfill cap are a common excuse for low well density in landfill interiors, these facilities are often poorly controlled and any groundwater mounding is either missed altogether, largely ignored or poorly defined (as is the case here). I would find it acceptable for professional judgment to be applied in such situations (AECOMS or that of others) provided good hydrogeologic reasoning was used to support contouring developed where control was lacking.

Rerunning the AECOM model, first to obtain agreement with their outcome and then subject to other water table interpretations that both better honor the control and apply professional judgement should allow for model-derived parameters that are either better in tune with site conditions or reflect the full range of possible values. We believe in the case of what the AECOM model derived, they were a bit extreme in some cases or fell toward one end of the range or spectrum of reasonable possibilities. It should also be possible to determine if there are hidden aspects/components internal to the model that can't be seen until presented in GMS (software NPS has to work with MODFLOW) or an equivalent visualization software (GW Vistas that Chuck has) that could affect flow hydraulics (e.g. one such possibility was the NW pinchout of Layer 4 apparent in GMS viewing that I mentioned in a previous email). Until there is some confirmation through testing of several parameters in combination to determine if other "best calibration fits" and associated parameters can be derived by the model and their effects on flow paths, we would encourage you to grant Geo-Hydro sufficient time perform these necessary model runs should that be possible with the AECOM files provided.

In lieu of Geo-Hydro's being able to successfully rerun the model, we would likely seek a 3rd party USGS review (Reston Office) due to the strong reservations we currently have with the site conceptual model, the base case water table configuration used by AECOM in its calibration fit and some of the model derived parameters. These effects, if taken in combination in our view, could potentially bias the particle tracking and flow paths of AECOM.

I have no reason to be any more or less critical of GeoHydro's model output than that of AECOM and would expect that the range of input and output parameters be reasonable, scientifically justified and would match water elevation heads in the calibration fit equally well. Our primary concern is that the stakeholders reach a concensus on a reasonable flow model

output or range of simulated outputs that reflect current site conditions going forward so that they may become part of a site decision record that is sound and technically defensible. Only on this basis can NPS evaluate the long term threat to its resources from this Yard 520 long term source.

regards,
Pete

Peter E. Penoyer
Hydrologist, WRD
1201 Oakridge Dr., Ste. 250
Ft. Collins, CO 80525
Ph 970-225-3535
Fax 970-225-9965
email: pete_penoyer@nps.gov

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| Drexler.Timothy@epam|
| ail.epa.gov |
| |
| 04/08/2009 10:41 AM |
| EST |
|---------+------------------------------>

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|
| To: "Mark Hutson" <[redacted]@geo-hydro.com>
|
| cc: "Charles Norris" <cnorris@geo-hydro.com>, "Pete Penoyer "
<pete_penoyer@nps.gov>, kay.bob@epamail.epa.gov,|
| Jablonowski.Eugene@epamail.epa.gov, [redacted],
brenda_waters@nps.gov, Karecki.Edward@epamail.epa.gov,|
| Johnson.Mark@epamail.epa.gov
|
| Subject: RE: Pine Site GW model
|

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-Tim

"Mark Hutson"
<[redacted]@geo-hydro.com>

04/08/2009 10:12 AM

To
Timothy Drexler/R5/USEPA/US@EPA

cc
"Charles Norris" <cnorris@geo-hydro.com>, "Pete Penoyer " <pete_penoyer@nps.gov>

Subject
RE: Pine Site GW model

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and will be back in the office tomorrow. At this point he thinks that he
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Subject: Pine Site GW model

Does everyone now have what they needed for review of the model?

EPA-R5-2013-003300RR-272

[redacted]

04/20/2009 03:22 PM

To Timothy Drexler

cc Pete_Penoyer, [redacted], [redacted] "'Chuck Norris'", [redacted], [redacted], [redacted], mark hutson, peggy, Paul Kysel, [redacted], [redacted]

bcc

Subject Request for extension of PINES comment period

Tim,

Chuck Norris and Mark Hutson would like to meet with Pete Penoyer of the NPS regarding the Remedial Investigation Draft and Groundwater Model. This would improve both the PINES' and NPS' understanding and comments. The meeting would take place next week.

For this reason, the PINES requests an extension of the comment period. In the interest of an improved Remedial Investigation, we believe that this is a reasonable request.

Thanks,
Larry Silvestri
PINES Secretary
[redacted]

EPA-R5-2013-003300RR-273

Timothy Drexler/R5/USEPA/US
04/20/2009 04:31 PM

To Laurence Silvestri

cc [redacted] "'Chuck Norris'", [redacted] mark hutson, peggy, Pete_Penoyer, Paul Kysel, [redacted] rtkay, kherron

bcc

Subject Re: Request for extension of PINES comment period

Hi Larry:

Thanks for the note. I appreciate the need for Chuck and Pete to get together and compare their views of the ground water model. I've spoken to both Chuck and Pete about their review. So I will approve this final extension request. I will notify my management of the delay in the Pines Site schedule. If the P.I.N.E.S. group could please make sure that the residents of Pines are aware of the need for the delay, I would really appreciate it.

Ultimately, the ground water model for the Pines Site will be just that, a model. EPA will take the comments of the reviewers on issues and uncertainties with this model and temper any decisions with that knowledge as we go to the next steps in the process.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071
Laurence Silvestri <[redacted]>

[redacted]
04/20/2009 03:22 PM

To Timothy Drexler/R5/USEPA/US@EPA

cc Pete_Penoyer@nps.gov, [redacted] "'Chuck Norris'" <cnorris@geo-hydro.com>, [redacted] mark hutson <[redacted]@geo-hydro.com>, [redacted] Paul Kysel <[redacted]>, [redacted]

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Thanks,
Larry Silvestri
PINES Secretary
Exemption 6

EPA-R5-2013-003300RR-274

Timothy Drexler/R5/USEPA/US
04/29/2009 05:30 PM

To Pete_Penoyer
cc Brenda_Waters
bcc
Subject Re: Request for extension of PINES comment period

Monday is fine, Pete. Glad your meeting went well.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071
Pete_Penoyer@nps.gov

Pete_Penoyer@nps.gov
04/29/2009 04:11 PM

To Timothy Drexler/R5/USEPA/US@EPA
cc Brenda_Waters@nps.gov

Subject Re: Request for extension of PINES comment period

Tim,

We met with Geo-Hydro here on Tuesday PM and exchanged perspectives and our insights from the more indepth groundwater model review and I will be completing my comments tomorow with our management's review here. After speaking with the park today, they wished to have the Superintendent have a look at what we found before signing the communication to EPA and that will take a day or so. I am not entirely sure the park can turn things around to you in a single day on friday so would receipt of our comments by Monday be acceptable?

Thanks for your consideration of this request?

regards,
Pete

Peter E. Penoyer
Hydrologist, WRD
1201 Oakridge Dr., Ste. 250
Ft. Collins, CO 80525
Ph 970-225-3535
Fax 970-225-9965
email: pete_penoyer@nps.gov

|---------+------------------------------->
	Drexler.Timothy@epam
	ail.epa.gov
	04/20/2009 04:31 PM
	EST
---------+------------------------------->

>--
--|
  |
|
  | To: Laurence Silvestri <[redacted]>
|
  | cc: [redacted], [redacted], "'Chuck
Norris'" <cnorris@geo-hydro.com>,
  | [redacted], [redacted],
[redacted], mark hutson
  | <[redacted]@geo-hydro.com>, [redacted], Pete_Penoyer@nps.gov,
Paul Kysel <[redacted]>,
  | [redacted], [redacted], rtkay@usgs.gov,
kherron@idem.in.gov
  | Subject: Re: Request for extension of PINES comment period
|

>--
--|

Hi Larry:

Thanks for the note. I appreciate the need for Chuck and Pete to get together and compare their views of the ground water model. I've spoken to both Chuck and Pete about their review. So I will approve this final extension request. I will notify my management of the delay in the Pines Site schedule. If the P.I.N.E.S. group could please make sure that the residents of Pines are aware of the need for the delay, I would really appreciate it.

Ultimately, the ground water model for the Pines Site will be just that, a model. EPA will take the comments of the reviewers on issues and uncertainties with this model and temper any decisions with that knowledge as we go to the next steps in the process.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

Laurence

Silvestri
<[redacted]>

04/20/2009 03:22
PM

To
Timothy Drexler/R5/USEPA/US@EPA
cc
Pete_Penoyer@nps.gov,
[redacted],
[redacted], "'Chuck
Norris'"
<cnorris@geo-hydro.com>,
[redacted],
[redacted], mark
hutson <[redacted]@geo-hydro.com>,
[redacted], Paul Kysel
<[redacted]>,
[redacted],

Subject
Request for extension of PINES
comment period

Tim,

Chuck Norris and Mark Hutson would like to meet with Pete Penoyer of the NPS regarding the Remedial Investigation Draft and Groundwater Model. This would improve both the PINES' and NPS' understanding and comments. The meeting would take place next week.

For this reason, the PINES requests an extension of the comment period. In the interest of an improved Remedial Investigation, we believe that this is a reasonable request.

Thanks,
Larry Silvestri
PINES Secretary
[redacted]

EPA-R5-2013-003300RR-275

Timothy Drexler/R5/USEPA/US
05/04/2009 04:03 PM

To "Exemp..."
cc
bcc
Subject Re: 7-year secret on fly ash

Thanks, Jan. I have been reading about that Site, but not that particular article. There are some interesting details. Its always good to see experiences that others are having with the same contaminants. I haven't seen anyone mention using cement kiln dust as a binder for flyash to reduce the contaminant mobility. I would wonder what that is based on.

-Tim

"Exempt..." < Exe Exemption 6 >

Exemption 6

05/04/2009 03:44 PM

To Timothy Drexler/R5/USEPA/US@EPA
cc

Subject 7-year secret on fly ash

Someone suggested you might be interested in this article in case you haven't already seen it.

jan nona

Published on HamptonRoads.com | PilotOnline.com (http://hamptonroads.com)

Dominion kept 7-year secret on fly ash's environmental risks

CHESAPEAKE

Dominion Virginia Power was warned as far back as 2001 that building a golf course with fly ash from its local coal-fired power plant might pose environmental risks.

Consultants hired by the utility said so based on two studies containing more than 350 pages of data and research.

For seven years, Dominion kept those records confidential. When questions surfaced about the project last year, utility officials continued to keep the studies private for six months.

Dominion's consultants, based on their initial findings, presented the utility with several options. They included extending city water to nearby homes or drilling replacement wells deep enough to avoid possible contamination from fly ash.
Neither of those options was chosen.

Instead, Dominion chose another option, spending more money on an enhanced model that yielded safer projections. In 2008, it cited the reports' findings to defend the environmental integrity of the project.

The full reports became public soon after the utility was sued in late March by roughly 400 residents who say fly ash from Battlefield Golf Club at Centerville has contaminated their drinking water, devalued their property and threatened their health.
The city of Chesapeake, which had been given the reports by Dominion in September, posted them on its Web site in early April, after giving them to The Virginian-Pilot following a public-records request.

Dominion officials say the records were given to the Virginia Department of Environmental Quality on the same day as the city.

Dominion insists that it was under no legal obligation to disclose - or even do - the studies and that their results were proprietary.

The utility says that while the initial findings of its consultants raised some environmental concerns, it opted to fund an enhanced, more sophisticated model that yielded more accurate projections, showing the project was safe.
The golf course opened in 2007, with 1.5 million tons of ash from Dominion's Deep Creek power plant used to sculpt its fairways and greens. A Dominion subcontractor paid the original developers to use the ash from its regulated landfill, where it had been piling up at levels high enough to prompt a warning from the Department of Environmental Quality.
The Virginian-Pilot reported last spring that groundwater beneath the golf course was not being monitored and that arsenic, lead and other metals found in fly ash posed leaching risks.

The golf course does not have a liner and contains about half a dozen "lakes" from which the course is irrigated.

Tests by city consultants last year found high levels of arsenic, lead and other contaminants in groundwater under the course. Additional tests by the Environmental Protection Agency, which intervened at the request of the city, also reported elevated levels of arsenic and lead in some groundwater samples from the course property.
Groundwater tests of the golf course site in 2001, before any fly ash was placed there, did not detect arsenic, lead, vanadium and other fly-ash related contaminants, according to data in the first of two studies for Dominion in 2001 by URS Corp.
In a prepared statement last week, Dominion said its consultant used a "state-of-the-art model to analyze the potential environmental effects of using fly ash in the golf course project."

"The consultant recommended methods for using the fly ash in combination with a binder," Dominion stated. "The modeling showed that the steps taken to treat the fly ash are expected to protect the groundwater."

Last September, Dominion committed to paying up to $6 million to cover the cost of extending city water to residents near the golf course.

While the consultant's enhanced modeling provided Dominion with assurances of safety, the initial modeling did not, raising red flags and presenting the utility with some stark options:
- Trying to lower the initial concentrations of arsenic and other constituents expected to leach from the fly ash by adding twice as much binding agent or more.
- Moving the ash mounds farther from nearby homes, creating a "more expansive residential buffer."

- Planning to offer residents an alternative water supply, such as city water or deeper replacement wells.

"Any of these options may have resulted in a potentially unacceptable project cost, requirements for project re-permitting with the city of Chesapeake, negative public perception, etc.," according to the December 2001 report by URS Corp.
"These developments could have led to a decision to end the golf course project or development of a significantly restructured project plan."

Dominion wound up choosing yet another option the consultants posed: spending more money to do more intensive studies, using "more sophisticated modeling tools," which projected much lower risks, centuries away.

That's what Dominion got, and a utility executive - who said in a recent interview that he was not involved at the time these decisions were made - maintains that it's all business as usual in the engineering community.

"A less than fully sophisticated initial study was performed at our request by URS that came up with the recommendations that you quoted and we decided that we needed to look at that in more detail, to add more sophistication to the model to help quantify the details around that further," said J. David Rives, Dominion senior vice president, Fossil & Hydro.

"I think that's the heart of the reason for the second study (the enhanced model) - was to add more detail behind it, more site specificity, some more details, and, you know, spend some more money to really understand in more detail what potentially was going to happen there."

The more sophisticated model was "an enhancement of the approach originally envisioned for this project," URS stated.

The enhanced modeling, using the most conservative, worst-case-scenario leaching data for arsenic, found it would take about 400 years for it to get to the property boundary, where the

concentrations would be under the drinking-water standard, said Dan Genest, a Dominion spokesman.

While in various passages the December 2001 URS study refers to the use of "conservative assumptions" in the final modeling, its summary section states:
"... Less than realistic and/or overly conservative assumptions associated with the more simplistic model initially considered in this study were eliminated," it added.
"The goal of the upgraded model was to predict the groundwater concentrations at the site property boundaries more accurately while providing Dominion with a technically defensible approach," it concluded.

Extensive leaching data on the fly ash from Dominion's Chesapeake Energy Center - both from its lined, regulated ash landfill and from its silos containing "fresh" ash - was included in URS' December 2001 report.

URS analyzed a broad array of samples of fly ash, including raw fly ash and some mixed with binding agents such as cement kiln dust and lime kiln dust in varying percentages.
Their analyses identified seven "chemicals of potential concern" - chemicals that were leachable from Dominion's fly ash and which could be transported to groundwater. Those substances were arsenic, lead, vanadium, beryllium, chromium, selenium and thallium - each profiled on the federal Agency for Toxic Substances & Disease Registry's Web site.
The consultants estimated that 82 percent of the residential wells around the site drew water from the shallow Columbia aquifer that lies under the golf course property.
The study said that wells drawing water from this aquifer were "potential receptors" of elements that could leach from the amended ash used to fill the golf course site.
Toward the end of its report, after assuring Dominion that the chosen study model showed "acceptable levels of chemicals once they reach the property boundary," URS recommended that the utility come up with a strategy for long-term groundwater monitoring, in order to avoid any surprises.

"Groundwater conditions during and after completion of the ash fill can be predicted by models, but can only be authenticated by groundwater quality monitoring once the project is under way," URS stated.

The transfer of ash from Dominion's plant to the golf course site began in the spring of 2002 and ended in the spring of 2007, Dominion officials have said.
The golf course opened in the fall of 2007.

While Dominion had obtained an easement from the property owner in 2002 to install monitoring wells around the perimeter, it didn't follow through until late last year, months after questions surfaced.

"I don't know that we were in the long-term maintenance mode at that point in 2008 for a project that was just completed in 2007 that had recommendations associated with it that are centuries down the road," Rives said.

In addition to the two URS stud ies, Dominion commissioned another study by GAI Consultants, dated May 2003, a year after ash placement had begun on the golf course.
The GAI study looked at the potential groundwater impacts from ammonia expected in Dominion's fly ash after the installation of new equipment at its plant.

GAI warned that workers involved in the transfer and distribution of the fly ash, as well as nearby residents, would be subject to some risk from ammonia gas.

"Also, local residents may be exposed to ammonia gas that is transported by wind," GAI stated. "Health concerns may become apparent when there is overexposure to ammonia largely through inhalation or direct skin contact."

The report said that ammonia is "a severe irritant to the eyes, respiratory tract, and skin," and advised workers involved in the mixing, handling and distribution of the ash to wear goggles, gloves, long-sleeve pants and shirts, and to consider using respirators.
Robert McCabe, (757) 446-2327, robert.mccabe@pilotonline.com

EPA-R5-2013-003300RR-276

[redacted]

06/03/2009 07:49 PM

To Timothy Drexler, Larry Johnson, vblumenfeld, dsullivan, Susan Pastor, Janet Pope

cc [redacted] "'Chuck Norris'", [redacted], mark hutson, peggy, Paul Kysel, [redacted]

bcc

Subject P.I.N.E.S. Progress Report

TAP MONTHLY PROGRESS REPORT

Date: June 3, 2009
Report Number:
Report Period: June 2008 / May 2009

Site: Pines Area of Investigation
Recipient:
Recipient Group Representative: P.I.N.E.S. Secretary Larry Silvestri
Technical Advisor: Geo-Hydro Inc., Charles H. Norris and Mark Hutson

PROGRESS ACHIEVED:

On behalf of P.I.N.E.S., and without compensation, Geo-Hydro continued to review the Draft Remedial Investigation Report. Geo-Hydro submitted comments to the EPA that pointed out errors and omissions. Geo-Hydro also examined the groundwater model and submitted comments on that model to EPA.

On May 5, 2009 a TAP amendment was signed that added conditions under which P.I.N.E.S. is eligible to receive additional grant funds.

DIFFICULTIES ENCOUNTERED:

The TAP Grant was exhausted at the end of June 2008. Since that time, Geo-Hydro has been reviewing technical information, participating in conference calls and preparing written comments on behalf of P.I.N.E.S. without payment.
Due to the confidentiality of draft documents, P.I.N.E.S. has been restricted in keeping the public informed regarding activities in the Pines Area of Investigation.

PERCENT OF PROJECT COMPLETED TO DATE:

Undetermined

MATERIALS PRODUCED THIS MONTH:

During the last year, Geo-Hydro participated in meetings and submitted comments.

ACTIVITY ANTICIPATED IN NEXT MONTH:

During the next month we anticipate that the EPA will be reviewing comments on the Revised Draft Remedial Investigation Report and Groundwater Model.

EPA has requested that P.I.N.E.S. resume submitting invoices for costs incurred by technical advisors and other eligible expenses under the amended TAP agreement. P.I.N.E.S. has requested that Geo-Hydro, Inc submit an invoice for unbilled effort incurred in reviewing and commenting on the Remedial Investigation and groundwater model.

Progress 2009-6-3.doc Progress 2009-6-3.pdf

EPA-R5-2013-003300RR-277

[redacted]
08/01/2009 06:58 PM

To KHERRON, Val Blumenfeld, dsullivan, Timothy Drexler

cc [redacted], [redacted], "'Chuck Norris'", [redacted], [redacted], [redacted], mark hutson, peggy, Paul Kysel, [redacted], [redacted]

bcc

Subject PINES' US Mail Address

All,

The PINES group no longer has a Beverly Shores post office box.

US Postal addresses for officers of the PINES (People in Need of Environmental Safety) group are:

James (Bud) Prast, President
[redacted],
[redacted]

Paul Kysel, Vice President
[redacted]
[redacted]

Diane Egilske, Treasurer
[redacted]
[redacted]

Peggy Richardson, Treasurer
[redacted]
[redacted]

Larry Silvestri, Secretary
[redacted] Ave.
[redacted]

Thank you,
Larry Silvestri
[redacted]

EPA-R5-2013-003300RR-278

"Alan Murray" <Exemption 6 Exemption 6>
08/05/2009 01:39 PM

To Timothy Drexler
cc
bcc
Subject bottled water

Hi Tim,

I hope you are enjoying your summer. I have a question about the bottled water in the RI area. Are homes in the RI area still receiving bottled water? Is so, who needs to be contacted to set up the delivery? If not, why are they not receiving water any longer?

Regards,
Cathi Murray

EPA-R5-2013-003300RR-279

Timothy Drexler/R5/USEPA/US
08/05/2009 07:29 PM

To "Alan Murray"
cc
bcc
Subject Re: bottled water

Hi Cathi:

My summer is going very well. I hope that yours is also.

Yes, the folks that were listed in the Order to the responsible parties are still receiving bottled water , except for those south of the known aquifer. Has someone new moved into that area that we need to get on the list of bottled water?

I plan to be in the area next Friday, August 14th. Would you be interested in meeting?
-Tim

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

-----"Alan Murray" < Exemption 6 Exemption 6 > wrote: -----

To: Timothy Drexler/R5/USEPA/US@EPA
From: "Alan Murray" < Exemption 6 Exemption 6 >
Date: 08/05/2009 01:39PM
Subject: bottled water

Hi Tim,

I hope you are enjoying your summer. I have a question about the bottled water in the RI area. Are homes in the RI area still receiving bottled water? Is so, who needs to be contacted to set up the delivery? If not, why are they not receiving water any longer?

Regards,
Cathi Murray

EPA-R5-2013-003300RR-280

Laurence Silvestri
Exemption 6
08/19/2009 04:40 PM

To Timothy Drexler, Val Blumenfeld, dsullivan
cc Exemption 6, Exemptio..., "'Chuck Norris'", Exemption 6, Exemption 6, Exemption 6, mark hutson, peggy, Paul Kysel, Exemp..., Exe...
bcc
Subject Re: Status of EPA review of Pines Site Groundwater Model

Tim, Val and Dan,

Can you give us an update on the request for distribution to reimburse Geo-Hydro for their work?

Thanks,
Larry Silvestri

--- On **Wed, 8/19/09, Drexler.Timothy@epamail.epa.gov** ***<Drexler.Timothy@epamail.epa.gov>*** wrote:

From: Drexler.Timothy@epamail.epa.gov <Drexler.Timothy@epamail.epa.gov>
Subject: Status of EPA review of Pines Site Groundwater Model
To: kherron@idem.in.gov, vblumenfeld@bibtc.com, dsullivan@nisource.com, Johnson.Mark@epamail.epa.gov, pete_penoyer@nps.gov, brenda_waters@nps.gov, Exemption 6
Cc: Tanaka.Joan@epamail.epa.gov, Johnson.Larry@epamail.epa.gov, Jablonowski.Eugene@epamail.epa.gov, Karecki.Edward@epamail.epa.gov, lbradley@ensr.com, eperry@ensr.com, Exemption 6 @geo-hydro.com, cnorris@geo-hydro.com
Date: Wednesday, August 19, 2009, 9:00 AM

Hi all:

Last week EPA Chicago had a conference call with our Ada, Oklahoma office to review the status of their work on the Town of Pine Groundwater Site. Unfortunately, we all concluded that their work is not yet complete. The Ada Office committed to us that their review of the model and model comments will be completed by September 2, 2009. On that date, EPA will again have an internal conference call to discuss Ada's findings.. We then hope to follow up with discussions with you, and ultimately working toward a conclusion to the RI Report.

I'm sorry to be telling you this news. We are all also very disappointed with the delay. I will keep in touch with all of you as this progresses.

Thanks.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J

Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

EPA-R5-2013-003300RR-281

Laurence Silvestri
[redacted]
09/03/2009 10:11 PM

To Timothy Drexler

cc [redacted], [redacted], "'Chuck Norris'", [redacted], [redacted], [redacted], mark hutson, peggy, Paul Kysel, [redacted], [redacted]

bcc

Subject Your request for a meeting with PINES

Tim,

Thank you for your offer of assistance.

The PINES met regarding your request for a meeting. We are available 6:00pm, Thursday, September 17, at the Pines Township Trustee's office, 12 E. Dunes Highway, Beverly Shores.

Please let us know if this is convenient for you.

Sincerely,
Larry Silvestri

EPA Letter 8-27-09.pdf

EPA-R5-2013-003300RR-282

Charles Norris
<cnorris@geo-hydro.com>
09/15/2009 02:56 PM

To Larry Silvestri, Paul Kysel
cc "Exemp...", Mark Hutson, Timothy Drexler
bcc
Subject USEPA's review of Pines groundwater model

Larry and Paul,

Mark spoke with Tim Drexler this morning. He asked that we send him a Word version (the copy previous sent was PDF-format) of our non-groundwater comments to facilitate incorporation of comments in a document he is now preparing. Since the comments had been previously sent, we agreed to send the Word version without checking first with PINES. I hope we didn't overstep our authority.

Apparently the review of the AECOM groundwater model being done this summer by USEPA's modeling experts in Ada OK has been finished and the report is being reviewed by USEPA in Chicago. The full Ada report should be distributed shortly, once USEPA in Chicago has assessed it.

--
Chuck

Charles H. Norris
Geo-Hydro, Inc.
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-283

Charles Norris
<cnorris@geo-hydro.com>

09/28/2009 11:38 AM

To Timothy Drexler

cc kherron, brenda_waters, silvestri, Exemptio..., pete_penoyer, Bob Kay

bcc

Subject Re: Pines Site Ground water model

Mr. Drexler:

Thank you for including me on your email of 25Sep09, reporting USEPA's intention to proceed with the Pines Area RI/FS, including the HHRA, without a ground water model and "... without any interpretations of ground water flow direction." You invited comments and questions.

What you sent is not entirely clear to me. In order to facilitate our assisting PINES' with its obligation to inform and educate the public about the SuperFund process and how that process will impact this community specifically, please clarify the following, as you can.

From the document GW_model_Ada_com.doc:

> "Additional Comments of the Numerical Ground-Water Flow Model for the town of Pines, IN Ground-Water Plume (09-R05-002)"

Comment: This subject line indicates that there are previous comments from the Ada center addressing AECOM's Numerical Ground-Water Flow Model.

Question: Do you intend that the previous comments also be made available to PINES and other stakeholders? If previous comments were only made verbally, e.g., in a phone conversation, do you intend that the logs of the conversations be made available to PINES and stakeholders?

From the document gw_model_wayforward.doc

> "The mathematical ground water flow model generated by AECOM, the Pines Site PRP contractor, appears to reflect historical groundwater contaminant concentrations."

Comment: This statement is wrong at two levels. 1) The AECOM model as released for review did not present any computations of the distribution of contaminant concentrations for such comparison directly. 2) As discussed in the first web conference of the model, the particle tracking that was computed by the AECOM model as released for review unambiguously established that the historical patterns of contamination that exist(ed) in the Town of Pines neighborhood north of north Yard 520 COULD NOT have resulted from the flows computed in the model simulations.

Questions: Is the cited quotation missing a critical "not," as a typographic error? If there is no typo, does USEPA's decision to proceed as indicated rely in any way on the false statement above, that historical contamination patterns are "reflected" by the model? If it does so rely, to what degree and in what way?

> "... as outlined in EPA's specific comments to the RI Report."

Question: At what point, and how, will USEPA distribute its "specific comments" to PINES and other stakeholders? Will those comments be made available for review prior to publication of the RI Report?

Question: When, and in what format, will USEPA share details of how it envisions someone computing meaningful "human health and ecological risks" while "... omitting interpretations of groundwater flow direction and contaminant transport ..."

From your email:

> "As you will read, EPA has concluded that the model is not useable. Instead of taking the time required to substantially rework the model, an effort that we estimate could take an additional 6 months, we would like the PRP to finalize the Remedial Investigation Report without any interpretations of ground water flow direction."

Question: Are you aware of any other SuperFund site involving a ground water plume impacting drinking water wells that does not rely in part upon a ground water model or that has finalized a Remediation Investigation Report "without any interpretations of ground water flow direction" as is now proposed at Pines? Could you provide up to three analogous sites, if some exist?

Comment: As a company, AECOM routinely builds and uses ground water models. In their promotional materials, it is a forte. Based upon GHI's interaction with AECOM modelers, they are knowledgeable, capable and sophisticated. Yet, in more than 18 months, with substantial feedback from stakeholders, they did not produce a usable model in the independent opinions of IDEM, the National Park Service, GHI, and USEPA's industry consultants in Ada, OK. Above, you estimate production of a usable model should take six months.

Question: Did USEPA at any point confront the PRPs and insist that they direct their consultants to produce a usable model? If so, when, by whom, and in what manner?

Comment: Since AECOM was allowed to expend 18 months and substantial resources by all stakeholders on the modeling exercise, presumably USEPA perceived the ground water model to be a need that was integral to the RI/FS process, including the HHRA exercise, and developing a defensible Record of Decision.

Question: If a ground water model is integral to the total process, is not an additional six months to produce a usable model the appropriate decision?

Question: If a ground water model is NOT integral to the total process, why did USEPA allow the excessive length of the delay of the RI/FS process at Pines, before terminating the exercise of competent people not producing a usable ground water model? To what end was the exercise allowed?

Comment: One concern repeatedly expressed by the citizens in the emergency response area was that after municipal water was introduced to the neighborhood, previously unexperienced flooding began. A usable ground water model would have allowed a meaningful investigation of whether the emergency response by the USEPA was creating unanticipated damage to citizens and their homes.

Question: In the absence of a usable ground water model, by what program or investigation will USEPA assess and determine the degree to which its emergency response of bringing in municipal water without the concomitant municipal sewer systems is causing or contributing to the flooding problem?

> I would like to thank everyone for the considerable amount of time and effort you have spent on this review.

Comment: Your welcome.

Comment: An integral part of educating the public about processes and impacts is explaining how the money flows and how decisions are reached regarding how the money flows. For example, does the citizenry pay for the process through higher taxes, or higher utility rates.

Question: Does USEPA plan to disclose how much all stakeholders, except PINES, were compensated for their "considerable time and effort on the review," and by whom? Does USEPA plan to disclose the process(es) by which the compensation decisions were reached and by whom? If USEPA does not plan to disclose such information, does USEPA have any recommendations by which PINES can obtain the information?

> I wish that we had a more positive result.

Comment: I don't agree with this assessment. It can only be a positive result that an unusable ground water model was recognized as unusable. Had that not been so recognized, the model would have been used as an engine to drive and support subsequent RI efforts and decisions, including the HHRA, that would be invalid. It is not at all clear that the process can defensibly continue without a usable ground water model, and I will look forward to a detailed rationalization of how that can be done. But, although it took far longer to get where we are than it should have, identifying the AECOM effort, process, and product as unusable is definitely a positive result.

I will send more comments and questions as they occur to me. This is merely an initial response.
--
Chuck

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1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-284

Pete_Penoyer@nps.gov
09/29/2009 04:07 PM

To Timothy Drexler
cc brenda_waters, cnorris, Bob Kay, kherron, Exemption 6, silvestri
bcc
Subject Re: Pines Site Ground water model

Thanks Tim for sharing EPA's evaluation,

NPS Natural Resource Program Staff and Management along with the Park will be reviewing the EPA evaluation and EPA's proposal to complete the RI in the absence of a useable groundwater model. I believe we would all find your response to Mr. Norris's recent questions helpful in our understanding the benefits that will be gained/lost by proceeding in this manner. I also think it could be very informative if there was a discussion between EPA contract reviewers and stakeholders as you did mention to me that stakeholder comments would be shared with the model reviewers.

While I would agree with the EPA reviewers that various model calibration issues were of concern (that may have been their primary focus), there was no mention of the NPS overriding issue with the model and our stated basis for its singular outright rejection expressed to EPA. That is, an unsupported stratigraphic pinchout of Model Layer 4 (laden with the contaminants) was employed by AECOM immediately north of Yard 520 (comment attached below). This was apparent to those who could look at the various model cross sections with the GMS User Interface (viewer) in conjunction with the Layer 4 Transmissivity Contour Map requested by NPS and provided by AECOM. This stratigraphic constraint would normally be expected to create the barrier to further north or northwestward flow that instead drove or greatly facilitated particle tracking toward the northeast in all of AECOM model outputs as their webinars demonstrated (NE became the path of least resistance under these geologic/stratigraphic constraints). Stakeholders were not aware of this stratigraphic construct at the time of the AECOM webinars. Previously AECOM had only offered their layer cake conceptual model of relatively consistent layer thickness (Appendix L. p. 3-3.) which is acceptable and consistent with USGS published cross sections for the surficial aquifer in the area. Only subsequently, after viewing the model using the GMS User Interface could we begin to understand why AECOM's webinar demonstration that changes to nearly all the numerical modeling parameters or variables (within a reasonable range), resulted in little effect on the flow/particle tracking outcomes given the previously hidden stratigraphic constraint. However, some unknown/invisible constraint was hypothesized by Mr. Norris at the time. This unseen, unsupported, yet unacknowledged construct by AECOM and buried in the model stratigraphy resulted in a highly misleading flow depiction to EPA and the stakeholder participants in those webinars.

I believe if the EPA contract model reviewers had participated in the AECOM webinars, they like me, would have been sensitive to or readily identified these stratigraphic constructs as a clear manipulation of the model to achieve a desired outcome. This one construct is potentially much more significant to model output than improving calibrations in several areas. This stratigraphic fix, along with the others of a calibration nature that EPA contract reviewers have identified, should not be difficult given the high level of competence demonstrated by AECOM modelers and Hydrogeologist.

Tim, could you please confirm that:

1) both the Ada Lab Director and the EPA contract reviewers received copies of stakeholder comments as you had indicated or
2) it was subsequently determined by you or the lab Director that a blind evaluation was preferable (which is understandable) or
3) EPA contract reviewers never opened up the GMS Groundwater Model Interface (viewer) in conjunction with the Layer 4 Transmissivity map to determine if thickness changes in Layer 4 could have played a major role in the AECOM model derived flow paths or
4) The unsupported Layer 4 pinchout was not previously addressed in some set of "initial comments" seeing that it was not covered in these "additional comments" referred to by the lab Director in his August 9 Memorandum

This group will either decide to go forward with an RI based on a groundwater model or it will not. I would hope there is a clear concensus reached on what fixes are most necessary from the stakeholder comments and EPA contract reviewers comments before ruling out a groundwater model which is so integral to understanding future risk at a site where groundwater is the key contaminant migration pathway. You can understand that if EPA Ada Lab disagreed with what NPS believes to be the overriding flaw with this groundwater model, we would want to discuss that with them to gain a better understanding of their views before a consensus on what needs to be fixed is reached. I would also be happy to contact Dr. Burden directly to discuss this if you would prefer.

I also spoke with our in-house risk assessor who formerly worked for EPA and he responded that it was unclear to him how this type of RI and subsequent risk assessment could proceed without a useable groundwater model. However, we are prepared to consider EPA's supporting rationale to proceed with the RI and risk assessment without a useable groundwater model and how risk would be determined going forward.

regards all, (See attached file: NPS TechCom#1.doc)
Pete

Peter E. Penoyer
Hydrologist, WRD
1201 Oakridge Dr., Ste. 250
Ft. Collins, CO 80525
Ph 970-225-3535
Fax 970-225-9965
email: pete_penoyer@nps.gov

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| To: kherron@idem.in.gov, brenda_waters@nps.gov,
Exemption 6 |
| cc: Exemption 6 @geo-hydro.com, pete_penoyer@nps.gov,
cnorris@geo-hydro.com, kay.bob@epamail.epa.gov |

| Subject: Pines Site Ground water model
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Hi everyone:

Attached please find the results of EPA's evaluation of the ground water model developed by AECOM, contractor to the potentially responsible parties (PRPs) for the Pines Site. As you will read, EPA has concluded that the model is not useable. Instead of taking the time required to substantially rework the model, an effort that we estimate could take an additional 6 months, we would like the PRP to finalize the Remedial Investigation Report without any interpretations of ground water flow direction. A human health and ecological risk assessment would then be required. If it is determined that there are potentially unacceptable risks from ground water, remedial alternatives would have to include options that reduce the ground water risk to receptors without constraints on direction. I have also attached some proposed language that I would add to a response to the PRPs. Please let me know what you think.

After you have had an opportunity to review EPA's attached results "GW_model_Ada", if you would like an opportunity to discuss these results with or without EPA's reviewers, please respond with that request. I will then set up a conference call for our discussion.

I would like to thank everyone for the considerable amount of time and effort you have spent on this review. I wish that we had a more positive result. We will just have to me more conservative as we move through the process of evaluating potential impacts from the CCBs. Please call me if you have any questions.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367

fax: 312.886.4071 NPS TechCom#1.doc

EPA-R5-2013-003300RR-285

Pete_Penoyer@nps.gov
10/06/2009 01:49 PM

To Timothy Drexler, Gary_Rosenlieb
cc brenda_waters, cnorris, Bob Kay, kherron, silvestri, Shawn_Mulligan, Charles_Morris
bcc
Subject Re: Response to comments

Tim,

The best call time for NPS in a call with Kerr Lab/contractors and other interested stakeholders would be next Thursday, Oct. 15 if you can get us the information you mentioned below by late this week. That would gives us enough time to review before the call. We note that Oct. 12 is a Fed. Holiday and we agree that date would not work. I am open to any time on the 15th if you want to propose something after checking with other stakeholders that may be interested.

RE to your note below:
"Ada did receive your comments and I asked them to respond to them as a part of their review. With regard to the "initial" comments they mention, their first review did not incorporate addressing your concerns. I will let them discuss with you any differences in the two documents. I do not know whether they opened the GMS viewer."

I was a little perplexed by this as the primary issue with the model expressed by NPS and the basis for our outright rejection was the hydro-stratigraphic thickness variations that only became apparent when one could look at the cross sections in GMS interface or some equivalent viewer. Stratigraphic manipulations clearly can be used to direct groundwater flow to provide an unrepresentative outcome, far more than 5 to 10% calibration errors in several areas that Kerr Lab took issue with and that we also saw as a problem. My sense is that this is particularly true when contaminants are confined to a single model layer (layer 4, Which AECOM did with their "strong vertical gradient" theory - possibly applicable but unsupported by data) upon leaving Yard 520 and then this layer thins significantly or pinches out abruptly in the down gradient direction groundwater would normally be expected to flow and thus preclude such flow.

My main remaining question is why when you directed EPA Lab to address stakeholder comments and NPS placed so much emphasis on this unsupported stratigraphic/model layer 4 change as our primary concern with the model, that it went unaddressed by Kerr Lab in their comments?

Please speak with the lab director before this call and get clarification on this point.

Thanks,
Pete

Peter E. Penoyer
Hydrologist, WRD

1201 Oakridge Dr., Ste. 250
Ft. Collins, CO 80525
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email: pete_penoyer@nps.gov

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| To: cnorris@geo-hydro.com, pete_penoyer@nps.gov
|
| cc: brenda_waters@nps.gov, [redacted], kay.bob@epamail.epa.gov, kherron@idem.in.gov |
| Subject: Response to comments
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Hi Chuck and Pete:

Thank you both for your comments. I've combined and paraphrased your comments for a response. If I've missed anything let me know. I'm still gathering the cost information Chuck requested. I will send out another note with what I can gather . In the mean time, here are answers to some of your questions:

As I mentioned in my email message, I'm fine with a conference call with the Ada folks. Please let me know your availability this week or next and I will check with them also. Right now my week is open except Oct. 9th. Next week the only bad day is Oct. 12th. Let me know when is convenient.

Ada did receive your comments and I asked them to respond to them as a part of their review. With regard to the "initial" comments they mention, their first review did not incorporate addressing your concerns. I will let them discuss with you any differences in the two documents. I do not know whether they opened the GMS viewer.

We obviously do not feel that a computer model of groundwater flow is integral to the understanding of future risk and feel that the RI/FS or RD/RA can continue without one. I'm currently working on modifications to the groundwater contamination remedy for the Conrail Site in Elkhart, Indiana. We have a lot of good groundwater data and did not feel that a mathematical model was necessary to develop a plan of action. In that example, we are modifying an inadequate existing remedy and will gauge the performance of the revised remedy with a monitoring well network. There are other examples listed below.

A correction: I stated in my last email that we would proceed without interpretations of groundwater flow direction. I should have said we would proceed without computer modeling of groundwater flow. The RI does contain an interpretation of groundwater flow direction based on water-level measurements collected during the RI. Interpretations of future flow direction though, as I mentioned, will have to be conservative.

Q1: You stated that the following statement from my email message was false: "The mathematical ground water flow model generated by AECOM, the Pines Site PRP contractor, appears to reflect historical groundwater contaminant concentrations." You also asked about the significance of that statement going forward.
A1: You are right that the AECON model did not include concentrations. Sorry for my mis-statement. However, overall the model did appear to reflect the historical distribution of contamination. Stating that in no way takes away from the flaws revealed in the model leading to EPA's decision.

Q2: Will EPA's comments on the RI Report be distributed prior to publication in the RI Report?
A2: EPA will distribute a draft of the combined RI Report Comments at the end of this week to IDEM, NPS, and PINES for review and comment prior to their submittal to the PRP.

Q3: How will the HHERA be developed without a groundwater model's interpretation of gw flow?
A3: The PRPs will be required to develop conservative assumptions of future gw flow based on the data collected during the RI. FS alternatives, if needed, will likewise have to be conservative with regard to groundwater contaminants and flow. Example remedial alternatives could include groundwater clean-up and long-term groundwater monitoring.

Q4: How can EPA continue the RI/FS without a mathematical gw model? Are there other SF sites without a numerical gw model?
A4: Many groundwater sites within EPA Region 5 do not have a mathematical model as the basis for an FS and remedy, including: WAUCONDA SAND AND GRAVEL, BYRON SALAVAGE YARD, PARSONS CASKET, CITY OF TROY, HI MILL, LITTLE SCIOTO RIVER, DIXIE AUTO, ILADA, SEVERAL PEOPLE'S GAS SITES, ELM STREET, and ELLSWORTH INDUSTRIAL SITE,

Q5: Did EPA confront the PRPs to develop a useable gw model?
A5: EPA's discussions on the GW model were with the model developers and their project managers.

Q6: Was the gw model an integral part of the RI/FS process? If not, why did EPA allow so much time for its development?
A6: The generation of a groundwater model was not a requirement of the statement of work attached to the Administrative Order on Consent with the PRPs for an RI/FS. It was, however, part of a subsequent agreed work plan. For that reason, EPA spent the time to review the original gw model developed by the PRP contractor and its modifications.

Q7: How will EPA determine if there is residential flooding based on the removal actions?
A7: There are pre-existing wells and a number of new monitoring wells in the Pines area and elsewhere in NW Indiana. That well network could be used to determine if fluctuations in groundwater elevation coincide with the municipal water supply. A study is also being performed by USGS to investigate residential flooding in the Beverly Shores area. That study may also provide insight into possible causes of residential flooding at Pines.

Q8: Will EPA disclose the amount of compensation received by all parties in the development and review of the gw model? If not, how can P.I.N.E.S. learn these costs?
A8: EPA can release some information on costs, including any grants to state or federal agencies. EPA can also obtain estimates of contractor costs. Some information is not releasable as confidential business information, including hourly rates and personnel. However, the total contractor cost can be provided. As I mentioned earlier, I will get that information together in a separate email message.

Thanks, again. Please contact me if I missed anything and to set up a conference call with the Ada folks.

-Tim

Tim Drexler
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phone: 312.353.4367
fax: 312.886.4071

EPA-R5-2013-003300RR-286

Timothy Drexler/R5/USEPA/US
10/08/2009 10:34 AM

To "[redacted]"
cc "Bud Prast", "nancy kolasa", peggy, "Paul Kysel", silvestri
bcc
Subject Re: HH risk reviewer for LLBO

Thanks, Jan. I passed on the date and time to everyone here. Looks like it'll be me, Don Bruce (acting Branch Chief), Janet Pope, and Eric Morton (HH risk assessor for the site).

See you then.

-Tim

"[redacted]" Tim: Definitely 10-22 at 7:00 pm. Plac... 10/08/2009 10:14:08 AM

From: "[redacted]" <[redacted]>
To: Timothy Drexler/R5/USEPA/US@EPA
Cc: "Bud Prast" <[redacted]>, "nancy kolasa" <[redacted]>, <[redacted]>, "Paul Kysel" <[redacted]>, <[redacted]>
Date: 10/08/2009 10:14 AM
Subject: Re: HH risk reviewer for LLBO

Tim: Definitely 10-22 at 7:00 pm. Place to be determined.

jan nona

----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "[redacted]" <[redacted]>
Cc: "Bud Prast" <[redacted]>; "nancy kolasa" <[redacted]>; <[redacted]>; "Paul Kysel" <[redacted]>; <[redacted]>
Sent: Wednesday, October 07, 2009 12:28 PM
Subject: Re: HH risk reviewer for LLBO

> Hi Jan:
>
> I checked with everyone here. It looks like Oct. 22nd would be the best
> date for all of us. Let me know how that works for P.I.N.E.S.
>
> -Tim
>
>
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>
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> From: "[redacted]" <[redacted]>
>
> To: <[redacted]>, Timothy Drexler/R5/USEPA/US@EPA
>
> Cc: <[redacted]>, "Paul Kysel" <[redacted]>,
> "nancy kolasa" <[redacted]>, "Bud

> Prast" <Exemption 6 Exemption 6>
>
> Date: 10/07/2009 11:13 AM
>
> Subject: Re: HH risk reviewer for LLBO
>
>
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>
>
> Tim: Larry isn't available to answer your e-m right now. However, we
> are tentatively looking at 10-19 or 22 for the meeting.
>
> Larry will get back to you when it is finalized.
>
> jan nona
> ----- Original Message -----
> From: Drexler.Timothy@epamail.epa.gov
> To: Exemption 6
> Cc: Exer Exemption 6 ; Exemption 6
> Sent: Wednesday, October 07, 2009 9:32 AM
> Subject: Fw: HH risk reviewer for LLBO
>
> Hi Larry:
>
> Following up on our meeting, attached is the phone number of the risk
> assessor that worked with the Leech Lake Band of Ojibwe in Cass Lake,
> MN.
>
> Do you know yet whether a meeting with my Branch Chief next Wed or
> Thurs evening will work for all of you?
>
> Tim
>
>
>
> ----- Forwarded by Timothy Drexler/R5/USEPA/US on 10/07/2009 09:29 AM
> -----
>
> From: "John Persell" <jpersell@lldrm.org>
>
> To: Timothy Drexler/R5/USEPA/US@EPA
>
> Cc: "Barbara Harper" <bharper@amerion.com>
>
> Date: 09/30/2009 09:19 AM
>
> Subject: RE: HH risk reviewer for LLBO
>
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>
> We used me. Barbs email is bharper@amerion.com
> Phone 509-967-5174
>
>
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>

>
> From: Drexler.Timothy@epamail.epa.gov [
> mailto:Drexler.Timothy@epamail.epa.gov]
> Sent: Tuesday, September 29, 2009 3:04 PM
> To: John Persell
> Subject: HH risk reviewer for LLBO
>
>
> Hi John:
>
> I've got a non-tribal community group for one of my sites in Indiana
> with whom I discussed the St. Regis Risk Assessment. They are
> interested in who LLBO used for their review of the HHRA. I know that
> Barbara Harper worked for you for a period of time. Did LLBO utilize
> anyone else? It is not a dioxin site. Do you have Barbara's contact
> info? Thanks!
>
> Tentatively, I will be on site this weekend to oversee the hatchery
> test.
>
> -Tim
>
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> No virus found in this incoming message.
> Checked by AVG - www.avg.com
> Version: 8.5.421 / Virus Database: 270.14.5/2419 - Release Date:
> 10/07/09 05:18:00
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No virus found in this incoming message.
Checked by AVG - www.avg.com
Version: 8.5.421 / Virus Database: 270.14.5/2419 - Release Date: 10/07/09
05:18:00

EPA-R5-2013-003300RR-287

Charles Norris
<cnorris@geo-hydro.com>
10/09/2009 06:13 PM

To Timothy Drexler
cc Pete_Penoyer, brenda_waters, kherron, Exemption 6, silvestri
bcc
Subject Re: Conference Call to discuss Pines Site GW model

> I will let Dave and his folks talk about how
> they felt their comments covered the concerns you raised.

This brings up something that wasn't clear to me from your initial response to questions/comments that were raised subsequent to your notice of the decision not to finish the ground water model. We had been told prior to the distribution of any Ada comments that Region 5 would distribute comments to the model reviewers. So far, we have only seen Ada's "additional comments". In your response, above, to Pete, does "their comments" refer to all of their comments or just the ones you have distributed? If the former, when will comments prior to the "additional comments" be distributed?

I understood Pete' reference to the comments of all stakeholder to mean comments on the model authored by Region 5 (if any), IDEM, NPS, and PINES. I understood the concern he was expressing to be whether all of those comments were provided to Ada's consultants at the time they were originally given the model. If I have that wrong, Pete, please straighten me out. I know I am interested in what Ada's consultants had available, and what they did in fact include in the scope of their review of the model.

Thanks for clarifying.
--
Chuck

Charles H. Norris
Geo-Hydro, Inc.
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-288

Pete_Penoyer@nps.gov
10/09/2009 06:46 PM

To Timothy Drexler
cc brenda_waters, cnorris, kherron, Exemptio..., silvestri, Gary_Rosenlieb
bcc
Subject Re: Conference Call to discuss Pines Site GW model

Thanks Tim,

For our records/files we would like the comments of IDEM and Geo-Hydro on the GW model. I'd like to look at these before our call so I may better understand the concerns with the model expressed by the others. You have supplied the Memo of EPA Kerr Lab (Ada) previously. If Chicago EPA has provided comments separate from those of Kerr Lab to the PRPs, we would like those as well so our files are complete and up-to-date on this subject (electronic files are fine). At the time the decision was made to involve the Kerr Lab in the review of the AECOM model, you communicated to me by phone that you had indicated to PRP's/AECOM (after your initial review of stakeholder comments 4 mos or so back), you thought the Kerr Lab review would likely concur with the stakeholder concerns about the model. Maybe nothing beyond this verbal note to PRPs (?) has been communicated to the PRP's to this point about their modelling effort. I am just not clear on that and where this conference call discussion falls in the PRP communications time line so to speak. There has been a 4 month or more hiatus on this project for NPS so just trying to figure out where we are all at.

Our Ecologist - Risk Assessor (Greg Eckert) and Section Chief (Gary Rosenlieb) will likely be sitting in on the call as will Paula Cutillo, if available.

Have you given any thought to discussion topics/agenda for the call? Some off-the-cuff thoughts.

Kerr Lab/Contractor Summary of what they saw (just the more substantive issues/problems w/ GW Model)
General Concerns with GW Model (anyone - beyond the calibration issues Kerr Lab ID'd)
Specific Concerns with GW Model (anyone)
Fixes (are they simple or complex?) (anyone)
Any Other Model-related Issues?
EPA Proposal to Proceed with RI and ERA in absence of a useable of GW model - Rationale-Analog sites
Additions? (anyone)

regards,
Pete

Peter E. Penoyer
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  | To: Pete_Penoyer@nps.gov
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  | cc: brenda_waters@nps.gov, cnorris@geo-hydro.com,
kherron@idem.in.gov, [redacted]@geo-hydro.com, |
  | pete_penoyer@nps.gov, [redacted]
|
  | Subject: Re: Conference Call to discuss Pines Site GW model
|

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Hi Pete:

You are correct. The call-in time is 9 am central or 8 am mountain time. As for the "#", you will receive a recorded prompt about that when you call in.

I've sent both of your email messages (9/29 and 10/6) to Dave in preparation for the call. I will let Dave and his folks talk about how they felt their comments covered the concerns you raised. I've told Dave that we will need to talk about that.

What did you mean regarding stakeholder comments? Just the gw model comments from Ada EPA and IDEM, or do you need the GeoHydro comments as well?

-Tim

From: Pete_Penoyer@nps.gov

To: Timothy Drexler/R5/USEPA/US@EPA

Cc: [redacted]@geo-hydro.com, cnorris@geo-hydro.com, pete_penoyer@nps.gov, brenda_waters@nps.gov, [redacted], kherron@idem.in.gov

Date: 10/08/2009 05:32 PM

Subject: Re: Conference Call to discuss Pines Site GW model

Sounds good Tim,

That's 8 AM Mtn time right (9 AM central/your time)? If so, may want to confirm. (also no # sign necessary after 10 digit passcode needs to be entered?)

Also, could you see that Dr. Burden has seen the two previous emails I sent
in reply to you (others cc'd). That may make for a shorter and more to the
point call if I don't have to reiterate those points made in the two emails. Did you feel the NPS comment #1 was addressed by Kerr Lab somewhere in the Director's memo? If so, I missed it, so please advise? I
don't want to belabor the point but would like it addressed.
Were you planning to share all stakeholder comments prior to call (IDEM, Geo-Hydro & NPS) along with EPA's comments to PRP's or just EPA's?

regards,
Pete

Peter E. Penoyer
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Fax 970-225-9965
email: pete_penoyer@nps.gov

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| To: Burden.David@epamail.epa.gov,
kay.bob@epamail.epa.gov, charles_morris@nps.gov, |
| [redacted]@geo-hydro.com, cnorris@geo-hydro.com,
pete_penoyer@nps.gov, brenda_waters@nps.gov, |
| [redacted], kherron@idem.in.gov
|
| cc:
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| Subject: Conference Call to discuss Pines Site GW model
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Hi all:

We are scheduled for a conference call on Thursday, October 15, 2009, at
9
am to discuss the results of EPA's Ada, OK laboratory review of the
groundwater model generated by AECOM for the Pines Site PRPs. Please
call
866-299-3188, then 3128866222.

Talk to you soon.

-Tim

Tim Drexler
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phone: 312.353.4367
fax: 312.886.4071

EPA-R5-2013-003300RR-289

Pete_Penoyer@nps.gov
10/13/2009 12:32 PM

To Charles Norris
cc brenda_waters, Timothy Drexler, kherron, Exemption 6, silvestri, Paula_Cutillo
bcc
Subject Re: Conference Call to discuss Pines Site GW model

That is correct Chuck, you have it right.

I would like to know what others saw as flawed in the model, if there was some concensus, and when NPS emphasized a particular model constraint that would appear to so strongly control flow output, why EPA Lab did not appear to mention that given Tim's direction to address stakeholder concerns. If NPS was off base in our evaluation, we would certainly want to know that.

Certainly stratigraphy and how it changes (thickens or thins) is open to interpretation. However, after viewing the boring logs, this extreme a model construct for layer 4 (pinchout/extreme thinning along a several thousand foot trend immediately north of the North Landfill cell) is unsupported given the previous interpretations of the surficial sand aquifer (construct was hidden in the files until those files were shared in the last week or so with stakeholders) and was way beyond a reasonable interpretation. It seemed designed to ensure that even changing conventional variables (model numeric parameters within an accepted range) as was done in the two webinars led by AECOM/ENSR, would still be shown to have no effect on the flow output of the model as indicated in the particle tracking.

Pete

I understood Pete' reference to the comments of all stakeholder to mean comments on the model authored by Region 5 (if any), IDEM, NPS, and PINES. I understood the concern he was expressing to be whether all of those comments were provided to Ada's consultants at the time they were originally given the model. If I have that wrong, Pete, please straighten me out. I know I am interested in what Ada's consultants had available, and what they did in fact include in the scope of their review of the model.

Peter E. Penoyer
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	Charles Norris
	<cnorris@geo-hydr
	o.com>
	10/09/2009 05:13

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  | To: Drexler.Timothy@epamail.epa.gov
|
  | cc: Pete_Penoyer@nps.gov, brenda_waters@nps.gov,
kherron@idem.in.gov, [redacted]@geo-hydro.com, |
  | [redacted]
|
  | Subject: Re: Conference Call to discuss Pines Site GW model
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> I will let Dave and his folks talk about how
> they felt their comments covered the concerns you raised.

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I understood Pete' reference to the comments of all stakeholder to mean comments on the model authored by Region 5 (if any), IDEM, NPS, and PINES. I understood the concern he was expressing to be whether all of those comments were provided to Ada's consultants at the time they were originally given the model. If I have that wrong, Pete, please straighten me out. I know I am interested in what Ada's consultants had available, and what they did in fact include in the scope of their review of the model.

Thanks for clarifying.
--
Chuck

Charles H. Norris
Geo-Hydro, Inc.
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-290

"HERRON, KEVIN" <KHERRON@idem.IN.gov>
10/14/2009 06:14 AM

To Pete_Penoyer, "Charles Norris", Timothy Drexler
cc brenda_waters, [redacted], silvestri, Paula_Cutillo, "SPINDLER, KEVIN", "MICHIRA, WILFRED", "JOHNSON, KEVIN", "HERRON, KEVIN"
bcc
Subject RE: Conference Call to discuss Pines Site GW model

If it (the GW Model) is not going to be used and be discounted, then IDEM staff do not see the benfit and need to spend any eXtra time time and effort on it. I am sure that the PRPs would agree that they should not spend any additional funds to those that they reimburse for additional time on something that has been determined to be of no use and rejected. Tim can share IDEM's draft comments as they will not be technical differnet than the draft version. IDEM staff (particularly technical staff) have had many of the same issues that have been previously expressed in writing and during verbal exchanges (i.e., webex, conference calls) by NPS (Pete Penoyer) and the PINES consultant (Chuck Norris) and discussions with EPA. Now, if it (the GW Model) is deemed to be pertinent and in some manner useable by EPA for decisions moving forward, then IDEM staff agree with additional time and effort being used on the GW Model. IDEM will follow EPA's lead on whether the GW Model will be used or not and participate accordingly. IDEM technical staff each have several hundred sites that require their attention and expertise. Their time and effort is valuable, limited and should be used wisely and expeditiously.

Tim, Please advise on the significance of the GW Model moving forward and your need for IDEM staff continued time and effort addressing it.

Thanks,
Kevin

Kevin D. Herron
Indiana Department of Environmental Management
Mail Code 66-30
Office of Land Quality - Federal Programs Section
100 North Senate Avenue
Indianapolis, IN 46204-2251
(317) 234-0354
(317) 234-0428 (fax)

-----Original Message-----
From: Pete_Penoyer@nps.gov [mailto:Pete_Penoyer@nps.gov]
Sent: Tuesday, October 13, 2009 1:32 PM
To: Charles Norris
Cc: brenda_waters@nps.gov; Drexler.Timothy@epamail.epa.gov; HERRON, KEVIN; [redacted]@geo-hydro.com; [redacted]; Paula_Cutillo@nps.gov
Subject: Re: Conference Call to discuss Pines Site GW model

That is correct Chuck, you have it right.

I would like to know what others saw as flawed in the model, if there was some concensus, and when NPS emphasized a particular model constraint that would appear to so strongly control flow output, why EPA

Lab did not appear to mention that given Tim's direction to address stakeholder concerns. If NPS was off base in our evaluation, we would certainly want to know that.

Certainly stratigraphy and how it changes (thickens or thins) is open to interpretation. However, after viewing the boring logs, this extreme a model construct for layer 4 (pinchout/extreme thinning along a several thousand foot trend immediately north of the North Landfill cell) is unsupported given the previous interpretations of the surficial sand aquifer (construct was hidden in the files until those files were shared in the last week or so with stakeholders) and was way beyond a reasonable interpretation. It seemed designed to ensure that even changing conventional variables (model numeric parameters within an accepted range) as was done in the two webinars led by AECOM/ENSR, would still be shown to have no effect on the flow output of the model as indicated in the particle tracking.

Pete

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Peter E. Penoyer
Hydrologist, WRD
1201 Oakridge Dr., Ste. 250
Ft. Collins, CO 80525
Ph 970-225-3535
Fax 970-225-9965
email: pete_penoyer@nps.gov

|---------+---------->
| Charles Norris |
| <cnorris@geo-hydr|
| o.com> |
| |
| 10/09/2009 05:13 |
| PM CST |
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>----------
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| To: Drexler.Timothy@epamail.epa.gov
|
| cc: Pete_Penoyer@nps.gov, brenda_waters@nps.gov,
kherron@idem.in.gov, Exemption 6 @geo-hydro.com, |
| Exemption 6
|
| Subject: Re: Conference Call to discuss Pines Site GW model
|

>----------
----------|

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Thanks for clarifying.
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Chuck

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(303) 322-3171

EPA-R5-2013-003300RR-291

Charles Norris
<cnorris@geo-hydro.com>
10/17/2009 12:25 AM

To Timothy Drexler
cc pete_penoyer, brenda_waters, silvestri, Bob Kay, kherron
bcc
Subject Re: Response to comments

Good afternoon, everyone,

In the past several weeks, I have heard or seen comments ,like those below:

"The mathematical ground water flow model generated by AECOM, the Pines Site PRP contractor, appears to reflect historical groundwater contaminant concentrations."

"However, overall the model did appear to reflect the historical distribution of contamination."

"The mathematical ground water flow model generated by AECOM, the Pines Site PRP contractor, appears to reflect the historical location of groundwater contamination."

I believe such statements are quite simply wrong, and not subtly or trivially so. In fact, it was the discordance between the results of the ground water model and the historical contamination data that triggered GHI's in-depth investigation of the model and our calls for the opportunity to examine the model input files.

The following is a discussion of the Pines Site data and its comparison to the PRP's contractor's modeled simulations of groundwater flow.

The Pines Site ground water model was never calibrated to the historic conditions that controlled the flows existing when the contamination developed across Pines. There was never a modeled attempt to run a simulation that would "reflect" the historic contamination patterns or reproduce them.

The closest approach of the model to simulating that period was a scenario of taking today's conditions as represented with the final "calibrated" model and modifying it by reducing the recharge in the areas that were provided municipal water (Simulation A). The purpose offered for this modification was represented as investigating head level changes potentially relating to concerns of localized flooding and ponding caused by the introduction of municipal water but not sewer.

Although this run was not presented for, or represented as being for, purposes of reflecting historical contamination patterns, particle tracking was implemented and displayed as output (Figure 5-2). In the area north of North Yard 520, a total of three particles, from among many dozens released, tracked in map view through the residential area, away from US 20, eastward to Brown Ditch. Presumably this display and comments offered by PRP's contractors during discussions with reviewers created the impressions expressed in the quotes above.

A close examination of Appendix L Figure 5-2 (blow up to 800% and identify the wells from Figure 4-5) shows the following:

Each of the particles originated in the NW corner of North Yard

520

Each of the particles exited North Yard 520 in the vicinity of and between MW-1R and well nest TW-13S,D.

Each of these three particles tracked with water flowing through the area sampled by well nest TW-13S, D.

Each of these three particles subsequently tracked north of all of the other north-side TW well nests.

The middle of these three particles tracks with water passing by MW-105.

Particles tracking through in the vicinity of all other TW well nests are moving eastward, not northward into the neighborhood. The concentrations at these wells do not influence the area to the north according to the simulated flow paths.

Base upon the model simulations, each of the three particles is traveling in Layer 4, the bottom of the aquifer, a layer that in this area thins to inches thick. (This cannot be seen in map display on Figure 5-2, but has been verified in the model.)

Thus, to the extent that Simulation A can be inferred as approximating "historical" patterns, the groundwater model shows only water passing by TW-13S,D crosses significantly into the Pines neighborhood north of US 20. The simulated track of flow is largely west to east and represents a very small percentage of all contaminants leaving the North Yard 520 landfill. The center of the simulated neighborhood particle plume passes through MW-105, and the northern boundary of the particles is always at least 4 residences south of US 12.

There are no leachate data to establish the source term for contaminants that are migrating. However, since all particles penetrating significantly into and through the neighborhood pass by TW-13D,S, or near MW-1,1R, the concentration of the plume at those locations wells should be fairly representative of the water quality left the landfill and is migrating into the neighborhood. Attenuation processes can only serve to decrease the concentrations along a flow path. There are no postulated additional sources of contaminants along the simulated migration path between TW-13S,D and MW-105 that could increase the concentration.

Thus, if the PRP's consultant's groundwater model reflects historical contamination patterns, those historical data along the path should show a) greatest contamination at the base of the aquifer, b) minimal contamination north of the particle tracking envelope (some potentially due to diffusion, but no advective transport), and c) a decline in concentrations through the neighborhood between TW-13S,D and MW-105, if there is any active attenuation.

When one considers the water quality data, one observes the following:

Boron concentrations at MW-105 ranged from 0.6 to 2.0 mg/L, with concentrations systematically building with time. (RI Table 2-12, page 3 of 21)

Boron concentrations at TW-13S and -13D are not reported in RI Table
2-12 or in anywhere else in the RI. Yet, these data are critical for establishing whether the groundwater simulation reflects historical contamination patterns. Weaver Boos & Gordon data for April 21, 2003, reported boron at 0.32 mg/L in TW-13S and and 0.04 mg/L from TW-13D.

The higher concentration at MW-105 relative to the TW-13 nest is inconsistent with the groundwater model simulations, both with respect to the magnitude of the concentrations and with respect to the depth of maximum concentration (shallowest is higher concentration, not the lower. Were the simulation reflecting historical patterns, either the TW-13 concentrations would have to be higher or the concentrations at MW-105 would have to be lower. Further, the concentrations at TW-13D would have to be higher than those in TW-13S, not lower. (IDEM data from MW-1 in March 2001 are similarly inconsistent with the modeled simulations with respect to horizontal patterns of contamination. There is no vertical data available at MW-1)

Historical concentration patterns are not contoured in the RI. They
are presented graphically in the SMS as averages on Figure 4. On that figure, some "red" wells, with average concentrations between 2000 and 14,000+ ug/L are outside (north of) the simulated paths of migration, as are some "yellow" wells, between 900 and 2000 ug/L. Not only are these concentrations north of the simulated flow paths, they are concentrations that are higher than the simulated source area for migration through the neighborhood.

Further, RI data itself establishes the inconsistency of the historical patterns of contamination and the flow patterns simulated by the groundwater model, data available before the modeling report was ever written. The RI program for vertical profiling groundwater quality established that the maximum contamination was not at the base of the aquifer, but in the middle of the aquifer, inconsistent with the model simulations. The assessment of the vertical profiling data led ENSR to conclude, "Based on the data collected at the three locations with 25 to 30 ft of saturated thickness, the highest levels of B are consistently detected in the middle of the aquifer vertically, that is, neither near/at the water table nor at the base of the surficial aquifer."

One of the locations for vertical profiling became MW-101. MW-101 is significantly north of the simulated paths of migration, yet had boron concentrations as high as 2.75 mg/L (see letter of 21Jun06, ENSR to USEPA, of vertical profiling results), higher than concentration at either monitoring point within the simulated migration path.

When the simulations are compared to the data, the only conclusion is that each of the quotes at the beginning of this email needs to have the word "not" included; "not appear", "not reflect", etc. I believe the statements are not simply wrong, but they are dangerous in that they create a false suggestion that there is some level of support provided by the model for PRP contractor's site interpretations and conceptual models, a model determined to be unusable by all 3rd party reviewers. The failure of the model is attributable to the force-fit of the model to the PRP's contractor's site interpretations and conceptual models. It is a disservice to use the debunked model to prop up the erroneous interpretations that made the model fail.
--
Chuck

Charles H. Norris
Geo-Hydro, Inc.
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-292

Laurence Silvestri
[redacted]
10/17/2009 09:34 AM

To Timothy Drexler
cc [redacted], 'Chuck Norris'
bcc
Subject PINES - Request for data base

Tim,

Please email a copy of the AECOM/USEPA electronic data base of Yard 520 water quality data from the landfill monitoring program. It iincludes the following citation:

From the SMS, Section 3.7.3 Site-Specific Groundwater Data, page 3-30

"Groundwater monitoring has been conducted at Yard 520 since the early 1980s. The monitoring data from 1998 to 2003 has been provided electronically by Weaver Boos (2004), and is available electronically upon request."

Thank you,
Larry Silvestri
PINES Secretary
[redacted]

EPA-R5-2013-003300RR-293

Pete_Penoyer@nps.gov
10/20/2009 12:31 PM

To Charles Norris
cc brenda_waters, Timothy Drexler, Bob Kay, kherron, silvestri
bcc
Subject Re: Response to comments

All,
We have gone through the points made below by Chuck Norris and appreciate the detailed look at the data he has provided. We also do not understand why EPA-Chicago would want to suggest that a model deemed "unusable" could be construed to reflect a true or representative "depiction of the historical distribution of contamination" when that was never even the intent of the modeling effort. NPS was also misled by the RI language and initial modeling results into the false sense that particle tracking simulations in plan view were somehow corroborated by the historical distribution of contamination. This last conclusion has always been an underlying premise for the assumption in the beginning that the model must have at least some merit or factual basis and just needs some fine tuning. Now that his premise is clearly debunked by anyone willing to take the time and make the effort for this and other detailed analysis to identify the several contradictions, we also regret that such statements made by EPA might lead the PRP's contractor to conclude that any number of elements related to the groundwater model are representative of the site. This applies to the site conceptual model in particular, which we believe has been flawed from the very beginning and never modified despite collection (and avoidance of collection) of data that could conflict with their conceptual model as the RI was scoped and implemented.

Thus we concur with the following conclusion of Mr. Norris:

"When the simulations are compared to the data, the only conclusion is that each of the quotes at the beginning of this email needs to have the word "not" included; "not appear", "not reflect", etc. I believe the statements are not simply wrong, but they are dangerous in that they create a false suggestion that there is some level of support provided by the model for PRP contractor's site interpretations and conceptual models, a model determined to be unusable by all 3rd party reviewers. The failure of the model is attributable to the force-fit of the model to the PRP's contractor's site interpretations and conceptual models. It is a disservice to use the debunked model to prop up the erroneous interpretations that made the model fail."

regards,
Pete

Peter E. Penoyer
Hydrologist, WRD
1201 Oakridge Dr., Ste. 250
Ft. Collins, CO 80525
Ph 970-225-3535
Fax 970-225-9965
email: pete_penoyer@nps.gov

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| | Charles Norris |

	<cnorris@geo-hydr
	o.com>
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  | To: Drexler.Timothy@epamail.epa.gov
|
  | cc: pete_penoyer@nps.gov, brenda_waters@nps.gov,
[redacted], kay.bob@epamail.epa.gov, |
  | kherron@idem.in.gov
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  | Subject: Re: Response to comments
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>----------
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Chuck

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1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-294

Laurence Silvestri
Exemption 6

10/20/2009 06:12 PM

To Timothy Drexler

cc brenda_waters, Timothy Drexler, Bob Kay, kherron, Exemptio..., 'Chuck Norris', pete_penoyer

bcc

Subject Radionuclide PAHs and Dioxin not addressed in RI

Tim,

These attached comments are not addressed in the Remedial Investigation Report. PINES developed these comments in response to the following document.

Pines AOC II for RI/FS Docket No. V-W-'04-C-784
Evaluation of Polycyclic Aromatic Hydrocarbon,
Polychlorinated Dibenzodioxin/
Polychlorinated Dibenzofuran, and
Radionuclide Data from Yard 520
April 25, 2006

That document was removed from the public accessible EPA web site shortly after our comments were submitted. However, these issues are still unresolved and there is no replacement document evaluating PAHs, dioxin and radionuclide.

Thank you,
Larry Silvestri
PINES Secretary
Exemption 6

ReviewCommentsYard520.pdf Jensen Rad Comments.pdf

EPA-R5-2013-003300RR-295

Laurence Silvestri
Exemption 6
10/20/2009 08:55 PM

To Timothy Drexler
cc
bcc
Subject Fw: PINES - Request for data base

Tim,

We still need a copy of the database.

Larry Silvestri

--- On **Sat, 10/17/09, Laurence Silvestri** <Exemption 6> wrote:

From: Laurence Silvestri <Exemption 6>
Subject: PINES - Request for data base
To: Drexler.Timothy@epamail.epa.gov
Cc: Exemption 6@geo-hydro.com, "'Chuck Norris'" <cnorris@geo-hydro.com>
Date: Saturday, October 17, 2009, 10:34 AM

Tim,

Please email a copy of the AECOM/USEPA electronic data base of Yard 520 water quality data from the landfill monitoring program. It iincludes the following citation:

From the SMS, Section 3.7.3 Site-Specific Groundwater Data, page 3-30

"Groundwater monitoring has been conducted at Yard 520 since the early 1980s. The monitoring data from 1998 to 2003 has been provided electronically by Weaver Boos (2004), and is available electronically upon request."

Thank you,
Larry Silvestri
PINES Secretary
Exemption 6

EPA-R5-2013-003300RR-296

Timothy Drexler/R5/USEPA/US
10/21/2009 08:22 AM

To lbradley
cc
bcc
Subject Fw: PINES - Request for data base

Hi Lisa:

Not sure if I already forwarded this request from P.I.N.E.S. to you. If I have, well, here it is again. Please call me if you have any questions on this.

Thanks.

-Tim

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

----- Forwarded by Timothy Drexler/R5/USEPA/US on 10/21/2009 08:22 AM -----

From: Laurence Silvestri <[redacted]>
To: Timothy Drexler/R5/USEPA/US@EPA
Date: 10/20/2009 08:55 PM
Subject: Fw: PINES - Request for data base

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Larry Silvestri

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From: Laurence Silvestri <[redacted]>
Subject: PINES - Request for data base
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Thank you,
Larry Silvestri
PINES Secretary
Exemption 6

EPA-R5-2013-003300RR-297

Timothy Drexler/R5/USEPA/US
10/21/2009 08:23 AM

To Laurence Silvestri
cc
bcc
Subject Re: Fw: PINES - Request for data base

Thanks, Larry. I have forwarded this request to the PRPs. I will check on the status.

-Tim

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

Laurence Silvestri	Tim, We still need a copy of the dat...	10/20/2009 08:55:12 PM

From: Laurence Silvestri <[redacted]>
To: Timothy Drexler/R5/USEPA/US@EPA
Date: 10/20/2009 08:55 PM
Subject: Fw: PINES - Request for data base

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Subject: PINES - Request for data base
To: Drexler.Timothy@epamail.epa.gov
Cc: [redacted]@geo-hydro.com, "'Chuck Norris'" <cnorris@geo-hydro.com>
Date: Saturday, October 17, 2009, 10:34 AM

Tim,

Please email a copy of the AECOM/USEPA electronic data base of Yard 520 water quality data from the landfill
the following citation:

From the SMS, Section 3.7.3 Site-Specific Groundwater Data, page 3-30

"Groundwater monitoring has been conducted at Yard 520 since the early 1980s. The monitoring data from 1998
electronically by Weaver Boos (2004), and is available electronically upon request."

Thank you,
Larry Silvestri
PINES Secretary
Exemption 6

EPA-R5-2013-003300RR-298

"Bradley, Lisa"
<lisa.bradley@aecom.com>
10/21/2009 08:25 AM

To Timothy Drexler
cc
bcc
Subject RE: PINES - Request for data base

Hi Tim – No you have not. I will discuss with the group and get back to you. :) LAIS

From: Drexler.Timothy@epamail.epa.gov [mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Wednesday, October 21, 2009 9:23 AM
To: Bradley, Lisa
Subject: Fw: PINES - Request for data base

Hi Lisa:

Not sure if I already forwarded this request from P.I.N.E.S. to you. If I have, well, here it is again. Please call me if you have any questions on this.

Thanks.

-Tim

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

----- Forwarded by Timothy Drexler/R5/USEPA/US on 10/21/2009 08:22 AM -----

From: Laurence Silvestri <[redacted] Exemption 6 >
To: Timothy Drexler/R5/USEPA/US@EPA
Date: 10/20/2009 08:55 PM
Subject: Fw: PINES - Request for data base

Tim,

We still need a copy of the database.

Larry Silvestri

--- On **Sat, 10/17/09, Laurence Silvestri** <[redacted]> wrote:

From: Laurence Silvestri <[redacted]>
Subject: PINES - Request for data base
To: Drexler.Timothy@epamail.epa.gov
Cc: [redacted]@geo-hydro.com, "'Chuck Norris'" <cnorris@geo-hydro.com>
Date: Saturday, October 17, 2009, 10:34 AM

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From the SMS, Section 3.7.3 Site-Specific Groundwater Data, page 3-30

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Thank you,
Larry Silvestri
PINES Secretary
[redacted]

EPA-R5-2013-003300RR-299

"Mark Hutson"
<[redacted]@geo-hydro.com>
Exemption 6
10/21/2009 11:22 AM

To Timothy Drexler
cc "Charles Norris", "Larry Silvestri"
bcc
Subject GHI Comments on EPA draft Pines RI comments

Tim

Geo-Hydro, Inc (GHI) has reviewed your draft comments on the revised Remedial Investigation Report for the Pines Groundwater Plume site and is providing the following additional comments for your consideration.

1) General Comment No. 1 - Both GHI and National Park Service reviewers disagree with the comments made in General Comment No.1, specifically the statement that the mathematical ground water flow model "appears to reflect the historical location of groundwater contamination. Rather than elaborating on this objection here I am attaching recent e-mails from Chuck Norris and Pete Penoyer in which they each fully discuss this comment.

2) Yard 520 Sampling - Only one on Larry Jensen's comments on the radiochemistry results submitted in the the December 5, 2008 Evaluation of Data Collected Under the Yard 520 Sampling and Analysis Plan were included in your draft RI comments. GHI submits that several of Larry's comments on the characterization warrant inclusion especially where he points out erroneous data inadequacies and/or locations with anomalously high results that should trigger additional investigation. I am attaching Larry's original comments for your reconsideration.

3) Source Term - The concentration of leachate within the Yard 520 disposal cells and other CCB placement areas, and that will eventually migrate out of the cells and impact receptors has not yet been determined. EPA's stated intention to forgo completion of the groundwater model and/or additional remedial investigation activities in favor of a conservative approach in determining risk will necessarily require that the initial concentration of contaminants in the leachate be determined so that the source term used in risk assessment calculations reflect real site conditions. Substituting monitoring well results for leachate concentrations would not be a conservative estimation because, as stated in your comment on Section 2.1.7, processes like sorption and co-precipitation can be effective at removing some contaminants from groundwater as it migrates downgradient. However, concentrations seen in one monitoring well may reflect a reduction attributable to that particular flow path that does not occur on other flow paths. Further, sorptive capacity can become saturated as more mass moves along a flow path, with contaminants thereafter reflecting source term concentrations. Finally, sorption, and to a lesser degree, coprecipitation are equilibrium, and therefore reversible, reactions. Changes in Eh and/or pH at some point in the future can remobilize sequestered contaminants, sometimes at concentrations higher even than the original source concentration. A conservative risk assessment must be based on source terms that represent the highest contaminant concentrations that a receptor could be exposed to, not concentrations that have been diluted and/or reacted as water migrates downgradient.

Please let us know if you have any questions.

Mark

Mark Hutson
Geo-Hydro, Inc.
303-948-1417
[redacted]@geo-hydro.com

----- Message from "Charles Norris" <cnorris@geo-hydro.com> on Fri, 16 Oct 2009 23:25:32 -0600 -----

To: <Drexler.Timothy@epamail.epa.gov>

cc: <pete_penoyer@nps.gov>, <brenda_waters@nps.gov>, <[redacted]>, <kay.bob@epamail.epa.gov>, <kherron@idem.in.gov>

Subject: Re: Response to comments

Good afternoon, everyone,

In the past several weeks, I have heard or seen comments ,like those below:

"The mathematical ground water flow model generated by AECOM, the Pines Site PRP contractor, appears to reflect historical groundwater contaminant concentrations."

"However, overall the model did appear to reflect the historical distribution of contamination."

"The mathematical ground water flow model generated by AECOM, the Pines Site PRP contractor, appears to reflect the historical location of groundwater contamination."

I believe such statements are quite simply wrong, and not subtly or trivially so. In fact, it was the discordance between the results of the ground water model and the historical contamination data that triggered GHI's in-depth investigation of the model and our calls for the opportunity to examine the model input files.

The following is a discussion of the Pines Site data and its comparison to the PRP's contractor's modeled simulations of groundwater flow.

The Pines Site ground water model was never calibrated to the historic conditions that controlled the flows existing when the contamination developed across Pines. There was never a modeled attempt to run a simulation that would "reflect" the historic contamination patterns or reproduce them.

The closest approach of the model to simulating that period was a scenario of taking today's conditions as represented with the final "calibrated" model and modifying it by reducing the recharge in the areas that were provided municipal water (Simulation A). The purpose offered for this modification was represented as investigating head level changes potentially relating to concerns of localized flooding and ponding caused by the introduction of municipal water but not sewer.

Although this run was not presented for, or represented as being for, purposes of reflecting historical contamination patterns, particle tracking was implemented and displayed as output (Figure 5-2). In the area north of North Yard 520, a total of three particles, from among many dozens released, tracked in map view through the residential area, away from US 20, eastward to Brown Ditch. Presumably this display and comments offered by PRP's contractors during discussions with reviewers created the impressions expressed in the quotes above.

A close examination of Appendix L Figure 5-2 (blow up to 800% and identify the wells from Figure 4-5) shows the following:

Each of the particles originated in the NW corner of North Yard 520

Each of the particles exited North Yard 520 in the vicinity of and between MW-1R and well nest TW-13S,D.

Each of these three particles tracked with water flowing through the area sampled by well nest TW-13S, D.

Each of these three particles subsequently tracked north of all of the other north-side TW well nests.

The middle of these three particles tracks with water passing by MW-105.

Particles tracking through in the vicinity of all other TW well nests are moving eastward, not northward into the neighborhood. The concentrations at these wells do not influence the area to the north according to the simulated flow paths.

Base upon the model simulations, each of the three particles is traveling in Layer 4, the bottom of the aquifer, a layer that in this area thins to inches thick. (This cannot be seen in map display on Figure 5-2, but has been verified in the model.)

Thus, to the extent that Simulation A can be inferred as approximating "historical" patterns, the groundwater model shows only water passing by TW-13S,D crosses significantly into the Pines neighborhood north of US 20. The simulated track of flow is largely west to east and represents a very small percentage of all contaminants leaving the North Yard 520 landfill. The center of the simulated neighborhood particle plume passes through MW-105, and the northern boundary of the particles is always at least 4 residences south of US 12.

There are no leachate data to establish the source term for contaminants that are migrating. However, since all particles penetrating significantly into and through the neighborhood pass by TW-13D,S, or near MW-1,1R, the concentration of the plume at those locations wells should be fairly representative of the water quality left the landfill and is migrating into the neighborhood. Attenuation processes can only serve to decrease the concentrations along a flow path. There are no postulated additional sources of contaminants along the simulated migration path between TW-13S,D and MW-105 that could increase the concentration.

Thus, if the PRP's consultant's groundwater model reflects historical contamination patterns, those historical data along the path should show a) greatest contamination at the base of the aquifer, b) minimal contamination north of the particle tracking envelope (some potentially due to diffusion, but no advective transport), and c) a decline in concentrations through the neighborhood between TW-13S,D and MW-105, if there is any active attenuation.

When one considers the water quality data, one observes the following:

Boron concentrations at MW-105 ranged from 0.6 to 2.0 mg/L, with concentrations systematically building with time. (RI Table 2-12, page 3 of 21)

Boron concentrations at TW-13S and -13D are not reported in RI Table 2-12 or in anywhere else in the RI. Yet, these data are critical for establishing whether the groundwater simulation reflects historical contamination patterns. Weaver Boos & Gordon data for April 21, 2003, reported boron at 0.32 mg/L in TW-13S and and 0.04 mg/L from TW-13D.

The higher concentration at MW-105 relative to the TW-13 nest is inconsistent with the groundwater model simulations, both with respect to the magnitude of the concentrations and with respect to the depth of maximum concentration (shallowest is higher concentration, not the lower. Were the simulation reflecting historical patterns, either the TW-13 concentrations would have to be higher or the concentrations at MW-105 would have to be lower. Further, the concentrations at TW-13D would have to be higher than those in TW-13S, not lower. (IDEM data from MW-1 in March 2001 are similarly inconsistent with the modeled simulations with respect to horizontal patterns of contamination. There is no vertical data available at MW-1)

Historical concentration patterns are not contoured in the RI. They are presented graphically in the SMS as averages on Figure 4. On that figure, some "red" wells, with average concentrations between 2000 and 14,000+ ug/L are outside (north of) the simulated paths of migration, as are some "yellow" wells, between 900 and 2000 ug/L. Not only are these concentrations north of the simulated flow paths, they are concentrations that are higher than the simulated source area for migration through the neighborhood.

Further, RI data itself establishes the inconsistency of the historical patterns of contamination and the flow patterns simulated by the groundwater model, data available before the modeling report was ever written. The RI program for vertical profiling groundwater quality established that the maximum contamination was not at the base of the aquifer, but in the middle of the aquifer, inconsistent with the model simulations. The assessment of the vertical profiling data led ENSR to conclude, "Based on the data collected at the three locations with 25 to 30 ft of saturated thickness, the highest levels of B are consistently detected in the middle of the aquifer vertically, that is, neither near/at the water table nor at the base of the surficial aquifer."

One of the locations for vertical profiling became MW-101. MW-101 is significantly north of the simulated paths of migration, yet had boron concentrations as high as 2.75 mg/L (see letter of 21Jun06, ENSR to USEPA, of vertical profiling results), higher than concentration at either monitoring point within the simulated migration path.

When the simulations are compared to the data, the only conclusion is that each of the quotes at the beginning of this email needs to have the word "not" included; "not appear", "not reflect", etc. I believe the statements are not simply wrong, but they are dangerous in that they create a false suggestion that there is some level of support provided by the model for PRP contractor's site interpretations and conceptual models, a model determined to be unusable by all 3rd party reviewers. The failure of the model is attributable to the force-fit of the model to the PRP's contractor's site interpretations and conceptual models. It is a disservice to use the debunked model to prop up the erroneous interpretations that made the model fail.
--
Chuck

Charles H. Norris
Geo-Hydro, Inc.
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

----- Message from <Pete_Penoyer@nps.gov> on Tue, 20 Oct 2009 11:31:06 -0600 -----

To: "Charles Norris" <cnorris@geo-hydro.com>

cc: <brenda_waters@nps.gov>, <Drexler.Timothy@epamail.epa.gov>, <kay.bob@epamail.epa.gov>, <kherron@idem.in.gov>, <[redacted]>

Subject: Re: Response to comments

All,
We have gone through the points made below by Chuck Norris and appreciate the detailed look at the data he has provided. We also do not understand why EPA-Chicago would want to suggest that a model deemed "unusable" could be construed to reflect a true or representative "depiction of the historical distribution of contamination" when that was never even the intent of the modeling effort. NPS was also misled by the RI language and initial modeling results into the false sense that particle tracking simulations in plan view were somehow corroborated by the historical distribution of contamination. This last conclusion has always been an underlying premise for the assumption in the beginning that the model must have at least some merit or factual basis and just needs some fine tuning. Now that his premise is clearly debunked by anyone willing to take the time and make the effort for this and other detailed analysis to identify the several contradictions, we also regret that such statements made by EPA might lead the PRP's contractor to conclude that any number of elements related to the groundwater model are representative of the site. This applies to the site conceptual model in particular, which we believe has been flawed from the very beginning and never modified despite collection (and avoidance of collection) of data that could conflict with their conceptual model as the RI was scoped and implemented.

Thus we concur with the following conclusion of Mr. Norris:

"When the simulations are compared to the data, the only conclusion is that each of the quotes at the beginning of this email needs to have the word "not" included; "not appear", "not reflect", etc. I believe the statements are not simply wrong, but they are dangerous in that they create a false suggestion that there is some level of support provided by the model for PRP contractor's site interpretations and conceptual models, a model determined to be unusable by all 3rd party reviewers. The failure of the model is attributable to the force-fit of the model

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interpretations that made the model fail."

regards,
Pete

Peter E. Penoyer
Hydrologist, WRD
1201 Oakridge Dr., Ste. 250
Ft. Collins, CO 80525
Ph 970-225-3535
Fax 970-225-9965
email: pete_penoyer@nps.gov

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| Charles Norris |
| <cnorris@geo-hydr|
| o.com> |
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| 10/16/2009 11:25 |
| PM CST |
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| To: Drexler.Timothy@epamail.epa.gov
|
| cc: pete_penoyer@nps.gov, brenda_waters@nps.gov,
[redacted], kay.bob@epamail.epa.gov, |
| kherron@idem.in.gov
|
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|

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Chuck

Charles H. Norris
Geo-Hydro, Inc.
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

ReviewCommentsYard520_May19_2008.doc

EPA-R5-2013-003300RR-300

Pete_Penoyer@nps.gov
10/23/2009 03:20 PM

To Timothy Drexler
cc brenda_waters, charles_morris, cnorris, Bob Kay, kherron, [redacted], silvestri
bcc
Subject Re: Pines Site: RI Report IDEM draft comments

Tim,

Please find attached NPS suggested changes and additions (see track changes) to your proposed Oct. 23 letter to Ms Lisa Bradley of AECOM. We believe it is paramount that the EPA express directly with candor and utmost transparency the stakeholder concensus failings of the groundwater model and the limitations and weaknesses that remain in the RI Report. Without such direct communication to the PRP's in wording and content that clearly and substantially reflects what led to the groundwater model's rejection and remaining concerns with the RI, consistently expressed by NPS and other stakeholders, we are concerned that going forward will lead to similar unsatisfactory results with the Ecological Risk Assessment.

In the absence of the PRP contractor's ability to produce a useable site groundwater model and their unacceptable response to comments in the previous draft site documents, the Water Resources Division of the NRPC will find it difficult to advise the Park to concur with EPA's conditional approval of the Remedial Investigation as a basis to begin the ERA. We believe moving forward with the ERA under some conditional acceptance of the RI (subject to EPA's revisions as proposed in your draft letter) when the several areas of weakness with the RI have not first been clearly expressed/vetted with the PRP's and their contractor and documented for the record, is irresponsible. In several instances, it has been unclear to NPS why EPA, after receiving technical comments from stakeholders throughout all phases of the CERCLA process, has not directed the PRP's contractor to conduct certain actions and applied conventionally accepted investigative practices that would have substantially improved the confidence in the RI results. In our view, such actions would likely have produced data that made development of the groundwater model less subject to dispute and a useable product while providing a far better understanding of the groundwater plume fate and extent which currently remains poorly defined at best.

Your consideration of NPS proposed changes and additions to this letter is appreciated and while further wordsmithing by EPA may be appropriate, we believe the changes to content that NPS has made is technically sound, justified and fully defensible. Please do not hesitate to give me a call should you not concur with any of the NPS proposed revisions/additions to your draft letter to AECOM. In closing the recent conference call with EPA Kerr Lab, you requested stakeholders remain vigilant. Given EPA's and subsequent responses of the PRP contractor to stakeholder's previous comments, we are reaching the conclusion that such vigilance is largely ineffectual in working with the Chicago-EPA office.

thank you, (See attached file: EPA_comments_101309NPSrev.doc)
Pete

Peter E. Penoyer

Hydrologist, WRD
1201 Oakridge Dr., Ste. 250
Ft. Collins, CO 80525
Ph 970-225-3535
Fax 970-225-9965

email: pete_penoyer@nps.gov EPA_comments_101309NPSrev.doc

EPA-R5-2013-003300RR-301

Laurence Silvestri
Exemption 6
10/25/2009 10:05 PM

To Timothy Drexler, Bob Kay, don.bruce, Janet Pope

cc Exemption 6, Exemptio..., Exemption 6, Exemption 6, Exemption 6, peggy, Paul Kysel, Exemp..., Exe..., 'Chuck Norris', Exemption 6, phyllis damota, Charlotte Read, Lisa Evans, Jeffrey Stant

bcc

Subject Comments on the Pines Remedial Investigation

People In Need of
Environmental Safety (PINES)
Comments on the Remedial
Investigation Report
Pines Area of Investigation
Alternative Superfund

October 25, 2009

EPA Superfund Project Manager
Tim Drexler:

The EPA permitted the responsible parties, NIPSCO and Brown Inc. to obstruct and impede the superfund process. EPA did this by allowing NIPSCO and Brown Inc, to submit, repeatedly and almost without change, error-filled Remedial Investigation Drafts and an unworkable groundwater model. The PINES' technical advisor, Geo-Hydro Inc. had to check and recheck these erroneous documents and model. This redundant but necessary activity by our technical advisor exhausted the community group's Technical Assistance Program (TAP) grant. The EPA oversaw and actively participated in these activities with Geo-Hydro Inc and continued to do so, long after EPA knew that the TAP money

was exhausted.

You said, during several telephone calls, that the EPA wanted to have Geo-Hydro compensated for their work. EPA lawyers wrote an amendment to the TAP agreement, which NIPSCO, Brown Inc. and the PINES community group all endorsed. No dollar amount and no beginning or end dates are specified in the amendment. Now, EPA, NIPSCO and Brown Inc., refuse to honor the amendment leaving the PINES community group with an $86,409.90 bill.

The members of the PINES community group are convinced that these stalling and delaying tactics are a deliberate action, intended to exhaust the PINES community group's time, energy and money. Moreover, these tactics are intended to prevent Geo-Hydro Inc. from protecting the health and safety of the residents. EPA failed in their duty to keep NIPSCO and Brown Inc on schedule. Now EPA must carry out their responsibility to enforce the TAP amendment and instruct the Responsible Parties, NIPSCO and Brown Inc., to pay our technical advisor for the work they performed on behalf of the residents of the superfund area.

Larry Silvestri
PINES Secretary
Exemption 6

RI_Comments.pdf

EPA-R5-2013-003300RR-302

Paul Kysel
[redacted]
10/26/2009 08:46 PM

To Timothy Drexler, Larry Silvestri

cc Cathi Murry, Bud PrastPresPINES, Chuck NorrisH2Oconsultant, don.bruce, Ellen Becker, Helen Molinaro, Nancy Kolasa, Janet Pope, Jeff Stant, Lisa Evans, Mark Hutson, Peggy Richardson, phyllisdamota, Charlotte Read, Larry Jensen, Jan Nona

bcc

Subject RE: Comments on the Pines Remedial Investigation

Tim - I would like to throw my support behind the input already provided by my PINES co-members, our technical advisers, as well as other stakeholders, and would like to offer the following as additional item that ought, in my opinion to be included in the comments back to the PRP's regarding the RI:

Both an RI and the subsequent RA will be woefully incomplete without a source water chemical analysis. The PRP's should immediately be directed to complete a sampling of water from within both the north and south cell and the resulting analysis encorporated in the RI.

Thanks,
Paul Kysel, VP PINES Group

> Subject: Re: Comments on the Pines Remedial Investigation
> To: [redacted]
> CC: [redacted]; cnorris@geo-hydro.com; don.bruce@epamail.epa.gov; [redacted]; Pope.Janet@epamail.epa.gov; [redacted]; levans@earthjustice.org; [redacted]@geo-hydro.com; [redacted]; [redacted]; [redacted]; [redacted]; [redacted]; [redacted]
> From: Drexler.Timothy@epamail.epa.gov
> Date: Mon, 26 Oct 2009 14:08:52 -0500
>
> Thanks, Larry. You bring up a number of issues on which EPA will need
> to respond. I have drafted a reply and sent it for internal review. I
> hope to get you a response tomorrow. Regarding Larry's comments, as I
> mentioned Thursday, I am also having them reviewed by our rad expert to
> make sure that our previous conversations with Larry addressed all of
> these questions before finalizing the combined RI Report comments.
>
> Also, as a follow-up to our meeting last Thursday, I am checking with
> IDEM on the following:
>
> the Indiana State Board of Health's rad survey for flyash in the
> Pines area
> Checking on seeps from the north cell
> Getting additional technical details of the construction of the south
> cell. Any as-builts, photos, borings, etc.
> modifications to the RI Report comments to reflect our discussions on
> the Conceptual Site Model
>

> I'll let you know as I get word on these topics.
>
>
>
> Tim Drexler
> Remedial Project Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-6J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
> fax: 312.886.4071
>
>
>
> From: Laurence Silvestri <[redacted]>
>
> To: Timothy Drexler/R5/USEPA/US@EPA, Bob Kay/R5/USEPA/US@EPA, don.bruce@epamail.epa.gov, Janet
> Pope/R5/USEPA/US@EPA
>
> Cc: [redacted], [redacted], [redacted],
> [redacted], [redacted], Paul Kysel <[redacted]>,
> [redacted], 'Chuck Norris' <cnorris@geo-hydro.com>, [redacted]@geo-hydro.com, phyllis damota
> <[redacted]>, Charlotte Read <[redacted]>, Lisa Evans <levans@earthjustice.org>,
> Jeffrey Stant <[redacted]>
>
> Date: 10/26/2009 07:10 AM
>
> Subject: Comments on the Pines Remedial Investigation
>
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>
> People In Need of Environmental Safety (PINES)
> Comments on the Remedial Investigation Report
> Pines Area of Investigation Alternative Superfund
>
> October 25, 2009
>
> EPA Superfund Project Manager Tim Drexler:
>
> The EPA permitted the responsible parties, NIPSCO and Brown Inc. to obstruct and impede the superfund process. EPA did
> this by allowing NIPSCO and Brown Inc, to submit, repeatedly and almost without change, error-filled Remedial

> Investigation Drafts and an unworkable groundwater model. The PINES' technical advisor, Geo-Hydro Inc. had to check
> and recheck these erroneous documents and model. This redundant but necessary activity by our technical advisor
> exhausted the community group's Technical Assistance Program (TAP) grant. The EPA oversaw and actively participated in
> these activities with Geo-Hydro Inc and continued to do so, long after EPA knew that the TAP money was exhausted.
>
> You said, during several telephone calls, that the EPA wanted to have Geo-Hydro compensated for their work. EPA
> lawyers wrote an amendment to the TAP agreement, which NIPSCO, Brown Inc. and the PINES community group all endorsed.
> No dollar amount and no beginning or end dates are specified in the amendment. Now, EPA, NIPSCO and Brown Inc., refuse
> to honor the amendment leaving the PINES community group with an $86,409.90 bill.
>
> The members of the PINES community group are convinced that these stalling and delaying tactics are a deliberate
> action, intended to exhaust the PINES community group's time, energy and money. Moreover, these tactics are intended
> to prevent Geo-Hydro Inc. from protecting the health and safety of the residents. EPA failed in their duty to keep
> NIPSCO and Brown Inc on schedule. Now EPA must carry out their responsibility to enforce the TAP amendment and
> instruct the Responsible Parties, NIPSCO and Brown Inc., to pay our technical advisor for the work they performed on
> behalf of the residents of the superfund area.
>
> Larry Silvestri
> PINES Secretary
> Exemption 6
>
>
>
>
> [attachment "RI_Comments.pdf" deleted by Timothy Drexler/R5/USEPA/US]
>
>

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EPA-R5-2013-003300RR-303

Paul Kysel
Exemption 6
10/28/2009 09:06 AM

To Timothy Drexler
cc Larry Silvestri, Larry Jensen
bcc
Subject RI for PINES Yard 520

Hi Tim, I am hoping that it goes without saying that we expect inclusion within your comments to the PRP's the "recommendations / conclusion" sections of the Gamma Count Rate Survey report we provided to you at the meeting.

I owe you a final copy of that document - which will come by snail mail and be a CD Rom in lieu of a written report. Since the meeting Larry Jensen has identified some very minor appearance / formatting issues that will be addressed before I send a final copy to your attention. I expect to get this in the mail before Monday of next week.

For your reference / potential use I have attached both of these sections - the content of these sections will be unaltered in the final copy.

Take care,

Paul Kysel

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EPA-R5-2013-003300RR-304

Timothy Drexler/R5/USEPA/US
10/28/2009 09:23 AM

To Paul Kysel
cc Larry Jensen, Larry Silvestri, EUGENE JABLONOWSKI
bcc
Subject Re: RI for PINES Yard 520

Thanks, Paul.

Gene Jablonowski, our radiation expert, is already reviewing the draft you gave me last Thursday. I am scheduled to meet with Gene when he returns to Chicago on Tuesday morning to discuss Larry's work and also Larry's June 11, 2008, comments. I'm pretty sure that we resolved those issues, except for the one that remains in the draft comment document, during earlier discussions between Larry and Gene. I will confirm that during my meeting with Gene. I promise that the combined RI Report comments will not go to the PRPs until I conclude this; hopefully next Tuesday. Based on your email message, I am assuming that your final document will not be substantially different. Please let me know if that is the wrong assumption.

If its OK, if we have any questions, we will contact either you or Larry Jensen directly.

-Tim

Paul Kysel	Hi Tim, I am hoping that it goes without...	10/28/2009 09:05:59 AM

From: Paul Kysel <[redacted] Exemption 6 >
To: Timothy Drexler/R5/USEPA/US@EPA
Cc: Larry Silvestri <[redacted] Exemption 6 >, Larry Jensen <[redacted] Exe... xemption 6 >
Date: 10/28/2009 09:05 AM
Subject: RI for PINES Yard 520

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Take care,

Paul Kysel

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EPA-R5-2013-003300RR-305

Paul Kysel
[redacted]
10/28/2009 10:02 AM

To Timothy Drexler
cc Larry Jensen, Larry Silvestri, EUGENE JABLONOWSKI
bcc
Subject RE: RI for PINES Yard 520

Tim, thanks for the quick update / response. I am pleased to learn about your plans. You are correct about your assumptions, Larry just found a few changes to make that will make the document flow better for the reader - all Word format issues, nothing from a data standpoint will change. Larry J. is leaving on vacation this Friday and unless Gene identifies any questions that this novice can answer he may well have to wait until Larry's return.

thanks again,
Paul

> Subject: Re: RI for PINES Yard 520
> To: [redacted]
> CC: [redacted]; [redacted]; Jablonowski.Eugene@epamail.epa.gov
> From: Drexler.Timothy@epamail.epa.gov
> Date: Wed, 28 Oct 2009 09:23:23 -0500
>
> Thanks, Paul.
>
> Gene Jablonowski, our radiation expert, is already reviewing the draft
> you gave me last Thursday. I am scheduled to meet with Gene when he
> returns to Chicago on Tuesday morning to discuss Larry's work and also
> Larry's June 11, 2008, comments. I'm pretty sure that we resolved those
> issues, except for the one that remains in the draft comment document,
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> -Tim
>
>
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> From: Paul Kysel <[redacted]>
>
> To: Timothy Drexler/R5/USEPA/US@EPA
>
> Cc: Larry Silvestri <[redacted]>, Larry Jensen <[redacted]>
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> Date: 10/28/2009 09:05 AM
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> Subject: RI for PINES Yard 520

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> Paul Kysel
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> Windows 7: It helps you do more. Explore Windows 7.(See attached file:
> 21 Conclusions.doc)(See attached file: 22 Recommendations.doc)

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EPA-R5-2013-003300RR-306

"Larry Jensen "
<[redacted]
10/28/2009 11:15 AM

To "Paul Kysel", Timothy Drexler
cc "Larry Silvestri", EUGENE JABLONOWSKI
bcc
Subject Re: RI for PINES Yard 520

Sorry to interfere with your plans, Tim. I will be out of the country from October 30 until November 14. My only free time before I leave is tomorrow (Thursday, October 29) morning. If a discussion can take place then I am willing.

Larry Jensen

----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "Paul Kysel" <[redacted]>
Cc: "Larry Jensen" <[redacted]>; "Larry Silvestri"
<[redacted]>; <Jablonowski.Eugene@epamail.epa.gov>
Sent: Wednesday, October 28, 2009 9:23 AM
Subject: Re: RI for PINES Yard 520

> Thanks, Paul.
>
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> Jensen directly.
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> -Tim
>
>
>
> From: Paul Kysel <[redacted]>
>
> To: Timothy Drexler/R5/USEPA/US@EPA
>
> Cc: Larry Silvestri <[redacted]>, Larry Jensen
> <[redacted]>
>
> Date: 10/28/2009 09:05 AM
>
> Subject: RI for PINES Yard 520
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>

EPA-R5-2013-003300RR-307

Timothy Drexler/R5/USEPA/US
10/28/2009 01:50 PM

To "Larry Jensen"
cc EUGENE JABLONOWSKI, "Paul Kysel", "Larry Silvestri"
bcc
Subject Re: RI for PINES Yard 520

Thanks, Larry. But based on the previous discussions you and I had with Gene and the study you gave me Thursday, I think that we have what we need. I will confirm that with Gene first, though.

If I don't talk to you, I hope you have a great trip.

-Tim

"Larry Jensen"	Sorry to interfere with your plans, Tim. ...	10/28/2009 11:14:52 AM

From: "Larry Jensen" <[redacted]>
To: "Paul Kysel" <[redacted]>, Timothy Drexler/R5/USEPA/US@EPA
Cc: "Larry Silvestri" <[redacted]>, EUGENE JABLONOWSKI/R5/USEPA/US@EPA
Date: 10/28/2009 11:14 AM
Subject: Re: RI for PINES Yard 520

Sorry to interfere with your plans, Tim. I will be out of the country from October 30 until November 14. My only free time before I leave is tomorrow (Thursday, October 29) morning. If a discussion can take place then I am willing.

Larry Jensen

----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "Paul Kysel" <[redacted]>
Cc: "Larry Jensen" <[redacted]>; "Larry Silvestri" <[redacted]>; <Jablonowski.Eugene@epamail.epa.gov>
Sent: Wednesday, October 28, 2009 9:23 AM
Subject: Re: RI for PINES Yard 520

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>
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> -Tim
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>
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> From: Paul Kysel <[redacted]>
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> To: Timothy Drexler/R5/USEPA/US@EPA
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> Cc: Larry Silvestri <[redacted]>, Larry Jensen
> <[redacted]>
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> Date: 10/28/2009 09:05 AM
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> Subject: RI for PINES Yard 520
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>

EPA-R5-2013-003300RR-308

Pete_Penoyer@nps.gov
11/02/2009 03:36 PM

To Timothy Drexler
cc brenda_waters, charles_morris, cnorris, Bob Kay, kherron, [redacted], silvestri
bcc
Subject Re: Pines Site: RI Report IDEM draft comments

Tim,

I have a Memo document dated Dec. 5 2008 to you and Kevin Herron from Elizabeth Perry entitled "Response to Comments on Remediation Investigation Report dated May 19, 2008" which provides the EPA compiled comments and the "responses to the comments received from the USEPA on August 22, 2008 on the Remedial Investigation for the Pines Area of Investigation, submitted to USEPA in May 2008."

Is this what you are referencing below? If so, when do you plan to submit EPA's final RI comments reflecting these response to comments from ENSR/AECOM that you indicated below "the PRP did not revise the second draft to all of our liking".

In response to comment #2 of the above document, ENSR/AECOM provided a Draft Technical Memorandum on the "discussion of Hydrogeologic Conditions in and around Yard 520 Pines Area of Investigation". They state that "the conceptual model serves as the basis for the numerical model". The conceptual "Hydrogeologic" model was what I was referring to in stating previously it remains fundamentally flawed.

I can go back and provide specific comments and directions on the ENSR/AECOM responses in that document so they are incorporated in the final RI if that is what you are seeking.

For example, ENSR/AECOM seems pleased to discuss in detail why the South cell must behave as a hermetically sealed unit and could not contribute to the levels of COCs seen in MW-3 and MW-4 located in the narrow strip between the South Landfill cell and Brown ditch. They seem to attribute these higher levels of COCs seen in these two wells as somehow sourced by the North Cell despite a 1700 foot barrier wall on the north side of the South cell that must be circumnavigated to accomplish this feat. While not impossible from groundwater flow that parallels the west side of the landfill and ditch and flows around SW corner of the S. landfill cell (flow around the SE corner would require the COCs to migrate upgradient and in the upstream direction), it is certainly less plausible then southerly flow directly through the 3 foot clay wall and out of the south cell given the likelihood of significant head build up in the south cell and applying a little less optimistic barrier wall permeability value.

What ENSR/AECOM chose not to expand upon/discuss are the quite obvious effects on or changes to groundwater flow across Yard 520 (initially represented North to South in the Site Management Strategy Weaver-Boos potentiometric surface maps based on perimeter monitoring wells only). They chose not to discuss what flow reversal one would expect to see from first building a mound of fly ash in a wetland at the location of the north cell creating the now acknowledged groundwater mound, followed by building the 1700 foot barrier wall (in surficial the aquifer) on its south side in construction of the South landfill cell.

One would anticipate this to cause a flow reversal from the local, historic North to South flow regime to Brown ditch (that illustrated by Weaver-Boos and referenced by ENSR/AECOM in the SMS) and also indicated by USGS for localized areas surrounding the dune ridges (local groundwater divides coincident with dune ridges with flow toward ditches) in their publications prior to these engineered Landfill structures.

Many arguments/applied theory of ENSR/AECOM sound plausible but fall short or lack proof on closer inspection and lack critical supporting data that in many instances they have chosen to avoid collecting when given the opportunity to propose in the sampling plan (or were proposed by stakeholders but argued against by PRPs contractor) where data gaps were most obvious. Equally sound if not better science-based arguments or theories run contrary to several explanations of ENSR/AECOM.

Even if ENSR/AECOM's horizontal and vertical gradient (conceptual) solutions were "not forced on the model" in the area of Yard 520, the poor calibration suggests their application is suspect and changes to other model inputs or other explanations are equally warranted or ignored. For example, what effect would the 1 to 2 foot thick low permeability peat layer or varying layers of horizontal hydraulic conductivity have on facilitating horizontal flow in the fly ash (layers 1 - 3) of the North Cell - never considered by ENSR/AECOM. What may have been forced on the model to constrain output of particle flow once COCs were limited to downward vertical movement in fly ash and then only horizontal movement in model layer 4 from Yard 520 by the above theories, was the stratigraphic pinchout of Layer 4 immediately north of Yard 520. Such a false constraint would preclude north to northwesterly contaminant migration of its own accord.

Removing this false stratigraphic construct together with a baseline groundwater contour map that should conform to the data from PZ-001 and the known topography of the landfill (shown in Appendix Z) would have gone a long way in providing a basis for model calibration and a usable groundwater model with more credible output. One reason the model may not have calibrated well in Yard 520 was the flawed depiction of the water level surface in the baseline groundwater contour map. That should at least be corrected to conform to the topography of the north and south cells with an intervening low under the ditch separating the two topo and groundwater highs. This requires illustration at a scale that the contractors seem to have avoided previously. A map (insert) of Yard a 520 and the surrounding area within 1500 feet of the boundary on a 8 1/2 x 11" sheet of paper might at a minimum, serve to illustrate these details better and make it clear what is lost in the smaller scale sitewide illustrations used throughout the document.

Pete

Peter E. Penoyer
Hydrologist, WRD
1201 Oakridge Dr., Ste. 250
Ft. Collins, CO 80525
Ph 970-225-3535
Fax 970-225-9965
email: pete_penoyer@nps.gov

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|---------+------------------------------>
|         |           Drexler.Timothy@epam|
|         |           ail.epa.gov         |
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	10/26/2009 03:09 PM
	EST
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|
  | To: Pete_Penoyer@nps.gov
|
  | cc: Kay.Bob@epamail.epa.gov, brenda_waters@nps.gov,
charles_morris@nps.gov, cnorris@geo-hydro.com, |
  | kherron@idem.in.gov, Exemption 6 @geo-hydro.com, Exemption 6
|
  | Subject: Re: Pines Site: RI Report IDEM draft comments
|

>----------
----------|

Pete:

As we discussed on the phone today, please provide more detail regarding the NPS concerns with the CSM. General comments must be combined with specific comments giving the PRP direction on exactly what they must change in order to avoid a poor response from them. With regard to EPA responsiveness to partner and stakeholder comments, I know that it's been a while, but I'd ask you to review the 25-page August 22, 2008 combined comments document for EPA's incorporation of NPS comments. That the PRP did not revise the second draft to all of our liking is the reason for the current round of comments. This will be the last opportunity for the PRPs.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

From: Pete_Penoyer@nps.gov

To: Timothy Drexler/R5/USEPA/US@EPA

Cc: brenda_waters@nps.gov, charles_morris@nps.gov,
cnorris@geo-hydro.com, Bob Kay/R5/USEPA/US@EPA,
kherron@idem.in.gov, Exemption 6 @geo-hydro.com,
Exemption 6

Date: 10/23/2009 03:19 PM

Subject: Re: Pines Site: RI Report IDEM draft comments

Tim,

Please find attached NPS suggested changes and additions (see track changes) to your proposed Oct. 23 letter to Ms Lisa Bradley of AECOM. We believe it is paramount that the EPA express directly with candor and utmost transparency the stakeholder concensus failings of the groundwater model and the limitations and weaknesses that remain in the RI Report. Without such direct communication to the PRP's in wording and content that clearly and substantially reflects what led to the groundwater model's rejection and remaining concerns with the RI, consistently expressed by NPS and other stakeholders, we are concerned that going forward will lead to similar unsatisfactory results with the Ecological Risk Assessment.

In the absence of the PRP contractor's ability to produce a useable site groundwater model and their unacceptable response to comments in the previous draft site documents, the Water Resources Division of the NRPC will find it difficult to advise the Park to concur with EPA's conditional approval of the Remedial Investigation as a basis to begin the ERA. We believe moving forward with the ERA under some conditional acceptance of the RI (subject to EPA's revisions as proposed in your draft letter) when the several areas of weakness with the RI have not first been clearly expressed/vetted with the PRP's and their contractor and documented for the record, is irresponsible. In several instances, it has been unclear to NPS why EPA, after receiving technical comments from stakeholders throughout all phases of the CERCLA process, has not directed the PRP's contractor to conduct certain actions and applied conventionally accepted investigative practices that would have substantially improved the confidence in the RI results. In our view, such actions would likely have produced data that made development of the groundwater model less subject to dispute and a useable product while providing a far better understanding of the groundwater plume fate and extent which currently remains poorly defined at best.

Your consideration of NPS proposed changes and additions to this letter is appreciated and while further wordsmithing by EPA may be appropriate, we believe the changes to content that NPS has made is technically sound, justified and fully defensible. Please do not hesitate to give me a call

should you not concur with any of the NPS proposed revisions/additions to
your draft letter to AECOM. In closing the recent conference call with EPA
Kerr Lab, you requested stakeholders remain vigilant. Given EPA's and subsequent responses of the PRP contractor to stakeholder's previous comments, we are reaching the conclusion that such vigilance is largely ineffectual in working with the Chicago-EPA office.

thank you, (See attached file: EPA_comments_101309NPSrev.doc)
Pete

Peter E. Penoyer
Hydrologist, WRD
1201 Oakridge Dr., Ste. 250
Ft. Collins, CO 80525
Ph 970-225-3535
Fax 970-225-9965
email: pete_penoyer@nps.gov[attachment "EPA_comments_101309NPSrev.doc" deleted by Timothy Drexler/R5/USEPA/US]

EPA-R5-2013-003300RR-309

Charles Norris
<cnorris@geo-hydro.com>
11/03/2009 09:29 PM

To Timothy Drexler
cc Pete_Penoyer, Bob Kay, brenda_waters, charles_morris, kherron, Exemptio..., silvestri
bcc
Subject Re: Pines Site: RI Report IDEM draft comments

PP on 23OCT:

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> requested stakeholders remain vigilant. Given EPA's and
> subsequent responses of the PRP contractor to stakeholder's previous
> comments, we are reaching the conclusion that such vigilance is largely
> ineffectual in working with the Chicago-EPA office.

TD on 02NOV:

> That was a completely warrantless and unfair
> comment. EPA spent a considerable amount of time reviewing and
> incorporating partner and stakeholder comments and providing
> opportunities to share their views and we will continue to do so. To
> imply that EPA does not value the NPS participation in the site process
> is, frankly, ridiculous.

Tim,

I've reread several times your Nov 2 response to Pete's Oct 23 summary observation, and it bothers me. Enough so that I'm going to add my two-cents worth:

First of all, Pete spoke only to the effectiveness of stakeholder vigilance to the process, based on what he's seen previously in the Comment-Response cycle for this site. He didn't lament NPS not being valued for is work. He observed that to date stakeholder vigilance is largely ineffectual. I doubt that either Pete or NPS cares a bit whether USEPA considers their participation valuable or considers it an obligatory pain in the neck. I think they care very much whether stakholders' vigilance is having any meaningful impact.

Secondly, I don't see Pete's observation as either warrantless or unfair. Compared to some comments I've heard from others who have monitored and been part of the effort much longer that Pete, I believe it to have carefully considered and cautiously worded.

Before you are too offended by the way Pete said it, you need to understand that there is more than an undercurrent of feeling and opinion that USEPA does not have its priorities where they should be on this project. Much of that undercurrent is generated by observations of multiple Comment-Response cycles throughout this project, not just the RI portion. Of concern is whether the USEPA is appropriately exercising authority or unduly acquiescing to the goals of PRPs. To a lot of people, you haven't yet made the case for the former.

[My opinions only. Not speaking for Mark. Not speaking for GHI. Not speaking for PINES.]

--
Chuck

Charles H. Norris
Geo-Hydro, Inc.
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-310

Timothy Drexler/R5/USEPA/US
11/04/2009 08:32 AM

To Charles Norris
cc Bob Kay, brenda_waters, charles_morris, kherron, Exemption 6, Pete_Penoyer, silvestri
bcc
Subject Re: Pines Site: RI Report IDEM draft comments

Thanks for the notes, Chuck. I will stand by EPA's record and my files on the level of participation given to all stakeholders and impacts of that participation in the form of agency documents at the Pines Site at this point in the process. You can argue that EPA does not carry forward all comments as they are written, or at all in some cases. That is not unusual. EPA is the lead regulatory agency, and after careful review, may not agree with all positions. To essentially state that NPS participation is "ineffectual", by the record, is false. You cannot change my opinion.

That said, I see no reason to dwell on this. If any stakeholder has concerns that their comments are not included in any final document to the PRPs, anyone can call me at any time to discuss the issue. EPA is on record at this site of always being available to any stakeholder at any time of the day or night to discuss issues of concern as long as the stakeholders wish to discuss them. EPA will continue to have that policy for this site.

I look forward to us all cooperatively working together to resolve the Pines Site. We will certainly not always agree, but EPA will ALWAYS respect the opinions of all stakeholders and will always give them all of the time they wish to express their opinions. You will never convince me that we have not acted that way and I assure you that we will continue to be responsive in the future.

-Tim

Charles Norris | PP on 23OCT: > In closing the recent c... | 11/03/2009 09:29:50 PM

From: Charles Norris <cnorris@geo-hydro.com>
To: Timothy Drexler/R5/USEPA/US@EPA
Cc: Pete_Penoyer@nps.gov, Bob Kay/R5/USEPA/US@EPA, brenda_waters@nps.gov, charles_morris@nps.gov, kherron@idem.in.gov, Exemption 6@geo-hydro.com, Exemption 6
Date: 11/03/2009 09:29 PM
Subject: Re: Pines Site: RI Report IDEM draft comments

PP on 23OCT:

> In closing the recent conference call with EPA Kerr Lab, you
> requested stakeholders remain vigilant. Given EPA's and
> subsequent responses of the PRP contractor to stakeholder's previous
> comments, we are reaching the conclusion that such vigilance is largely
> ineffectual in working with the Chicago-EPA office.

TD on 02NOV:

> That was a completely warrantless and unfair
> comment. EPA spent a considerable amount of time reviewing and
> incorporating partner and stakeholder comments and providing
> opportunities to share their views and we will continue to do so. To
> imply that EPA does not value the NPS participation in the site process
> is, frankly, ridiculous.

Tim,

I've reread several times your Nov 2 response to Pete's Oct 23 summary observation, and it bothers me. Enough so that I'm going to add my two-cents worth:

First of all, Pete spoke only to the effectiveness of stakeholder vigilance to the process, based on what he's seen previously in the Comment-Response cycle for this site. He didn't lament NPS not being valued for is work. He observed that to date stakeholder vigilance is largely ineffectual. I doubt that either Pete or NPS cares a bit whether USEPA considers their participation valuable or considers it an obligatory pain in the neck. I think they care very much whether stakholders' vigilance is having any meaningful impact.

Secondly, I don't see Pete's observation as either warrantless or unfair. Compared to some comments I've heard from others who have monitored and been part of the effort much longer that Pete, I believe it to have carefully considered and cautiously worded.

Before you are too offended by the way Pete said it, you need to understand that there is more than an undercurrent of feeling and opinion that USEPA does not have its priorities where they should be on this project. Much of that undercurrent is generated by observations of multiple Comment-Response cycles throughout this project, not just the RI portion. Of concern is whether the USEPA is appropriately exercising authority or unduly acquiescing to the goals of PRPs. To a lot of people, you haven't yet made the case for the former.

[My opinions only. Not speaking for Mark. Not speaking for GHI. Not speaking for PINES.]

--
Chuck

Charles H. Norris
Geo-Hydro, Inc.
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-311

Timothy Drexler/R5/USEPA/US
11/04/2009 09:37 AM

To silvestri
cc [redacted], [redacted], [redacted], peggy, cnorris, [redacted], EUGENE JABLONOWSKI, [redacted]
bcc
Subject Pines Site follow up from Oct. 22nd meeting

Hi Larry:

Just an update on our meeting.

- I made contact with Mike Sonnefeld with IDEM in Indianapolis regarding as-builts for Yard 520. He has faxed me some information and I am going through my own files. I hope to send you a package of information early next week.

- I called the NW Regional office of IDEM and spoke to Ashley Snyder, the inspector. I told her that some of you could point out the location of the seeps you saw in the north cell of Yard 520. She said that you could call her at 219-757-0276 to arrange an inspection. I'd like to participate in that, so please let me know what dates you are looking at so that I can clear my schedule.

- You received a copy of the comments on the RI Report last night. You no doubt noticed that it included many of your comments, but not all. In particular, Larry Jensen's comments that you attached to your email message. Gene Jablonowski, our rad expert here, and I reviewed Larry's comments. These same comments were included in our August 22, 2008 comments to the PRPs on the first draft of the RI Report. Gene and I reviewed the responses the PRP made to Larry's comments. Their response is in Attachment E to the December 5, 2008 "Evaluation of Data Collected Under the Yard 520 Sampling and Analysis Plan". After a careful review of the responses, we felt that Larry's concerns were adequately addressed. With regard to the new work that Larry performed and you submitted to me in draft form at the meeting, Gene suggested that Larry, Gene, and I get together to discuss the work and any follow-up. After Larry returns (Nov. 15?) I'd like to set up a meeting.
- With regard to any other comments you submitted for the RI Report comments that did not go forward, if you'd like, please call me to set up a time to discuss them.

- I still have no response from the Indiana State Board of Health on their flyash survey. I'll continue to pursue that.

-Tim

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

EPA-R5-2013-003300RR-312

Timothy Drexler/R5/USEPA/US
11/04/2009 10:24 AM

To [redacted]
cc silvestri
bcc
Subject Fw: Pines Site follow up from Oct. 22nd meeting

Hi Paul:

Sent this to everyone else and it bounced when I sent it to you. I had an old email address for you. I have corrected my address book for your new email address and am resending.

-Tim

----- Forwarded by Timothy Drexler/R5/USEPA/US on 11/04/2009 10:22 AM -----

From: Timothy Drexler/R5/USEPA/US
To: [redacted]
Cc: [redacted], cnorris@geo-hydro.com, [redacted], EUGENE JABLONOWSKI/R5/USEPA/US@EPA, [redacted]@geo-hydro.com
Date: 11/04/2009 09:37 AM
Subject: Pines Site follow up from Oct. 22nd meeting

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phone: 312.353.4367
fax: 312.886.4071

EPA-R5-2013-003300RR-313

Timothy Drexler/R5/USEPA/US

11/04/2009 11:18 AM

To Laurence Silvestri

cc [redacted] Bob Kay, [redacted] 'Chuck Norris', don.bruce, [redacted], [redacted], [redacted] Janet Pope, Mary Canavan, Jeffrey Stant, Lisa Evans, [redacted] peggy, phyllis damota, Paul Kysel, Charlotte Read, [redacted], [redacted], Larry Johnson

bcc

Subject Re: Comments on the Pines Remedial Investigation

Hi Larry:

Thank you for your email message. From the beginning of the U.S. Environmental Protection Agency's involvement in the Pines Site, EPA has appreciated the hard work and dedication of the P.I.N.E.S. community group. EPA was pleased to name P.I.N.E.S. as the selected community group for this site As the selected community group, P.I.N.E.S. entered into and agreement with the PRPs at the Site to receive funds for aTechnical Assistance Plan (TAP). As you know, P.I.N.E.S. will receive a second distribution of $50,000 to fund the TAP, which will allow continued meaningful participation in the Superfund process.

In your email you raised a number of serious concerns with the P.I.N.E.S. TAP. We have attempted to address the specific issues you raised and to clarify why EPA made the decisions we discussed in our meetings of September 28th and October 22nd.

1. "EPA allowed NIPSCO and Brown, Inc. to submit, repeatedly and almost without change, error-filled Remedial Investigation drafts and an unworkable model."

EPA submitted the first draft RI Report to IDEM (our agency partner), NPS, and P.I.N.E.S. (our stakeholders) for review. All agencies and stakeholders had a considerable number of comments on the draft. On August 22, 2008, EPA submitted to the PRPs, and copied our partner and stakeholders, a 25-page comment document incorporating EPA's, IDEM's, NPS, and P.I.N.E.S.comments. After repeated technical discussions between all of the stakeholders and the PRP group, a second draft of the RI Report was prepared. EPA then submitted the second draft to our partners and stakeholders for review. After a review period that was lengthened due to the groundwater model issues, all stakeholders received the draft combined comments document from EPA for review and again provided input to EPA. EPA reviewed that input, generated the RI Report Comments and forwarded them to the PRPs with copies to the stakeholders. This will be the last opportunity for the PRPs to correct omissions and inaccuracies identified in the comments. If the PRP fails to make the proper corrections, EPA will supplement the RI Report with its conclusions. Other than the inclusion of P.I.N.E.S. in so many draft documents, this is normal procedure for a PRP-lead investigation.

2. The P.I.N.E.S. technical advisor had to check and recheck erroneous documents. This redundant but necessary activity exhausted TAP funds.

Beginning with the first receipt of the Pines groundwater model from the PRPs, issues were raised, not only by P.I.N.E.S technical advisor, Geo-Hydro, but by IDEM and NPS, who had their own groundwater modeler review the submitted Pines groundwater model. It is not uncommon for partners and stakeholders to bring important comments to the attention of EPA. EPA encourages and partners and stakeholders to supply input. On May 8, 2009, EPA received a letter from NPS stating that their evaluation of the Pines Site mathematical groundwater model was fundamentally flawed. The NPS model reviewer's evaluation prompted EPA to enlist the assistance of EPA's Office of Research and Development lab in Ada, OK for a review of the mathematical model. After the Ada Lab concluded that the PRP groundwater model was not usable EPA consulted with IDEM and determined that a groundwater model was not necessary to continue the Pines Site RI/FS process. As EPA has stated before, it is not unusual for the RI/FS process to continue without a mathematical groundwater model. In EPA's and IDEM's determination, the delays in completing the remedial activities at the site, which had occurred and would have continued to occur if EPA required completion of an acceptable groundwater model, did not justify the limited benefits that a

groundwater model would have provided. EPA's final decision to drop the groundwater model was supported by Geo-Hydro.

At the time that the NPS groundwater modeler was evaluating the Pines model, Geo-Hydro was conducting an independent evaluation of the groundwater model without funding from the TAP. Had P.I.N.E.S. been within the TAP process during this period EPA could have worked with P.I.N.E.S. on the utilization of their limited funds, as we would any community group under a TAP or TAG. For the same reason, EPA suggested during the September meeting that P.I.N.E.S. conserve the new funds that the PRP is making available during the review of the risk assessment by leveraging the work of others in their review.

3. EPA wanted to have GeoHydro compensated for their work and now will not honor the amendment to the TAP by providing $86,409.90 toGeoHydro for work performed between funding .

EPA notified P.I.N.E.S. in June 2008 that they did not qualify for additional funds, based on the then current TAP agreement. P.I.N.E.S. understood that the funding was exhausted and that they did not qualify for additional funds under the TAP agreement and that any work performed by Geo-Hydro after their funds expired could not be compensated by the TAP. Monthly reports from P.I.N.E.S. during this period state that: a) the TAP funds were exhausted at the end of June 2008, 2) that work continued by Geo-Hydro "without compensation", and that 3) Geo-Hydro continued to review documents and participate in conference calls without payment. In a meeting with EPA on September 25, 2009, P.I.N.E.S. told EPA that Geo-Hydro was aware that their work would not be compensated but continued to work with the project because of their interest in the national flyash issue.

After a review by EPA headquarters of TAPS nationwide, EPA determined that the P.I.N.E.S. TAP needed to be modified so that additional new funds could be made available. While EPA was working with the PRPs to modify the TAP, EPA made P.I.N.E.S. aware that EPA was working to see if additional new funding was possible. At the time that EPA told P.I.N.E.S. of the modification of the TAP agreement, EPA stated that the purpose of the amendment was to provide additional new funding to P.I.N.E.S. EPA did not state the amount of new funding or state that the new funds could be used retroactively. When EPA notified P.I.N.E.S. that funding was again available, EPA stated that they looked forward to P.I.N.E.S. renewed participation.

4. These are stalling and delaying tactic that are "...a deliberate action , intended to exhaust the P.I.N.E.S. community group 's time, energy, and money."

EPA's actions that led the PRPs to provide P.I.N.E.S. with an additional $50,000 in funds, as we would do for any qualifying community group, is evidence that we consider the contributions of P.I.N.E.S. important to the Superfund process at the Pines Site. EPA cannot, however, provide funds to any TAG or TAP group for expenses that were not authorized by an agreement or grant with EPA or a PRP. EPA's own fiscal responsibilities prevent us from this regardless of the merits of the expenses . EPA’s request on August 24, 2009 for P.I.N.E.S. to present a spending plan for the $50,000 in new funding is the process that P.I.N.E.S. adhered to with the initial funding and that has been put in place for all TAPs and TAGs to prevent expenditures that are not agreed upon in advance. Anyone paying a bill has the right to review and approve that bill. If, however, a TAP group and PRP can reach agreement on another larger funding amount, EPA would have no objections to that arrangement.

5. EPA failed to keep NIPSCO and Brown , Inc. on schedule.

Purposefully, there was no set schedule for the completion of the Remedial Investigation in the Administrative Order on Consent with the PRPs. As is evidenced by the delays to the remedial process brought on by the lengthy discussions regarding the groundwater model, it is extremely difficult to set schedules for RI activities; only estimates. Many adjustments are usually necessary due to the discovery of new information, arguments over differences in interpretation of the existing information, re-interpretation of the data, etc. Additional work, not identified in the original work plan, was also required

of the PRPs by EPA that involved additional sampling. In addition, as you mention, there was a great amount of time spent evaluating multiple versions of the groundwater model. The Pines Site, according to the 2004 Consent Order with the PRPs, is now back on an enforceable schedule because of EPA's conditional approval of the RI Report.

EPA appreciates the hard work and dedication of the P.I.N.E.S. members and looks forward to your continued participation at the Pines Site. It is rare that we have a perfectly smooth process. But, ultimately, this work will result in the determination of any unacceptable risks to the residents and environment of Pines. If risks are present, EPA is committed to performing the actions necessary to reduce those risks to acceptable levels. Thank you for your continued work.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

Laurence Silvestri	People In Need of Environmental S...	10/26/2009 07:10:50 AM

From: Laurence Silvestri <[redacted]>
To: Timothy Drexler/R5/USEPA/US@EPA, Bob Kay/R5/USEPA/US@EPA, don.bruce@epamail.epa.gov, Janet Pope/R5/USEPA/US@EPA
Cc: [redacted], Paul Kysel <[redacted]>, [redacted], 'Chuck Norris' <cnorris@geo-hydro.com>, [redacted]@geo-hydro.com, phyllis damota <[redacted]>, Charlotte Read <[redacted]>, Lisa Evans <levans@earthjustice.org>, Jeffrey Stant <[redacted]>
Date: 10/26/2009 07:10 AM
Subject: Comments on the Pines Remedial Investigation

People In Need of Environmental Safety (PINES)
Comments on the Remedial Investigation Report
Pines Area of Investigation Alternative Superfund

October 25, 2009

EPA Superfund Project Manager Tim Drexler:

The EPA permitted the responsible parties, NIPSCO and Brown Inc. to obstruct and impede the superfund proces
NIPSCO and Brown Inc, to submit, repeatedly and almost without change, error-filled Remedial Investigation Dr
groundwater model. The PINES' technical advisor, Geo-Hydro Inc. had to check and recheck these erroneous doc
redundant but necessary activity by our technical advisor exhausted the community group's Technical Assistance
oversaw and actively participated in these activities with Geo-Hydro Inc and continued to do so, long after EPA h
exhausted.

You said, during several telephone calls, that the EPA wanted to have Geo-Hydro compensated for their work. E
to the TAP agreement, which NIPSCO, Brown Inc. and the PINES community group all endorsed. No dollar amo

are specified in the amendment. Now, EPA, NIPSCO and Brown Inc., refuse to honor the amendment leaving the
$86,409.90 bill.

The members of the PINES community group are convinced that these stalling and delaying tactics are a delibera
PINES community group's time, energy and money. Moreover, these tactics are intended to prevent Geo-Hydro I
safety of the residents. EPA failed in their duty to keep NIPSCO and Brown Inc on schedule. Now EPA must ca
enforce the TAP amendment and instruct the Responsible Parties, NIPSCO and Brown Inc., to pay our technical
performed on behalf of the residents of the superfund area.

Larry Silvestri
PINES Secretary
Exemption 6

[attachment "RI_Comments.pdf" deleted by Timothy Drexler/R5/USEPA/US]

EPA-R5-2013-003300RR-314

"Mark Hutson"
<[redacted]@geo-hydro.com>
11/04/2009 03:58 PM

To Timothy Drexler, "'Laurence Silvestri'"

cc [redacted], Bob Kay, [redacted], "'Chuck Norris'", don.bruce, [redacted], [redacted], [redacted], Janet Pope, Mary Canavan, "'Jeffrey Stant'", "'Lisa Evans'", peggy, "'phyllis damota'", "'Paul Kysel'", "'Charlotte Read'", [redacted], [redacted], Larry Johnson

bcc

Subject RE: Comments on the Pines Remedial Investigation

Tim

After reading your responses to Larry's comments I feel that a few points of clarification are necessary.

1) At no time has Geo-Hydro, Inc supported the decision to drop the groundwater model. In fact, when I discussed the decision with you, I told you that it was unbelievable to me that EPA would allow the RI for the PINES GROUNDWATER PLUME SITE to proceed without a functional groundwater model or even a firm understanding of the direction and velocity of groundwater flow in the area. Chuck has indicated that using no model at all would be preferable to using the model prepared by the PRP's. That was an indication of how flawed PRP's model was, not an endorsement of proceeding with the RI without a functional model.

2) Our continued involvement has nothing to do with interest in a "national flyash issue". We did so because we, I believe rightly, concluded that our participation in the process was critical to highlighting the inadequacies and imbedded fabrications in the products that were being delivered to EPA and our belief that PINES involvement must not be marginalized by lack of funding from the PRP's. We hope that some arrangement can be identified to allow Geo-Hydro, Inc to re-coop some of our expended effort, but our support of PINES does not hinge on our ability to do so. We do not intend to allow the PRP's to use their control of funding of the TAP to control who reviews their deliverables or how much they are scrutinized.

3) Geo-Hydro, Inc did indeed continue to participate in the process knowing that our invoice might not be fully paid and knowing that EPA was working to get TAP funding extended. We did not expect that the EPA would allow the PRP's to avoid paying for any of our involvement through the crucial period when the draft RI and groundwater models were being reviewed. We found it interesting that PINES received the paperwork to amend the TAP agreement at the same time that the PRP's were attempting to get Geo-Hydro, Inc to sign a confidentiality agreement to receive the groundwater model. After completing our review of the model it is painfully clear why the confidentiality agreement was so desired. Since it appears that neither PINES nor Geo-Hydro, Inc was bound by the terms of the TAP agreement during our "independent evaluation" of the RI and models, any information that we obtained during those reviews can apparently be used in any manner that we deem appropriate.

4) Given the history of deliverables on this site, and the obvious skill and advocacy of the PRP's consultants, it is highly unlikely that the $50,000 allotted for the second funding of the TAP will carry PINES through the remainder of the process. Is it necessary to wait until funding is again depleted to request additional support or must Geo-Hydro, Inc. be prepared to do additional "independent evaluation" to see that PINES fully

understands the documents and can communicate such to the public?

Feel free to contact me if you have any questions on these points.

Mark Hutson
Geo-Hydro, Inc.

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Wednesday, November 04, 2009 10:19 AM
To: Laurence Silvestri
Cc: [redacted]; Kay.Bob@epamail.epa.gov; [redacted]; 'Chuck Norris'; don.bruce@epamail.epa.gov; [redacted]; Pope.Janet@epamail.epa.gov; Canavan.Mary@epamail.epa.gov; Jeffrey Stant; Lisa Evans; [redacted]@geo-hydro.com; [redacted]; phyllis damota; Paul Kysel; Charlotte Read; [redacted]; Johnson.Larry@epamail.epa.gov
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Purposefully, there was no set schedule for the completion of the Remedial Investigation in the Administrative Order on Consent with the PRPs. As is evidenced by the delays to the remedial process brought on by the lengthy discussions regarding the groundwater model, it is extremely difficult to set schedules for RI activities; only estimates. Many adjustments are usually necessary due to the discovery of new information, arguments over differences in interpretation of the existing information, re-interpretation of the data, etc. Additional work, not identified in the original work plan, was also required of the PRPs by EPA that involved additional sampling. In addition, as you mention, there was a great amount of time spent evaluating multiple versions of the groundwater model. The Pines Site, according to the 2004 Consent Order with the PRPs, is now back on an enforceable schedule because of EPA's conditional approval of the RI Report.

EPA appreciates the hard work and dedication of the P.I.N.E.S. members and looks forward to your continued participation at the Pines Site. It is rare that we have a perfectly smooth process. But, ultimately, this work will result in the determination of any unacceptable risks to the residents and environment of Pines. If risks are present, EPA is committed to performing the actions necessary to reduce those risks to acceptable levels. Thank you for your continued work.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

From: Laurence Silvestri <[redacted]>

To: Timothy Drexler/R5/USEPA/US@EPA, Bob Kay/R5/USEPA/US@EPA, don.bruce@epamail.epa.gov, Janet Pope/R5/USEPA/US@EPA

Cc: [redacted], Paul Kysel <[redacted], 'Chuck Norris' <cnorris@geo-hydro.com>, [redacted]@geo-hydro.com, phyllis.damota <[redacted]>, Charlotte Read <[redacted]>, Lisa Evans <levans@earthjustice.org>, Jeffrey Stant <[redacted]>

Date: 10/26/2009 07:10 AM

Subject: Comments on the Pines Remedial Investigation

People In Need of Environmental Safety (PINES)

Comments on the Remedial Investigation Report

Pines Area of Investigation Alternative Superfund

October 25, 2009

EPA Superfund Project Manager Tim Drexler:

The EPA permitted the responsible parties, NIPSCO and Brown Inc. to obstruct and impede the superfund process. EPA did this by allowing NIPSCO and Brown Inc, to submit, repeatedly and almost without change, error-filled Remedial Investigation Drafts and an unworkable groundwater model. The PINES' technical advisor, Geo-Hydro Inc. had to check and recheck these erroneous documents and model. This redundant but necessary activity by our technical advisor

exhausted the community group's Technical Assistance Program (TAP) grant. The EPA oversaw and actively participated in these activities with Geo-Hydro Inc and continued to do so, long after EPA knew that the TAP money was exhausted.

You said, during several telephone calls, that the EPA wanted to have Geo-Hydro compensated for their work. EPA lawyers wrote an amendment to the TAP agreement, which NIPSCO, Brown Inc. and the PINES community group all endorsed. No dollar amount and no beginning or end dates are specified in the amendment. Now, EPA, NIPSCO and Brown Inc., refuse to honor the amendment leaving the PINES community group with an $86,409.90 bill.

The members of the PINES community group are convinced that these stalling and delaying tactics are a deliberate action, intended to exhaust the PINES community group's time, energy and money. Moreover, these tactics are intended to prevent Geo-Hydro Inc. from protecting the health and safety of the residents. EPA failed in their duty to keep NIPSCO and Brown Inc on schedule. Now EPA must carry out their responsibility to enforce the TAP amendment and instruct the Responsible Parties, NIPSCO and Brown Inc., to pay our technical advisor for the work they performed on behalf of the residents of the superfund area.

Larry Silvestri

PINES Secretary

Exemption 6

[attachment "RI_Comments.pdf" deleted by Timothy Drexler/R5/USEPA/US]

EPA-R5-2013-003300RR-315

Timothy Drexler/R5/USEPA/US
11/04/2009 04:19 PM

To "Mark Hutson"

cc [redacted], Bob Kay, [redacted], "'Chuck Norris'", don.bruce, [redacted], [redacted], [redacted], Janet Pope, "'Jeffrey Stant'", Larry Johnson, "'Lisa Evans'", Mary Canavan, peggy, "'phyllis damota'", "'Paul Kysel'", "'Charlotte Read'", [redacted], [redacted], "'Laurence Silvestri'"

bcc

Subject RE: Comments on the Pines Remedial Investigation

Mark:

Thanks for the corrections. With regard to #1, I'm sorry for my oversimplification. For #2, that's just what I was told. For #3 we're not "allowing" anything. We just don't have a mechanism to pay you during a time that there was no TAP. With regard to #4, as we said at the meeting with P.I.N.E.S., yes there is the potential for additional funding to P.I.N.E.S. after this second allocation is used, in accordance with the TAP.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

"Mark Hutson" Tim After reading your responses to La... 11/04/2009 03:59:10 PM

From: "Mark Hutson" <[redacted]@geo-hydro.com>
To: Timothy Drexler/R5/USEPA/US@EPA, "'Laurence Silvestri'" <[redacted]>
Cc: <[redacted]>, Bob Kay/R5/USEPA/US@EPA, <[redacted]>, "'Chuck Norris'" <cnorris@geo-hydro.com>, <don.bruce@epamail.epa.gov>, <[redacted]>, <[redacted]>, <[redacted]>, Janet Pope/R5/USEPA/US@EPA, Mary Canavan/R5/USEPA/US@EPA, "'Jeffrey Stant'" <[redacted]>, "'Lisa Evans'" <levans@earthjustice.org>, <[redacted]>, "'phyllis damota'" <[redacted]>, "'Paul Kysel'" <[redacted]>, "'Charlotte Read'" <[redacted]>, <[redacted]>, <[redacted]>, Larry Johnson/R5/USEPA/US@EPA
Date: 11/04/2009 03:59 PM
Subject: RE: Comments on the Pines Remedial Investigation

Tim

After reading your responses to Larry's comments I feel that a few points of clarification are necessary.

1) At no time has Geo-Hydro, Inc supported the decision to drop the groundwater model. In fact, when I discussed the decision with you, I told you that it was unbelievable to me that EPA would allow the RI for the PINES GROUNDWATER PLUME SITE to proceed without a functional groundwater model or even a firm understanding of the direction and velocity of groundwater flow in the area. Chuck has indicated that using no model at all would be preferable to using the model prepared by the PRP's. That was an indication

of how flawed PRP's model was, not an endorsement of proceeding with the RI without a functional model.

2) Our continued involvement has nothing to do with interest in a "national flyash issue". We did so because we, I believe rightly, concluded that our participation in the process was critical to highlighting the inadequacies and imbedded fabrications in the products that were being delivered to EPA and our belief that PINES involvement must not be marginalized by lack of funding from the PRP's. We hope that some arrangement can be identified to allow Geo-Hydro, Inc to re-coop some of our expended effort, but our support of PINES does not hinge on our ability to do so. We do not intend to allow the PRP's to use their control of funding of the TAP to control who reviews their deliverables or how much they are scrutinized.

3) Geo-Hydro, Inc did indeed continue to participate in the process knowing that our invoice might not be fully paid and knowing that EPA was working to get TAP funding extended. We did not expect that the EPA would allow the PRP's to avoid paying for any of our involvement through the crucial period when the draft RI and groundwater models were being reviewed. We found it interesting that PINES received the paperwork to amend the TAP agreement at the same time that the PRP's were attempting to get Geo-Hydro, Inc to sign a confidentiality agreement to receive the groundwater model. After completing our review of the model it is painfully clear why the confidentiality agreement was so desired. Since it appears that neither PINES nor Geo-Hydro, Inc was bound by the terms of the TAP agreement during our "independent evaluation" of the RI and models, any information that we obtained during those reviews can apparently be used in any manner that we deem appropriate.

4) Given the history of deliverables on this site, and the obvious skill and advocacy of the PRP's consultants, it is highly unlikely that the $50,000 allotted for the second funding of the TAP will carry PINES through the remainder of the process. Is it necessary to wait until funding is again depleted to request additional support or must Geo-Hydro, Inc. be prepared to do additional "independent evaluation" to see that PINES fully understands the documents and can communicate such to the public?

Feel free to contact me if you have any questions on these points.

Mark Hutson
Geo-Hydro, Inc.

-----Original Message-----
From: Drexler.Timothy@epamail.epa.gov
[mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Wednesday, November 04, 2009 10:19 AM
To: Laurence Silvestri
Cc: [redacted]; Kay.Bob@epamail.epa.gov; [redacted]; 'Chuck Norris'; don.bruce@epamail.epa.gov; [redacted]; [redacted]; [redacted]; Pope.Janet@epamail.epa.gov; Canavan.Mary@epamail.epa.gov; Jeffrey Stant; Lisa Evans; [redacted]@geo-hydro.com; [redacted]; phyllis damota; Paul Kysel; Charlotte Read; [redacted]; [redacted]; Johnson.Larry@epamail.epa.gov
Subject: Re: Comments on the Pines Remedial Investigation

Hi Larry:

Thank you for your email message. From the beginning of the U.S. Environmental Protection Agency's involvement in the Pines Site, EPA has appreciated the hard work and dedication of the P.I.N.E.S. community group. EPA was pleased to name P.I.N.E.S. as the selected community group for this site As the selected community group, P.I.N.E.S. entered into and agreement with the PRPs at the Site to receive funds for aTechnical Assistance Plan (TAP). As you know, P.I.N.E.S. will receive a second distribution of $50,000 to fund the TAP, which will allow continued meaningful participation in the Superfund process.

In your email you raised a number of serious concerns with the P.I.N.E.S. TAP. We have attempted to address the specific issues you raised and to clarify why EPA made the decisions we discussed in our meetings of September 28th and October 22nd.

1. "EPA allowed NIPSCO and Brown, Inc. to submit, repeatedly and almost without change, error-filled Remedial Investigation drafts and an unworkable model."

EPA submitted the first draft RI Report to IDEM (our agency partner), NPS, and P.I.N.E.S. (our stakeholders) for review. All agencies and stakeholders had a considerable number of comments on the draft. On August 22, 2008, EPA submitted to the PRPs, and copied our partner and stakeholders, a 25-page comment document incorporating EPA's, IDEM's, NPS, and P.I.N.E.S.comments. After repeated technical discussions between all of the stakeholders and the PRP group, a second draft of the RI Report was prepared. EPA then submitted the second draft to our partners and stakeholders for review. After a review period that was lengthened due to the groundwater model issues, all stakeholders received the draft combined comments document from EPA for review and again provided input to EPA. EPA reviewed that input, generated the RI Report Comments and forwarded them to the PRPs with copies to the stakeholders. This will be the last opportunity for the PRPs to correct omissions and inaccuracies identified in the comments. If the PRP fails to make the proper corrections, EPA will supplement the RI Report with its conclusions. Other than the inclusion of P.I.N.E.S. in so many draft documents, this is normal procedure for a PRP-lead investigation.

2. The P.I.N.E.S. technical advisor had to check and recheck erroneous documents. This redundant but necessary activity exhausted TAP funds. Beginning with the first receipt of the Pines groundwater model from the PRPs, issues were raised, not only by P.I.N.E.S technical advisor, Geo-Hydro, but by IDEM and NPS, who had their own groundwater modeler review the submitted Pines groundwater model. It is not uncommon for partners and stakeholders to bring important comments to the attention of EPA. EPA encourages and partners and stakeholders to supply input. On May 8, 2009, EPA received a letter from NPS stating that their evaluation of the Pines Site mathematical groundwater model was fundamentally flawed. The NPS model reviewer's evaluation prompted EPA to enlist the assistance of EPA's Office of Research and Development lab in Ada, OK for a review of the mathematical model. After the Ada Lab concluded that the PRP groundwater model was not usable EPA consulted with IDEM and determined that a groundwater model was not necessary to continue the Pines Site RI/FS process. As EPA has stated before, it is not unusual for the RI/FS process to continue without a mathematical groundwater model. In EPA's and IDEM's determination, the delays in completing the remedial activities at the site, which had occurred and would have continued to occur if EPA required completion of an acceptable groundwater model, did not justify the limited benefits that a groundwater model would have provided. EPA's final decision to drop the groundwater model was supported by Geo-Hydro.

At the time that the NPS groundwater modeler was evaluating the Pines model, Geo-Hydro was conducting an independent evaluation of the groundwater model without funding from the TAP. Had P.I.N.E.S. been within the TAP process during this period EPA could have worked with P.I.N.E.S. on the utilization of their limited funds, as we would any community group under a TAP or TAG. For the same reason, EPA suggested during the September meeting that P.I.N.E.S. conserve the new funds that the PRP is making available during the review of the risk assessment by leveraging the work of others in their review.

3. EPA wanted to have GeoHydro compensated for their work and now will not honor the amendment to the TAP by providing $86,409.90 toGeoHydro for work performed between funding.

EPA notified P.I.N.E.S. in June 2008 that they did not qualify for additional funds, based on the then current TAP agreement. P.I.N.E.S. understood that the funding was exhausted and that they did not qualify for additional funds under the TAP agreement and that any work performed by Geo-Hydro after their funds expired could not be compensated by the TAP. Monthly reports from P.I.N.E.S. during this period state that: a) the TAP funds were exhausted at the end of June 2008, 2) that work continued by Geo-Hydro "without compensation", and that 3) Geo-Hydro continued to review documents and participate in conference calls without payment. In a meeting with EPA on September 25, 2009, P.I.N.E.S. told EPA that Geo-Hydro was aware that their work would not be compensated but continued to work with the project because of their interest in the national flyash issue.

After a review by EPA headquarters of TAPS nationwide, EPA determined that the P.I.N.E.S. TAP needed to be modified so that additional new funds could be made available. While EPA was working with the PRPs to modify the TAP, EPA made P.I.N.E.S. aware that EPA was working to see if additional new funding was possible. At the time that EPA told P.I.N.E.S. of the modification of the TAP agreement, EPA stated that the purpose of the amendment was to provide additional new funding to P.I.N.E.S. EPA did not state the amount of new funding or state that the new funds could be used retroactively. When EPA notified P.I.N.E.S. that funding was again available, EPA stated that they looked forward to P.I.N.E.S. renewed participation.

4. These are stalling and delaying tactic that are "...a deliberate action, intended to exhaust the P.I.N.E.S. community group's time, energy, and money."

EPA's actions that led the PRPs to provide P.I.N.E.S. with an additional $50,000 in funds, as we would do for any qualifying community group, is evidence that we consider the contributions of P.I.N.E.S. important to the Superfund process at the Pines Site. EPA cannot, however, provide funds to any TAG or TAP group for expenses that were not authorized by an agreement or grant with EPA or a PRP. EPA's own fiscal responsibilities prevent us from this regardless of the merits of the expenses. EPA's request on August 24, 2009 for P.I.N.E.S. to present a spending plan for the $50,000 in new funding is the process that P.I.N.E.S. adhered to with the initial funding and that has been put in place for all TAPs and TAGs to prevent expenditures that are not agreed upon in advance. Anyone paying a bill has the right to review and approve that bill. If, however, a TAP group and PRP can reach agreement on another larger funding amount, EPA would have no objections to that arrangement.

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Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

From: Laurence Silvestri <[redacted]>

To: Timothy Drexler/R5/USEPA/US@EPA, Bob Kay/R5/USEPA/US@EPA, don.bruce@epamail.epa.gov, Janet Pope/R5/USEPA/US@EPA

Cc: [redacted], Paul Kysel <[redacted]>, [redacted], 'Chuck Norris' <cnorris@geo-hydro.com>, [redacted]@geo-hydro.com, phyllis.damota <[redacted]>, Charlotte Read <[redacted]>, Lisa Evans <levans@earthjustice.org>, Jeffrey Stant <[redacted]>

Date: 10/26/2009 07:10 AM

Subject: Comments on the Pines Remedial Investigation

People In Need of Environmental Safety (PINES)

Comments on the Remedial Investigation Report

Pines Area of Investigation Alternative Superfund

October 25, 2009

EPA Superfund Project Manager Tim Drexler:

The EPA permitted the responsible parties, NIPSCO and Brown Inc. to obstruct and impede the superfund process. EPA did this by allowing NIPSCO and Brown Inc, to submit, repeatedly and almost without change, error-filled Remedial Investigation Drafts and an unworkable groundwater model. The PINES' technical advisor, Geo-Hydro Inc. had to check and recheck these erroneous documents and model. This redundant but necessary activity by our technical advisor exhausted the community group's Technical Assistance Program (TAP) grant. The EPA oversaw and actively participated in these activities with Geo-Hydro Inc and continued to do so, long after EPA knew that the TAP money was exhausted.

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The members of the PINES community group are convinced that these stalling and delaying tactics are a deliberate action, intended to exhaust the PINES community group's time, energy and money. Moreover, these tactics are intended to prevent Geo-Hydro Inc. from protecting the health and safety of the residents. EPA failed in their duty to keep NIPSCO and Brown Inc on schedule. Now EPA must carry out their responsibility to enforce the TAP amendment and instruct the Responsible Parties, NIPSCO and Brown Inc., to pay our technical advisor for the work they performed on

behalf of the residents of the superfund area.

Larry Silvestri

PINES Secretary

Exemption 6

[attachment "RI_Comments.pdf" deleted by Timothy Drexler/R5/USEPA/US]

EPA-R5-2013-003300RR-316

Laurence Silvestri
Exemption 6
11/05/2009 09:25 AM

To Timothy Drexler

cc Exemption 6, Bob Kay, Exemptio..., 'Chuck Norris', don.bruce, Exemption 6, Exemption 6, Exemption 6, Janet Pope, Mary Canavan, Jeffrey Stant, Lisa Evans, Exemptio..., peggy, phyllis damota, Paul Kysel, Charlotte Read, Exe..., Exemp..., Larry Johnson

bcc

Subject TAP Amendment and Geo-Hydro Invoice

Tim,

This TAP Amendment was written by EPA attorneys and signed by PINES, NIPSCO and Brown Inc.

This Tap Amendment has no beginning or ending period, therefore there is no justification to deny payment during any particular period. The TAP Amendment covers any time after the original TAP money was spent, any time before the TAP Amendment was signed, and any other time throughout this entire superfund process.

The Tap Amendment provides PINES with "More than $50,000." The only mention of a dollar amount in the TAP Amendment is, "L. Obtaining More than $50,000. Respondents may waive the P.I.N.E.S.' $50,000 limit ...." This TAP Amendment covers any and all amounts that exceed the original TAP grant.

The TAP Amendment is open-ended regarding times and dollar amounts. The TAP Amendment is the document we all signed and we all agreed to. GEO-Hydro's invoice for $86,409.90, for the period from July 2008 to May 2009, is a legitimate expenditure according to the TAP Amendment. I have attached the TAP Amendment and Geo-Hydro's invoice.

If you feel that I am incorrect, please cite the TAP Amendment.

Larry Silvestri
PINES Secretary
Exemption 6

--- On **Wed, 11/4/09, Drexler.Timothy@epamail.epa.gov** ***<Drexler.Timothy@epamail.epa.gov>*** wrote:

From: Drexler.Timothy@epamail.epa.gov <Drexler.Timothy@epamail.epa.gov>
Subject: Re: Comments on the Pines Remedial Investigation
To: "Laurence Silvestri" <Exemption 6>
Cc: Exemption 6 Exemption 6, Kay.Bob@epamail.epa.gov, Exemption 6 Exemption 6, "'Chuck Norris'" <cnorris@geo-hydro.com>, don.bruce@epamail.epa.gov, Exemption 6 Exemption 6,

Exemption 6 Exemption 6, Exemption 6 ion 6, Pope.Janet@epamail.epa.gov, Canavan.Mary@epamail.epa.gov, "Jeffrey Stant" <Exemption 6>, "Lisa Evans" <levans@earthjustice.org>, Exemption 6@geo-hydro.com, Exemption 6, "phyllis damota" <Exemption 6>, "Paul Kysel" <Exemption 6>, "Charlotte Read" <Exemption 6>, Exem... emption 6, Exe Exemption 6, Johnson.Larry@epamail.epa.gov
Date: Wednesday, November 4, 2009, 12:18 PM

Hi Larry:

Thank you for your email message. From the beginning of the U.S. Environmental Protection Agency's involvement in the Pines Site, EPA has appreciated the hard work and dedication of the P.I.N.E.S. community group. EPA was pleased to name P.I.N.E.S. as the selected community group for this site As the selected community group, P.I.N.E.S. entered into and agreement with the PRPs at the Site to receive funds for aTechnical Assistance Plan (TAP). As you know, P.I.N.E.S. will receive a second distribution of $50,000 to fund the TAP, which will allow continued meaningful participation in the Superfund process.

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its conclusions. Other than the inclusion of P.I.N.E.S. in so many draft documents, this is normal procedure for a PRP-lead investigation.

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At the time that the NPS groundwater modeler was evaluating the Pines model, Geo-Hydro was conducting an independent evaluation of the groundwater model without funding from the TAP. Had P.I.N.E.S. been within the TAP process during this period EPA could have worked with P.I.N.E.S. on the utilization of their limited funds, as we would any community group under a TAP or TAG. For the same reason, EPA suggested during the September meeting that P.I.N.E.S. conserve the new funds that the PRP is making available during the review of the risk assessment by leveraging the work of others in their review.

3. EPA wanted to have GeoHydro compensated for their work and now will not honor the amendment to the TAP by providing $86,409.90 toGeoHydro for work performed between funding.

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EPA's actions that led the PRPs to provide P.I.N.E.S. with an additional $50,000 in funds, as we would do for any qualifying community group, is evidence that we consider the contributions of P.I.N.E.S. important to the Superfund process at the Pines Site. EPA cannot, however, provide funds to any TAG or TAP group for expenses that were not authorized by an agreement or grant with EPA or a PRP. EPA's own fiscal responsibilities prevent us from this regardless of the merits of the expenses. EPA’s request on August 24, 2009 for P.I.N.E.S. to present a spending plan for the $50,000 in new funding is the process that P.I.N.E.S. adhered to with the initial funding and that has been put in place for all TAPs and TAGs to prevent expenditures that are not agreed upon in advance. Anyone paying a bill has the right to review and approve that bill. If, however, a TAP group and PRP can reach agreement on another larger funding amount, EPA would have no objections to that arrangement.

5. EPA failed to keep NIPSCO and Brown, Inc. on schedule.

Purposefully, there was no set schedule for the completion of the Remedial Investigation in the Administrative Order on Consent with the PRPs. As is evidenced by the delays to the remedial process brought on by the lengthy discussions regarding the groundwater model, it is extremely difficult to set schedules for RI activities; only estimates. Many adjustments are usually necessary due to the discovery of new information, arguments over differences in interpretation of the existing information, re-interpretation of the data, etc. Additional work, not identified in the original work plan, was also required of the PRPs by EPA that involved additional sampling. In addition, as you mention, there was a great amount of time spent evaluating multiple versions of the groundwater model. The Pines Site, according to the 2004 Consent Order with the PRPs, is now back on an enforceable schedule because of EPA's conditional approval of the RI Report.

EPA appreciates the hard work and dedication of the P.I.N.E.S. members and looks forward to your continued participation at the Pines Site. It is rare that we have a perfectly smooth process. But, ultimately, this work will result in the determination of any unacceptable risks to the residents and environment of Pines. If risks are present, EPA is committed to performing the actions necessary to reduce those risks to acceptable levels. Thank you for your continued work.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

From: Laurence Silvestri <[redacted]>

To: Timothy Drexler/R5/USEPA/US@EPA, Bob Kay/R5/USEPA/US@EPA, don.bruce@epamail.epa.gov, Janet Pope/R5/USEPA/US@EPA

Cc: [redacted], [redacted], [redacted], [redacted], [redacted], [redacted], [redacted], Paul Kysel <[redacted]>, [redacted],

[redacted], 'Chuck Norris' <cnorris@geo-hydro.com>,
[redacted]@geo-hydro.com, phyllis damota
<[redacted]>, Charlotte Read <[redacted]>, Lisa Evans <
levans@earthjustice.org>,
Jeffrey Stant <[redacted]>

Date: 10/26/2009 07:10 AM

Subject: Comments on the Pines Remedial Investigation

People In Need of Environmental Safety (PINES)
Comments on the Remedial Investigation Report
Pines Area of Investigation Alternative Superfund

October 25, 2009

EPA Superfund Project Manager Tim Drexler:

The EPA permitted the responsible parties, NIPSCO and Brown Inc. to obstruct and impede the superfund process. EPA did
this by allowing NIPSCO and Brown Inc, to submit, repeatedly and almost without change, error-filled Remedial
Investigation Drafts and an unworkable groundwater model. The PINES' technical advisor, Geo-Hydro Inc. had to check
and recheck these erroneous documents and model. This redundant but necessary activity by our technical advisor
exhausted the community group's Technical Assistance Program (TAP) grant. The EPA oversaw and actively participated in
these activities with Geo-Hydro Inc and continued to do so, long after EPA knew that the TAP money was exhausted.

You said, during several telephone calls, that the EPA wanted to have Geo-Hydro compensated for their work. EPA
lawyers wrote an amendment to the TAP agreement, which NIPSCO, Brown Inc. and the PINES community group all endorsed.
No dollar amount and no beginning or end dates are specified in the amendment. Now, EPA, NIPSCO and Brown Inc., refuse
to honor the amendment leaving the PINES community group with an $86,409.90 bill.

The members of the PINES community group are convinced that these stalling and delaying tactics are a deliberate
action, intended to exhaust the PINES community group's time, energy and money. Moreover, these tactics are intended
to prevent Geo-Hydro Inc. from protecting the health and safety of the residents. EPA failed in their duty to keep
NIPSCO and Brown Inc on schedule. Now EPA must carry out their responsibility to enforce the TAP amendment and
instruct the Responsible Parties, NIPSCO and Brown Inc., to pay our technical advisor for the work they performed on
behalf of the residents of the superfund area.

Larry Silvestri
PINES Secretary
Exemption 6

[attachment "RI_Comments.pdf" deleted by Timothy Drexler/R5/USEPA/US]

Signed_TAP_Amendment.pdf inv 2009 July.pdf

EPA-R5-2013-003300RR-317

Exemption 6

11/05/2009 01:15 PM

To Timothy Drexler

cc

bcc

Subject Re: Comments on the Pines Remedial Investigation

Tim: We all thought the groundwater model was flawed. Now I think we can add a lot of what you have written below. Did you actually write this? Did you have a ghostwriter? Did you have an EPA public relations person write it? Do you really believe everything you have supposedly written? It's like you all have decided on a road and are only going to consider things that will fit on that road. Everything else gets ignored.

I had always thought better of you. Don't know any of the other EPA people copied. I'm disillusioned, disappointed and ashamed.

This particular superfund site is going to hell in a hand basket in a big hurry. You mentioned wanting to get the process back on track. Epistles such as this won't get it done. If, like we have always thought NIPSCO & Brown were doing, you are trying to make us shut up and go away, it won't work. I should think that would be obvious my now. It seems to just make our group madder and come closer together.

Shame, shame on the bunch of you.

jan nona

From: <Drexler.Timothy@epamail.epa.gov>
To: "Laurence Silvestri" <Exemption 6>
Cc: <Exemption 6 Exemption 6>; <Kay.Bob@epamail.epa.gov>; <Exemption 6 Exemption 6>; "'Chuck Norris'" <cnorris@geo-hydro.com>; <don.bruce@epamail.epa.gov>; <Exemption 6 Exemption 6>; <Exemption 6 Exemption 6>; <Exemption 6 Exemption 6>; <Pope.Janet@epamail.epa.gov>; <Canavan.Mary@epamail.epa.gov>; "Jeffrey Stant" <Exemption 6>; "Lisa Evans" <levans@earthjustice.org>; <Exemption 6 @geo-hydro.com>; <Exemption 6>; "phyllis damota" <Exemption 6>; "Paul Kysel" <Exemption 6>; "Charlotte Read" <Exemption 6>; <Exempti... Exemption 6>; <Exer. Exemption 6>; <Johnson.Larry@epamail.epa.gov>
Sent: Wednesday, November 04, 2009 11:18 AM
Subject: Re: Comments on the Pines Remedial Investigation

> Hi Larry:
>
> Thank you for your email message. From the beginning of the U.S.
> Environmental Protection Agency's involvement in the Pines Site, EPA has
> appreciated the hard work and dedication of the P.I.N.E.S. community
> group. EPA was pleased to name P.I.N.E.S. as the selected community
> group for this site As the selected community group, P.I.N.E.S.
> entered into and agreement with the PRPs at the Site to receive funds
> for aTechnical Assistance Plan (TAP). As you know, P.I.N.E.S. will
> receive a second distribution of $50,000 to fund the TAP, which will
> allow continued meaningful participation in the Superfund process.
>
> In your email you raised a number of serious concerns with the

> P.I.N.E.S. TAP. We have attempted to address the specific issues you
> raised and to clarify why EPA made the decisions we discussed in our
> meetings of September 28th and October 22nd.
>
> 1. "EPA allowed NIPSCO and Brown, Inc. to submit, repeatedly and almost
> without change, error-filled Remedial Investigation drafts and an
> unworkable model."
>
> EPA submitted the first draft RI Report to IDEM (our agency partner),
> NPS, and P.I.N.E.S. (our stakeholders) for review. All agencies and
> stakeholders had a considerable number of comments on the draft. On
> August 22, 2008, EPA submitted to the PRPs, and copied our partner and
> stakeholders, a 25-page comment document incorporating EPA's, IDEM's,
> NPS, and P.I.N.E.S.comments. After repeated technical discussions
> between all of the stakeholders and the PRP group, a second draft of the
> RI Report was prepared. EPA then submitted the second draft to our
> partners and stakeholders for review. After a review period that was
> lengthened due to the groundwater model issues, all stakeholders
> received the draft combined comments document from EPA for review and
> again provided input to EPA. EPA reviewed that input, generated the RI
> Report Comments and forwarded them to the PRPs with copies to the
> stakeholders. This will be the last opportunity for the PRPs to correct
> omissions and inaccuracies identified in the comments. If the PRP fails
> to make the proper corrections, EPA will supplement the RI Report with
> its conclusions. Other than the inclusion of P.I.N.E.S. in so many draft
> documents, this is normal procedure for a PRP-lead investigation.
>
> 2. The P.I.N.E.S. technical advisor had to check and recheck erroneous
> documents. This redundant but necessary activity exhausted TAP funds.
> Beginning with the first receipt of the Pines groundwater model from the
> PRPs, issues were raised, not only by P.I.N.E.S technical advisor,
> Geo-Hydro, but by IDEM and NPS, who had their own groundwater modeler
> review the submitted Pines groundwater model. It is not uncommon for
> partners and stakeholders to bring important comments to the attention
> of EPA. EPA encourages and partners and stakeholders to supply input.
> On May 8, 2009, EPA received a letter from NPS stating that their
> evaluation of the Pines Site mathematical groundwater model was
> fundamentally flawed. The NPS model reviewer's evaluation prompted EPA
> to enlist the assistance of EPA's Office of Research and Development lab
> in Ada, OK for a review of the mathematical model. After the Ada Lab
> concluded that the PRP groundwater model was not usable EPA consulted
> with IDEM and determined that a groundwater model was not necessary to
> continue the Pines Site RI/FS process. As EPA has stated before, it is
> not unusual for the RI/FS process to continue without a mathematical
> groundwater model. In EPA’s and IDEM’s determination, the delays in
> completing the remedial activities at the site, which had occurred and
> would have continued to occur if EPA required completion of an
> acceptable groundwater model, did not justify the limited benefits that
> a groundwater model would have provided. EPA's final decision to drop
> the groundwater model was supported by Geo-Hydro.
>
> At the time that the NPS groundwater modeler was evaluating the Pines
> model, Geo-Hydro was conducting an independent evaluation of the
> groundwater model without funding from the TAP. Had P.I.N.E.S. been
> within the TAP process during this period EPA could have worked with
> P.I.N.E.S. on the utilization of their limited funds, as we would any
> community group under a TAP or TAG. For the same reason, EPA suggested
> during the September meeting that P.I.N.E.S. conserve the new funds that
> the PRP is making available during the review of the risk assessment by
> leveraging the work of others in their review.
>

> 3. EPA wanted to have GeoHydro compensated for their work and now will
> not honor the amendment to the TAP by providing $86,409.90 toGeoHydro
> for work performed between funding.
>
> EPA notified P.I.N.E.S. in June 2008 that they did not qualify for
> additional funds, based on the then current TAP agreement. P.I.N.E.S.
> understood that the funding was exhausted and that they did not qualify
> for additional funds under the TAP agreement and that any work performed
> by Geo-Hydro after their funds expired could not be compensated by the
> TAP. Monthly reports from P.I.N.E.S. during this period state that: a)
> the TAP funds were exhausted at the end of June 2008, 2) that work
> continued by Geo-Hydro "without compensation", and that 3) Geo-Hydro
> continued to review documents and participate in conference calls
> without payment. In a meeting with EPA on September 25, 2009, P.I.N.E.S.
> told EPA that Geo-Hydro was aware that their work would not be
> compensated but continued to work with the project because of their
> interest in the national flyash issue.
>
> After a review by EPA headquarters of TAPS nationwide, EPA determined
> that the P.I.N.E.S. TAP needed to be modified so that additional new
> funds could be made available. While EPA was working with the PRPs to
> modify the TAP, EPA made P.I.N.E.S. aware that EPA was working to see if
> additional new funding was possible. At the time that EPA told
> P.I.N.E.S. of the modification of the TAP agreement, EPA stated that the
> purpose of the amendment was to provide additional new funding to
> P.I.N.E.S. EPA did not state the amount of new funding or state that the
> new funds could be used retroactively. When EPA notified P.I.N.E.S. that
> funding was again available, EPA stated that they looked forward to
> P.I.N.E.S. renewed participation.
>
> 4. These are stalling and delaying tactic that are "...a deliberate
> action, intended to exhaust the P.I.N.E.S. community group's time,
> energy, and money."
>
> EPA's actions that led the PRPs to provide P.I.N.E.S. with an additional
> $50,000 in funds, as we would do for any qualifying community group, is
> evidence that we consider the contributions of P.I.N.E.S. important to
> the Superfund process at the Pines Site. EPA cannot, however, provide
> funds to any TAG or TAP group for expenses that were not authorized by
> an agreement or grant with EPA or a PRP. EPA's own fiscal
> responsibilities prevent us from this regardless of the merits of the
> expenses. EPA’s request on August 24, 2009 for P.I.N.E.S. to present a
> spending plan for the $50,000 in new funding is the process that
> P.I.N.E.S. adhered to with the initial funding and that has been put in
> place for all TAPs and TAGs to prevent expenditures that are not agreed
> upon in advance. Anyone paying a bill has the right to review and
> approve that bill. If, however, a TAP group and PRP can reach agreement
> on another larger funding amount, EPA would have no objections to that
> arrangement.
>
>
> 5. EPA failed to keep NIPSCO and Brown, Inc. on schedule.
>
> Purposefully, there was no set schedule for the completion of the
> Remedial Investigation in the Administrative Order on Consent with the
> PRPs. As is evidenced by the delays to the remedial process brought on
> by the lengthy discussions regarding the groundwater model, it is
> extremely difficult to set schedules for RI activities; only estimates.
> Many adjustments are usually necessary due to the discovery of new
> information, arguments over differences in interpretation of the
> existing information, re-interpretation of the data, etc. Additional

> work, not identified in the original work plan, was also required of the
> PRPs by EPA that involved additional sampling. In addition, as you
> mention, there was a great amount of time spent evaluating multiple
> versions of the groundwater model. The Pines Site, according to the 2004
> Consent Order with the PRPs, is now back on an enforceable schedule
> because of EPA's conditional approval of the RI Report.
>
> EPA appreciates the hard work and dedication of the P.I.N.E.S. members
> and looks forward to your continued participation at the Pines Site. It
> is rare that we have a perfectly smooth process. But, ultimately, this
> work will result in the determination of any unacceptable risks to the
> residents and environment of Pines. If risks are present, EPA is
> committed to performing the actions necessary to reduce those risks to
> acceptable levels. Thank you for your continued work.
>
> Tim Drexler
> Remedial Project Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-6J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
> fax: 312.886.4071
>
>
>

EPA-R5-2013-003300RR-318

[redacted]
11/06/2009 06:33 PM

To Timothy Drexler
cc 'Chuck Norris', [redacted], [redacted], [redacted], [redacted], [redacted], [redacted], peggy, Paul Kysel, [redacted], [redacted]
bcc
Subject Fw: Re: PINES - Request for data base

Tim,

Could you check on this request?
We still haven't received it.

Thanks,
Larry Silvestri
[redacted]

--- On **Tue, 10/20/09, Laurence Silvestri** <[redacted]> wrote:

From: Laurence Silvestri <[redacted]>
Subject: Re: PINES - Request for data base
To: Drexler.Timothy@epamail.epa.gov
Cc: [redacted]@geo-hydro.com, "'Chuck Norris'" <cnorris@geo-hydro.com>
Date: Tuesday, October 20, 2009, 9:57 PM

Tim,

We still need a copy of the database.

Larry Silvestri

--- On **Sat, 10/17/09, Laurence Silvestri** <[redacted]> wrote:

From: Laurence Silvestri <[redacted]>
Subject: PINES - Request for data base
To: Drexler.Timothy@epamail.epa.gov
Cc: [redacted]@geo-hydro.com, "'Chuck Norris'" <cnorris@geo-hydro.com>
Date: Saturday, October 17, 2009, 10:34 AM

Tim,

Please email a copy of the AECOM/USEPA electronic data base of Yard 520 water quality data from the landfill monitoring program. It includes the following citation:

From the SMS, Section 3.7.3 Site-Specific Groundwater Data, page 3-30

"Groundwater monitoring has been conducted at Yard 520 since the early 1980s. The monitoring data from 1998 to 2003 has been provided electronically by Weaver Boos (2004), and is available electronically upon request."

Thank you,
Larry Silvestri
PINES Secretary
Exemption 6

EPA-R5-2013-003300RR-319

Laurence Silvestri
[redacted]
11/08/2009 05:39 PM

To Timothy Drexler

cc 'Chuck Norris', [redacted], [redacted], [redacted], [redacted], [redacted], [redacted], peggy, Paul Kysel, [redacted], [redacted]

bcc

Subject EPA conditionally approves RI

Tim,

I received the copy of your November 3, 2009 letter to Ms. Lisa Bradly. Would you please email a copy of the letter and the 14 pages of comments to me? That would speed our distribution process.

Thank you,
Larry SIlvestri
[redacted]

EPA-R5-2013-003300RR-320

Timothy Drexler/R5/USEPA/US
11/09/2009 07:59 AM

To lbradley
cc silvestri
bcc
Subject Fw: PINES - Request for data base

Hi Lisa:

Still need this database. Please let me know when we can expect it.

Thanks.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

----- Forwarded by Timothy Drexler/R5/USEPA/US on 11/09/2009 07:58 AM -----

From: Laurence Silvestri <[redacted]>
To: Timothy Drexler/R5/USEPA/US@EPA
Cc: 'Chuck Norris' <cnorris@geo-hydro.com>, [redacted]@geo-hydro.com, [redacted], Paul Kysel <[redacted]>,
Date: 11/06/2009 06:33 PM
Subject: Fw: Re: PINES - Request for data base

Tim,

Could you check on this request?
We still haven't received it.

Thanks,
Larry Silvestri
[redacted]

--- On **Tue, 10/20/09, Laurence Silvestri** <[redacted]> wrote:

From: Laurence Silvestri <[redacted]>
Subject: Re: PINES - Request for data base
To: Drexler.Timothy@epamail.epa.gov
Cc: [redacted]@geo-hydro.com, "'Chuck Norris'" <cnorris@geo-hydro.com>
Date: Tuesday, October 20, 2009, 9:57 PM

Tim,

We still need a copy of the database.

Larry Silvestri

--- On **Sat, 10/17/09, Laurence Silvestri** <[redacted]> wrote:

From: Laurence Silvestri <[redacted]>
Subject: PINES - Request for data base
To: Drexler.Timothy@epamail.epa.gov
Cc: [redacted]@geo-hydro.com, "'Chuck Norris'" <cnorris@geo-hydro.com>
Date: Saturday, October 17, 2009, 10:34 AM

Tim,

Please email a copy of the AECOM/USEPA electronic data base of Yard 520 water quality data from the landfill
the following citation:

From the SMS, Section 3.7.3 Site-Specific Groundwater Data, page 3-30

"Groundwater monitoring has been conducted at Yard 520 since the early 1980s. The monitoring data from 1998
electronically by Weaver Boos (2004), and is available electronically upon request."

Thank you,
Larry Silvestri
PINES Secretary
[redacted]

EPA-R5-2013-003300RR-321

Timothy Drexler/R5/USEPA/US

11/13/2009 08:12 AM

To Laurence Silvestri

cc [redacted], Janet Pope, [redacted], [redacted], [redacted], [redacted], peggy, Paul Kysel, [redacted], [redacted], Larry Johnson

bcc

Subject Re: Pre-meeting with Pines Site PRP contractor to discuss HHERA

Hi Larry:

As I mentioned in my Nov. 9th email message to the PRPs, within the next couple of weeks I'd like to schedule a conference call with AECOM to discuss the upcoming draft HHERA. For that reason I'd like to make sure that P.I.N.E.S. is set with the second distribution of funds. Could you please contact Val Blumenfeld or Dan Sullivan regarding this? In our Sept. 25th meeting you told me that P.I.N.E.S. still has nonprofit status, so they would probably only need the information you have. They will also need a workplan for the funds. If you would like EPA to participate in your discussion with them that would be fine. Just let me know. If you'd like to talk to me about this, I will be in all of today and most of next week.

-Tim

EPA-R5-2013-003300RR-322

Paul Kysel
Exemption 6
11/16/2009 01:21 PM

To Dan Sullivan-Nipsco, Val Blumenfeld - Brown
cc Timothy Drexler, Larry Silvestri, Jan Nona
bcc
Subject FW: Form 990-N E-filing Receipt - IRS Status: Accepted

Val / Dan, Tim Drexler, EPA, directed us to provide you with documentation as to our current IRS 501 C3 status. This follows. Please let me know if there is more you are looking to receive before releasing the new TAP Grant funding.

FYI, we confirmed our status after filing this paper work with the following IRS employee:

Mrs. Black @ IRS ID# 1758627
1-877-829-5500

If no additional documentation is needed before releasing the funds, please let me know when we can expect to receive the funds.

Paul Kysel, VP PINES Group
Exemption 6

> > ----- Original Message -----
> > From: <epostcard@urban.org>
> > To: <Exe Exemption 6>
> > Sent: Thursday, September 10, 2009 9:25 AM
> > Subject: Form 990-N E-filing Receipt - IRS Status: Accepted
> >
> >
> > Organization: PEOPLE IN NEED OF ENVIORNMENTAL SAFETY INC
> > EIN: 20-2034833
> > Submission Type: Form 990-N
> > Year: 2007
> > Submission ID: 7800582009253aw14409
> > e-File Postmark: 9/10/2009 11:19:41 AM
> > Accepted Date: 9/10/2009
> >
> > The IRS has accepted the e-Postcard described above. Please save this
> > receipt for your records.
> >
> > Thank you for filing.
> > ---
> > e-Postcard technical support
> > Phone: 866-255-0654 (toll free)
> > email:ePostcard@urban.org
> > ---
> >
> >
> > PEOPLE IN NEED OF ENVIORNMENTAL
> > SAFETY INC
> > Exemption 6
> > Exemption 6

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> > ----------
> >
> >
> >
> > No virus found in this incoming message.
> > Checked by AVG - www.avg.com
> > Version: 8.5.409 / Virus Database: 270.13.89/2360 - Release Date: 09/10/09
> > 11:29:00
> >
>

Hotmail: Trusted email with powerful SPAM protection. Sign up now.

EPA-R5-2013-003300RR-323

Laurence Silvestri
[redacted]
11/19/2009 03:04 PM

To Timothy Drexler
cc [redacted], peggy, Paul Kysel, [redacted], DarcyMassimino
bcc
Subject Fw: Re: PINES - Request for data base

Tim,

We still haven't received this data. Could you find out why or please provide it.

Thanks,
Larry Silvestri

--- On **Fri, 11/6/09, Laurence Silvestri** <[redacted]> wrote:

From: Laurence Silvestri <[redacted]>
Subject: Fw: Re: PINES - Request for data base
To: Drexler.Timothy@epamail.epa.gov
Cc: "'Chuck Norris'" <cnorris@geo-hydro.com>, [redacted]@geo-hydro.com, [redacted], "Paul Kysel" <[redacted]>, [redacted]
Date: Friday, November 6, 2009, 7:33 PM

Tim,

Could you check on this request?
We still haven't received it.

Thanks,
Larry Silvestri
[redacted]

--- On **Tue, 10/20/09, Laurence Silvestri** <[redacted]> wrote:

From: Laurence Silvestri <[redacted]>
Subject: Re: PINES - Request for data base
To: Drexler.Timothy@epamail.epa.gov
Cc: [redacted]@geo-hydro.com, "'Chuck Norris'" <cnorris@geo-hydro.com>
Date: Tuesday, October 20, 2009, 9:57 PM

Tim,

We still need a copy of the database.

Larry Silvestri

--- On **Sat, 10/17/09, Laurence Silvestri** <[redacted]> wrote:

From: Laurence Silvestri <[redacted]>
Subject: PINES - Request for data base
To: Drexler.Timothy@epamail.epa.gov
Cc: [redacted]@geo-hydro.com, "'Chuck Norris'" <cnorris@geo-hydro.com>
Date: Saturday, October 17, 2009, 10:34 AM

Tim,

Please email a copy of the AECOM/USEPA electronic data base of Yard 520 water quality data from the landfill monitoring program. It includes the following citation:

From the SMS, Section 3.7.3 Site-Specific Groundwater Data, page 3-30

"Groundwater monitoring has been conducted at Yard 520 since the early 1980s. The monitoring data from 1998 to 2003 has been provided electronically by Weaver Boos (2004), and is available electronically upon request."

Thank you,
Larry Silvestri
PINES Secretary
[redacted]

EPA-R5-2013-003300RR-324

Laurence Silvestri
Exemption 6
11/23/2009 09:15 PM

To Timothy Drexler
cc Exemption 6, Exemptio..., Exemption 6, Exemption 6, Exemption 6, peggy, Paul Kysel, Exemp..., Exe...
bcc
Subject Re: Package to your attention

Thank you.

--- On **Mon, 11/23/09, Drexler.Timothy@epamail.epa.gov** ***<Drexler.Timothy@epamail.epa.gov>*** wrote:

From: Drexler.Timothy@epamail.epa.gov <Drexler.Timothy@epamail.epa.gov>
Subject: Package to your attention
To: Exemption 6
Date: Monday, November 23, 2009, 7:00 PM

Hi Larry:

I just put a package in the mail to you following up with information P.I.N.E.S. requested at our last meeting. I contacted Mike Sonnefeld with IDEM and Jane Smith with the Indiana State Department of Health Laboratories. They provided me with information on Yard 520 closure and local state-performed groundwater studies with radiological components. You should be receiving it in a couple of days.

Once you get it, please call me if you have any questions.

-Tim

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

EPA-R5-2013-003300RR-325

Laurence Silvestri
Exemption 6
11/29/2009 09:26 AM

To Timothy Drexler
cc Exemption 6, Exemptio..., Exemption 6, Exemption 6, Exemption 6, peggy, Paul Kysel, Exemp..., Exe...
bcc
Subject Re: Package to your attention

Tim,

I received the information and I will forward it to Paul Kysel.

In the future, please send all US mail, email, and telephone calls to:

People In Need of Environmental Safety (P.I.N.E.S.)

Paul Kysel, Vice-President

Exemption 6

Exemption 6

Exemption 6

Exemption 6

Thanks,
Larry Silvestri

--- On **Mon, 11/23/09, Drexler.Timothy@epamail.epa.gov** ***<Drexler.Timothy@epamail.epa.gov>*** wrote:

From: Drexler.Timothy@epamail.epa.gov <Drexler.Timothy@epamail.epa.gov>
Subject: Package to your attention
To: Exemption 6
Date: Monday, November 23, 2009, 7:00 PM

Hi Larry:

I just put a package in the mail to you following up with information P.I.N.E.S. requested at our last meeting. I contacted Mike Sonnefeld with IDEM and Jane Smith with the Indiana State Department of Health Laboratories. They provided me with information on Yard 520 closure and local state-performed groundwater studies with radiological components. You should be receiving it in a couple of days.

Once you get it, please call me if you have any questions.

-Tim

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

EPA-R5-2013-003300RR-326

Timothy Drexler/R5/USEPA/US
11/30/2009 07:46 AM

To Laurence Silvestri
cc pkysel
bcc
Subject Re: Package to your attention

Will do, Larry.

-Tim

Laurence Silvestri Tim, 11/29/2009 09:25:59 AM

From: Laurence Silvestri <[redacted]>
To: Timothy Drexler/R5/USEPA/US@EPA
Cc: [redacted], Paul Kysel <[redacted]>, [redacted]
Date: 11/29/2009 09:25 AM
Subject: Re: Package to your attention

Tim,

I received the information and I will forward it to Paul Kysel.

In the future, please send all US mail, email, and telephone calls to:

People In Need of Environmental Safety (P.I.N.E.S.)

Paul Kysel, Vice-President

[redacted]

[redacted]

[redacted]

[redacted]

Thanks,
Larry Silvestri

--- On **Mon, 11/23/09, Drexler.Timothy@epamail.epa.gov** ***<Drexler.Timothy@epamail.epa.gov>*** wrote:

From: Drexler.Timothy@epamail.epa.gov <Drexler.Timothy@epamail.epa.gov>
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Date: Monday, November 23, 2009, 7:00 PM

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Once you get it, please call me if you have any questions.

-Tim

Tim Drexler
Remedial Project Manager
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United States Environmental Protection Agency
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Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

EPA-R5-2013-003300RR-327

Paul Kysel
Exemption 6
11/30/2009 08:15 PM

To Dan Sullivan-Nipsco, Larry Silvestri
cc Timothy Drexler, kherron, Val Blumenfeld - Brown
bcc
Subject RE: Technical Assistance Plan - Pines

Dan, sorry for the delay in getting back to you on this. We are in the midst of straightening out our incorporation status with the State of Indiana. We did not realize that an annual filing was required to maintain our status and thus it was permitted to lapse. We are trading letters / info with the State and will forward the requested information as soon as it becomes available to us. We are hopeful that there is some way that the PRP's can find a way to release these new funds.

I discussed this situation with Tim Drexler today and he both indicated he would be discussing this with you and would be asking someone @ the EPA to assist PINES Group re-establish our status with the State.

Regarding the proposed budget and description of work to be performed:
Tim Drexler has advised we ear mark $30K for our RA technical advisor and we plan to utilize this person to review the work product that Aecom will be submitting. We expect to hold meetings with the general public when the both the final RA and RI are public record.

As the RA process draws to a close, we will revisit any remaining funding for possible disbursement to Geo-Hydro for work completed but not yet compensated.

Thanks,

Paul Kysel
PINES Group VP

> Subject: Technical Assistance Plan - Pines
> To: Exemption 6; Exemption 6
> CC: drexler.timothy@epamail.epa.gov; kherron@idem.in.gov; vblumenfeld@bibtc.com
> From: DSullivan@NiSource.com
> Date: Fri, 20 Nov 2009 13:58:07 -0600
>
>
> Thank you for providing your note of November 16 that contains a Form 990-N
> E-filing receipt from the IRS. However, in order to demonstrate that
> P.I.N.E.S. is a legally established Not-for-Profit Corporation please
> provide to us a current, valid, Certificate of Existence/Authorization from
> the State of Indiana.
>
> In addition, as outlined in the TAP Agreement between the Respondents and
> P.I.N.E.S. and as identified in previous communication between U.S. EPA and
> P.I.N.E.S., in order to be eligible for the additional funding please
> provide us with a budget and a description of work to be performed.
>
> Please advise if you have questions or require additional information...
>
> Thanks, Dan

>
>
> Dan Sullivan
> NiSource Environmental Health & Safety
> (219) 647-5248
>

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EPA-R5-2013-003300RR-328

"Larry Jensen"
<Exe... Exemption 6
12/01/2009 09:48 AM

To Timothy Drexler
cc
bcc
Subject Re: Pines - Initial Response to Comments - EPA-10 and EPA-80 - Rad

PINES, Tim,

I have these quick responses. Then I will repeat the email I sent Larry Silvestri on November 16, 2009, which I hope got to you Tim.

RE: EPA COMMENT #10

Total U as labeled here is not Total U. Total U is the sum of U-238, U-234, and U-235. The ICP results do not include U-234.

If a risk assessment is to be done properly, then all three uranium isoptopes must be determined.

Comments sent to Larry Silvestri on November 16, 2009

"I am puzzled by EPA's general Comment on radiation. It begins "EPA is concerned with the radiological water results..." Tim Drexler sent me an email on October 16, 2008, relaying responses from Lisa Bradley, then of ENSR, that sample GP004ICB092305B was an "agueous equipment blank associated with soil samples," not a field sample. I am not sure why EPA is treating this as a data point.

The other problem that EPA speaks to is that the detection limits used on GEL Laboratory samples 202261002, 20226103, and 202261044 are too high. Thus, it cannot be determined if the radium and/or uranium drinking water standards were exceeded. For a complete Human Helath Risk Assessment, isotopic radium and isotopic uranium concentrations must be included, especially if drinking water standards are exceeded. EPA is correct in wanting to refine this data. I am not clear if there are any residential measurements for radium and uranium in drinking water.

I was also disappointed that EPA did not mention soils. The data shows that there are data sites where radium soil criteria traditionally used by EPA Region 5 are exceeded. Our recent gamma survey shows that there are regions of elevated gamma count rate in Pines that might lead to excess gamma dose. A complete Human Health Risk Assessment must include these aspects."

Larry Jensen

----- Original Message -----

From: Drexler.Timothy@epamail.epa.gov
To: [redacted] ; Jablonowski.Eugene@epamail.epa.gov ; [redacted] ; [redacted] ; kay.bob@epamail.epa.gov ; kherron@idem.in.gov ; brenda_waters@nps.gov ; charles_morris@nps.gov ; pete_penoyer@nps.gov
Sent: Tuesday, December 01, 2009 8:51 AM
Subject: Fw: Pines - Initial Response to Comments - EPA-10 and EPA-80 - Rad

Hi all:

Please provide any comments you have to this response.

-Tim

----- Forwarded by Timothy Drexler/R5/USEPA/US on 12/01/2009 08:51 AM -----

From: "Bradley, Lisa" <lisa.bradley@aecom.com>
To: Timothy Drexler/R5/USEPA/US@EPA
Date: 12/01/2009 08:44 AM
Subject: Pines - Initial Response to Comments - EPA-10 and EPA-80 - Rad

---

Tim –

We still think there is some confusion about the rad data and whether the data in question are from RI samples of environmental media, or from QA/QC samples such as field or equipment blanks. Please see the comments and responses below and let me know if you have any questions. Thanks!

EPA Comment #10. Because the contaminant source material is CCB, AECOM should have refined the radionuclide analytical results to total uranium because there is no need to speciate for the individual radionuclides. In addition, reporting results were likely below MDLs. The lab assigned the MDL as the result. These results may not be suitable for the risk assessment. Please confirm how the results are reported.

Response #10

Reviewing the February 2006 Yard 520 boring data and the April 2007 Yard 520 background soil data, Total U was analyzed by ICP 6010 (U235 and U238 results were total to provide a calculated total U result). All soil samples had positive total U results. Only the equipment blank samples (AECOM sample IDs ending in B) had ND results at the MDL.

EPA Comment #80. EPA is concerned with the radiological water results, as reported. For example, the combined result (Ra-226 + Ra-228) for sample GP004ICB092305B exceeds the 5pCi/L MCL, but the uncertainty exceeds the result. In the same sample, the U-238 result is 161 pCi/L where the uncertainty listed is +/- 346 pCu/L. This is an indication of inadequate counting time. Longer counting times would

have reduced the counting uncertainty. In addition, the certificates of analysis do not provide counting times so a thorough evaluation is not possible. Please provide additional information

Response #80

This sample is an equipment blank and the information was only used for quality control purposes to ensure that the decontamination procedures were appropriate. The sample was counted for 8 hours and could have been counted for the maximum count time of 16 hours in an attempt to reduce the counting uncertainty. However, the results as presented, even with the high uncertainty, met the sample objectives of verifying appropriate decontamination procedures.

Please note that both of these comments were addressed in the Response to Comments document provided as Appendix BB to the December 2008 RI Report.

Lisa JN Bradley, Ph.D., DABT
Senior Toxicologist and Senior Regional Program Manager
Environment
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C 978-846-3463

lisa.bradley@aecom.com

AECOM
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F 866-758-4856

www.aecom.com

EPA-R5-2013-003300RR-329

Paul Kysel
Exemption 6
12/01/2009 08:01 PM

To: Timothy Drexler, Larry Jensen, EUGENE JABLONOWSKI, Larry Silvestri, Bob Kay, "Kevin Herron@IDEM", Brenda Waters, charles_morris, pete_penoyer
cc:
bcc:
Subject: RE: Pines - Initial Response to Comments - EPA-10 and EPA-80 - Rad

Tim, attached is our initial feedback to the 11/25/09 push back you have received from Aecom on behalf of the PRP's. As we review the other comments flowing in from Aecom we will forward additional comments. It looks to us that a very disturbing stand-off is developing.

Paul Kysel - PINES Group

To: Exemption 6; Jablonowski.Eugene@epamail.epa.gov; Exemption 6; Exemption 6; kay.bob@epamail.epa.gov; kherron@idem.in.gov; brenda_waters@nps.gov; charles_morris@nps.gov; pete_penoyer@nps.gov
Subject: Fw: Pines - Initial Response to Comments - EPA-10 and EPA-80 - Rad
From: Drexler.Timothy@epamail.epa.gov
Date: Tue, 1 Dec 2009 08:51:03 -0600

Hi all:

Please provide any comments you have to this response.

-Tim

----- Forwarded by Timothy Drexler/R5/USEPA/US on 12/01/2009 08:51 AM -----

From: "Bradley, Lisa" <lisa.bradley@aecom.com>
To: Timothy Drexler/R5/USEPA/US@EPA
Date: 12/01/2009 08:44 AM
Subject: Pines - Initial Response to Comments - EPA-10 and EPA-80 - Rad

---

Tim – We still think there is some confusion about the rad data and whether the data in question are from RI samples of environmental media, or from QA/QC samples such as field or equipment blanks. Please see the comments and responses below and let me know if you have any questions. Thanks! **EPA Comment #10.** Because the contaminant source material is CCB, AECOM should have refined the radionuclide analytical results to total uranium because there is no need to speciate for the individual radionuclides. In addition, reporting results were likely below MDLs. The

lab assigned the MDL as the result. These results may not be suitable for the risk assessment. Please confirm how the results are reported.

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Reviewing the February 2006 Yard 520 boring data and the April 2007 Yard 520 background soil data, Total U was analyzed by ICP 6010 (U235 and U238 results were total to provide a calculated total U result). All soil samples had positive total U results. Only the equipment blank samples (AECOM sample IDs ending in B) had ND results at the MDL.

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Please note that both of these comments were addressed in the Response to Comments document provided as Appendix BB to the December 2008 RI Report.

Lisa JN Bradley, Ph.D., DABT
Senior Toxicologist and Senior Regional Program Manager
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20091130 Cmmnts on AECOM partial response final[1].doc

EPA-R5-2013-003300RR-330

Pete_Penoyer@nps.gov
12/03/2009 02:11 PM

To Timothy Drexler
cc brenda_waters, Bob Kay, kherron, pkysel, rtkay, silvestri
bcc
Subject Re: Fw: Pines - Initial to Comments

Tim,

Some of these Responses of PRP Contractor are difficult to respond two but we regard the initial comments of EPA as technically sound. We note the following however:

Re: Response #26:

I am not aware of any NPS first hand knowledge of these seeps but note the comments supplied by Paul Kysel appear reasonable and a basis for assuming there is reasonable cause to conclude or at least infer that leachate has leaked from the the south cell in the past. Inspections made after a few wet periods (heavy rain events or a wet spring) should confirm or preclude this interpretation of seepage. We also note the final site inspection of Tetra Tech just after the South cell was completed was at a time likely well before a high head was reached in the South cell and sidewalls were subjected to higher pressure heads.

Re: Response #27:

It is not unreasonable to infer minimum water table levels in the south cell (from the North cell) based on the data (the south cell is actually topographically higher so the water table should be higher (the barrier walls suggest a bathtub model to a degree is more appropriate for the south cell and would increase the water levels further) and water level behavior should be similar also because of the similar fine grained materials disposed in the North cell that has data (although initially censored) to demonstrate water table mounding. In fact, this would be a more accurate/representative interpretation in our view than not depicting anything in the absence of data for the South cell, data that AECOM chose not to collect despite advancing multiple shallow soil borings in the South cell (one or more could have been easily advanced another 10 to 15 feet to reach the inferred water table). Again, water table contours (dashed in this case) that follow/parallel the topographic contours of the land surface is an appropriate rule-of-thumb to apply. Hydrogeologists commonly use "dashed" water table contours where water levels are inferred or poorly controlled to indicated such an inference is being made and would be appropriate here. If we had been aware from the start that AECOM would argue/contest every minor point along the way that is not supported by actual data but is supported by generally accepted Hydrogeologic theory but leads to a depiction of site conditions that does not reflect the best interest of their client, we would have insisted that two wells be installed on the crest of each of these landfill cells to demonstrate the water table mounding, that contours follow the topography in these situations and that the South cell also has a water table mound beneath it and is likely higher than that of the North cell because the same principles apply. While we believe the south cell is a source of contamination, the North cell was the larger source of concern to NPS. That was our focus assuming that a water table mound established in the North cell would be sufficient to prove the concept that the topographic man-made highs composed of fine-grained material (fly ash) in humid regions

of the country under shallow water table conditions, generate water table mounds. Any reasonable, independent observer of this data would appreciate this fact unless there is data to suggest otherwise. Please show me the data that refutes this commonly accepted Hydrogeologic principal or direct the PRPs to aquire data that supports their weak arguments.

RE Response #28:
AECOM indicates that:
A reasonable approximation of hydrogeologic conditions within and surrounding the Type III (South) Area has been provided in both the December 2008 RI submittal (Section 3.4.2) and has been extensively discussed in response to Comment 3 (Appendix BB December 2008 RI).

Whether or not a reasonable approximation of the data was used or not would seem to depend on several factors that AECOM could not support/confirm and therefore their calculations could reflect an optimistic value. We note there was no effort made to address the range of possible computations using conservative parameters that reflect the following unknowns.

1) no documention of actual head to apply to the side walls
2) no documentation of whether vertical or horizontal K values were obtained from the lab analysis based on orientation of the cores (horizontal K's are of most interest and appropriate to use from the walls and are normally 10X or more the vertical K's). Vertical K's are what one would interested in the cap. Whether this distinction was made in the coring process is unclear.
3) no documentation that hydraulic parameters today are or can be expected to be the same as that originally installed and tested at the time (covers have been shown to degrade significantly through time (K increases), do sidewalls also?)
4) no documentation if thinner sidewalls on south, west and east (3 feet thick) were compacted to the degree that the much thicker north wall was compacted where cores were taken. The wider north wall would accept access by heavy compaction equipment readily whereas the narrow barrier walls on the other 3 sides would not appear to.
5) in general, small core permeabilities because of their few number and inability to represent inhomogeneities in wall construction do not capture areas of the barrier wall that may have substantially higher hydraulic conductivity. Natural earth materials(even clay/clay loam) are rarely that homogeneous and the construction processes that use them are rarely applied with such consistency due to a number of factors. Thus a few determinations of hydraulic conductivity from core is rarely widely applicable or representative. We also note that boreholes form the area indicate the transition from the surficial aquifer to the underlying clay aquitard is not always sharp (i.e. can contain thin sand interbeds) so some interbedded sand material from the upper clay aquitard interval may be incorporated into the sidewalls.

For these reasons we believe it is more rational to explain contamination observed in MW3 & MW4 as more likely originating from leakage through the adjacent south landfill cell barrier wall rather than explaining the contamination being from the groundwater flow contortions needed for a North cell source to cause the contamination observed in those wells on the south side of the landfill cell.

If AECOM feels strongly that the proposed depictions of the North and South cells based on the limited data that they chose to collect is grossly in error, NPS would certainly support their collection of additional data to refute these interpretations that are based on commonly accepted hydrogeologic principles and potentially reduce their clients liability .

Pete

Peter E. Penoyer
Hydrologist, WRD
1201 Oakridge Dr., Ste. 250
Ft. Collins, CO 80525
Ph 970-225-3535
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email: pete_penoyer@nps.gov

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| Drexler.Timothy@epam|
| ail.epa.gov |
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| 11/23/2009 08:59 AM |
| CST |
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| To: rtkay@usgs.gov, kay.bob@epamail.epa.gov,
[redacted], kherron@idem.in.gov, |
| pete_penoyer@nps.gov, brenda_waters@nps.gov, [redacted]
|
| cc:
|
| Subject: Fw: Pines - Initial to Comments
|

>----------
----------|

Hi all:

I had a talk last week with Lisa Bradley, the contractor for the Pines Site PRPs. She asked if it would be OK to send initial responses to some of our comments prior to the due date. I told her that I encouraged it so that we can have the best chance of getting what we need. Below is a response to some of our comments. Please review these and let me know whether or not they adequately address the issues. If not, I need details on what is deficient and how it can be corrected. I'd like responses by Dec. 2nd, if possible.

Thanks.

-Tim

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J

Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071
----- Forwarded by Timothy Drexler/R5/USEPA/US on 11/23/2009 08:55 AM -----

From: "Bradley, Lisa" <lisa.bradley@aecom.com>

To: Timothy Drexler/R5/USEPA/US@EPA

Date: 11/19/2009 03:37 PM

Subject: Pines - Initial to Comments

Hi Tim! Per our conversation last week, I am forwarding to you some responses to the comments dated November 3, 2009 that you provided on the RI Report for the Pines Area of Investigation, and our suggestions for changes to the text of the document. As you will see, we have numbered the comments you provided and refer to them by number, but are also providing the original text of each comment for your ease of review. Please feel free to contact me if you have any questions.

:)A LSI

Lisa JN Bradley, Ph.D., DABT
Senior Toxicologist and Senior Regional Program Manager
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EPA Comment #26 (11/09)
Section 3.4.2: You state that "(the Type III South area)…is expected to have little, if any, interaction with the surrounding groundwater system." This should be edited to state that although little groundwater interaction may be occurring from the Type III South Cell of Yard 520, historical seeps in the south cell may indicate that meteoric water may be filling parts of the cell causing overland releases

Response #26
To date, we have no evidence of seeps from the Type III (South) area. The subject of seeps was addressed in the response to Comment 3 (Appendix BB December 2008 RI). As noted there, we can find no record of any seeps that post-date closure of the Type III (South) Area in 2004. Prior to that time, the Final Site Inspection Report (Tetra Tech, 2002) and occasional IDEM inspections make note of "leachate". A sample said to be leachate was collected by TetraTech, but there is no description provided of what was

observed in the field; it is not described as a seep. The location of the sample was in the northwest corner of the Type III (South) Area. This was an active waste management area prior to closure in 2004. There is no indication that this sample represents liquid released to the environment (i.e., outside the limits of the active waste management areas).

Please see also Response to Comment #3 from August 22, 2008, Appendix BB of the December 2008 RI submittal and Response #28, below. We understand that a site visit may be set up with IDEM to inspect alleged seeps; the Respondents would like to be informed in advance of the visit and also attend.

EPA Comment #27 (11/09)
The discussion of the construction of the North and South Areas at Yard 520 indicates that the North Area was capped with a "vegetated clayey soil cover". Please discuss the cover applied to the South Area. Water level data collected from PZ001 as part of the RI shows that precipitation is penetrating the cover. This recharge coupled with natural mounding of the water table under topography (hills) composed of fine-grained, materials such as fly ash, resulting in high hydraulic head in North Yard 520. Assuming that the soil cover on the South Area is similar to that on the North Area, we should expect that head within the topography of the South Area will be at least as high, and perhaps higher, since flow out the sides and bottom should be slowed relative to flow from the North cell by the presence of the 3-foot clay side-walls and the removal of the underlying aquifer. Since PZ001 is the only data point within either of the disposal areas, leachate elevation in both the North and South Areas should reflect the development of a mound consistent with PZ001. Please show leachate levels in both the north and South Areas consistent with highest measured elevation of leachate at PZ001 or install piezometers in both cells to obtain actual current head data in Yard 520.

Response #27
The details on cap construction for the South Area are discussed below in the Response to Comment #28. That information will be included in the main text of the RI Report. The conceptual model for groundwater elevations in the Type III (South) Area outlined in this comment is useful in considering the Type III (South) Area. AECOM has considered a similar conceptual model in order to calculate groundwater discharge rates out of the Type III (South) Area to the general groundwater system. However, such a conceptual model is insufficient to allow for an accurate depiction of groundwater elevations and flow patterns within the Type III (South) Area. Even if data from PZ001 were used to indicate groundwater elevations in the Type III (South) Area, it alone is insufficient to draw conclusions about groundwater elevations/flow elsewhere within the area.
Water from the Type III (South) Area is considered a "very minor part of the overall groundwater flow system." This conclusion is based on calculations summarized in the December 2008 submittal of the RI, Section 3.4.2 and are presented in detail in response to Comment 3 (Appendix BB December 2008 RI). See also Response #28.

Comment #28
The assumption that the South Area of Yard 520 has no interaction with the surrounding aquifer hydrologically is based on no empirical data. Installation and continuous monitoring of piezometers inside and outside of Yard 520 would be necessary to demonstrate lack of a hydraulic connection. Water will move as easily through the soil cover above the ash within south Yard 520 as it does in north Yard 520. We agree that the clay walls slow migration, but completely removing the south cell from the shallow system is not appropriate. Please include a reasonable approximation of hydrogeologic conditions within and surrounding South Yard 520.

Response #28
A reasonable approximation of hydrogeologic conditions within and surrounding the Type III (South) Area has been provided in both the December 2008 RI submittal (Section 3.4.2) and has been extensively discussed in response to Comment 3 (Appendix BB December 2008 RI). The specific text of the response to Comment 3 formed the basis for the summary text in the December 2008 RI and is as follows:

During construction of the Type III (South) Area, IDEM required Brown Inc. to construct a clay barrier wall between the two disposal areas (the Type II and Type III Areas). As stated in the Construction Quality Assurance (CQA) Report (Weaver Boos, 1995), the clay barrier was constructed 1700 ft in length, 17 ft in height, a minimum of 10 ft in width, with a design permeability of 1x10-6 cm/sec or less. A copy of the CQA Report, which documents the testing of the wall, is attached for reference (Attachment 2), without appendices (which can be provided on request).

Other Yard 520 documents discuss the construction of the other walls (e.g., Weaver Boos, undated). In 1987-1988, the sands of the surficial aquifer in the Type III (South) Area were excavated to a depth of approximately 15 ft, which was approximately 3 ft into the underlying clay confining unit. In addition to the compacted clay barrier wall to the north, compacted clay walls were also installed on the eastern, southern, and western sides of the area. The design hydraulic conductivity for these three sides was the same as the barrier wall (less than 1x10-6 cm/sec), and the design thickness was at least 3 ft.

In addition, according to representatives from Weaver Boos (the design engineer for Yard 520), the clay cap installed during closure was constructed to tie into the clay side walls. This is documented in the as-built drawing for the eastern wall in the Closure Certification Report (Weaver Boos, 2005). The eastern wall was constructed inside the original eastern barrier wall, based on the final location of filling activities (that is, filling did not extend to the original barrier wall to the east). The cap was constructed similarly for the other three sides of the Type III (South) Area.

Based on the construction of the Type III (South) Area, it is expected to have little, if any, interaction with the surrounding groundwater system. Any potential leakage through the walls would be on a scale so small as to be completely masked by groundwater in the surficial aquifer and groundwater migrating from the Type II (North) Area of Yard 520. The hydraulic conductivity of the clay barrier wall was measured at 7 x 10-8 cm/sec (Weaver Boos, 1995) or 2 x 10-4 feet/day. This represents more than a 100,000-fold decrease over the hydraulic conductivity of the surficial aquifer (geometric mean of 15 feet/day). Even assuming a relatively steep hydraulic gradient across the walls, the potential contribution of water from the Type III (South) Area to the groundwater system would be several orders of magnitude smaller than the volume of water in the groundwater system.

The comment mentions historical seeps; we can find no record of any seeps that post-date closure of the Type III (South) Area in 2004. Prior to that time, the Final Site Inspection Report (Tetra Tech, 2002) and occasional IDEM inspections make note of “leachate”. A sample said to be leachate was collected by TetraTech, but there is no description provided of what was observed in the field; it is not described as a seep. The location of the sample was in the northwest corner of the Type III (South) Area. This was an active waste management area prior to closure in 2004. There is no indication that this sample represents liquid released to the environment

(i.e., outside the limits of the waste management areas).

The Type III (South) Area was designed and configured such that free water would flow to the storm-water retention area (previously located in the eastern portion of the Type III Area). Most of the flow was from covered slopes and not from disposal areas. Runoff was retained in the storm-water retention area to allow for the settlement of solids before discharge into Brown Ditch, in accordance with the Yard 520 operating permit.

Other USEPA comments note that the concentrations of CCB-derived constituents present in MW-3 and in Brown Ditch on the south side of the Type III (South) Area indicate leakage from this area. However, the assumption that these concentrations represent leakage (which if occurring, would be very small in volume due to the clay walls) is not the only explanation. In fact, it is not the most plausible explanation. Instead, groundwater migrating from the Type II (North) Area is a more likely source. First, the groundwater levels at MW-3 and MW-4 are higher than nearby Brown Ditch. In this narrow remnant strip of aquifer between Yard 520 and the ditch, it is unlikely that leakage from the Type III (South) Area and the small amount of recharge would provide water sufficient to maintain these high levels. Another source of water clearly exists. Furthermore, even if the Type III (South) Area were to be replaced by a block of completely impermeable material, groundwater would still be present in this remnant aquifer area. The most likely source of that groundwater is the area north of the Type III (South) Area, that is, the Type II (North) Area of Yard 520.

Calculations were performed to provide a simplified evaluation of the significance of potential leakage from the Type III (South) Area. Darcy's Law was used to calculate potential volumes of leakage, using actual parameter values, where known. The most important unknown is the groundwater level within the Type III Area. Therefore, a range of possible values was used (i.e., akin to a sensitivity analysis) for the difference in water levels between the Type III Area and the surrounding groundwater. The calculation results provide a range of potential leakage rates, from 0 to 56 ft3/day. Details of the calculations are provided in Attachment 3.

Two different approaches were used to evaluate the potential effect of the calculated leakage:

§ Leakage that may occur from the Type III Area will mix with the surrounding groundwater and flow into Brown Ditch. Therefore, the calculated leakage rates were compared to flow rates measured in Brown Ditch during the RI. Under low flow conditions, the maximum potential leakage from the Type III Area represents 0.15% of the flow in Brown Ditch; under high flow conditions, it is an order of magnitude lower, 0.013%. In all cases, the rate of leakage from the Type III Area is less than 0.2% of the flow in Brown Ditch.

§ The calculated leakage range was also compared to groundwater flow rates using a groundwater flow tube representing groundwater flow from the south into Brown Ditch (see Attachment 3). The calculated groundwater discharge through this flow tube (100 ft wide) is 376 ft3/day. The calculated discharge through a 100-ft wide section of the clay barrier wall ranges from 1 to 3 ft3/day. Therefore, the potential leakage is less than 1% of a comparable groundwater flow rate.

These calculations demonstrate that if there is leakage from the Type III (South) Area, it is a very minor part of the overall groundwater flow system.

In final RI Report, the appropriate section(s) of the RI will be updated to include the entire detailed contents of Response to Comment 3 from Appendix BB of the December 2008 RI, including the detailed spreadsheet calculations.

EPA-R5-2013-003300RR-331

Paul Kysel
Exemption 6
12/03/2009 07:37 PM

To Timothy Drexler
cc Larry Silvestri, Larry Johnson, "Kevin Herron@IDEM", Pete Penoyer-NPS, Charles Morris-NPS, Brenda Waters, Bob Kay, EDWARD KARECKI, Jan Nona
bcc
Subject RE: Pines - RI Report Extension

Tim, we find it FASCINATING, if not outrageous, that EPA is now expecting a draft copy of the HHERA
from the PRP's 5 days BEFORE the new revised deadline for (hopefully) receiving an approvable final copy of the RI Report.

We were under the belief that the appropriate sequence is do an RI, finalize a report of the RI, then based
upon what is finally concluded in the completed / accepted RI, a HHERA study is commenced, and THEN
a report on the results of the HHERA study is drafted.

You are now asking for the HHERA report (draft form) before completion of the RI reporting.

To us that clearly means the HHERA is already being drafted with results that may be ginned into the draft report. FASCINATING! Extremely troubling...

It appears that the completion of the work product process has become more important than the contents of the reports or the outcome for the community.

Please assure me we have this wrong...

Paul Kysel - PINES Group

To: lisa.bradley@aecom.com
CC: Exemption 6; Exemption 6; Johnson.Larry@epamail.epa.gov; kherron@idem.in.gov; pete_penoyer@nps.gov; charles_morris@nps.gov; brenda_waters@nps.gov; kay.bob@epamail.epa.gov; Karecki.Edward@epamail.epa.gov
Subject: Re: Pines - RI Report Extension
From: Drexler.Timothy@epamail.epa.gov
Date: Thu, 3 Dec 2009 16:42:26 -0600

Lisa:

Given the additional correspondence that will be needed to complete the RI Report, EPA grants the extension to January 8, 2010. In the mean time, EPA will look for continued activity from AECOM in the form of proposals for language changes to the document. In that way, we will work toward an approvable document on the new due date. We also look forward to the first draft HHERA on January 3, 2009, and hope to schedule a conference call in the next couple of weeks with our stakeholders to discuss that document.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

From: "Bradley, Lisa" <lisa.bradley@aecom.com>
To: Timothy Drexler/R5/USEPA/US@EPA
Date: 12/03/2009 04:28 PM
Subject: Pines - RI Report Extension

Tim – Per our discussion, today, December 3, is 30 days after we received USEPA's conditional approval and comments on the RI Report for the Pines Area of Investigation (Docket No. V-W-'04-C-784). As you know, we have been working with you on finalizing this document and we have been having a correspondence back and forth concerning the responses to various comments and subsequent revisions to finalize the report. As many issues are still outstanding for both of us, I would like to request an extension for submission of the RI Report until Friday January 8, 2009. I look forward to your reply. Thanks you! :) ALSI

Lisa JN Bradley, Ph.D., DABT
Senior Toxicologist and Senior Regional Program Manager
Environment
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C 978-846-3463
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EPA-R5-2013-003300RR-332

Paul Kysel
Exemption 6
12/03/2009 08:33 PM

To: Timothy Drexler
cc: Larry Silvestri, Larry Johnson, "Kevin Herron@IDEM", Pete Penoyer-NPS, Charles Morris-NPS, Brenda Waters, Bob Kay, EDWARD KARECKI
bcc:
Subject: PINES Group comments to Aecom's latest push back on EPA comments contained in letter to them dated 11/3/09 RE: RI Report

Tim, here is our latest set of comments regarding Aecom's push back.

Paul Kysel - PINES Group

To: lisa.bradley@aecom.com
CC: Exemption 6; Exemption 6; Johnson.Larry@epamail.epa.gov; kherron@idem.in.gov; pete_penoyer@nps.gov; charles_morris@nps.gov; brenda_waters@nps.gov; kay.bob@epamail.epa.gov; Karecki.Edward@epamail.epa.gov
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20091202 Cmmnts on AECOM partial response cmmnt 2[1].doc

EPA-R5-2013-003300RR-333

Paul Kysel
Exemption 6
12/09/2009 07:18 PM

To Timothy Drexler
cc Charles Morris-NPS, "Kevin Herron@IDEM", Pete Penoyer-NPS, Jan Nona, Larry Silvestri
bcc
Subject RE: Inspection of Yard 520 North Cell tomorrow

Tim, sorry I missed your call this afternoon, highways were atrocious. I will be there, thanks.
By the way, I thought it best to look after a lack of precipitation, not soon after a rain?

Paul Kysel

To: Exemption 6
CC: brenda_waters@nps.gov; charles_morris@nps.gov; kherron@idem.in.gov; pete_penoyer@nps.gov; Exe Exemption 6; Exemption 6
Subject: Inspection of Yard 520 North Cell tomorrow
From: Drexler.Timothy@epamail.epa.gov
Date: Wed, 9 Dec 2009 16:14:04 -0600

Hi all:

Based on the amount of precipitation we've been having I called up the IDEM inspector for the NW Area to see if she might be available to inspect the north cell of Yard 520 tomorrow for seeps. She is available. I then checked with Val Blumenfeld to see if she would be OK with an inspection tomorrow. She is also available. So, Bob Kay and I will be meeting Ashley Snyder with IDEM at 11 am at the Exemption 6 [redacted], for an inspection. If anyone is interested in participating, you are welcome to join us. I will be in the office today until 5:30 pm if you have any questions. Otherwise I hope to see you tomorrow.

-Tim Drexler

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EPA-R5-2013-003300RR-334

Timothy Drexler/R5/USEPA/US
12/10/2009 07:09 AM

To: Paul Kysel
cc: Charles Morris-NPS, "Kevin Herron@IDEM", Pete Penoyer-NPS, Jan Nona, Larry Silvestri
bcc:
Subject: RE: Inspection of Yard 520 North Cell tomorrow

Glad to hear you can make it, Paul. We'll just have to see how it goes. Bob Kay and I have been talking to the contractor who witnessed and sampled the seep on the south cell. He said that it flowed after precipitation. That is when they sampled it in 2002. But, as I said, we'll just see how it goes. Did you or anyone else from P.I.N.E.S. see the north cell seeps? If so, maybe you can help us to pinpoint the location(s).

See you there.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

-----Paul Kysel <[redacted]> wrote: -----

To: Timothy Drexler/R5/USEPA/US@EPA
From: Paul Kysel <[redacted]>
Date: 12/09/2009 07:18PM
cc: Charles Morris-NPS <charles_morris@nps.gov>, "Kevin Herron@IDEM" <kherron@idem.in.gov>, Pete Penoyer-NPS <pete_penoyer@nps.gov>, Jan Nona <[redacted]>, Larry Silvestri <[redacted]>
Subject: RE: Inspection of Yard 520 North Cell tomorrow

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Paul Kysel

To: [redacted]
CC: brenda_waters@nps.gov; charles_morris@nps.gov; kherron@idem.in.gov; pete_penoyer@nps.gov; [redacted]; [redacted]
Subject: Inspection of Yard 520 North Cell tomorrow
From: Drexler.Timothy@epamail.epa.gov
Date: Wed, 9 Dec 2009 16:14:04 -0600

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-Tim Drexler

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EPA-R5-2013-003300RR-335

Paul Kysel
[redacted] Exemption 6
12/10/2009 09:46 AM

To: Timothy Drexler
cc: Charles Morris-NPS, "Kevin Herron@IDEM", Pete Penoyer-NPS, Jan Nona, Larry Silvestri
bcc:
Subject: RE: Inspection of Yard 520 North Cell tomorrow

Yes, we felt we did locate a seep on the north cell and I will attempt to show you - snow cover may make that a little tough.
See you @ 11.
Paul

Subject: RE: Inspection of Yard 520 North Cell tomorrow
From: Drexler.Timothy@epamail.epa.gov
To: [redacted] Exemption 6
CC: charles_morris@nps.gov; kherron@idem.in.gov; pete_penoyer@nps.gov;
[redacted] Exemption 6; [redacted] Exemption 6
Date: Thu, 10 Dec 2009 07:09:19 -0600

Glad to hear you can make it, Paul. We'll just have to see how it goes. Bob Kay and I have been talking to the contractor who witnessed and sampled the seep on the south cell. He said that it flowed after precipitation. That is when they sampled it in 2002. But, as I said, we'll just see how it goes. Did you or anyone else from P.I.N.E.S. see the north cell seeps? If so, maybe you can help us to pinpoint the location(s).

See you there.

Tim Drexler
Remedial Project Manager
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United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

-----Paul Kysel <[redacted] Exemption 6> wrote: -----

To: Timothy Drexler/R5/USEPA/US@EPA
From: Paul Kysel <[redacted] Exemption 6>
Date: 12/09/2009 07:18PM
cc: Charles Morris-NPS <charles_morris@nps.gov>, "Kevin Herron@IDEM" <kherron@idem.in.gov>, Pete Penoyer-NPS <pete_penoyer@nps.gov>, Jan Nona <[redacted] Exemption 6>, Larry Silvestri <[redacted] Exemption 6>
Subject: RE: Inspection of Yard 520 North Cell tomorrow

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Paul Kysel

To: [redacted] Exemption 6
CC: brenda_waters@nps.gov; charles_morris@nps.gov; kherron@idem.in.gov; pete_penoyer@nps.gov;

Exe Exemption 6 ; Exemption 6
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-Tim Drexler

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EPA-R5-2013-003300RR-336

Paul Kysel
Exemption 6
12/10/2009 06:53 PM

To Dan Sullivan-Nipsco
cc Timothy Drexler, "Kevin Herron@IDEM", Larry Silvestri, Val Blumenfeld - Brown
bcc
Subject RE: Technical Assistance Plan - Pines

Hi Dan. Two of us met with Tim Drexler today following his "seep" inspection of Yard 520. Among other things, we discussed our efforts to reinstate our incorporation status with the State of Indiana. We learned today that we were remiss with some filings, and as a result, have to re-file necessary paperwork to regain this status. We do, as previously demonstrated to you, remain recognized by the Federal IRS as a 501 C3 organization.

We have been told by the State that this re-instatement process will likely take between 60 and 90 days. Mr. Drexler suggested that we contact you to again explore the possibility of Nipsco and Brown Inc making the next round of TAP funds available to us - in spite of our lack of incorporation status with the State. Please let me know if this might be a possibility, and if not, what other options might exist.

For instance, might it be possible to place the new funds into an escrow account of some kind with a letter to us that once the incorporation status is resolved the funds will be released for our use (of course barring any unforeseen complicating factors)? This way we might be able to immediately engage the services of our technical advisor for the Risk Assessment (RA) phase. Please let me know if either this might be feasible, or if not, if we might meet in the near future to discuss other alternatives. Tim would make himself available for such a meeting, obviously Ms. Blumenfeld's availability would need to be factored in as well.

Regarding your request that we provide additional clarification regarding how we intend to utilize the additional funding; to this end I had previously provided you with budget that had been previously discussed with Tim Drexler. At this point in time, aside from relying upon Mr. Drexler's suggestion that we earmark $30,000 of the expected $50,000 for the consulting services of our RA Technical Advisor and anticipating the need for a future community meeting to discuss with our community the implications of the Record of Decision, we do not have a firm laundry list of other expected expenses.

I assume that you are aware that none of the PINES Group has ever participated in an Alternative Superfund Site, thus we have no previous experience from which to draw. We are hopeful that when we reach the end of this process (the publication / acceptance of the Record of Decision) that we will have funds available to compensate our Remedial Investigation Technical Advisors for the as yet, uncompensated work they have performed for our group, EPA, and the Town of Pines.

Dan, please get back to me at your earliest convenience,

Paul Kysel - Vice President - PINES Group

> Subject: RE: Technical Assistance Plan - Pines
> To: Exemption 6
> CC: drexler.timothy@epamail.epa.gov; kherron@idem.in.gov; Exemption 6; vblumenfeld@bibtc.com

> From: DSullivan@NiSource.com
> Date: Thu, 10 Dec 2009 15:55:47 -0600
>
> Paul - Thank you for the update. The Respondents look forward to the
> forthcoming documentation related to the P.I.N.E.S. corporate status. In
> regards to your plans for the funding, can you please supply a more
> detailed scope of work and budget? For example, we anticipate that you
> would earmark funds to allow for participation in the upcoming conference
> call related to the risk assessment. The work scope/budget should also
> account for the fact that the TAP is intended to be in existence until the
> issuance of the Record of Decision. A detailed scope of work and budget
> will allow all parties to more closely track expenditures, manage
> resources, and ensure that available funding is utilized in the most
> efficient manner possible.
>
> Thank you for your attention to this matter.
>
> Dan
>
>
> Dan Sullivan
> NiSource Environmental Health & Safety
> (219) 647-5248
>
>
>
> Paul Kysel
> <[redacted]>
> To
> 11/30/2009 08:15 Dan Sullivan-Nipsco
> PM <dsullivan@nisource.com>, Larry
> Silvestri <[redacted]>
> cc
> Tim Drexler
> <drexler.timothy@epamail.epa.gov>,
> <kherron@idem.in.gov>, Val
> Blumenfeld - Brown
> <vblumenfeld@bibtc.com>
> Subject
> RE: Technical Assistance Plan -
> Pines
>
>
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>
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>
> Dan, sorry for the delay in getting back to you on this. We are in the
> midst of straightening out our incorporation status with the State of
> Indiana. We did not realize that an annual filing was required to maintain

> our status and thus it was permitted to lapse. We are trading letters /
> info with the State and will forward the requested information as soon as
> it becomes available to us. We are hopeful that there is some way that the
> PRP's can find a way to release these new funds.
>
> I discussed this situation with Tim Drexler today and he both indicated he
> would be discussing this with you and would be asking someone @ the EPA to
> assist PINES Group re-establish our status with the State.
>
> Regarding the proposed budget and description of work to be performed:
> Tim Drexler has advised we ear mark $30K for our RA technical advisor and
> we plan to utilize this person to review the work product that Aecom will
> be submitting. We expect to hold meetings with the general public when the
> both the final RA and RI are public record.
>
> As the RA process draws to a close, we will revisit any remaining funding
> for possible disbursement to Geo-Hydro for work completed but not yet
> compensated.
>
> Thanks,
>
> Paul Kysel
> PINES Group VP
>
> > Subject: Technical Assistance Plan - Pines
> > To: Exemption 6; Exemption 6
> > CC: drexler.timothy@epamail.epa.gov; kherron@idem.in.gov;
> vblumenfeld@bibtc.com
> > From: DSullivan@NiSource.com
> > Date: Fri, 20 Nov 2009 13:58:07 -0600
> >
> >
> > Thank you for providing your note of November 16 that contains a Form
> 990-N
> > E-filing receipt from the IRS. However, in order to demonstrate that
> > P.I.N.E.S. is a legally established Not-for-Profit Corporation please
> > provide to us a current, valid, Certificate of Existence/Authorization
> from
> > the State of Indiana.
> >
> > In addition, as outlined in the TAP Agreement between the Respondents and
> > P.I.N.E.S. and as identified in previous communication between U.S. EPA
> and
> > P.I.N.E.S., in order to be eligible for the additional funding please
> > provide us with a budget and a description of work to be performed.
> >
> > Please advise if you have questions or require additional information...
> >
> > Thanks, Dan
> >
> >
> > Dan Sullivan
> > NiSource Environmental Health & Safety
> > (219) 647-5248

> >
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EPA-R5-2013-003300RR-337

Timothy Drexler/R5/USEPA/US
12/11/2009 08:01 AM

To Paul Kysel
cc Larry Johnson, Janet Pope, DONALD BRUCE, Susan Pastor
bcc
Subject RE: Technical Assistance Plan - Pines

Paul:

I just spoke to Dan. He is going to check with his management about at least getting P.I.N.E.S. an amount that will allow you to begin the review of the draft risk assessment while you wait for state nonprofit status . He said he'd let me know.

Tim

Paul Kysel	Hi Dan. Two of us met with Tim Drexler...	12/10/2009 06:52:37 PM

From: Paul Kysel <[redacted] Exemption 6 >
To: Dan Sullivan-Nipsco <dsullivan@nisource.com>
Cc: Timothy Drexler/R5/USEPA/US@EPA, "Kevin Herron@IDEM" <kherron@idem.in.gov>, Larry Silvestri <[redacted] Exemption 6 >, Val Blumenfeld - Brown <vblumenfeld@bibtc.com>
Date: 12/10/2009 06:52 PM
Subject: RE: Technical Assistance Plan - Pines

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We have been told by the State that this re-instatement process will likely take between 60 and 90 days. Mr. Drexler suggested that we contact you to again explore the possibility of Nipsco and Brown Inc making the next round of TAP funds available to us - in spite of our lack of incorporation status with the State. Please let me know if this might be a possibility, and if not, what other options might exist.

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Dan, please get back to me at your earliest convenience,

Paul Kysel - Vice President - PINES Group

> Subject: RE: Technical Assistance Plan - Pines
> To: [redacted] Exemption 6
> CC: drexler.timothy@epamail.epa.gov; kherron@idem.in.gov; [redacted] Exemption 6 ;
vblumenfeld@bibtc.com
> From: DSullivan@NiSource.com
> Date: Thu, 10 Dec 2009 15:55:47 -0600
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> Paul Kysel
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> 11/30/2009 08:15 Dan Sullivan-Nipsco
> PM <dsullivan@nisource.com>, Larry
> Silvestri <[redacted] Exemption 6>
> cc
> Tim Drexler
> <drexler.timothy@epamail.epa.gov>,
> <kherron@idem.in.gov>, Val
> Blumenfeld - Brown

> <vblumenfeld@bibtc.com>
> Subject
> RE: Technical Assistance Plan -
> Pines
>
>
>
>
>
>
>
>
>
>
> Dan, sorry for the delay in getting back to you on this. We are in the
> midst of straightening out our incorporation status with the State of
> Indiana. We did not realize that an annual filing was required to maintain
> our status and thus it was permitted to lapse. We are trading letters /
> info with the State and will forward the requested information as soon as
> it becomes available to us. We are hopeful that there is some way that the
> PRP's can find a way to release these new funds.
>
> I discussed this situation with Tim Drexler today and he both indicated he
> would be discussing this with you and would be asking someone @ the EPA to
> assist PINES Group re-establish our status with the State.
>
> Regarding the proposed budget and description of work to be performed:
> Tim Drexler has advised we ear mark $30K for our RA technical advisor and
> we plan to utilize this person to review the work product that Aecom will
> be submitting. We expect to hold meetings with the general public when the
> both the final RA and RI are public record.
>
> As the RA process draws to a close, we will revisit any remaining funding
> for possible disbursement to Geo-Hydro for work completed but not yet
> compensated.
>
> Thanks,
>
> Paul Kysel
> PINES Group VP
>
> > Subject: Technical Assistance Plan - Pines
> > To: [redacted]; [redacted]
> > CC: drexler.timothy@epamail.epa.gov; kherron@idem.in.gov;
> vblumenfeld@bibtc.com
> > From: DSullivan@NiSource.com
> > Date: Fri, 20 Nov 2009 13:58:07 -0600
> >
> >
> > Thank you for providing your note of November 16 that contains a Form
> 990-N
> > E-filing receipt from the IRS. However, in order to demonstrate that
> > P.I.N.E.S. is a legally established Not-for-Profit Corporation please
> > provide to us a current, valid, Certificate of Existence/Authorization

> from
> > the State of Indiana.
> >
> > In addition, as outlined in the TAP Agreement between the Respondents and
> > P.I.N.E.S. and as identified in previous communication between U.S. EPA
> and
> > P.I.N.E.S., in order to be eligible for the additional funding please
> > provide us with a budget and a description of work to be performed.
> >
> > Please advise if you have questions or require additional information...
> >
> > Thanks, Dan
> >
> >
> > Dan Sullivan
> > NiSource Environmental Health & Safety
> > (219) 647-5248
> >
>
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>

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EPA-R5-2013-003300RR-338

Paul Kysel
Exemption 6
12/11/2009 12:55 PM

To Timothy Drexler, Brenda Waters, Charles Morris-NPS, Bob Kay, asnyder
cc "Kevin Herron@IDEM", lbradley, Jan Nona, Larry Silvestri
bcc
Subject RE: 12/10/09 Inspection of Yard 520 Landfill

Thanks for the update Tim. In retrospect and for the record, I feel that appropriate thing for Val Blumenfeld to have done yesterday was to present me with a waiver (for my signature) that would have cleared them of any liability - instead of denying me / PINES Group access - they effectively shut us out of a very important fact finding mission.

Since PINES was not allowed to participate, I would like to request that PINES receive copies of all field notes and subsequent written and electronic communications of participants relating to any and everything seen and discussed by them during and following the site visit. This should extend to photographs taken and should of course include the south cell / landfill.

In the event that any such materials are deemed for distribution only by FOI, please indicate that and what these materials might be. This is the only way that PINES can reasonably inform itself, and subsequently the public, of what transpired and what that means for the citizens of Pines, Porter County and others who are impacted by the wastes and risks associated with those wastes.

Thanks again and please let me know about your ability / willingness to fulfill this request,

Paul

To: brenda_waters@nps.gov; charles_morris@nps.gov; Exemption 6 ;
kay.bob@epamail.epa.gov; asnyder@idem.in.gov
CC: kherron@idem.in.gov; lbradley@ensr.com
Subject: 12/10/09 Inspection of Yard 520 Landfill
From: Drexler.Timothy@epamail.epa.gov
Date: Fri, 11 Dec 2009 09:41:02 -0600

Hi all:

Thanks again for participating in IDEM's inspection of the Yard 520 landfill in Town of Pines yesterday. Again, I apologize for the short notice. We interviewed the EPA contractor that had sampled a previous seep at the Yard 520 south cell in 2002 and he said that the seep they sampled with high CCB-related results was most obvious just after a precipitation event. We also were hoping that with the particularly cold weather, seeps would be easier to identify.

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Ashley said that she would check on IDEM regs on restricting access to the landfill. There are obvious ruts

and ATV tracks in both the north and south cells from trespassers.

If I missed anything else, please let me know. If you have any questions, please call me.

-Tim

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

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EPA-R5-2013-003300RR-339

"HERRON, KEVIN" <KHERRON@idem.IN.gov>
12/11/2009 01:28 PM

To Timothy Drexler
cc
bcc
Subject RE: 12/10/09 Inspection of Yard 520 Landfill

I guess they do not understand that it is private property and she has the right of refusal. It may have been in Val's best interest to allow them access though, but I understand the liability issue and it is best to err on the safe side. I am glad that you have to deal with these people. I would probably get fired for my responses to them. LOL

Big game with the Packers this weekend.

Have a great weekend.

From: Paul Kysel [mailto: Exemption 6]
Sent: Friday, December 11, 2009 1:55 PM
To: Tim Drexler; Brenda Waters; Charles Morris-NPS; Bob Kay-EPA; Snyder, Ashley
Cc: HERRON, KEVIN; lbradley@ensr.com; Jan Nona; Larry Silvestri
Subject: RE: 12/10/09 Inspection of Yard 520 Landfill

Thanks for the update Tim. In retrospect and for the record, I feel that appropriate thing for Val Blumenfeld to have done yesterday was to present me with a waiver (for my signature) that would have cleared them of any liability - instead of denying me / PINES Group access - they effectively shut us out of a very important fact finding mission.

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Thanks again and please let me know about your ability / willingness to fulfill this request,

Paul

To: brenda_waters@nps.gov; charles_morris@nps.gov; Exemption 6 ;
kay.bob@epamail.epa.gov; asnyder@idem.in.gov
CC: kherron@idem.in.gov; lbradley@ensr.com
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From: Drexler.Timothy@epamail.epa.gov
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If I missed anything else, please let me know. If you have any questions, please call me.

-Tim

Tim Drexler
Remedial Project Manager
Superfund Division
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Chicago, Illinois 60604-3590

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fax: 312.886.4071

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EPA-R5-2013-003300RR-340

Timothy Drexler/R5/USEPA/US
12/11/2009 02:36 PM

To Paul Kysel
cc
bcc
Subject RE: 12/10/09 Inspection of Yard 520 Landfill

Hi Paul:

Yesterday was officially an IDEM inspection. Ashley will have the official record. I took few notes and no pictures, leaving it to her to photograph and make notations at areas of interest, for follow-up. The emails that I forwarded to you are the extent of my correspondence. If anyone adds anything to my emails, I'm hoping that they cc: everyone. If they do not, I will forward what I get to you, unless I can't for some reason (enforcement sensitive, confidential business etc.). Since you also sent your message to Ashley, I would follow-up with her about how to get all of her notes and photos. She should not be surprised to hear from you. I would encourage P.I.N.E.S. to develop a relationship with her so that you can keep updated on IDEM's follow-up. I'm also expecting to get a copy of Ashley's documentation.

I promise to keep P.I.N.E.S. informed of the progress; including any sampling, sample results, corrective measures at the landfill, and any other measures that IDEM requires. I can't estimate when sampling will occur, though. It will be weather dependent.

-Tim

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

Paul Kysel | Thanks for the update Tim. In retrospec... | 12/11/2009 12:54:36 PM

From: Paul Kysel <[redacted] Exemption 6 >
To: Timothy Drexler/R5/USEPA/US@EPA, Brenda Waters <brenda_waters@nps.gov>, Charles Morris-NPS <charles_morris@nps.gov>, Bob Kay/R5/USEPA/US@EPA, <asnyder@idem.in.gov>
Cc: "Kevin Herron@IDEM" <kherron@idem.in.gov>, <lbradley@ensr.com>, Jan Nona <[redacted] Exemption 6 >, Larry Silvestri <[redacted] Exemption 6 >
Date: 12/11/2009 12:54 PM
Subject: RE: 12/10/09 Inspection of Yard 520 Landfill

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To: brenda_waters@nps.gov; charles_morris@nps.gov; Exemption 6 ;
kay.bob@epamail.epa.gov; asnyder@idem.in.gov
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From: Drexler.Timothy@epamail.epa.gov
Date: Fri, 11 Dec 2009 09:41:02 -0600

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Tim Drexler
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fax: 312.886.4071

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EPA-R5-2013-003300RR-341

"Snyder, Ashley"
<ASnyder@idem.IN.gov>
12/11/2009 03:38 PM

To Timothy Drexler
cc
bcc
Subject RE: 12/10/09 Inspection of Yard 520 Landfill

Hi Tim,
I didn't catch the name of the fellow who accompanied you on the inspection and would like to add his name in the inspection report as those involved. If you would please email me his name I would appreciate it. I should have the report and letter finished next week and then once it gets reviewed by my supervisor I will cc all of you on it.
Thanks,
-Ashley Snyder-

Ashley R. Snyder
Agricultural and Solid Waste Inspector
Indiana Department of Environmental Management
Northwest Regional Office
8380 Louisiana Street
Merrillville, IN 46410
ph: 219/757-0276
fax: 219/757-0267

From: Drexler.Timothy@epamail.epa.gov [mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Friday, December 11, 2009 9:41 AM
To: brenda_waters@nps.gov; charles_morris@nps.gov; [redacted]; kay.bob@epamail.epa.gov; Snyder, Ashley
Cc: HERRON, KEVIN; lbradley@ensr.com
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Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

EPA-R5-2013-003300RR-342

Paul Kysel
Exemption 6
12/21/2009 08:16 PM

To Timothy Drexler
cc Jan Nona, Larry Silvestri
bcc
Subject FW: Pines' scientists still not paid News Dispatch 12-21-09

Happy Holidays Tim. Below is the second of two articles that appeared in our local rag Sunday and Monday of this week. Please note the last couple of paragraphs, printed in red. If the news reporting is accurate, Nipsco and Brown are willing to pay our consultants the $86K owed - if so directed by the EPA. This appears to be a tremendous change of standing on this issue on the part of the Potentially Responsible Parties - yet at odds with the email I received from Dan Sullivan today. It appears that the one hand, Dan Sullivan, is at odds with the other, Mr. Meyer of Nipsco.

The email I received from Dan Sullivan today is hopeful but contains a condition that is not acceptable - that if we use the remainder of the next $50K for payment to Geo-Hydro (estimated to be $20K) then we must concede on Geo-Hydro's behalf to stop pursuing any additional payment for what would be about $66K+.

Not only do we feel it morally / ethically wrong for PINES Group to entertain / agree to such a proposal / arrangement - we certainly will not agree to such a condition - especially since it now appears that others at Nipsco appear more willing to accept their responsibility in this matter.

We again respectfully request that you direct Nipsco and Brown to compensate our technical advisors, Geo-Hydro for all work completed since the original TAP monies were exhausted and we would also request (for a second time) that you copy us with all work product generated by IDEM / EPA / Aecom during the recent seep inspection.

Respectfully,

Paul Kysel - PINES VP

Monday, December 21, 2009

PLEASE PAY ATTENTION TO THE LAST TWO PARAGRAPHS OF THIS ARTICLE.

Non-profit group upset scientists still not paid

Disagreement involves PINES, utility, contractor

Alicia Ebaugh
Staff Writer

Monday, December 21, 2009

Editor's note - This is the last in a series of articles on the Pines groundwater pollution issue.

PINES - Scientists on behalf of Pines residents who examined groundwater pollution caused by coal ash in the town are still owed more than $86,000 for their work, but the companies who would be responsible for the bill say they won't pay it.

Northern Indiana Public Service Co., Brown Inc. and its subsidiaries who are paying for the investigation into the pollution at the Pines' Superfund Alternative site say the work was done outside of the agreement it signed with People in Need of Environmental Safety, a resident group formed to track the groundwater issue.

The agreement, called a Technical Assistance Plan, was meant to provide money for PINES to hire scientists who could interpret reports for them, said Tim Drexler, Environmental Protection Agency project manager for the site.

"The EPA has a similar process for its Superfund sites, where it pays the funds," he said. "It's so the community can be involved in the process."

It was the first agreement of its kind in the region, if not the country, to have potentially responsible parties directly pay community groups' consultants, Drexler said. Superfund Alternative sites - paid for by the people or companies who created the pollution to be cleaned up - are a relatively new concept themselves, he said.

"At the time the TAP was generated, there was no guidance, no model for development," Drexler said. "Unfortunately, that uncertainty has resulted in this issue."

The original terms of the agreement allowed for the group's consultants, Denver-based Geo-Hydro Inc., to be paid up to $50,000 for their work. That money was exhausted in July 2008, but Geo-Hydro scientist Charles Norris kept working on the issue with the full knowledge of the EPA, said Paul Kysel, PINES vice president.

"The EPA knew the exact moment we exhausted our funds; that moment was months ago," Kysel said. "They were in frequent contact with Geo-Hydro asking for their opinions and work, using their expertise after the clock ran out."

An amendment was written for the agreement this spring that would provide another $50,000, but it was not signed by PINES until May. By that time, most of Geo-Hydro's work was already done. The unpaid portion of their bill amounts to $86,409.90, Kysel said.

"They are honest-to-goodness, altruistic guys who have stood by us. They have done phenomenally good work and should be compensated for that," he said. "Their work was done under the understanding there was no money left and with the promise things would be worked out."

NIPSCO spokesman Nick Meyer said because this work was done while the agreement was technically expired, the companies have no obligation to pay for it.

"It's important to provide funds for a community group to have their opinions heard and be involved. I think we all have the same goal in mind. But there was a process set in place for those funds and that process wasn't followed," he said. "It would have been smoother had they waited to spend the money."

The deadlines were such, Kysel said, that waiting was impossible. The work had to be done then for the process to keep going.

"The folks at NIPSCO and Brown have accused us of playing a game with this," he said. "Well, it is a game, a stupid game we're being forced to play and we're not even holding the cards."

The non-profit PINES certainly doesn't have that kind of money, Kysel said. Also, NIPSCO and Brown Inc. fully reimburse the National Park Service and Indiana Department of Environmental Management for all their work on the project.

"What is it about our group that makes us different?" Kysel asked.

As of the end of 2008, NIPSCO and Brown paid out more than $3 million to AECOM and other agencies for the work that has gone into the investigation so far, including water and soil sampling and the production of reports, Drexler said.

Meyer said the companies would not confirm that amount.

"That amount of money makes ours seem insignificant," Kysel said.

Norris said he is hopeful the issue will be resolved soon.

"Not getting paid is not a business model we can follow very much and stay in business, but we have the luxury of being flexible with these issues," he said. "We'll let all of these processes work their way through. We have talked with the PINES group about starting chili suppers and bake sales, but if they have to advertise 40 of those to make $2,000 each, I don't think that's the kind of publicity NIPSCO would want."

Now, PINES is even having trouble getting NIPSCO and Brown Inc. to release the second round of funding for the upcoming human health and environmental risk assessments because its non-profit status lapsed with the state, Kysel said. That paperwork should be completed within two months, he said, but time is of the essence.

"They will need time to review the risk assessments before comments are due," he said. "I just feel like (NIPSCO and Brown) don't want us involved, and they'll find any way to make that happen."

Kysel thinks NIPSCO and Brown are only stalling because all money given to a recognized non-profit is tax-deductible. But Meyer said NIPSCO and Brown Inc. are simply following the rules of the agreement. They are leaving it up to the EPA to make a determination on the money that is already owed, Meyer said.

"We'll continue to do as directed by the EPA, and if that's their direction, we'll follow it," he said.

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Your E-mail and More On-the-Go. Get Windows Live Hotmail Free. Sign up now.

EPA-R5-2013-003300RR-343

Paul Kysel
Exemption 6

01/03/2010 10:17 PM

To Janet Pope

cc Bud Prast, Cathi Murry, Ellen Becker, Helen Molinaro, Jan Nona, Larry Jensen, Larry Silvestri, Nancy Kolasa, Peggy Richardson, Timothy Drexler, Chuck NorrisH2Oconsultant, Mark Hutson

bcc

Subject RE: TAP Monthly Meetings

Janet, thanks for the holiday wishes, hope yours were good also. I have taken a holiday of sort from email / the alternative site / etc during the seasonal holidays - so I must offer an apology for the delay in responding to your email.

I alerted our group of your proposal - and at first we were all scurrying, trying to see who might be available during the work day. But, alas this time just won't work for most of us and so we must respectfully reject it.

I know that for EPA, Nipsco and Brown folks 2 pm is a great time to meet as this is your work - but we are volunteers to this process - most of us are full time employees elsewhere - in addition to our PINES Group work.

We respectfully request a late afternoon / early evening time to better accommodate more of our group. Please let me know if this might be possible and thanks.

Paul Kysel - PINES Group

> Subject: TAP Monthly Meetings
> To: Exemption 6; vblumenfeld@bibtc.com; dsullivan@nisource.com; Drexler.Timothy@epamail.epa.gov
> From: Pope.Janet@epamail.epa.gov
> Date: Tue, 22 Dec 2009 13:51:50 -0600
>
>
> Hi all,
>
> Hope you are having a wonderful holiday season.
>
> In January 2010 we will start having monthly or bi-monthly conference
> calls regarding the People In Need of Environmental Safety (PINES), and
> the Responsible Parties regarding the TAP, other issues and concerns.
>
> The first call will be held on January 21, 2010 @ 2:00pm (Chicago time),
> I'll send you a call in number before the meeting.
> EPA believes that meaningful communication results in better solutions
> to site cleanup issues, therefore the EPA, PRP, and the PINES must work
> with each other to ensure a successful TAP as well as site cleanup.
>
> If you have any questions, please call me at the number below or email
> me.
>
>
> Janet Pope

> Community Involvement Coordinator
> U.S Environmental Protection Agency
> Superfund Division
> Community Involvement Section (SI-7J)
> 77 W. Jackson Blvd.
> Chicago, IL 60604
> pope.janet@epa.gov
> 312) 353-0628
>
>
>
>

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EPA-R5-2013-003300RR-344

Paul Kysel
Exemption 6
01/04/2010 07:35 PM

To Ashley Snyder-IDEM
cc Timothy Drexler, Jan Nona, Chuck NorrisH2Oconsultant, Larry Silvestri, Nancy Kolasa
bcc
Subject Work product generated from Yard 520 seep inspection

Hello Ms. Snyder, I attempted to represent the P.I.N.E.S. Group during the 12/11 seep inspection that took place at Yard 520 in the Town of Pines - but was blocked from participating by Val Brown Blumenthal.

I have previously requested that Tim Drexler of Area 5 EPA make all notes, images, observations, etc available to us so that we might review, consider, respond to, etc - Tim has indicated that since this was your show, you are to be the work product generator for the group.

I would respectfully request that you share all such items with our group at your earliest convenience.

My mailing address, should electronic versions not be readily available is
Paul Kysel, VP of PINES Group
Exemption 6
Exemption 6
phone: Exemption 6
email: Exemption 6

Thanks,

Paul

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EPA-R5-2013-003300RR-345

"Larry Jensen"
Exemption 6
01/04/2010 09:19 PM

To Timothy Drexler
cc "Paul Kysel"
bcc
Subject Re: Meeting to discuss Pines Site gamma count survey conducted 10/10-15/2009.

Hi, Tim,

I wanted Paul Kysel, the president of PINES, to be in on these discussions too. He is not available Monday, but would be available early afternoon on Friday the 15th. That is later I realize. Is this OK with you and Gene?

Also, when you come should I prepare in any way? Will you want to see any sites? Will you bring your own meter? Let me know if you want to do anything more than discuss the report. I'm flexible.

Larry Jensen

----- Original Message -----
From: Drexler.Timothy@epamail.epa.gov
To: Exem... Exemption 6
Cc: Exemption 6 ; Jablonowski.Eugene@epamail.epa.gov
Sent: Monday, January 04, 2010 9:33 AM
Subject: Meeting to discuss Pines Site gamma count survey conducted 10/10-15/2009.

Hi Larry:

I spoke to Gene today about getting together to discuss your gamma count survey of the Pines area. Would you be available next Monday, Jan. 11th at say 10 am? We can meet you at someplace near you, perhaps at the library? Let me know if that works for you.

-Tim

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

EPA-R5-2013-003300RR-346

Paul Kysel
Exemption 6
01/06/2010 07:58 PM

To Dan Sullivan-Nipsco
cc Timothy Drexler, "Kevin Herron@IDEM", Larry Silvestri, Val Blumenfeld - Brown
bcc
Subject RE: Technical Assistance Plan - Pines

Dan, sorry about the delay in getting back to you regarding your last communication (below). We greatly appreciate the incredible generosity that is reflected in the "Respondents" willingness to make the next $50,000 of TAP funding available prior to our group of very dedicated volunteers resolving a paperwork oversight that put our State Incorporation status in limbo. However, as the offer appears contingent upon the PINES Group agreeing to reimburse our RI Technical Advisor, Geo-Hydro, for only a small fraction of work completed after the initial TAP funding was exhausted we must reject your 12/21 offer.

The Nipsco spokesperson quoted in the recent News Dispatch article asserted that should the EPA direct the Responsible Parties to compensate Geo-Hydro for all all work completed / to be completed then the Responsible Parties will do so. The PINES Group is committed to having Geo-Hydro fully reimbursed for their exceptional work on the Remedial Investigation portion of this project - work that is not yet completed. With the final draft of the RI report is due later this week, we hope that Geo-Hydro will graciously agree to complete yet another review of this document on behalf of the PINES Group.

Lastly, I will be meeting with Tim Drexler on 1/15 to discuss the Radiation Report we submitted to EPA on 10/22/09 and will at that time discuss with Tim how best to provide the budget request you have demanded. I hope to have something for you before long.

Respectfully,

Paul Kysel - PINES Group VP

> Subject: Technical Assistance Plan - Pines
> To: Exemption 6
> CC: drexler.timothy@epamail.epa.gov; kherron@idem.in.gov; Exemption 6; vblumenfeld@bibtc.com
> From: DSullivan@NiSource.com
> Date: Mon, 21 Dec 2009 16:00:37 -0600
>
> Paul -
>
> The Respondents understand that you are taking the steps necessary to
> obtain Indiana non-profit incorporation for P.I.N.E.S. Under the
> circumstances, we are willing to waive the requirement that P.I.N.E.S. be a
> not-for-profit corporation in good standing with the State of Indiana until
> the end of March, 2010. In the interim, we would allow P.I.N.E.S. to
> submit for disbursement charges against the remaining $50,000 available
> under the TAP agreement (see below). We would need to revisit this issue
> should the proper incorporation not be obtained by the end of March, 2010.
>
>

> Per your request, the Respondents also agree to allow P.I.N.E.S. to earmark
> $20,000 of the remaining $50,000 to use for past bills by your technical
> advisor. The Respondents need a request for the past bill amount of
> $20,000 with an understanding that the Respondents will only cover $20,000
> in past costs.
>
>
> P.I.N.E.S. made a demonstration in their application for the TAP funding
> that as a group you are capable of administering the TAP. Consistent with
> the requirements of the TAP agreement, P.I.N.E.S. does need to submit a
> detailed budget for the remaining $30,000. This budget should identify
> tasks based on major project milestones, and provide a budget for each
> task, such that the remaining budget will address the risk assessment,
> feasibility study, through the record of decision stage of the project.
> Not only is this a requirement of the TAP, but we also feel that having a
> budget in hand will aid the P.I.N.E.S. in administering the funds,
> communicating the finding allocations to their technical advisor(s), and
> ensuring that their technical advisors adhere to the specified level of
> funding. You may want to work together with your technical advisor to
> develop this budget.
>
>
> In the interim, we would agree to allow P.I.N.E.S. to earmark TAP funds for
> participation by a qualified technical representative on the Risk
> Assessment conference call (schedule pending), i.e., waving the budget,
> qualification, and other requirements for the actual time of the Risk
> Assessment conference call only.
>
>
> Note that the procedure for disbursement of funds will remain the same as
> under the term of the first $50,000. P.I.N.E.S. will submit a request for
> disbursement, which the Respondents will review, determine whether or not
> the charges are consistent with the TAP, and then where appropriate provide
> payment, either to P.I.N.E.S. or directly to your technical advisor based
> on your request.
>
>
> If you have any questions, we would be happy to discuss this with you and
> Tim Drexler of USEPA via conference call.
>
>
> Thanks, Dan
>
>
>
> Dan Sullivan
> NiSource Environmental Health & Safety
> (219) 647-5248
>

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EPA-R5-2013-003300RR-347

"Larry Jensen"
<Exe... Exemption 6
01/10/2010 08:45 PM

To Timothy Drexler
cc "Paul Kysel"
bcc
Subject Re: Meeting to discuss Pines Site gamma count survey conducted 10/10-15/2009.

For convenience, there is a restaurant, Joe's, just a little east of Pumps. Pumps hasn't plowed so there is no parking there. We could meet at Joe's, at least in front initially.

Larry Jensen

----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "Rosemary & Larry" <Exempti... Exemption 6>
Sent: Wednesday, January 06, 2010 9:00 AM
Subject: Re: Meeting to discuss Pines Site gamma count survey conducted 10/10-15/2009.

> That's lousy. I really liked that place.
>
>
>
>
> From: "Rosemary & Larry" <Exempti... Exemption 6>
>
> To: Timothy Drexler/R5/USEPA/US@EPA
>
> Date: 01/06/2010 08:57 AM
>
> Subject: Re: Meeting to discuss Pines Site gamma count survey
> conducted 10/10-15/2009.
>
>
>
>
>
>
> Yep, out of business.
>
> Larry
>
>
> ----- Original Message -----
> From: <Drexler.Timothy@epamail.epa.gov>
> To: "Rosemary & Larry" <Exempti... Exemption 6>
> Sent: Wednesday, January 06, 2010 7:50 AM
> Subject: Re: Meeting to discuss Pines Site gamma count survey conducted
> 10/10-15/2009.
>
>
>> Pumps closed down? Its out of business?
>>
>>
>>

>> From: "Rosemary & Larry" <[redacted]>
>>
>> To: Timothy Drexler/R5/USEPA/US@EPA
>>
>> Cc: "Paul Kysel" <[redacted]>, EUGENE
>> JABLONOWSKI/R5/USEPA/US@EPA
>>
>> Date: 01/05/2010 08:40 PM
>>
>> Subject: Re: Meeting to discuss Pines Site gamma count survey
>> conducted 10/10-15/2009.
>>
>>
>>
>>
>>
>>
>> Sounds like a plan, Tim. We can meet at Pumps but it has closed down
> so
>> if
>> we want to meet where it's warm and there's coffee, etc., we"ll have
> to
>> go
>> elsewhere. Whatever, let's meet at Pumps, Jan. 15th, 1:30.
>>
>> Larry
>>
>>
>> ----- Original Message -----
>> From: <Drexler.Timothy@epamail.epa.gov>
>> To: "Larry Jensen" <[redacted]>
>> Cc: "Paul Kysel" <[redacted]>;
> <Jablonowski.Eugene@epamail.epa.gov>
>> Sent: Tuesday, January 05, 2010 3:44 PM
>> Subject: Re: Meeting to discuss Pines Site gamma count survey
> conducted
>> 10/10-15/2009.
>>
>>
>>> Hi Larry:
>>>
>>> Gene and I can come by on Friday, Jan. 15th. How about we meet in the
>>> parking lot of "Pumps on 12" at 1:30. We'll just want to discuss your
>>> report and the development of the site risk assessment.
>>>
>>> -Tim
>>>
>>>
>>>
>>>
>>> Tim Drexler
>>> Remedial Project Manager
>>> Superfund Division
>>> United States Environmental Protection Agency
>>> 77 W. Jackson Blvd., SR-6J
>>> Chicago, Illinois 60604-3590
>>>
>>> phone: 312.353.4367
>>> fax: 312.886.4071
>>>
>>>

>>>
>>> From: "Larry Jensen" <[redacted]>
>>>
>>> To: Timothy Drexler/R5/USEPA/US@EPA
>>>
>>> Cc: "Paul Kysel" <[redacted]>
>>>
>>> Date: 01/04/2010 09:19 PM
>>>
>>> Subject: Re: Meeting to discuss Pines Site gamma count survey
>>> conducted 10/10-15/2009.
>>>
>>>
>>>
>>>
>>>
>>>
>>> Hi, Tim,
>>>
>>> I wanted Paul Kysel, the president of PINES, to be in on these
>>> discussions too. He is not available Monday, but would be available
>>> early afternoon on Friday the 15th. That is later I realize. Is
> this
>>> OK with you and Gene?
>>>
>>> Also, when you come should I prepare in any way? Will you want to
> see
>>> any sites? Will you bring your own meter? Let me know if you want
> to
>>> do anything more than discuss the report. I'm flexible.
>>>
>>> Larry Jensen
>>> ----- Original Message -----
>>> From: Drexler.Timothy@epamail.epa.gov
>>> To: [redacted]
>>> Cc: [redacted] ; Jablonowski.Eugene@epamail.epa.gov
>>> Sent: Monday, January 04, 2010 9:33 AM
>>> Subject: Meeting to discuss Pines Site gamma count survey conducted
>>> 10/10-15/2009.
>>>
>>> Hi Larry:
>>>
>>> I spoke to Gene today about getting together to discuss your gamma
>>> count survey of the Pines area. Would you be available next Monday,
>>> Jan. 11th at say 10 am? We can meet you at someplace near you,
> perhaps
>>> at the library? Let me know if that works for you.
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>>> -Tim
>>>
>>>
>>>
>>> Tim Drexler
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>>> phone: 312.353.4367
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>

EPA-R5-2013-003300RR-348

Paul Kysel
Exemption 6
01/12/2010 05:25 PM

To Timothy Drexler
cc Larry Silvestri, Larry Jensen, Jan Nona, Nancy Kolasa, Bud Prast
bcc
Subject RE: Pines Site Update

You know, Tim I am somewhat confused. About 3+ weeks ago, didn't we get an email from you specifically stating that AEOCOM had to accept the comments and conditions that went long with the Conditional Approval - all of them, as written - or Region 5 would have to issue their own version? Do I recall that wrong?

Now, you appear to be giving them yet another bite at the apple. It will be interesting to see how much ground they gave up, this time. Not that we'll have much time to review it to determine that.

Your email today proposing a community meeting seems very appropriate - it is probably time to be thinking about how to explain all this to the public so they can understand "how the process really works."

BTW, I did not receive the final draft today - I know you stated that you hoped to get that out today. I just want to make sure that I / PINES have not been suddenly excluded from the email routing since we have formally rejected Nipsco's new TAP funding conditions.

Paul Kysel - PINES

To: Exemption 6; kherron@idem.in.gov; brenda_waters@nps.gov; charles_morris@nps.gov; pete_penoyer@nps.gov; Exe Exemption 6
Subject: Pines Site Update
From: Drexler.Timothy@epamail.epa.gov
Date: Mon, 11 Jan 2010 10:28:58 -0600

Hi all:

I just wanted to update you on the Town of Pines Site. Last week EPA received from the PRPs the last of their responses to our comments on the RI Report. As you know, I initially sent you them as I received them, which caused some confusion. To make it easier, I compiled all of them into a single document and have attached all of EPA's final responses in draft. I hope to send the document to you tomorrow for your review.

This will be the last response to the RI Report, containing the final language that EPA will accept. If this language is not included in the final version of the RI Report, EPA will simply take the language in this response document today, and generate an addendum to the RI Report which will then be a part of the Site's Administrative Record. Please review our draft responses and let me know as soon as you can if you have any comments or edits. I plan to send an email message to the PRPs today that the FINAL RI Report will be due 3-weeks after their receipt of our comments.

In addition, I have granted an extension to the due date for the human health and ecological risk assessments. Since the ecological risk assessment is not dependent on these RI Report replies I will be sending you today, that due date will be Jan. 22nd. The Human Health Risk Assessment will be due 3-weeks after they receive our comments on the RI Report, since aspects of the HHRA will be dependent on our responses. Also by that time, we hope that P.I.N.E.S. funding issues can be cleared up for their

participation.

Please contact me if you would like to have a call to discuss any of this. As I said, I hope to have our comments/final responses to you for review tomorrow.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

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EPA-R5-2013-003300RR-349

"Larry Jensen"
<Exe... Exemption 6
01/15/2010 03:53 PM

To Timothy Drexler
cc "Paul Kysel"
bcc
Subject Pines and radiation issues

Tim,

I found the meeting with you and Gene Jablonowski today beneficial. Thanks. As I tried to explain, I believe that the risk assessment should at least project the risk from gamma exposure to CCB's in critical areas (residential yards for example) and the risk from total radium (radium-226, radium-228) and total uranium (uranium-238, uranium-234 and uranium-235) in drinking water. These, I believe, could be the dominant radiation risks.

You offered to provide to me or reference for me, in the Yard 520 data, the concentrations measured for radionuclides in water. That would be appreciated. I have not been able to find these in the site data on my own.

Larry Jensen

EPA-R5-2013-003300RR-350

Paul Kysel
<Exemption 6
01/26/2010 12:51 PM

To Timothy Drexler, Greg Eckert-NPS

cc eric.morton, Jan Nona, EDWARD KARECKI, cgorman, Pete Penoyer-NPS, Brenda Waters, "Kevin Herron@IDEM", Charles Morris-NPS, Mike Schmul-Donnelly, Lane Ralph-Luga

bcc

Subject RE: Due date for comments on draft Pines Yard 520 Alternative Superfund Site ERA

Tim, as you know, the PINES Group has been effectively muzzled at this point in time as we have been without funding since before mid-year 2009. The Responsible Parties continue to withhold the additional funding promised by the signed TAP Agreement Amendment which was consummated by PINES in May of 2009. We have been in touch with our Federal Congressional Representatives and Administrator Jackson, seeking their support / assistance - to date, to no real avail.

Being without the funds necessary to engage the consulting expertise of our selected Risk Assessment Technical Advisor, we will not be able to provide the requested feedback regarding the available drafted document - which appears to be exactly what the Responsible Parties (and EPA, given their unwillingness to halt the process until the funds are made available) desire given their previous successful efforts to control the RI process and to force the PINES Group to either stop its review involvement of the RI drafts or to force our RI Technical Advisors, Geo-Hydro, to continue to provide technical consulting services to PINES Group (and EPA in the absence of its own RI consultant) without any guarantee of just compensation - which, as you know, was the path our RI Technical Advisors chose.

It must be noted that the Responsible Parties did, in an email to PINES dated 12/21/09, offer to finally release the new TAP funding - but with the proviso that the funds would be released only if the PINES Group would agree to abandon efforts to have the Responsible Parties compensate Geo-Hydro for its uncompensated work to date. This unacceptable proviso forced the PINES Group to reject this offer, and to date, we have not heard from the Responsible Parties or the EPA regarding the status of ongoing funding - effectively preventing the PINES Group from further participating in the Alternative Superfund Process.

Given the number of errors, omissions and out and out distortions previously submitted by the PRP's during the RI phase (best illustrated by the now rejected underground water flow model), we feel that the Community of Pines (and the Great Lakes Watershed) has been severely marginalized as having an active interest / stakeholder role in the Pines Yard 520 Alternative Superfund Process and will of course be making exactly that case to the public when the EPA holds its tentatively scheduled February 9th public meeting.

The PINES Group strongly recommends that the Pines Yard 520 Alternative Superfund Process be halted immediately until such time that the PINES Group is able to continue in its role as the TAP recipient / Alternative Superfund community liaison stakeholder.

The Obama Administration has purportedly committed itself to greater governmental transparency, exactly how the Area 5 EPA reconciles its handling of Yard 520's toxins within both this stated objective as well as the the recently announced Obama Administration's commitment to protect / preserve Lake Michigan, as outlined in the $475 million Great

Lakes Restoration Project is beyond my comprehension.

Respectfully,

Paul Kysel - PINES VP

To: brenda_waters@nps.gov; pete_penoyer@nps.gov; kherron@idem.in.gov; charles_morris@nps.gov; Greg_Eckert@nps.gov
CC: Eric.Morton@ttemi.com; [redacted]; Karecki.Edward@epamail.epa.gov; [redacted]; cgorman@onesullivan.com
Subject: Due date for comments on draft Pines Site ERA
From: Drexler.Timothy@epamail.epa.gov
Date: Tue, 26 Jan 2010 09:24:28 -0600

Hi all:

As you know, the Pines Site draft ERA is available for download from the PRPs. I plan to send you EPA's draft comments on the document by Feb. 16th. I'd like to schedule a conference call to discuss the document with you later that week. I would then like to receive your comments on the draft by Feb. 26th to incorporate with ours.

Thanks a lot for your help in reviewing the document. Please call me at any time if you have questions.

-Tim

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
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fax: 312.886.4071

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EPA-R5-2013-003300RR-351

"Larry Jensen"
<Exe... Exemption 6
02/05/2010 12:59 PM

To Timothy Drexler
cc "Paul Kysel"
bcc
Subject Re: News articles in the Michigan City News Dispatch

Tim,

I have never been quite sure what water tests were made. Last time we met, and previously too, you said you would provide me with data from the Yard 520 measurements because I wasn't able to find anything on my own. However, I have never received the data or a data reference. If you can still help here I would be appreciative.

Larry

----- Original Message -----
From: Drexler.Timothy@epamail.epa.gov
To: Exem... Exemption 6
Cc: Exemption 6
Sent: Friday, February 05, 2010 9:19 AM
Subject: News articles in the Michigan City News Dispatch

Hi Larry:

I read the articles in the paper this morning. I thought she was pretty balanced. I just wanted to let you know that I was somewhat misquoted. As you know from your reviews of the Pines RI, we did not test residents wells for rad and I told her that. What I told her was that we took samples from monitoring wells in close proximity to Yard 520 and in the plume for lab analysis because we felt that would be more conservative. I left a message with her this morning to correct that and I will restate that on Tuesday.

Just wanted to let you know. See you at the meeting.

-Tim

EPA-R5-2013-003300RR-352

"Larry Jensen"
<Exe... Exemption 6
02/09/2010 08:32 PM

To Timothy Drexler
cc "Paul Kysel"
bcc
Subject Re: News articles in the Michigan City News Dispatch

Tim,

I looked over this data. It looks like from 2 sampling rounds. I see no data from residential sites. My comments are attached.

Larry Jensen

----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "Larry Jensen" <Exempti... Exemption 6>
Cc: "Paul Kysel" <Exemption 6>
Sent: Friday, February 05, 2010 3:20 PM
Subject: Re: News articles in the Michigan City News Dispatch

> Hi Larry:
>
> I've attached all of the information you need, I think. These are from
> the 12/5/08 version of the RI Report; Table 2-13 and Appendix S under
> "RI Aug 2006 Sampling Data Reports". I've also attached some of the rad
> sampling correspondence. Please let me know if you need anything else.
> Note that the Oct. 2006 letter contains unvalidated data. I'm sending it
> to you because it contains a map of the monitoring well locations if you
> don't have a copy of the draft RI Report handy.
>
> Call me if you need anything else, Larry. Have a good weekend.
>
> -Tim
>
> (See attached file: Pines_Rad_Lab_data.PDF)(See attached file: Pages
> from RI_Appendices_Rad in GW Memo_&_Response.pdf)
>
> Tim Drexler
> Remedial Project Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-6J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
> fax: 312.886.4071
>
>
>
> From: "Larry Jensen" <Exempti... Exemption 6>
>
> To: Timothy Drexler/R5/USEPA/US@EPA
>
> Cc: "Paul Kysel" <Exemption 6>
>
> Date: 02/05/2010 12:59 PM

>
> Subject: Re: News articles in the Michigan City News Dispatch
>
>
>
>
>
>
> Tim,
>
> I have never been quite sure what water tests were made. Last time we
> met, and previously too, you said you would provide me with data from
> the Yard 520 measurements because I wasn't able to find anything on my
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> you can still help here I would be appreciative.
>
> Larry
> ----- Original Message -----
> From: Drexler.Timothy@epamail.epa.gov
> To: [redacted] Exemption 6
> Cc: [redacted] Exemption 6
> Sent: Friday, February 05, 2010 9:19 AM
> Subject: News articles in the Michigan City News Dispatch
>
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>
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> misquoted. As you know from your reviews of the Pines RI, we did not
> test residents wells for rad and I told her that. What I told her was
> that we took samples from monitoring wells in close proximity to Yard
> 520 and in the plume for lab analysis because we felt that would be
> more conservative. I left a message with her this morning to correct
> that and I will restate that on Tuesday.
>
> Just wanted to let you know. See you at the meeting.
>
> -Tim
>

Comments on Data Provided by Tim Drexler on Feb 5, 2010.docx

EPA-R5-2013-003300RR-353

"Bradley, Lisa"
<lisa.bradley@aecom.com>
02/11/2010 11:13 AM

To Timothy Drexler
cc EUGENE JABLONOWSKI
bcc
Subject RE: News articles in the Michigan City News Dispatch

I'll look into this and get back to you Tim. :) LAIS

From: Drexler.Timothy@epamail.epa.gov [mailto:Drexler.Timothy@epamail.epa.gov]
Sent: Thursday, February 11, 2010 11:30 AM
To: Bradley, Lisa
Cc: Jablonowski.Eugene@epamail.epa.gov
Subject: Fw: News articles in the Michigan City News Dispatch

Here are Larry's comments. I guess I didn't send Larry the validation data. Could you tell me where to find it in the package? We also now have time to review more closely the new data AECOM had analyzed from the trench samples. We'll also need to share that with Larry with all of the lab and validation information. Do we have everything?

-Tim

----- Forwarded by Timothy Drexler/R5/USEPA/US on 02/11/2010 10:24 AM -----

From: "Larry Jensen" <[redacted]>
To: Timothy Drexler/R5/USEPA/US@EPA
Cc: "Paul Kysel" <[redacted]>
Date: 02/09/2010 08:33 PM
Subject: Re: News articles in the Michigan City News Dispatch

---

Tim,

I looked over this data. It looks like from 2 sampling rounds. I see no data from residential sites. My comments are attached.

Larry Jensen

----- Original Message -----
From: <Drexler.Timothy@epamail.epa.gov>
To: "Larry Jensen" <[redacted]>
Cc: "Paul Kysel" <[redacted]>
Sent: Friday, February 05, 2010 3:20 PM
Subject: Re: News articles in the Michigan City News Dispatch

> Hi Larry:

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> the 12/5/08 version of the RI Report; Table 2-13 and Appendix S under
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> Call me if you need anything else, Larry. Have a good weekend.
>
> -Tim
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> (See attached file: Pines_Rad_Lab_data.PDF)(See attached file: Pages
> from RI_Appendices_Rad in GW Memo_&_Response.pdf)
>
> Tim Drexler
> Remedial Project Manager
> Superfund Division
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> 77 W. Jackson Blvd., SR-6J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
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>
>
>
> From: "Larry Jensen" <Exempti... emption 6>
>
> To: Timothy Drexler/R5/USEPA/US@EPA
>
> Cc: "Paul Kysel" <Exemption 6>
>
> Date: 02/05/2010 12:59 PM
>
> Subject: Re: News articles in the Michigan City News Dispatch
>
>
>
>
>
>
> Tim,
>
> I have never been quite sure what water tests were made. Last time we
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> the Yard 520 measurements because I wasn't able to find anything on my
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> Larry
> ----- Original Message -----
> From: Drexler.Timothy@epamail.epa.gov
> To: Exempti... emption 6
> Cc: Exemption 6
> Sent: Friday, February 05, 2010 9:19 AM
> Subject: News articles in the Michigan City News Dispatch
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>
> Just wanted to let you know. See you at the meeting.
>
> -Tim
>

EPA-R5-2013-003300RR-354

Paul Kysel
Exemption 6
02/19/2010 05:12 PM

To Timothy Drexler

cc Adam Russell-Donnelly, Bharat Mathur, Bud Prast, Cathi Murry, Celina Weatherwax-Lugar, David Rozmanich-Bayh, Don Bruce, Ellen Becker, George Adey, Helen Molinaro, Jan Nona, Lane Ralph-Luga, Larry Jensen, Mike Schmul-Donnelly, Nancy Kolasa, "Exemption 6", Richard Karl

bcc

Subject Mediation: Pines Yard 520

Tim,

PINES is leaning towards a tentative yes on the question of mediation, but needs to understand more about what the EPA means by "mediation" and why EPA is pressing for it. The PINES Group is an un-funded, volunteer group whose sole mission is to see that the responsible parties live up to their legal responsibilities to clean up their mess and protect the environment from the known toxins they un-safely placed there. We do not have paid employees who can be directed to represent the group's interests at meetings - all work is completed by a very small group of very dedicated volunteers.

From our perspective the PINES Group and its technical advisor, Geo-Hydro, completed only necessary work directly due to the efforts of the PRP's to minimize their liability by skewing and in some cases ignoring relevant questions and data. Deadlines necessitated much of that work be performed during the interim period of TAP funding. The efforts of our technical advisors were instrumental in uncovering and pointing out many technical issues that have subsequently been incorporated into EPA's comments on the RI. None us us could have foreseen the effort required to uncover the truth from the PRP's initial RI submittals. Within that context we continue to be perplexed and concerned that paying for work that was needed / produced by our technical advisors even remains an issue.

That said: Please provide us with answers to the following questions and we'll get back to you as soon as possible with an answer:

1. What exact issues is EPA expecting to have mediated?
2. Toward what end or objective?
3. Why does EPA expect mediation to have any material impact on the issues.
4. What "resolution" does EPA envision can come out of the process?
5. What procedurally does EPA expect for the conduct of the mediation?

Respectfully,

Paul Kysel = VP PINES Group

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EPA-R5-2013-003300RR-355

EUGENE JABLONOWSKI /R5/USEPA/US

03/01/2010 04:59 PM

To Larry Jensen

cc Timothy Drexler

bcc

Subject Fw: Pines - AECOM Responses to LJensen Rad in GW Comments

Hello Larry,

Attached are AECOM's responses to your previous comments.

If you have any questions don't hesitate contacting Tim or I.

Eugene Jablonowski
Health Physicist
U.S. EPA (SM-5J)
77 W. Jackson Blvd.
Chicago, IL 60604
(312) 886-4591 office
(312) 636-3891 cell
(312) 692-2466 fax
jablonowski.eugene@epa.gov

AECOM_Resp_LJensen Rad in GW Comments_2-15-10.pdf

EPA-R5-2013-003300RR-356

Timothy Drexler/R5/USEPA/US
03/04/2010 07:55 AM

To [redacted], peggy, pkysel, [redacted]
cc Janet Pope
bcc
Subject Pines Site pre-meeting?

Hi Paul:

I understand that some of the P.I.N.E.S. will not be able to make the public meeting because of spring break. I was wondering if any P.I.N.E.S. and/or Town of Pines Council members would be interested in meeting informally somewhere in Pines sometime next week. My schedule is pretty open. We could use this as an opportunity to discuss the best day/time for more regular meetings.

Let me know what you think.

-Tim

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

EPA-R5-2013-003300RR-357

Timothy Drexler/R5/USEPA/US
03/08/2010 08:40 AM

To kherron, pkysel, Exemp..., Eric.Morton, brenda_waters, Mark Johnson, EUGENE JABLONOWSKI
cc charles_morris, pete_penoyer, Greg_Eckert
bcc
Subject Fw: Pines Area of Investigation - Human Health Risk Assessment

Hi all:

You and your staff should have received notification from AECOM that the Pines Site draft Human Health Risk Assessment is available at the AECOM website for download. Please let me know immediately if you have trouble downloading the document. At this time EPA is still working with the PRPs and P.I.N.E.S. to mediate PRP funding for the community group's technical advisor to review the document. Until that funding is in place, I cannot specify an exact due date for comments. It will be 30 days after the P.I.N.E.S. technical advisor is funded and has the document to begin her/his review. I'll keep you posted.

Thanks for your help in this review. If you would like to discuss the document at any time, please contact me and I'll set up a conference call.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071
----- Forwarded by Timothy Drexler/R5/USEPA/US on 03/08/2010 08:24 AM -----

From: lisa.bradley@aecom.com
To: Timothy Drexler/R5/USEPA/US@EPA
Date: 03/05/2010 07:45 PM
Subject: Pines Area of Investigation - Human Health Risk Assessment

*** You have a secure file transfer awaiting download. Details enclosed. ***

FROM: lisa.bradley@aecom.com
TO: Drexler.Timothy@epamail.epa.gov (Drexler.Timothy@epamail.epa.gov)
SUBJECT: Pines Area of Investigation - Human Health Risk Assessment

FILE TRANSFER WAITING:
Click the secure link to download.
http://aecomenvironment.leapfile.com/get.jsp?t=c8a02f7d26a6799101273122 0f354ce2
(TRANSFER EXPIRES March 19, 2010 07:45 PM)

You are receiving this email because Tim Drexler of the USEPA has requested that you receive a copy of the Draft Human Health Risk Assessment Report for the Pines Area of

Investigation.

If you have any questions or problems please contact me at the address below.

Lisa JN Bradley, Ph.D., DABT
Senior Toxicologist and Senior Regional Program Manager
Environment
D 978-589-3059
C 978-846-3463
lisa.bradley@aecom.com

AECOM
2 Technology Park Drive
Westford, MA 01886
T 978-589-3000
F 866-758-4856
www.aecom.com

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EPA-R5-2013-003300RR-358

"HERRON, KEVIN" <KHERRON@idem.IN.gov>

03/18/2010 06:31 AM

To "Snyder, Ashley"

cc "Grady, Charles", "SIMMONS, BOB", "Paul Kysel", Timothy Drexler

bcc

Subject Yard 520 Issues

Ashley:

I noticed in your violation letter to Brown Inc. regarding the Yard 520 Landfill that you indicated that they needed to control site access by ATV traffic due to its potential to damage the integrity of the landfill cap. This concern was raised by the local community at the public meeting on Tuesday night, March 16, 2010. Could you please notify me of any follow-up actions regarding the Yard 520? I noticed the landfill seep as well and have some digital photos when I can get them downloaded from my phone.
Thanks for your help,

Kevin

Kevin D. Herron
Indiana Department of Environmental Management
Mail Code 66-30
Office of Land Quality - Federal Programs Section
100 North Senate Avenue
Indianapolis, IN 46204-2251
(317) 234-0354
(317) 234-0428 (fax)

EPA-R5-2013-003300RR-359

Paul Kysel
Exemption 6

03/26/2010 05:01 PM

To Timothy Drexler

cc Eric Morton-EPA RA Consultant, EUGENE JABLONOWSKI, Jan Nona, Bud Prast, Larry Jensen, Nancy Kolasa, Ellen Becker, Helen Molinaro, George Adey

bcc

Subject Larry Jensen's radiation report

Hi Tim, I am forwarding to you Larry Jensen's report - work he assembled leading to the public meeting last week. We would like this information to be included within the RA document.

We remain very concerned about Larry's findings and remain confident that Larry has taken a much more accurate and conservative approach to the evaluation of this exposure in our community. I for one was very disturbed by the way Larry was treated during the public meaning - his findings being marginalized / dismissed.

Lastly, I had hoped to send Janet Pope / Dan Sullivan a copy of a draft work plan for the RA phase by the end of this week. Instead, it looks like it will be coming your way within the next few days.

Paul Kysel - PINES Group

P.S. - Any update on the mediation??

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Pines Flyash Rad Risk.xlsx Pines Flyash Rad Risk Discussion.doc

EPA-R5-2013-003300RR-360

Timothy Drexler/R5/USEPA/US
03/26/2010 05:33 PM

To Paul Kysel
cc Bud Prast, Ellen Becker, Eric Morton-EPA RA Consultant, EUGENE JABLONOWSKI, George Adey, Helen Molinaro, Nancy Kolasa, Larry Jensen, Jan Nona
bcc
Subject Re: Larry Jensen's radiation report

Hi Paul:

It was good to see everyone at the meeting.

You shouldn't think that we are in any way marginalizing Larry's work. On the contrary, we have spent quite a bit of time evaluating Larry's results individually with you and Larry in Pines, during phone conversations, and again during our discussions at the public meeting. As I told you and Larry and reiterated during the public meeting, Larry's work will be considered in our human health risk evaluation and added to the site Administrative Record. I hope that you appreciate that since the development of the RI work plan and during subsequent sampling events, we have taken the radionuclide issue at the Pines Site seriously. If not then we need to discuss that more.

I look forward to getting your draft work plan and getting your technical advisors back on board soon. I had an introductory talk with the mediator today. He should be contacting you and Dan soon. I'm also looking forward to working through that issue.

Have a good weekend.

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

Paul Kysel	Hi Tim, I am forwarding to you Larry Je...	03/26/2010 05:01:28 PM

From: Paul Kysel <[redacted]>
To: Timothy Drexler/R5/USEPA/US@EPA
Cc: Eric Morton-EPA RA Consultant <eric.morton@ttemi.com>, EUGENE JABLONOWSKI/R5/USEPA/US@EPA, Jan Nona <[redacted]>, Bud Prast <[redacted]>, Larry Jensen <[redacted]>, Nancy Kolasa <[redacted]>, Ellen Becker <[redacted]>, Helen Molinaro <[redacted]>, George Adey <[redacted]>
Date: 03/26/2010 05:01 PM
Subject: Larry Jensen's radiation report

Hi Tim, I am forwarding to you Larry Jensen's report - work he assembled leading to the public meeting last week. We would like this information to be included within the RA document.

We remain very concerned about Larry's findings and remain confident that Larry has taken a much more accurate and conservative approach to the evaluation of this exposure in our

community. I for one was very disturbed by the way Larry was treated during the public meaning - his findings being marginalized / dismissed.

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Paul Kysel - PINES Group

P.S. - Any update on the mediation??

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[attachment "Pines Flyash Rad Risk.xlsx" deleted by Timothy Drexler/R5/USEPA/US]
[attachment "Pines Flyash Rad Risk Discussion.doc" deleted by Timothy Drexler/R5/USEPA/US]

EPA-R5-2013-003300RR-361

Paul Kysel
Exemption 6
04/05/2010 04:39 PM

To Timothy Drexler
cc Jan Nona, Bud Prast, Ellen Becker, Nancy Kolasa, Larry Jensen, George Adey
bcc
Subject RE: P.I.N.E.S. budget and work plan

Tim, I have not yet submitted a proposed workplan to Dan Sullivan @ Nipsco yet - been swamped with work / personal stuff. I have also not heard from anyone regarding the mediation process.

I'll give it to you straight, I have asked Chuck and Mark @ Geo-Hydro for guidance in workplan development and received the attached. I was going to re-cast their document in my own words - but just don't have the time right now.

I would like you to review their document - it says it all from my perspective. EPA has modified, in our opinion, PINES Group's role in the last few months from a full participant in the process to one that appears now to be a mere communication mouthpiece between EPA / Responsible parties and the public at large.

Perhaps the best illustration of this is was the near total clamp down on informational flow that you initiated during late December '09 when you did not like the feedback you were receiving - as Aecom was providing its responses in a piecemeal fashion for the EPA redirects for the RI final draft and unilaterly decided that no additional information would flow from Aecom to EPA to PINES Group until the final draft was received by EPA - at which time we were provided the final draft to review without the aid of a Technical Advisor - at least from the EPA's point of view. Of course the altruistic Geo-Hydro folks were again watching the community's / our backs and did review the weak at best changes that Aecom made in comparison to the EPA re-directs. Our role was reduced and marginalized.

You have indicated that with Mr. Morton on the scene our technical advisor for the RA portion will have little to do but complete some sampling checks of Mr. Morton's work - something that appeared to be a good thing when first explained but as we now are of the opinion that EPA is ignoring the major concerns of Larry Jensen's excellent work on our behalf - we see that this marginalization has only expanded.

Please give us the official EPA opinion on these two very different scenarios presented. Of course the PINES Group would prefer to continue to operate as described under Scenario #2 but assume you're going to instruct us to submit Scenario #1 to Nipsco.

Surprise me,

Paul Kysel - PINES Group

To: Exemption 6
CC: Exe Exemption 6

Subject: P.I.N.E.S. budget and work plan
From: Drexler.Timothy@epamail.epa.gov
Date: Mon, 5 Apr 2010 14:38:23 -0500

Hi Paul:

Just checking on things.

Has P.I.N.E.S. submitted a budget and work plan for the $50K for new work to the PRPs?.

Also, did you hear from the mediator yet?

-Tim

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

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Work plan for second round of TAP funding.pdf

EPA-R5-2013-003300RR-362

Paul Kysel
Exemption 6
04/05/2010 04:53 PM

To Dan Sullivan-Nipsco

cc Timothy Drexler, "Kevin Herron@IDEM", Val Blumenfeld - Brown, Jan Nona, Bud Prast, George Adey, Nancy Kolasa, Ellen Becker, Helen Molinaro

bcc

Subject RE: Technical Assistance Plan - Pines

Dan, as indicated in previous communications, the PINES Group has re-established its Indiana state incorporation status and remains a not-for-profit entity within IRS guidelines / requirements.

I have today submitted a document for Tim Drexler's review prior to the submittal of a RA phase workplan to you - for the second round of TAP funding. I hope to get a copy of this workplan to your attention within the next week.

Paul Kysel - PINES Group

> Subject: RE: Technical Assistance Plan - Pines
> To: Exemption 6
> CC: drexler.timothy@epamail.epa.gov; kherron@idem.in.gov; vblumenfeld@bibtc.com
> From: DSullivan@NiSource.com
> Date: Thu, 1 Apr 2010 09:17:58 -0500
>
> Paul - The Respondents appreciate that P.I.N.E.S. has decided to
> participate in the mediation discussion about the TAP funding. As we have
> discussed in previous correspondence, the Respondents understand that
> P.I.N.E.S. is working towards re-establishing their official not-for-profit
> status so that they can qualify for additional TAP funding. We had
> anticipated that this would be accomplished by the end of March, and would
> appreciate an update on your progress. In the interim, the Respondents
> would be willing to have P.I.N.E.S submit a detailed scope and budget for
> review of the Human Health Risk Assessment (HHRA) Report so that the
> schedule for the RI/FS can continue in a timely manner.
>
> In order to approve advance funding for the HHRA Report, the following
> should be provided:
>
> A short scope of work describing the level of review,
> Identification of the selected reviewer(s) and the qualifications for the
> reviewer(s),
> A budget for the review that includes the hourly rate for the reviewer(s),
> and the designated number of hours for the review,
> A total budget for the task based on the above.
>
> Once the scope and budget are approved, it will be the responsibility of
> P.I.N.E.S. to ensure that the budget is not exceeded, or to find outside
> sources of funding to cover any budget overage.
>
> Please feel free to contact me if you have any questions or need additional
> clarification.

>
> Dan
>
>
> Dan Sullivan
> NiSource Environmental Health & Safety
> (219) 647-5248
>
>
>
> Paul Kysel
> <[redacted]>
> To
> 01/06/2010 07:58 Dan Sullivan-Nipsco
> PM <dsullivan@nisource.com>
> cc
> Tim Drexler
> <drexler.timothy@epamail.epa.gov>,
> "Kevin Herron@IDEM"
> <kherron@idem.in.gov>, Larry
> Silvestri
> <[redacted]>, Val
> Blumenfeld - Brown
> <vblumenfeld@bibtc.com>
> Subject
> RE: Technical Assistance Plan -
> Pines
>
>
>
>
>
>
>
>
>
>
> Dan, sorry about the delay in getting back to you regarding your last
> communication (below). We greatly appreciate the incredible generosity that
> is reflected in the "Respondents" willingness to make the next $50,000 of
> TAP funding available prior to our group of very dedicated volunteers
> resolving a paperwork oversight that put our State Incorporation status in
> limbo. However, as the offer appears contingent upon the PINES Group
> agreeing to reimburse our RI Technical Advisor, Geo-Hydro, for only a small
> fraction of work completed after the initial TAP funding was exhausted we
> must reject your 12/21 offer.
>
> The Nipsco spokesperson quoted in the recent News Dispatch article asserted
> that should the EPA direct the Responsible Parties to compensate Geo-Hydro
> for all all work completed / to be completed then the Responsible Parties
> will do so. The PINES Group is committed to having Geo-Hydro fully
> reimbursed for their exceptional work on the Remedial Investigation portion
> of this project - work that is not yet completed. With the final draft of
> the RI report is due later this week, we hope that Geo-Hydro will

> graciously agree to complete yet another review of this document on behalf
> of the PINES Group.
>
> Lastly, I will be meeting with Tim Drexler on 1/15 to discuss the Radiation
> Report we submitted to EPA on 10/22/09 and will at that time discuss with
> Tim how best to provide the budget request you have demanded. I hope to
> have something for you before long.
>
> Respectfully,
>
> Paul Kysel - PINES Group VP
>
> > Subject: Technical Assistance Plan - Pines
> > To: [redacted]
> > CC: drexler.timothy@epamail.epa.gov; kherron@idem.in.gov;
> [redacted]; vblumenfeld@bibtc.com
> > From: DSullivan@NiSource.com
> > Date: Mon, 21 Dec 2009 16:00:37 -0600
> >
> > Paul -
> >
> > The Respondents understand that you are taking the steps necessary to
> > obtain Indiana non-profit incorporation for P.I.N.E.S. Under the
> > circumstances, we are willing to waive the requirement that P.I.N.E.S. be
> a
> > not-for-profit corporation in good standing with the State of Indiana
> until
> > the end of March, 2010. In the interim, we would allow P.I.N.E.S. to
> > submit for disbursement charges against the remaining $50,000 available
> > under the TAP agreement (see below). We would need to revisit this issue
> > should the proper incorporation not be obtained by the end of March,
> 2010.
> >
> >
> > Per your request, the Respondents also agree to allow P.I.N.E.S. to
> earmark
> > $20,000 of the remaining $50,000 to use for past bills by your technical
> > advisor. The Respondents need a request for the past bill amount of
> > $20,000 with an understanding that the Respondents will only cover
> $20,000
> > in past costs.
> >
> >
> > P.I.N.E.S. made a demonstration in their application for the TAP funding
> > that as a group you are capable of administering the TAP. Consistent with
> > the requirements of the TAP agreement, P.I.N.E.S. does need to submit a
> > detailed budget for the remaining $30,000. This budget should identify
> > tasks based on major project milestones, and provide a budget for each
> > task, such that the remaining budget will address the risk assessment,
> > feasibility study, through the record of decision stage of the project.
> > Not only is this a requirement of the TAP, but we also feel that having a
> > budget in hand will aid the P.I.N.E.S. in administering the funds,
> > communicating the finding allocations to their technical advisor(s), and
> > ensuring that their technical advisors adhere to the specified level of

> > funding. You may want to work together with your technical advisor to
> > develop this budget.
> >
> >
> > In the interim, we would agree to allow P.I.N.E.S. to earmark TAP funds
> for
> > participation by a qualified technical representative on the Risk
> > Assessment conference call (schedule pending), i.e., waving the budget,
> > qualification, and other requirements for the actual time of the Risk
> > Assessment conference call only.
> >
> >
> > Note that the procedure for disbursement of funds will remain the same as
> > under the term of the first $50,000. P.I.N.E.S. will submit a request for
> > disbursement, which the Respondents will review, determine whether or not
> > the charges are consistent with the TAP, and then where appropriate
> provide
> > payment, either to P.I.N.E.S. or directly to your technical advisor based
> > on your request.
> >
> >
> > If you have any questions, we would be happy to discuss this with you and
> > Tim Drexler of USEPA via conference call.
> >
> >
> > Thanks, Dan
> >
> >
> >
> > Dan Sullivan
> > NiSource Environmental Health & Safety
> > (219) 647-5248
> >
>
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>

Your E-mail and More On-the-Go. Get Windows Live Hotmail Free. Sign up now.

EPA-R5-2013-003300RR-363

Paul Kysel
[redacted] Exemption 6
04/11/2010 06:13 PM

To Dan Sullivan-Nipsco

cc George Adey, Bud PrastPresPINES, Jan Nona, Nancy Kolasa, Ellen Becker, '[redacted] Exemption 6', Timothy Drexler, Janet Pope

bcc

Subject Proposed Workplan from PINES Group re: additional TAP funding

Dan, attached is the PINES Group's proposed workplan for the new TAP funding - which we view as continuation of the first TAP grant - not distinct in any way from the initial funding we received.

You have repeatedly represented to PINES that the second $50,000 TAP authorization must carry PINES through the RA process to the completion of the Record of Decision for the Pines Groundwater Plume Site - we can't imagine that it will indeed carry us through to the end, especially given our experience to date.

Please let me know when funds will be made available for disbursement so that we can request that our technical advisors begin their review of the draft RA document.

Paul Kysel - VP PINES Group

The New Busy is not the old busy. Search, chat and e-mail from your inbox. Get started.

2nd Round Workplan.doc

EPA-R5-2013-003300RR-364

Paul Kysel
[redacted]
04/13/2010 08:05 AM

To Dan Sullivan-Nipsco
cc George Adey, Bud PrastPresPINES, Jan Nona, Nancy Kolasa, Ellen Becker, '[redacted]', Timothy Drexler, Janet Pope
bcc
Subject RE: Proposed Workplan from PINES Group re: additional TAP funding

Oops, I made a huge error and for that I am truly sorry. That's what happens when your a volunteer in a small organization I guess....

At any rate, I previously sent you the wrong copy of the workplan for the continuation of the TAP funding. Attached is the correct version.

Any questions please contact me,

Paul Kysel - PINES Group

From: [redacted]
To: dsullivan@nisource.com
CC: [redacted]; [redacted]; [redacted];
[redacted]; [redacted]; [redacted];
drexler.timothy@epamail.epa.gov; pope.janet@epamail.epa.gov
Subject: Proposed Workplan from PINES Group re: additional TAP funding
Date: Sun, 11 Apr 2010 19:13:40 -0400

Dan, attached is the PINES Group's proposed workplan for the new TAP funding - which we view as continuation of the first TAP grant - not distinct in any way from the initial funding we received.

You have repeatedly represented to PINES that the second $50,000 TAP authorization must carry PINES through the RA process to the completion of the Record of Decision for the Pines Groundwater Plume Site - we can't imagine that it will indeed carry us through to the end, especially given our experience to date.

Please let me know when funds will be made available for disbursement so that we can request that our technical advisors begin their review of the draft RA document.

Paul Kysel - VP PINES Group

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Proposed PINES workplan for second round of TAP funding.doc

EPA-R5-2013-003300RR-365

Paul Kysel
[redacted] Exemption 6
04/16/2010 04:54 PM

To "Kevin Herron@IDEM", Ashley Snyder-IDEM
cc cgrady, bsimmons, Timothy Drexler
bcc
Subject RE: Yard 520 Issues

Kevin, I have not received any communication regarding your Yard 520 email since receiving your email. Is there any news on this front?

Thanks,

Paul Kysel - PINES Group

From: KHERRON@idem.IN.gov
To: ASnyder@idem.IN.gov
CC: CGRADY@idem.IN.gov; BSIMMONS@idem.IN.gov; [redacted] Exemption 6 ;
Drexler.Timothy@epamail.epa.gov
Date: Thu, 18 Mar 2010 07:31:08 -0400
Subject: Yard 520 Issues

Ashley:

I noticed in your violation letter to Brown Inc. regarding the Yard 520 Landfill that you indicated that they needed to control site access by ATV traffic due to its potential to damage the integrity of the landfill cap. This concern was raised by the local community at the public meeting on Tuesday night, March 16, 2010. Could you please notify me of any follow-up actions regarding the Yard 520? I noticed the landfill seep as well and have some digital photos when I can get them downloaded from my phone.
Thanks for your help,

Kevin

Kevin D. Herron
Indiana Department of Environmental Management
Mail Code 66-30
Office of Land Quality - Federal Programs Section
100 North Senate Avenue
Indianapolis, IN 46204-2251
(317) 234-0354
(317) 234-0428 (fax)

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image001.gif

EPA-R5-2013-003300RR-366

Paul Kysel
[redacted] Exemption 6
04/16/2010 05:01 PM

To Timothy Drexler, EUGENE JABLONOWSKI, Eric Morton-EPA RA Consultant, Mark Hutson
cc
bcc
Subject FW: Pines Rad Risk

All, if I had not previously forwarded this email with Larry Jensen's on going work, I apologize.

Paul Kysel

From: [redacted] Exem... Exemption 6
To: [redacted] Exemption 6
Subject: Pines Rad Risk
Date: Fri, 26 Mar 2010 14:01:06 -0500

Paul,

Please send these on to Tim Drexler so that he can relay them to Gene Jablonowski and Eric Morton. Also, Mark at Geo Hydro should get a copy.

Larry Jensen

Hotmail is redefining busy with tools for the New Busy. Get more from your inbox. See how.

Pines Flyash Rad Risk.xlsx Pines Flyash Rad Risk Discussion.doc

EPA-R5-2013-003300RR-367

Paul Kysel
Exemption 6
04/19/2010 08:13 AM

To Brenda Waters
cc Ashley Snyder-IDEM, Charles Morris-NPS, Bob Kay, "Kevin Herron@IDEM", Timothy Drexler, Pete Penoyer-NPS
bcc
Subject Elevated radiation levels associated with the Pines Site

Brenda, I have attached a letter that Larry Jensen, a Beverly Shores resident and former USEPA Radiation Health Scientist of 20+ years, recently wrote to Senator Bayh, following his radiation sampling at a number of areas in and around the Town of Pines. The PINES Group shared Larry's summary report with EPA in October of last year but to date his concerns / recommendations / findings have been dismissed by EPA.

I wish to make you aware of Larry's / PINES Group's concerns about this issue in hopes that NPS might voice its own concerns about these findings and prompt action on Larry's recommendations. Larry is available to field any questions NPS might have about his findings / concerns - or credentials.

Larry can be reached at: Exemption 6. PINES Group would be more than happy to supply a full copy of Larry's report to NPS if it is desired.

Paul Kysel - PINES Group VP

> Subject: Re: Seep Sampling of Pines Site Yard 520 Landfill
> To: Drexler.Timothy@epamail.epa.gov
> CC: asnyder@idem.in.gov; charles_morris@nps.gov; kay.bob@epamail.epa.gov; kherron@idem.in.gov; Exemption 6
> From: Brenda_Waters@nps.gov
> Date: Mon, 19 Apr 2010 07:59:28 -0500
>
> Tim,
>
> I hope the date for this was a typo as April 14 had passed before you sent
> the e-mail. Please let us know.
>
> Thanks,
> Brenda
>
> **********
> Brenda Waters
> Assistant Chief of Natural Resources
> Indiana Dunes National Lakeshore
> 1100 N Mineral Springs Road
> Porter, IN 46304
> Office: (219) 395-1552
> Fax: (219) 395-1588
> **********
>
>

>
>
> Drexler.Timothy@e
> pamail.epa.gov
> To
> 04/16/2010 04:52 kherron@idem.in.gov,
> PM charles_morris@nps.gov,
> [redacted],
> brenda_waters@nps.gov,
> asnyder@idem.in.gov
> cc
> kay.bob@epamail.epa.gov
> Subject
> Seep Sampling of Pines Site Yard
> 520 Landfill
>
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>
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> information as we develop a firm schedule.
>
> Have a good weekend.
>
> Tim Drexler
> Remedial Project Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-6J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
> fax: 312.886.4071
>

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Bayh letter re radiation 3'2010.doc

EPA-R5-2013-003300RR-368

Paul Kysel
Exemption 6
04/19/2010 08:36 AM

To Dan Sullivan-Nipsco
cc Timothy Drexler, "Kevin Herron@IDEM", Val Blumenfeld - Brown
bcc
Subject RE: Technical Assistance Plan - Pines

Friday last, Tim Drexler, USEPA, Erik Morton, RA Consultant to EPA, Chuck Norris and Mark Hutson of Geo-Hydro, and I conferred regarding PINES previously submitted workplan for continued TAP funding. Attached is a letter from Geo-Hydro which summarizes their recommended workplan for this continued funding along with their rationale for its development and most importantly, its limitations.

PINES Group has reviewed and accepted this revised workplan and is submitting it today, 4/19/2010, as its final workplan.

The PINES Group fully understands its role will be much diminished in the review process going forward - putting both the community and environment at tremendously greater risk - but it appears that this is the only role the USEPA and Responsible Parties will permit PINES Group to assume given the financial constraints placed upon the group. It would appear that the goal of USEPA is to permit just enough participation in the process to permit it to assert that the community group has had a chance to influence the process but not enough to really matter.

The PINES Group will unfortunately be left to explain to the public, at the end of what is therefore a flawed process by design, what errors / omissions / concerns remain following the acceptance of the work completed by the Responsible Parties - all when its too late. The PINES Group and un-knowing public can only hope that USEPA is considerably more diligent going forward than they have been to date.

Paul Kysel - PINES Group

> Subject: RE: Technical Assistance Plan - Pines
> To: Exemption 6
> CC: drexler.timothy@epamail.epa.gov; kherron@idem.in.gov; vblumenfeld@bibtc.com
> From: DSullivan@NiSource.com
> Date: Thu, 1 Apr 2010 09:17:58 -0500
>
> Paul - The Respondents appreciate that P.I.N.E.S. has decided to
> participate in the mediation discussion about the TAP funding. As we have
> discussed in previous correspondence, the Respondents understand that
> P.I.N.E.S. is working towards re-establishing their official not-for-profit
> status so that they can qualify for additional TAP funding. We had
> anticipated that this would be accomplished by the end of March, and would
> appreciate an update on your progress. In the interim, the Respondents
> would be willing to have P.I.N.E.S submit a detailed scope and budget for
> review of the Human Health Risk Assessment (HHRA) Report so that the
> schedule for the RI/FS can continue in a timely manner.
>
> In order to approve advance funding for the HHRA Report, the following
> should be provided:

>
> A short scope of work describing the level of review,
> Identification of the selected reviewer(s) and the qualifications for the
> reviewer(s),
> A budget for the review that includes the hourly rate for the reviewer(s),
> and the designated number of hours for the review,
> A total budget for the task based on the above.
>
> Once the scope and budget are approved, it will be the responsibility of
> P.I.N.E.S. to ensure that the budget is not exceeded, or to find outside
> sources of funding to cover any budget overage.
>
> Please feel free to contact me if you have any questions or need additional
> clarification.
>
> Dan
>
>
> Dan Sullivan
> NiSource Environmental Health & Safety
> (219) 647-5248
>
>
>
> Paul Kysel
> <[redacted]>
> To
> 01/06/2010 07:58 Dan Sullivan-Nipsco
> PM <dsullivan@nisource.com>
> cc
> Tim Drexler
> <drexler.timothy@epamail.epa.gov>,
> "Kevin Herron@IDEM"
> <kherron@idem.in.gov>, Larry
> Silvestri
> <[redacted]>, Val
> Blumenfeld - Brown
> <vblumenfeld@bibtc.com>
> Subject
> RE: Technical Assistance Plan -
> Pines
>
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>
>
>
> Dan, sorry about the delay in getting back to you regarding your last
> communication (below). We greatly appreciate the incredible generosity that
> is reflected in the "Respondents" willingness to make the next $50,000 of

> TAP funding available prior to our group of very dedicated volunteers
> resolving a paperwork oversight that put our State Incorporation status in
> limbo. However, as the offer appears contingent upon the PINES Group
> agreeing to reimburse our RI Technical Advisor, Geo-Hydro, for only a small
> fraction of work completed after the initial TAP funding was exhausted we
> must reject your 12/21 offer.
>
> The Nipsco spokesperson quoted in the recent News Dispatch article asserted
> that should the EPA direct the Responsible Parties to compensate Geo-Hydro
> for all all work completed / to be completed then the Responsible Parties
> will do so. The PINES Group is committed to having Geo-Hydro fully
> reimbursed for their exceptional work on the Remedial Investigation portion
> of this project - work that is not yet completed. With the final draft of
> the RI report is due later this week, we hope that Geo-Hydro will
> graciously agree to complete yet another review of this document on behalf
> of the PINES Group.
>
> Lastly, I will be meeting with Tim Drexler on 1/15 to discuss the Radiation
> Report we submitted to EPA on 10/22/09 and will at that time discuss with
> Tim how best to provide the budget request you have demanded. I hope to
> have something for you before long.
>
> Respectfully,
>
> Paul Kysel - PINES Group VP
>
> > Subject: Technical Assistance Plan - Pines
> > To: [redacted] Exemption 6
> > CC: drexler.timothy@epamail.epa.gov; kherron@idem.in.gov;
> [redacted] Exemption 6; vblumenfeld@bibtc.com
> > From: DSullivan@NiSource.com
> > Date: Mon, 21 Dec 2009 16:00:37 -0600
> >
> > Paul -
> >
> > The Respondents understand that you are taking the steps necessary to
> > obtain Indiana non-profit incorporation for P.I.N.E.S. Under the
> > circumstances, we are willing to waive the requirement that P.I.N.E.S. be
> a
> > not-for-profit corporation in good standing with the State of Indiana
> until
> > the end of March, 2010. In the interim, we would allow P.I.N.E.S. to
> > submit for disbursement charges against the remaining $50,000 available
> > under the TAP agreement (see below). We would need to revisit this issue
> > should the proper incorporation not be obtained by the end of March,
> 2010.
> >
> >
> > Per your request, the Respondents also agree to allow P.I.N.E.S. to
> earmark
> > $20,000 of the remaining $50,000 to use for past bills by your technical
> > advisor. The Respondents need a request for the past bill amount of
> > $20,000 with an understanding that the Respondents will only cover
> $20,000

> > in past costs.
> >
> >
> > P.I.N.E.S. made a demonstration in their application for the TAP funding
> > that as a group you are capable of administering the TAP. Consistent with
> > the requirements of the TAP agreement, P.I.N.E.S. does need to submit a
> > detailed budget for the remaining $30,000. This budget should identify
> > tasks based on major project milestones, and provide a budget for each
> > task, such that the remaining budget will address the risk assessment,
> > feasibility study, through the record of decision stage of the project.
> > Not only is this a requirement of the TAP, but we also feel that having a
> > budget in hand will aid the P.I.N.E.S. in administering the funds,
> > communicating the finding allocations to their technical advisor(s), and
> > ensuring that their technical advisors adhere to the specified level of
> > funding. You may want to work together with your technical advisor to
> > develop this budget.
> >
> >
> > In the interim, we would agree to allow P.I.N.E.S. to earmark TAP funds
> for
> > participation by a qualified technical representative on the Risk
> > Assessment conference call (schedule pending), i.e., waving the budget,
> > qualification, and other requirements for the actual time of the Risk
> > Assessment conference call only.
> >
> >
> > Note that the procedure for disbursement of funds will remain the same as
> > under the term of the first $50,000. P.I.N.E.S. will submit a request for
> > disbursement, which the Respondents will review, determine whether or not
> > the charges are consistent with the TAP, and then where appropriate
> provide
> > payment, either to P.I.N.E.S. or directly to your technical advisor based
> > on your request.
> >
> >
> > If you have any questions, we would be happy to discuss this with you and
> > Tim Drexler of USEPA via conference call.
> >
> >
> > Thanks, Dan
> >
> >
> >
> > Dan Sullivan
> > NiSource Environmental Health & Safety
> > (219) 647-5248
> >
>
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20100416 TAP 2 Workplan_Final.pdf

EPA-R5-2013-003300RR-369

Paul Kysel
[redacted]
04/22/2010 07:32 PM

To Timothy Drexler
cc
bcc
Subject RE: Seep Sampling of Pines Site Yard 520 Landfill

Thanks for the update,Tim. I look forward to receiving that info.

FYI, I heard from Mike Harty this afternoon and have an appointment with him for tomorrow afternoon.

Regarding the whole mediation situation Tim, I must apologize for the overall aggressive stance I took the other day with you on the phone about wanting EPA at that mediation table with checkbook in hand. I do realize that not only is that impossible but also not necessary. What we want is for the PRP's to pay for the work that we were forced to do to keep them honest.

So, please accept my apology for the outburst.

Take care,

Paul

> Subject: RE: Seep Sampling of Pines Site Yard 520 Landfill
> To: [redacted]
> From: Drexler.Timothy@epamail.epa.gov
> Date: Thu, 22 Apr 2010 08:26:17 -0500
>
> Hi Paul:
>
> Will do. Sampling went well, yesterday. Ashley Snyder, with the IDEM NW
> Regional office also was present.
>
> Tim
>
>
>
> From: Paul Kysel <[redacted]>
>
> To: Timothy Drexler/R5/USEPA/US@EPA
>
> Date: 04/19/2010 06:15 PM
>
> Subject: RE: Seep Sampling of Pines Site Yard 520 Landfill
>
>
>
>
>
>
> Tim I would like to be copied with the results please,

> Paul
>
> To: kherron@idem.in.gov; charles_morris@nps.gov; Exemption 6 ;
> brenda_waters@nps.gov; asnyder@idem.in.gov
> CC: kay.bob@epamail.epa.gov
> Subject: Seep Sampling of Pines Site Yard 520 Landfill
> From: Drexler.Timothy@epamail.epa.gov
> Date: Fri, 16 Apr 2010 16:52:38 -0500
>
> Hi all:
>
> Sampling of the Yard 520 seep identified by IDEM is tentatively
> scheduled to be conducted by AECOM under EPA oversight next Wednesday,
> April 14th, weather permitting. Please let me know if you would like
> additional information as we develop a firm schedule.
>
> Have a good weekend.
>
> Tim Drexler
> Remedial Project Manager
> Superfund Division
> United States Environmental Protection Agency
> 77 W. Jackson Blvd., SR-6J
> Chicago, Illinois 60604-3590
>
> phone: 312.353.4367
> fax: 312.886.4071
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> your inbox. See how.
>
>

The New Busy think 9 to 5 is a cute idea. Combine multiple calendars with Hotmail. Get busy.

EPA-R5-2013-003300RR-370

Timothy Drexler/R5/USEPA/US
04/23/2010 06:30 AM

To Paul Kysel
cc
bcc
Subject RE: Seep Sampling of Pines Site Yard 520 Landfill

Apology accepted, Paul. I truly wish you a speedy resolution. Keep in mind that "forced" is an interpretation.
-Tim

Tim Drexler
Remedial Project Manager
Superfund Division
United States Environmental Protection Agency
77 W. Jackson Blvd., SR-6J
Chicago, Illinois 60604-3590

phone: 312.353.4367
fax: 312.886.4071

-----Paul Kysel < Exemption 6 > wrote: -----

To: Timothy Drexler/R5/USEPA/US@EPA
From: Paul Kysel < Exemption 6 >
Date: 04/22/2010 07:32PM
Subject: RE: Seep Sampling of Pines Site Yard 520 Landfill

Thanks for the update,Tim. I look forward to receiving that info.

FYI, I heard from Mike Harty this afternoon and have an appointment with him for tomorrow afternoon.

Regarding the whole mediation situation Tim, I must apologize for the overall aggressive stance I took the other day with you on the phone about wanting EPA at that mediation table with checkbook in hand. I do realize that not only is that impossible but also not necessary. What we want is for the PRP's to pay for the work that we were forced to do to keep them honest.

So, please accept my apology for the outburst.

Take care,

Paul

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> Will do. Sampling went well, yesterday. Ashley Snyder, with the IDEM NW
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>
> Tim
>

>
>
> From: Paul Kysel <Exemption 6>
>
> To: Timothy Drexler/R5/USEPA/US@EPA
>
> Date: 04/19/2010 06:15 PM
>
> Subject: RE: Seep Sampling of Pines Site Yard 520 Landfill
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> Tim I would like to be copied with the results please,
> Paul
>
> To: kherron@idem.in.gov; charles_morris@nps.gov; Exemption 6;
> brenda_waters@nps.gov; asnyder@idem.in.gov
> CC: kay.bob@epamail.epa.gov
> Subject: Seep Sampling of Pines Site Yard 520 Landfill
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The New Busy think 9 to 5 is a cute idea. Combine multiple calendars with Hotmail. Get busy.

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"HERRON, KEVIN" <KHERRON@idem.IN.gov>
04/26/2010 06:03 AM

To "'Paul Kysel'", "Snyder, Ashley"
cc "Grady, Charles", "SIMMONS, BOB", Timothy Drexler, "HERRON, KEVIN", "OSBORN, REX"
bcc
Subject RE: Yard 520 Issues

Paul:

I will have to defer to Ashley Snyder and the IDEM Northern Regional Office for a response on this issue at this time as it falls within their coverage of the Yard 520 Landfill and recent actions being taken on their part. Hopefully, you have already received some contact on this matter. I am scheduled for field oversight work for three to four days per week for the next five to eight weeks, so my availability is limited. Let me know if you need help and I will do what I can.

Kevin

Kevin D. Herron
Indiana Department of Environmental Management
Mail Code 66-30
Office of Land Quality - Federal Programs Section
100 North Senate Avenue
Indianapolis, IN 46204-2251
(317) 234-0354
(317) 234-0428 (fax)

From: Paul Kysel [mailto: Exemption 6]
Sent: Friday, April 16, 2010 5:55 PM
To: HERRON, KEVIN; Snyder, Ashley
Cc: Grady, Charles; SIMMONS, BOB; Tim Drexler
Subject: RE: Yard 520 Issues

Kevin, I have not received any communication regarding your Yard 520 email since receiving your email. Is there any news on this front?

Thanks,

Paul Kysel - PINES Group

From: KHERRON@idem.IN.gov
To: ASnyder@idem.IN.gov
CC: CGRADY@idem.IN.gov; BSIMMONS@idem.IN.gov; Exemption 6 ; Drexler.Timothy@epamail.epa.gov
Date: Thu, 18 Mar 2010 07:31:08 -0400
Subject: Yard 520 Issues

Ashley:

I noticed in your violation letter to Brown Inc. regarding the Yard 520 Landfill that you indicated that they needed to control site access by ATV traffic due to its potential to damage the integrity of the landfill cap. This concern was raised by the local community at the public meeting on Tuesday night, March 16, 2010.

Could you please notify me of any follow-up actions regarding the Yard 520? I noticed the landfill seep as well and have some digital photos when I can get them downloaded from my phone.
Thanks for your help,

Kevin

Kevin D. Herron
Indiana Department of Environmental Management
Mail Code 66-30
Office of Land Quality - Federal Programs Section
100 North Senate Avenue
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EPA-R5-2013-003300RR-372

"Snyder, Ashley" <ASnyder@idem.IN.gov>
04/26/2010 08:56 AM

To "HERRON, KEVIN", "'Paul Kysel'"
cc "Grady, Charles", "SIMMONS, BOB", Timothy Drexler, "OSBORN, REX"
bcc
Subject RE: Yard 520 Issues

Mr. Kysel,

I will put through a request to get you copies of the correspondence with Yard 520 and their consultant on the matter of getting in compliance with the violations noted in my December inspection. They have submitted a plan for remediating the rills/gullies in the cap, access restriction, and the seep area. I had further questions on their plan and just received the response to that a couple of weeks ago.
Please feel free to contact me directly with any questions about the above referenced documentation after you receive it.

Thanks,

Ashley R. Snyder
Agricultural and Solid Waste Inspector
Indiana Department of Environmental Management
Northwest Regional Office
8380 Louisiana Street
Merrillville, IN 46410
ph: 219/757-0276
fax: 219/757-0267

From: HERRON, KEVIN
Sent: Monday, April 26, 2010 6:04 AM
To: 'Paul Kysel'; Snyder, Ashley
Cc: Grady, Charles; SIMMONS, BOB; Tim Drexler; HERRON, KEVIN; OSBORN, REX
Subject: RE: Yard 520 Issues

Paul:

I will have to defer to Ashley Snyder and the IDEM Northern Regional Office for a response on this issue at this time as it falls within their coverage of the Yard 520 Landfill and recent actions being taken on their part. Hopefully, you have already received some contact on this matter. I am scheduled for field oversight work for three to four days per week for the next five to eight weeks, so my availability is limited. Let me know if you need help and I will do what I can.

Kevin

Kevin D. Herron
Indiana Department of Environmental Management
Mail Code 66-30

Office of Land Quality - Federal Programs Section
100 North Senate Avenue
Indianapolis, IN 46204-2251
(317) 234-0354
(317) 234-0428 (fax)

From: Paul Kysel [mailto: Exemption 6]
Sent: Friday, April 16, 2010 5:55 PM
To: HERRON, KEVIN; Snyder, Ashley
Cc: Grady, Charles; SIMMONS, BOB; Tim Drexler
Subject: RE: Yard 520 Issues
Kevin, I have not received any communication regarding your Yard 520 email since receiving your email. Is there any news on this front?

Thanks,

Paul Kysel - PINES Group

From: KHERRON@idem.IN.gov
To: ASnyder@idem.IN.gov
CC: CGRADY@idem.IN.gov; BSIMMONS@idem.IN.gov; Exemption 6 ; Drexler.Timothy@epamail.epa.gov
Date: Thu, 18 Mar 2010 07:31:08 -0400
Subject: Yard 520 Issues
Ashley:

I noticed in your violation letter to Brown Inc. regarding the Yard 520 Landfill that you indicated that they needed to control site access by ATV traffic due to its potential to damage the integrity of the landfill cap. This concern was raised by the local community at the public meeting on Tuesday night, March 16, 2010. Could you please notify me of any follow-up actions regarding the Yard 520? I noticed the landfill seep as well and have some digital photos when I can get them downloaded from my phone.
Thanks for your help,

Kevin

Kevin D. Herron
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EPA-R5-2013-003300RR-373

Paul Kysel
Exemption 6

05/20/2010 08:21 AM

To Ashley Snyder-IDEM

cc Timothy Drexler, Jan Nona, Chuck NorrisH2Oconsultant, "Kevin Herron@IDEM"

bcc

Subject RE: Yard 520 information

Ashley, upon further review, consideration and discussion we would like to offer the following observations, expressed concerns and assertions regarding the feedback you received from Brown's engineering consultant regarding Yard 520:

They (Weaver Boos and Brown) appear to want you to believe, and are acting as though, the wet area on the west side of North Yard 520 is surface water being running off the landfill cover and being caught in tire tracks.

They apparently don't recognize that the water that accumulates in the ruts on the west side near road level is virtually certainly (in part, or totally) leachate seeping from the landfill. Or perhaps, desperately doesn't want to recognize that. Brown is asking to be allowed to regrade the area to allow the leachate to simply ooze down the hillside instead of collecting in visible pools. It is a cosmetic fix, and the second time they've been allowed the cosmetic solution.

The original problem was first observed years ago. At that time, even during mid-summer when there had been no rain for weeks, there was water seeping from the landfill at rates high enough to run across Birch Street at a time when there was no ditch to stop it. Instead of documenting it was an escape of leachate due to high elevations in the landfill, Brown was allowed to treat the liquid as surface water. Birch was raised several feet so there would be a ditch, the ditch was lined with baseball-sized rock to obscure the seepage now running down the ditch instead of across the road, the rutted seepage areas were regraded and replanted, and Brown was off the hook.

Fast forward. The seeping continued, and because leachate drainage was partially blocked or because of rising levels of leachate, re-appeared on the west side and again caused rutting when they tried to mow across it. Their solution to to remove the ruts, eliminate the ponding, and either not mow when it's soft (a good trick since it's a continual seep) or use a smaller, lighter mower so it doesn't sink in. Nothing is being done to alleviate the problem, just to make it harder to see.

The only way to understand the persistent wet areas is to document the leachate levels within the landfill and get a good handle on the water chemistry feeding the pools. Brown has been successful in avoiding any requirement to document leachate composition in the landfill and has been allowed to remove the temporary monitoring points for leachate levels. One can infer a lot, however, from indirect evidence:

The wet areas have been persistently wet, regardless of time of year or

time since the last rain.

There is standing water whether it has been weeks since it rained or whether there has been extended hot dry conditions that would have evaporated surface water run-off caught in the ruts.

The water is reluctant to freeze. (See attached picture.) We're sure it has frozen over, but we've never seen it so. On the day of this pictures, even stationary sections of streams were frozen over - only visibly flowing water was ice free. Yet these still ponds aren't frozen. Two characteristics of groundwater seeps are consistent with this. Discharging groundwater in winter is warmer than surface temperatures, delaying or preventing its freezing. Leachate from a fly ash landfill would be expected to have high total dissolved solids (TDS), which will prevent its freezing at normal temperatures, although if it gets cold enough, it will freeze.

Anyway, that's why it's important to know the results of sampling that was done recently by EPA, as well as the sampling methodology they used. We have requested that Tim Drexler / USEPA copy PINES Group with the test results and would also like to be copied with the field notes from the recent sampling. The sampling results should obviously be taken into consideration before approving the Weaver Boos offered fixes.

Lastly, Weaver Boos / Brown's suggestion for addressing the access control issue is similarly rejected - speaking to local parents of kids suspected to be using Yard 520 as their playground is a good start but complete enclosure of the Yard 520 must be part of the efforts to control further access.

Respectfully,

Paul Kysel - PINES Group VP

From: ASnyder@idem.IN.gov
To: [redacted] Exemption 6
Date: Mon, 10 May 2010 10:15:59 -0400
Subject: Yard 520 information

Mr. Kysel,

Please find the documents you requested attached. The attachments contain copies of the request for extension from Yard 520, IDEM's response to the extension, the remediation plan submitted by Weaver Boos on behalf of Yard 520, IDEM's response to the remediation plan, and the additional information submitted by Weaver Boos on behalf of Yard 520. I will be drafting a final letter to Weaver Boos in regards to the access control at Yard 520 and once that is completed I will get that approved to send to you as well.

Please let me know if you have questions regarding any of the documents.
Sincerely,

Ashley R. Snyder
Agricultural and Solid Waste Inspector
Indiana Department of Environmental Management
Northwest Regional Office
8380 Louisiana Street
Merrillville, IN 46410
ph: 219/757-0276
fax: 219/757-0267

The New Busy is not the old busy. Search, chat and e-mail from your inbox. Get started.

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seep pic.jpg

EPA-R5-2013-003300RR-374

Paul Kysel
[redacted]
05/26/2010 04:11 PM

To Timothy Drexler

cc Bud PrastPresPINES, Chuck NorrisH2Oconsultant, Ellen Becker, George Adey, Helen Molinaro, Nancy Kolasa, Kim Ferraro-LEAF, Mark Hutson, Jan Nona, Larry Silvestri

bcc

Subject RE: Pines Site Update Meeting

Good deal Tim, thanks for the kind words. We will be in touch ASAP. In your absence, to whom shall we direct Kim's letter (of course with a cc to you, as well).

Hope you're getting out of town for a vacation.

Take care,
Paul

> Subject: RE: Pines Site Update Meeting
> To: [redacted]
> CC: [redacted]; cnorris@geo-hydro.com; [redacted]; [redacted]; [redacted]; [redacted]; kim.ferraro@leafindiana.org; [redacted]@geo-hydro.com; [redacted]; [redacted]
> From: Drexler.Timothy@epamail.epa.gov
> Date: Wed, 26 May 2010 09:16:52 -0500
>
> Hi Paul:
>
> Sorry to hear about the continued family health issues. I wish your
> family the best.
>
> Thanks for the update on P.I.N.E.S. I'll notify our attorney that he can
> expect to have communication with your legal counsel in the next few
> weeks. I will be out of the office from June 4th to June 21st. I was
> just hoping to have a status meeting with P.I.N.E.S. before that. If
> its not convenient for P.I.N.E.S., we can schedule it when it is more
> convenient for you.
>
> As I have mentioned before, as soon as the sampling results are
> available from AECOM I will share them immediately with all parties. As
> of two days ago when I checked with AECOM, they did not have the
> validated results.
>
> Good luck with work. I know the feeling. I hope things moderate for you.
> I will be in and out of the office for the next two weeks overseeing
> construction at two other sites. Please feel free to call or email,
> though, if there is anything you'd like to discuss.
>
> Tim
>
>
>

> From: Paul Kysel <[redacted]>
>
> To: Timothy Drexler/R5/USEPA/US@EPA
>
> Cc: Jan Nona <[redacted]>, Kim Ferraro-Leaf <kim.ferraro@leafindiana.org>, Chuck NorrisH2Oconsultant
> <cnorris@geo-hydro.com>, Mark Hutson <[redacted]@geo-hydro.com>, George Adey <[redacted]>, Bud Prast
> <[redacted]>, Larry Silvestri <[redacted]>, Ellen Becker
> <[redacted]>, Helen Molinaro <[redacted]>, Nancy Kolasa
> <[redacted]>
>
> Date: 05/26/2010 08:52 AM
>
> Subject: RE: Pines Site Update Meeting
>
>
>
>
>
>
> Tim, I have been swamped with both personal work and family health
> issues and thus the delay in responding to your email and call from
> Friday. I apologize for that.
>
> As I believe you know, the PINES Group has sought the advice of legal
> counsel and our attorney, Ms. Kim Farraro, is nearing the completion of
> a pertinent document review that will lead to the creation of a letter
> summarizing identified concerns that will need to be discussed and
> hopefully laid to rest before we move forward - with both work plans for
> the RA phase as well as mediation. Ms. Ferraro, is hoping to finalize
> this letter either later this week or next.
>
> My request to you is that we hold off scheduling your proposed meeting
> until you have Kim's letter in hand and are prepared to discuss its
> contents with us. I would expect that we will desire to meet in Kim's
> office in Valparaiso, IN.
>
> So, if you will please bear with us for another 1 to 2 weeks it will be
> greatly appreciated.
>
> In the meanwhile, we would truly appreciate receiving the previously
> requested water analysis results from the April 2010 seep sampling that
> was completed, along with copies of associated field notes, etc. I have
> requested this of Ashley Snyder of IDEM but she has not yet acknowledged
> that the sampling was even completed.
>
> Paul
>
> To: [redacted]; [redacted]; Pope.Janet@epamail.epa.gov
> Subject: Pines Site Update Meeting
> From: Drexler.Timothy@epamail.epa.gov
> Date: Tue, 25 May 2010 08:55:28 -0500

>
> Hi Paul:
>
> I'd like to schedule an update meeting between EPA and P.I.N.E.S.
> sometime this week or next, preferably in person, but I could also
> arrange a conference call if that is more convenient. I'd like to begin
> regular update meetings so that we can discuss everyone's status, plans,
> and schedules for site-related activities. I'd like to suggest May 27,
> 28, or June 2nd or 3rd. Do any of those dates work for you?
>
> -Tim
> The New Busy think 9 to 5 is a cute idea. Combine multiple calendars
> with Hotmail. Get busy.
>
>

Hotmail is redefining busy with tools for the New Busy. Get more from your inbox. See how.

EPA-R5-2013-003300RR-375

Paul Kysel
Exemption 6

05/29/2010 08:59 AM

To: Timothy Drexler

cc: Chuck NorrisH2Oconsultant, Mark Hutson, Pete Penoyer-NPS, Charles Morris-NPS, "Kevin Herron@IDEM", Eric Morton-EPA RA Consultant, EUGENE JABLONOWSKI, Cathi Murry, Kim Ferraro-Leaf, Larry Silvestri, Larry Jensen, Jan Nona, Bud Prast, Nancy Kolasa, George Adey, Ellen Becker, Helen Molinaro

bcc:

Subject: Former USEPA Superfund Radiation Expert and Radiation Risk Assessor's comments on EPA5's HHRA Comments for Yard 520

Tim, PINES Group member Larry Jensen has prepared the attached analysis of EPA responses to the HHRA draft from Aecom pertaining to Yard 520 - offering his expert analysis. Larry offers the attached comments with some authority since he retired from Region 5 U.S. Environmental Protection Agency (USEPA) as a Superfund Radiation Expert and Radiation Risk Assessor with 21 years of Superfund experience.

As the PINES Group has repeatedly asserted in both written and public communication to USEPA Area 5 - the radiation levels detected in and around the Town of Pines remain a serious concern and potentially pose a significant health threat to its residents.

We once again demand that USEPA direct the PRP's to take the necessary steps to both identify the exact extent / scope of the radiation and to direct the PRP's to include this serious health threat within the context of their HHRA report utilizing historic USEPA criterion.

Paul Kysel - PINES Group

From: Exem... Exemption 6
To: Exemption 6
Subject: On EPA5's HHRA Comments
Date: Thu, 27 May 2010 08:41:58 -0500

Paul, I looked over EPA's comments and have the attached observations. Please forward these on to Tim Drexler. Thanks

Larry Jensen

The New Busy is not the too busy. Combine all your e-mail accounts with Hotmail. Get busy.

Comments on by USEPA5 on HHRA, May 14, 2010[1].doc

EPA-R5-2013-003300RR-376

Matthew Ohl /R5/USEPA/US
11/10/2010 11:34 AM

To Paul Kysel, Jan Nona
cc Jackie Lippe
bcc
Subject Pines Site - Thyroid Health Concerns

Good morning:
Jackie Lippe of the Agency for Toxic Substances and Disease Registry is following up on the thyroid health concerns you expressed during our meeting on Friday, November 5, 2010. She would appreciate any information you may have regarding the type of thyroid problems experienced by the community to facilitate her research into the matter. Please note that she is not asking for any medical records.
Thank you.

Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

EPA-R5-2013-003300RR-377

Paul Kysel
Exemption 6
11/10/2010 04:11 PM

To Matthew Ohl
cc Jan Nona
bcc
Subject RE: Link to Risk Assessments

Matt, thanks for the follow through on this. I will not be available until the end of next week. Maybe Friday the 19th?

> Subject: Link to Risk Assessments
> To: Exemption 6; Exe Exemption 6
> CC: lisa.bradley@aecom.com
> From: Ohl.Matthew@epamail.epa.gov
> Date: Tue, 9 Nov 2010 18:08:39 -0600
>
> Good evening:
> Please let Lisa Bradley of AECOM know the e-mail addresses of the people
> you want to have access to the risk assessments. She can send a link to
> download the documents. I would also like to have a meeting to discuss
> your work plan and budget providing for your participation through the
> Record of Decision. Are you available Friday, November 12?
> Thank you.
> Matthew J. Ohl
> Remedial Project Manager
> United States Environmental Protection Agency
> 77 West Jackson Boulevard, SR-6J
> Chicago, IL 60604-3590
>
> phone: 312.886.4442
> fax: 312.692.2447
> e-mail: ohl.matthew@epa.gov
>

EPA-R5-2013-003300RR-378

Paul Kysel
Exemption 6
11/12/2010 10:49 AM

To Matthew Ohl
cc Jan Nona, Chuck NorrisH2Oconsultant, Mark Hutson, Kim Ferraro-LEAF, Nancy Kolasa, Bud PrastPresPINES
bcc
Subject RE: Link to Risk Assessments

Matt, I spoke to Chuck Norris of Geo-Hydro this am and agree with him that the suggested meeting to discuss work plan would be enhanced tremendously if you would first connect with both Mark Hutson and Chuck prior to our meeting so that they have a chance to put together a draft workplan for discussion at the suggested meeting. Chuck can be reached anytime starting Tuesday morning. Note, as they are in Denver they are an hour behind Chicago time.

FYI: Jan and I would prefer a Thursday meeting over a Friday meeting if at all possible. Perhaps we can hold the meeting at one of our homes in the afternoon such that we can get Chuck / Mark on the phone to help discuss the draft work plan.

Charles H. Norris
Geo-Hydro, Inc.
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

Mark Hutson: (303) 948-1417.

Please let me know if this works for you and thanks,

Paul Kysel

> Subject: RE: Link to Risk Assessments
> To: Exemption 6
> CC: Exe Exemption 6
> From: Ohl.Matthew@epamail.epa.gov
> Date: Wed, 10 Nov 2010 16:22:43 -0600
>
> Paul:
> That would work. What time is best for your group?
> Matthew J. Ohl
> Remedial Project Manager
> United States Environmental Protection Agency
> 77 West Jackson Boulevard, SR-6J
> Chicago, IL 60604-3590
>
> phone: 312.886.4442
> fax: 312.692.2447
> e-mail: ohl.matthew@epa.gov
>
>
>
> From: Paul Kysel < Exemption 6 >
>
> To: Matthew Ohl/R5/USEPA/US@EPA
>
> Cc: Jan Nona < Exe Exemption 6 >

>
> Date: 11/10/2010 04:11 PM
>
> Subject: RE: Link to Risk Assessments
>
>
>
>
>
>
> Matt, thanks for the follow through on this. I will not be available
> until the end of next week. Maybe Friday the 19th?
>
> > Subject: Link to Risk Assessments
> > To: [redacted]; [redacted]
> > CC: lisa.bradley@aecom.com
> > From: Ohl.Matthew@epamail.epa.gov
> > Date: Tue, 9 Nov 2010 18:08:39 -0600
> >
> > Good evening:
> > Please let Lisa Bradley of AECOM know the e-mail addresses of the
> people
> > you want to have access to the risk assessments. She can send a link
> to
> > download the documents. I would also like to have a meeting to discuss
> > your work plan and budget providing for your participation through the
> > Record of Decision. Are you available Friday, November 12?
> > Thank you.
> > Matthew J. Ohl
> > Remedial Project Manager
> > United States Environmental Protection Agency
> > 77 West Jackson Boulevard, SR-6J
> > Chicago, IL 60604-3590
> >
> > phone: 312.886.4442
> > fax: 312.692.2447
> > e-mail: ohl.matthew@epa.gov
> >
>
>

EPA-R5-2013-003300RR-379

"Bradley, Lisa"
<lisa.bradley@aecom.com>
11/15/2010 08:28 AM

To Matthew Ohl
cc
bcc
Subject RE: Link to Risk Assessments

Thanks Matt – will send it off momentarily. :) LASI

From: Ohl.Matthew@epamail.epa.gov [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Monday, November 15, 2010 7:49 AM
To: Bradley, Lisa
Cc: kim.ferraro@leafindiana.org; 'Charles Norris'; 'Rodriguez, Gabriel M.'; Johnson.Larry@epamail.epa.gov; 'Mark Hutson'; 'Paul Kysel'; [redacted]
Subject: RE: Link to Risk Assessments

Lisa:
Here is the list of e-mail addresses you requested.
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

From: "Kim Ferraro" <kim.ferraro@leafindiana.org>
To: "'Rodriguez, Gabriel M.'" <grodriguez@schiffhardin.com>, Matthew Ohl/R5/USEPA/US@EPA, Larry Johnson/R5/USEPA/US@EPA
Cc: "'Charles Norris'" <cnorris@geo-hydro.com>, "'Mark Hutson'" <[redacted]@geo-hydro.com>, "[redacted]" <[redacted]>, "'Paul Kysel'" <[redacted]>
Date: 11/11/2010 08:42 AM
Subject: RE: Link to Risk Assessments

Thank you, Gabe. I had not received this.

Matthew, please include me in all future correspondence on this matter. Also, please direct Lisa Bradley to provide links to the risk assessments to all people included on this email.

As Gabe and I discussed, GeoHydro folks are waiting to hear from you to gain better understanding of the remaining work to be done and how GeoHydro can appropriately assist the PINES ' participation through EPA's

issuance of the ROD. After your discussion with Charles Norris and Mark Hutson, they will put together a proposed budget and work plan for the parties' consideration.

If you need Mr. Norris' and Mr. Hutson's contact information at GeoHydro (other than email), please let me know.

Thank you,

Kim Ferraro
Executive Director
Legal Environmental Aid Foundation (LEAF) of Indiana, Inc.
150 Lincolnway, Suite 3002
Valparaiso, IN 46383
219/464-0104
fax: 464-0115

From: Rodriguez, Gabriel M. [mailto:grodriguez@schiffhardin.com]
Sent: Wednesday, November 10, 2010 8:39 AM
To: 'kim.ferraro@leafindiana.org'
Subject: Link to Risk Assessments

Kim:

FYI, in case you did not see this.

Gabe

From: Ohl.Matthew@epamail.epa.gov [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Tuesday, November 09, 2010 7:09 PM
To: Paul Kysel; Jan Nona
Cc: Bradley, Lisa
Subject: Link to Risk Assessments

Good evening:
Please let Lisa Bradley of AECOM know the e-mail addresses of the people you want to have access to the risk assessments. She can send a link to download the documents. I would also like to have a meeting to discuss your work plan and budget providing for your participation through the Record of Decision. Are you available Friday, November 12?
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

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EPA-R5-2013-003300RR-380

Matthew Ohl /R5/USEPA/US
11/15/2010 10:01 AM

To DSullivan, vblumenfeld, "[redacted]", '"Paul Kysel"', '"Charles Norris"', '"Mark Hutson"', kim.ferraro, lisa.bradley, Larry Johnson, Janet Pope

cc

bcc

Subject Pines Site - Information Sharing

Good morning:
Please see the attached letter.
Thank you.

PINES Information Sharing FINAL.pdf

Thank you.

Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

EPA-R5-2013-003300RR-381

"Mark Hutson"
<[redacted]@geo-hydro.com>
11/16/2010 01:28 PM

To Matthew Ohl
cc "Kim Ferraro", "Chuck Norris"
bcc
Subject Pines TAP Tasks

Matt

Thanks for the input on the list of tasks. I understand that you have been informed that EPA generally does not put the proposed ROD out for review. Based on your input, I have eliminated the tasks of reviewing draft and final ROD's. I have also changed the wording on the reviews of the Proposed Plan to read draft and second draft, rather than draft and final. The following are the tasks that will be included in our scope of work:

- Review and comment on second draft of the Human Health Risk Assessment
- Review and comment on an assumed third draft of the Human Health Risk Assessment
- Review and comment on the draft Ecological Risk Assessment
- Review and comment on the second draft Ecological Risk Assessment
- Review and comment on the draft Identification of Remedial Action Objectives Technical Memorandum
- Review and comment on the second draft of the Remedial Action Objectives Technical Memorandum
- Review and comment on the draft Development and Screening of Alternatives Technical Memorandum
- Review and comment on the second draft Development and Screening of Alternatives Technical Memorandum
- Review and comment on the draft Feasibility Study
- Review and comment on the second draft Feasibility Study
- Review and comment on the draft Proposed Plan
- Review and comment on the second draft Proposed Plan

With this input I will proceed with developing the scope of work and cost estimate for continuing the Pines TAP through the remainder of the process.

Thanks for your input.

Mark

Mark Hutson
Geo-Hydro, Inc.
(303)948-1417
[redacted]@geo-hydro.com

EPA-R5-2013-003300RR-382

Paul Kysel
[redacted]
11/17/2010 09:36 AM

To Matthew Ohl
cc Jan Nona, Chuck NorrisH2Oconsultant, Mark Hutson, Kim Ferraro-Leaf, Nancy Kolasa, George Adey, Bud Prast
bcc
Subject RE: Meeting Thursday 11/16

Matt, I have an email into Chuck, Mark and Kim Ferraro regarding the flurry of communications this week btw: EPA, the responsible party's attorney and our attorney, proposing a conference call to discuss issues raised / discussed - in preparation for both the creation of a new draft workplan and for a face to face with you to discuss same. At this point, barring the completion of that call, I feel it would be a waste of our time to meet.

If this call comes to fruition today and I feel we are ready to meet to discuss their draft plan, I will immediately alert you so that we might still meet. Jan Nona has graciously offered to host this possible meeting at her home in the Pines.

I'll keep you in the loop on this during the day today.

Thanks for your understanding,

Paul

> Subject: Re: Meeting Thursday 11/16
> To: [redacted]
> CC: [redacted]
> From: Ohl.Matthew@epamail.epa.gov
> Date: Tue, 16 Nov 2010 17:51:59 -0600
>
> Paul:
> If you are available Thursday morning, is the Town Hall available?
> Thanks,
> Matthew J. Ohl
> Remedial Project Manager
> United States Environmental Protection Agency
> 77 West Jackson Boulevard, SR-6J
> Chicago, IL 60604-3590
>
> phone: 312.886.4442
> fax: 312.692.2447
> e-mail: ohl.matthew@epa.gov
>
>
>
> From: Matthew Ohl/R5/USEPA/US
>
> To: Paul Kysel <[redacted]>
>
> Cc: Bud PrastPresPINES <[redacted]>, Chuck NorrisH2Oconsultant <cnorris@geo-hydro.com>, Nancy Kolasa
> <[redacted]>, Kim Ferraro-LEAF <kim.ferraro@leafindiana.org>, Mark Hutson
> <[redacted]@geo-hydro.com>, Jan Nona <[redacted]>, Janet Pope/R5/USEPA/US@EPA, Larry

> Johnson/R5/USEPA/US@EPA

>
> Date: 11/16/2010 02:43 PM
>
> Subject: Meeting Thursday 11/16
>
>
>
>
>
> Paul:
> We have a conflict Thursday afternoon. Would 9:00 am work? If so, we
> will find a meeting location nearby.
> Thank you.
> Matthew J. Ohl
> Remedial Project Manager
> United States Environmental Protection Agency
> 77 West Jackson Boulevard, SR-6J
> Chicago, IL 60604-3590
>
> phone: 312.886.4442
> fax: 312.692.2447
> e-mail: ohl.matthew@epa.gov
>
>

EPA-R5-2013-003300RR-383

Paul Kysel
[redacted]
11/17/2010 11:44 AM

To: Matthew Ohl, Kim Ferraro-LEAF
cc: Bud PrastPresPINES, Chuck NorrisH2Oconsultant, George Adey, Nancy Kolasa, Mark Hutson, Jan Nona, Janet Pope, Larry Johnson
bcc:
Subject: RE: PINES Meeting

Good deal Matt, thanks for the information and for understanding. I / we will be in touch when we feel we are ready to schedule the proposed face to face. Given the short week next week I am thinking that it will be likely that we'll be looking to the week of 11/29 to schedule this. Perhaps give some thought to that Thursday, 12/2 and let me know if that will work for you.

Kim, thanks for the guidance / clarification / assistance!

Paul

> Subject: PINES Meeting
> To: kim.ferraro@leafindiana.org; [redacted]
> CC: [redacted]; cnorris@geo-hydro.com; [redacted]; [redacted]; [redacted]@geo-hydro.com; [redacted]; Pope.Janet@epamail.epa.gov; Johnson.Larry@epamail.epa.gov
> From: Ohl.Matthew@epamail.epa.gov
> Date: Wed, 17 Nov 2010 10:19:47 -0600
>
> Kim and Paul:
> We look forward to meeting when you are ready. I'm attaching the most
> recent guidance on technical assistance plans for your information.
> Thank you.
> (See attached file: interim-tap-sf-settle-mem.pdf)
> Matthew J. Ohl
> Remedial Project Manager
> United States Environmental Protection Agency
> 77 West Jackson Boulevard, SR-6J
> Chicago, IL 60604-3590
>
> phone: 312.886.4442
> fax: 312.692.2447
> e-mail: ohl.matthew@epa.gov
>
>
>
> From: "Kim Ferraro" <kim.ferraro@leafindiana.org>
>
> To: "'Paul Kysel'" <[redacted]>, Matthew Ohl/R5/USEPA/US@EPA
>
> Cc: "'Jan Nona'" <[redacted]>, "'Chuck NorrisH2Oconsultant'" <cnorris@geo-hydro.com>, "'Mark Hutson'"
> <[redacted]@geo-hydro.com>, "'Nancy Kolasa'" <[redacted]>, "'George Adey'" <[redacted]>,
> "'Bud Prast'" <[redacted]>

>
> Date: 11/17/2010 09:46 AM
>
> Subject: RE: Meeting Thursday 11/16
>
>
>
>
>
>
> Paul & all,
>
> Based on Mark and Chuck's conversation with Matt and my follow up
> conversation with Mark and Chuck, yesterday, it is my understanding that
> Mark and Chuck are now preparing a budget/work plan to include all tasks
> for ensuring PINES' participation through EPA's issuance of the ROD.
> Mark and Chuck stated that they should have the plan ready by the end of
> the week. I would think that any meeting to discuss the work plan must
> wait until we've all had an opportunity to review the plan. Otherwise,
> there isn't much to talk about.
>
>
> Kim Ferraro
> Executive Director
> Legal Environmental Aid Foundation (LEAF) of Indiana, Inc.
> 150 Lincolnway, Suite 3002
> Valparaiso, IN 46383
> 219/464-0104
> fax: 464-0115
>
>
>
>
> From: Paul Kysel [mailto: [redacted] Exemption 6]
> Sent: Wednesday, November 17, 2010 9:37 AM
> To: Matt Ohl
> Cc: Jan Nona; Chuck NorrisH2Oconsultant; Mark Hutson; Kim Ferraro-Leaf;
> Nancy Kolasa; George Adey; Bud Prast
> Subject: Re: Meeting Thursday 11/16
>
> Matt, I have an email into Chuck, Mark and Kim Ferraro regarding the
> flurry of communications this week btw: EPA, the responsible party's
> attorney and our attorney, proposing a conference call to discuss issues
> raised / discussed - in preparation for both the creation of a new draft
> workplan and for a face to face with you to discuss same. At this point,
> barring the completion of that call, I feel it would be a waste of our
> time to meet.
>
> If this call comes to fruition today and I feel we are ready to meet to
> discuss their draft plan, I will immediately alert you so that we might
> still meet. Jan Nona has graciously offered to host this possible
> meeting at her home in the Pines.
>
> I'll keep you in the loop on this during the day today.

>
> Thanks for your understanding,
>
> Paul
>
> > Subject: Re: Meeting Thursday 11/16
> > To: [redacted]
> > CC: [redacted]
> > From: Ohl.Matthew@epamail.epa.gov
> > Date: Tue, 16 Nov 2010 17:51:59 -0600
> >
> > Paul:
> > If you are available Thursday morning, is the Town Hall available?
> > Thanks,
> > Matthew J. Ohl
> > Remedial Project Manager
> > United States Environmental Protection Agency
> > 77 West Jackson Boulevard, SR-6J
> > Chicago, IL 60604-3590
> >
> > phone: 312.886.4442
> > fax: 312.692.2447
> > e-mail: ohl.matthew@epa.gov
> >
> >
> >
> > From: Matthew Ohl/R5/USEPA/US
> >
> > To: Paul Kysel <[redacted]>
> >
> > Cc: Bud PrastPresPINES <[redacted]>, Chuck
> NorrisH2Oconsultant <cnorris@geo-hydro.com>, Nancy Kolasa
> > <[redacted]>, Kim Ferraro-LEAF
> <kim.ferraro@leafindiana.org>, Mark Hutson
> > <[redacted]@geo-hydro.com>, Jan Nona <[redacted]>, Janet
> Pope/R5/USEPA/US@EPA, Larry
> > Johnson/R5/USEPA/US@EPA
> >
> > Date: 11/16/2010 02:43 PM
> >
> > Subject: Meeting Thursday 11/16
> >
> >
> >
> >
> >
> > Paul:
> > We have a conflict Thursday afternoon. Would 9:00 am work? If so, we
> > will find a meeting location nearby.
> > Thank you.
> > Matthew J. Ohl
> > Remedial Project Manager
> > United States Environmental Protection Agency
> > 77 West Jackson Boulevard, SR-6J

> > Chicago, IL 60604-3590
> >
> > phone: 312.886.4442
> > fax: 312.692.2447
> > e-mail: ohl.matthew@epa.gov
> >
> >

EPA-R5-2013-003300RR-384

Jackie Lippe /R5/USEPA/US
11/19/2010 09:26 AM

To prichardsonat1693
cc Matthew Ohl
bcc
Subject Thyroid concerns at Pines

Dear Peggy Richardson,

I received your name from Jan Nona as a contact for the Pines community concerns about Thyroid issues related to the Pines site. I work with the Agency for Toxic Substances and Disease Registry and will be writing a technical assist in regards to the known contaminants and any possible links to thyroid issues. However I am not certain about what types of thyroid issues you are concerned about. I am not a medical doctor and am not requesting medical records, if possible I would like to have a better idea of what types of thyroid problems are present in the community. The more specific information I have (in regards to the types of thyroid problems- e.g. thyroid cancer, hypothyroidism, hyperthyroidism, Graves disease) the more specific information I can provide in the technical assist.

I would appreciate any information you can provide me. If you would prefer to discuss the on the phone I can be reached at 312-353-4766.

Have a wonderful day and weekend.

Regards
Jackie Lippe
Environmental Health Scientist
ATSDR- Region 5
77 West Jackson Blvd.
Chicago, IL 60604
e-mail: jly7@cdc.gov
phone: 312-353-4766 (office)

EPA-R5-2013-003300RR-385

Jackie Lippe /R5/USEPA/US
11/19/2010 09:32 AM

To "Exemp..."
cc Matthew Ohl, "Paul Kysel", "Peggy Richardson"
bcc
Subject Re: Pines Site - Thyroid Health Concerns

Dear Jan-

I have attempted to email Peggy Richardson however the email address returns an error message that the email address is not valid. Do you have another email address that I can use.

Regards
Jackie Lippe
Environmental Health Scientist
ATSDR- Region 5
77 West Jackson Blvd.
Chicago, IL 60604
e-mail: jly7@cdc.gov
phone: 312-353-4766 (office)

"Exempt..." Matt: Please have Jackie contact our P... 11/10/2010 05:55:46 PM

From: "Exemp..." <Exe Exemption 6>
To: "Paul Kysel" <Exemption 6>, Matthew Ohl/R5/USEPA/US@EPA
Cc: Jackie Lippe/R5/USEPA/US@EPA, "Peggy Richardson" <Exemption 6>
Date: 11/10/2010 05:55 PM
Subject: Re: Pines Site - Thyroid Health Concerns

Matt: Please have Jackie contact our Peggy Richardson. She was the lady who discussed the thyroid issue with you on the 5th. Her e-m is Exemption 6, cell phone Exemption 6

jan nona

----- Original Message -----
From: <Ohl.Matthew@epamail.epa.gov>
To: "Paul Kysel" <Exemption 6>; "Jan Nona" <Exer Exemption 6>
Cc: <Lippe.Jackie@epamail.epa.gov>
Sent: Wednesday, November 10, 2010 11:34 AM
Subject: Pines Site - Thyroid Health Concerns

> Good morning:
> Jackie Lippe of the Agency for Toxic Substances and Disease Registry is
> following up on the thyroid health concerns you expressed during our
> meeting on Friday, November 5, 2010. She would appreciate any
> information you may have regarding the type of thyroid problems
> experienced by the community to facilitate her research into the matter.
> Please note that she is not asking for any medical records.

> Thank you.
>
> Matthew J. Ohl
> Remedial Project Manager
> United States Environmental Protection Agency
> 77 West Jackson Boulevard, SR-6J
> Chicago, IL 60604-3590
>
> phone: 312.886.4442
> fax: 312.692.2447
> e-mail: ohl.matthew@epa.gov
>

EPA-R5-2013-003300RR-386

Paul Kysel
[redacted]
11/19/2010 10:35 AM

To Jackie Lippe, Jan Nona
cc Matthew Ohl, Cathi Murry
bcc
Subject RE: Pines Site - Thyroid Health Concerns

Jackie, Peggy's husband passed away unexpectedly 1-week ago today and I am sure she is far from answering anyone's emails. I would suggest you connect with Cathi Murray, whom I have copied with this email regarding this issue. Cathi is one of the PINES Group founders, is on the Town Council and has some thyroid issues, along with other health issues, in her immediate family.

FYI: Cathi teaches full time and it may take a day or so before you hear back from her.

Thanks much,

Paul Kysel

> Subject: Re: Pines Site - Thyroid Health Concerns
> To: [redacted]
> CC: Ohl.Matthew@epamail.epa.gov; [redacted]; [redacted]
> From: Lippe.Jackie@epamail.epa.gov
> Date: Fri, 19 Nov 2010 09:32:41 -0600
>
> Dear Jan-
>
> I have attempted to email Peggy Richardson however the email address
> returns an error message that the email address is not valid. Do you
> have another email address that I can use.
>
>
>
> Regards
> Jackie Lippe
> Environmental Health Scientist
> ATSDR- Region 5
> 77 West Jackson Blvd.
> Chicago, IL 60604
> e-mail: jly7@cdc.gov
> phone: 312-353-4766 (office)
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> |---------->
> | From: |
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> |"[redacted]" <[redacted]> |
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> | To: |
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> |"Paul Kysel" <[redacted]>, Matthew Ohl/R5/USEPA/US@EPA |
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> |---------->
> | Cc: |
> |---------->
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> |Jackie Lippe/R5/USEPA/US@EPA, "Peggy Richardson" <[redacted]> |
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> |---------->
> | Date: |
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> |11/10/2010 05:55 PM |
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> |---------->
> | Subject: |
> |---------->
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> |Re: Pines Site - Thyroid Health Concerns |
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>
> Matt: Please have Jackie contact our Peggy Richardson. She was the
> lady
> who discussed the thyroid issue with you on the 5th. Her e-m is
> [redacted], cell phone [redacted]
>
> jan nona
>
>

> ----- Original Message -----
> From: <Ohl.Matthew@epamail.epa.gov>
> To: "Paul Kysel" <[redacted]>; "Jan Nona" <[redacted]>
> Cc: <Lippe.Jackie@epamail.epa.gov>
> Sent: Wednesday, November 10, 2010 11:34 AM
> Subject: Pines Site - Thyroid Health Concerns
>
>
> > Good morning:
> > Jackie Lippe of the Agency for Toxic Substances and Disease Registry
> is
> > following up on the thyroid health concerns you expressed during our
> > meeting on Friday, November 5, 2010. She would appreciate any
> > information you may have regarding the type of thyroid problems
> > experienced by the community to facilitate her research into the
> matter.
> > Please note that she is not asking for any medical records.
> > Thank you.
> >
> > Matthew J. Ohl
> > Remedial Project Manager
> > United States Environmental Protection Agency
> > 77 West Jackson Boulevard, SR-6J
> > Chicago, IL 60604-3590
> >
> > phone: 312.886.4442
> > fax: 312.692.2447
> > e-mail: ohl.matthew@epa.gov
> >
>
>
>

EPA-R5-2013-003300RR-387

Matthew Ohl /R5/USEPA/US
11/22/2010 06:48 AM

To Jackie Lippe
cc
bcc
Subject Fw: Town of Pines, IN coal ash video

FYI
----- Forwarded by Matthew Ohl/R5/USEPA/US on 11/22/2010 06:48 AM -----

From: "Morton, Eric" <Eric.Morton@tetratech.com>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: "Gorman, Cheryl" <cgorman@onesullivan.com>
Date: 11/18/2010 09:15 AM
Subject: FW: Town of Pines, IN coal ash video

FYI – didn't look like you both were included on the original distribution list.

From: Paul Kysel [mailto: Exemption 6]
Sent: Wednesday, November 17, 2010 7:38 PM
To: Adam Russell-Donnelly; Alicia Ebaugh; Alicia Snyder-Idemlocal; Ann Baughman; Bharat Mathur - Acting EPA Area 5 Admin; Bob Daum; Bob Kay-EPA; Brenda Waters; Celina Weatherwax-Lugar; Charles Morris-NPS; Vaccarello, Cheryl; Chesterton Tribune Chesterton Tribune; Dana Kozlov-CBSnews; Dan Sullivan-Nipsco; David Rozmanich-Bayh; Don Bruce; Edward Karecki-EPA; Eric Ehn; Morton, Eric; Gene Jablonowski; Gitte Laasby- Post Tribune; Greg Eckert-NPS; Janet Pope; Kevin Herron@IDEM; Lane Ralph-Luga; Larry Johnson-EPA
Subject: Town of Pines, IN coal ash video

Look at the very nice job Hoosier Environmental Council did in regards to the Pines Yard 520 Site!

They've got it right.

Paul Kysel - Pine Group

Date: Wed, 17 Nov 2010 14:17:10 -0500
From: kkuhn@HECWEB.ORG
Subject: Town of Pines, IN coal ash video
To: COAL-COMBUSTION-WASTE@LISTS.SIERRACLUB.ORG
Please check out the video created by the Hoosier Environmental Council with the help of Cathi Murray, an affected resident of the Town of Pines, Indiana. Pines was declared an alternate Superfund site in 2002 due to drinking water contamination from coal ash.

http://www.hecweb.org/issues/clean-water/understanding-the-issues/coal-ash/

Kelly Kuhn
Outreach Associate and Policy Researcher
Hoosier Environmental Council
3951 N. Meridian St., Suite 100
Indianapolis, IN 46208
P: 317.685.8800 Ext. 108
F: 317.686.4794

kkuhn@hecweb.org

Join us. Become a member at *www.hecweb.org* .

Please consider the environment before printing this email.

- To unsubscribe from the COAL-COMBUSTION-WASTE list, send any message to: COAL-COMBUSTION-WASTE-signoff-request@LISTS.SIERRACLUB.ORG Check out our Listserv Lists support site for more information: http://www.sierraclub.org/lists/faq.asp To view the Sierra Club List Terms & Conditions, see: http://www.sierraclub.org/lists/terms.asp

EPA-R5-2013-003300RR-388

Paul Kysel
Exemption 6
01/23/2011 05:48 PM

To Kim Ferraro-LEAF, Matthew Ohl, Larry Johnson, "Rodriguez, Gabriel M."
cc Chuck NorrisH2Oconsultant, Mark Hutson, Jan Nona
bcc
Subject RE: 1/12/11 Letter to Ferraro re Pines Site TAP Agreement

Awesome, and I say that after watching the Bears play miserably.
Thanks so much Kim, please advise the response is...i can hardly wait

> From: kim.ferraro@leafindiana.org
> To: Ohl.Matthew@epamail.epa.gov; Johnson.Larry@epamail.epa.gov; grodriguez@schiffhardin.com
> CC: cnorris@geo-hydro.com; Exemption 6@geo-hydro.com; Exemption 6; Exe Exemption 6
> Subject: RE: 1/12/11 Letter to Ferraro re Pines Site TAP Agreement
> Date: Sun, 23 Jan 2011 11:52:32 -0600
>
> Dear Mr. Ohl, Mr. Johnson & Mr. Rodriguez,
>
> Mr. Rodriguez' recent letter indicates that Respondents will accept SB
> Alternative 1 which provides for PINES review and comment on final versions
> of documents through EPA's issuance of the ROD. To put this matter to rest
> sooner rather than later, I recommend a conference call to resolve the
> following remaining issues:
>
> 1. Respondents have rejected SB Alternative 1, a budget that allows for
> full participation by PINES within Respondents' $50K limit. Respondents'
> rejection is based on Geo-Hydro's caution that assumptions about documents
> yet to generated by Respondents may not be realistic. In other words,
> Respondents' rejection is not based on Respondents' own conclusion that
> assumptions made about their own documents are unrealistic. In light of the
> fact that Respondents/AECOM are authors of the yet to be produced documents
> and are, therefore, in the best position to know what these documents will
> look like, PINES requests a statement from Respondents/AECOM that the
> assumptions contained in SB Alternative 1 are indeed unrealistic. If, on the
> other hand, Respondents/AECOM believe the assumptions are valid, PINES
> requests an explanation as to why SB Alternative 1 is not acceptable.
>
> 2. Respondents have accepted SB Alternative 2, a budget that will reduce
> PINES' participation below the level of involvement deemed by Mr. Ohl as
> necessary, below PINES' historical level of participation, below PINES'
> desired level of participation, and as PINES believes, below the level
> required by the AOC II and SOW. Notwithstanding those issues and their
> ramifications, PINES will acquiesce to SB Alternative 2 as long as EPA
> approves of same. Specifically, SB Alternative 2 is essentially the same
> budget PINES proposed well over a year ago that was rejected as unacceptable
> by EPA. Accordingly, PINES needs a statement from EPA that it will accept
> PINES' reduced-participation as imposed by SB Alternative 2 and an
> explanation as to why EPA has changed its position.
>
> 3. Finally, I am not clear as to why PINES' acceptance of either SB
> Alternative 1 or 2 requires a modification of the TAP Agreement. Certainly,

> a written settlement agreement is in order but the TAP, as written, does not
> appear to need amending simply because additional funding is being made
> available.
>
> As clearly stated in my letter of December 15th, PINES accepts Respondents'
> offer of $50K going forward. However, the budget selected depends on
> Respondents' good faith assessment of the likely length, content,
> transparency of its yet to be produced documents (SB 1) and/or EPA's
> approval of PINES' reduced participation (SB 2). These remaining issues can
> be easily resolved without further letter writing. In that regard, please
> advise as to your availability for a teleconference this week and I will
> provide a call in number.
>
> Thank you,
>
>
> Kim Ferraro
> Executive Director
> Legal Environmental Aid Foundation (LEAF) of Indiana, Inc.
> 150 Lincolnway, Suite 3002
> Valparaiso, IN 46383
> 219/464-0104
> fax: 464-0115
>
>
>
>
> -----Original Message-----
> From: Martin, Debbie [mailto:dmartin@schiffhardin.com]
> Sent: Wednesday, January 12, 2011 4:27 PM
> To: 'kim.ferraro@leafindiana.org'
> Cc: 'Ohl.Matthew@epamail.epa.gov'; Johnson.Larry@epamail.epa.gov; Rodriguez,
> Gabriel M.
> Subject: 1/12/11 Letter to Ferraro re Pines Site TAP Agreement
>
> The attached is for your information and file. Thanks much.
>
> Debbie Martin
> Assistant to Gabriel M. Rodriguez
> and Renee Cipriano
> SCHIFF HARDIN LLP
> 233 S. Wacker Drive, Suite 6600
> Chicago, IL 60606
> (312) 258-4909
> (312) 258-5600 (Fax)
> Hrs. 8:30am to 4:30pm
> dmartin@schiffhardin.com
> P please consider the environment - do you really need to print this
> email?
>
> -----Original Message-----
> From: xerox@schiffhardin.com [mailto:xerox@schiffhardin.com]
> Sent: Wednesday, January 12, 2011 4:25 PM
> To: Martin, Debbie

> Subject: Scanned from a Xerox multifunction device
>
> Please open the attached document. It was scanned and sent to you using a
> Xerox multifunction device.
>
> Attachment File Type: pdf
>
> multifunction device Location: machine location not set
> Device Name: CH-7548-01
>
> For more information on Xerox products and solutions, please visit
> http://www.xerox.com
>
> ----------
> Tax Matters: To the extent this message or any attachment concerns tax
> matters, it is not intended or written to be used, and cannot be used by a
> taxpayer, for the purpose of avoiding penalties that may be imposed on the
> taxpayer under law.
> ----------
> This message and any attachments may contain confidential information
> protected by the attorney-client or other privilege.
> If you believe that it has been sent to you in error, please reply to the
> sender that you received the message in error. Then delete it. Thank you.
> ----------
>

EPA-R5-2013-003300RR-389

Charles Norris
<cnorris@geo-hydro.com>
01/26/2011 03:41 PM

To Matthew Ohl, Timothy Thurlow
cc Kim Ferraro-Leaf, Paul Kysel, '[redacted]', Mark Hutson
bcc
Subject GHI activities on behalf of PINES

Good afternoon, Gentlemen,

Kim Ferraro shared with us that, as she understood your conversation with her, you were under the impression Geo-Hydro, Inc. (GHI), performed its own ground water modeling of the Pines Area of Investigation.

That is not the case. GHI did not run the AECOM groundwater model and did not produce or run an independent groundwater model. GHI's level of involvement with respect to the modeling at the site was a thorough review of AECOM's input files to the model and of outputs from simulations run by AECOM.

If you have questions regarding this or any other issues where we may be able to help you, please feel free to contact us.
--
Chuck

Charles H. Norris
Geo-Hydro, Inc.
1928 E 14th Avenue
Denver CO 80206

(303) 322-3171

EPA-R5-2013-003300RR-390

"Val Blumenfeld "
<VBLUMENFELD@bibtc.com
>

04/20/2011 07:52 AM

To Matthew Ohl

cc "Alan Murray", DSullivan, lisa.bradley

bcc

Subject RE: Town of Pines drainage pipe

All-
You can normally reach me at my office 219-872-8618. If I am away at another office or job site please leave a message.
Val

-----Original Message-----
From: Ohl.Matthew@epamail.epa.gov [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Wednesday, April 20, 2011 6:26 AM
To: Val Blumenfeld
Cc: Alan Murray; DSullivan@NiSource.com; lisa.bradley@aecom.com
Subject: Town of Pines drainage pipe

Good morning:
Could you provide your contact information to Mr. Murray.
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

From: "Alan Murray" < Exemption 6 Exemption 6 >

To: Matthew Ohl/R5/USEPA/US@EPA

Date: 04/19/2011 11:50 AM

Subject: drainage pipe

Do you have any contact info,tele# for Val?
Alan Murray, Town of Pines

EPA-R5-2013-003300RR-391

Matthew Ohl /R5/USEPA/US
05/05/2011 02:32 PM

To Paul Kysel
cc Chuck Norris, Nancy Kolasa, Kim Ferraro-LEAF, Mark Hutson, Peggy Richardson, Jan Nona, Bud Prast, Timothy Thurlow, Janet Pope
bcc
Subject Re: Possible public meeting dates for Pines Yard 520 project

Hi Paul:
I think there is a misunderstanding. I didn't request a public meeting. There isn't much to report since the last public meeting due to the funding dispute. I am interested in receiving any comments PINES may have on the risk assessments as soon as possible now that funding is available. I would be happy to meet with PINES if that would be helpful. If PINES is interested in meeting, are there any dates next week that would work.
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

Paul Kysel	Hi Matt. Kim Ferraro has communicate...	04/29/2011 11:38:09 AM

From: Paul Kysel <[redacted]>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: Kim Ferraro-LEAF <kim.ferraro@leafindiana.org>, Jan Nona <[redacted]>, Nancy Kolasa <[redacted]>, Bud Prast <[redacted]>, Chuck Norris <cnorris@geo-hydro.com>, Mark Hutson <[redacted]@geo-hydro.com>, Peggy Richardson <[redacted]>
Date: 04/29/2011 11:38 AM
Subject: Possible public meeting dates for Pines Yard 520 project

Hi Matt. Kim Ferraro has communicated your expressed interest in scheduling a public meeting to announce / review recent positive developments - especially in regards to the PINES Group re-engagement in the superfund process. - as well as to introduce you as the newly assigned project manager and to provide the public with an overview of the remaining process.

I would like to shoot out an email to my fellow board members exploring good potential dates for such a meeting - but wanted to check with you first regarding any bad dates for EPA in either the last 2 weeks in May or first couple of weeks in June.

We've used a local Baptist Church in the past for the last couple of public meetings and I think this will once again be a good choice - it is just down the road from Yard 520.

Once we have a week-day date selected, we'll check with the pastor to see if he will graciously accommodate us once again. If he cannot, there are other potential options including the town 's meeting room.

We would like to meet with you folks for a short time before the public meeting, if possible, to discuss

status, etc. If we started the public meeting at say 7 pm, perhaps we could meet beforehand at say 6:30?

Please shoot me some dates ASAP within that time frame that would work for you and I'll try and get back to you with our best choices early next week.

If the suggested time frame is too ambitious, please let me know and we'll look at other potential dates instead.

Respectfully,

Paul Kysel - PINES President
Exemption 6

EPA-R5-2013-003300RR-392

Paul Kysel
Exemption 6

05/06/2011 10:27 AM

To Matthew Ohl

cc Chuck Norris, Nancy Kolasa, Kim Ferraro-LEAF, Mark Hutson, Peggy Richardson, Jan Nona, Bud Prast, Timothy Thurlow, Janet Pope

bcc

Subject RE: Possible public meeting dates for Pines Yard 520 project

Matt, I guess there is - but maybe just on your side of the equation. Actually I think we are now perfectly poised to hold a public meeting. Much time has gone by since the last meeting. I think it would have been best to hold a meeting upon your appointment as project manager but I did not push for that since we were no longer active - so who was I to suggest such a meeting?

Now that we're poised to become active again (and by the way, Geo Hydro has received their initial down payment of $24K towards their partial outstanding balance of approved but hitherto uncompensated work - so they have now officially re-engaged in the project) a meeting is in order to update the public on a variety of topics, including at least the following:

1. Your existence, role, previous experience with such sites, etc.
2. The fact that after a very long delay, PINES Group has secured funding to become active in the process once again and what this means to the process.
3. Providing the public with an overview of the work that has been completed since the PINES was sidelined and an overview of remaining work to be completed, anticipated time line for completion, etc.
4. The PINES Group will be able to explain to the public who their technical advisor is to be for the remaining work and perhaps provide a brief overview of any issues /concerns identified by their technical advisors by the date of the meeting, etc.
5. Providing the public with a status report regarding the efforts undertaken to secure Yard 520's previously identified active seeps, access control concerns, etc - these were issues previously identified by your predecessor - and for which Brown Inc was cited by IDEM and for which it appears little has been done.

I am sure that there will be even more topics to discuss as we close in on a meeting date.

So please take a look at your calendar and let me know if we can get this scheduled - now likely early June would be best. As I stated before, I would favor the PINES Board having an opportunity to meet with you prior to the public meeting to discuss logistics, status, etc.

I look forward to hearing from you on this and thanks,

Paul Kysel

> Subject: Re: Possible public meeting dates for Pines Yard 520 project
> To: Exemption 6
> CC: cnorris@geo-hydro.com; Exemption 6 ion 6; kim.ferraro@leafindiana.org; Exemption 6@geo-hydro.com; Exemption 6; Exe Exemption 6; E: Exemption 6; Thurlow.Timothy@epamail.epa.gov; Pope.Janet@epamail.epa.gov
> From: Ohl.Matthew@epamail.epa.gov
> Date: Thu, 5 May 2011 14:32:34 -0500
>
> Hi Paul:

> I think there is a misunderstanding. I didn't request a public meeting.
> There isn't much to report since the last public meeting due to the
> funding dispute. I am interested in receiving any comments PINES may
> have on the risk assessments as soon as possible now that funding is
> available. I would be happy to meet with PINES if that would be
> helpful. If PINES is interested in meeting, are there any dates next
> week that would work.
> Thank you.
> Matthew J. Ohl
> Remedial Project Manager
> United States Environmental Protection Agency
> 77 West Jackson Boulevard, SR-6J
> Chicago, IL 60604-3590
>
> phone: 312.886.4442
> fax: 312.692.2447
> e-mail: ohl.matthew@epa.gov
>
>
>
> From: Paul Kysel <[redacted]>
>
> To: Matthew Ohl/R5/USEPA/US@EPA
>
> Cc: Kim Ferraro-LEAF <kim.ferraro@leafindiana.org>, Jan Nona <[redacted]>, Nancy Kolasa
> <[redacted]>, Bud Prast <[redacted]>, Chuck Norris
<cnorris@geo-hydro.com>, Mark
> Hutson <[redacted]@geo-hydro.com>, Peggy Richardson <[redacted]>
>
> Date: 04/29/2011 11:38 AM
>
> Subject: Possible public meeting dates for Pines Yard 520 project
>
>
>
>
>
>
> Hi Matt. Kim Ferraro has communicated your expressed interest in
> scheduling a public meeting to announce / review recent positive
> developments - especially in regards to the PINES Group re-engagement in
> the superfund process. - as well as to introduce you as the newly
> assigned project manager and to provide the public with an overview of
> the remaining process.
>
> I would like to shoot out an email to my fellow board members exploring
> good potential dates for such a meeting - but wanted to check with you
> first regarding any bad dates for EPA in either the last 2 weeks in May
> or first couple of weeks in June.
>
> We've used a local Baptist Church in the past for the last couple of
> public meetings and I think this will once again be a good choice - it
> is just down the road from Yard 520.
>

> Once we have a week-day date selected, we'll check with the pastor to
> see if he will graciously accommodate us once again. If he cannot, there
> are other potential options including the town 's meeting room.
>
> We would like to meet with you folks for a short time before the public
> meeting, if possible, to discuss status, etc. If we started the public
> meeting at say 7 pm, perhaps we could meet beforehand at say 6:30?
>
> Please shoot me some dates ASAP within that time frame that would work
> for you and I'll try and get back to you with our best choices early
> next week.
>
> If the suggested time frame is too ambitious, please let me know and
> we'll look at other potential dates instead.
>
> Respectfully,
>
> Paul Kysel - PINES President
> Exemption 6
>
>

EPA-R5-2013-003300RR-393

"HERRON, KEVIN" <KHERRON@idem.IN.gov>
05/09/2011 12:44 PM

To Matthew Ohl
cc
bcc
Subject RE: Possible public meeting dates for Pines Yard 520 project

Matthew:

I have no real thoughts that matter on this issue.

Kevin

-----Original Message-----
From: Ohl.Matthew@epamail.epa.gov [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Friday, May 06, 2011 2:01 PM
To: HERRON, KEVIN
Subject: Fw: Possible public meeting dates for Pines Yard 520 project

Hi Kevin:
Please let me know your thoughts on this.
Thanks,
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov
----- Forwarded by Matthew Ohl/R5/USEPA/US on 05/06/2011 12:58 PM -----

From: Paul Kysel <[redacted]>

To: Matthew Ohl/R5/USEPA/US@EPA

Cc: Chuck Norris <cnorris@geo-hydro.com>, Nancy Kolasa <[redacted]>, Kim Ferraro-LEAF <kim.ferraro@leafindiana.org>, Mark Hutson <[redacted]@geo-hydro.com>, Peggy Richardson <[redacted]>, Jan Nona <[redacted]>, Bud Prast <[redacted]>, Timothy Thurlow/R5/USEPA/US@EPA, Janet Pope/R5/USEPA/US@EPA

Date: 05/06/2011 10:27 AM

Subject: RE: Possible public meeting dates for Pines Yard 520 project

Matt, I guess there is - but maybe just on your side of the equation.
Actually I think we are now perfectly poised to hold a public meeting.
Much time has gone by since the last meeting. I think it would have been

best to hold a meeting upon your appointment as project manager but I did not push for that since we were no longer active - so who was I to suggest such a meeting?

Now that we're poised to become active again (and by the way, Geo Hydro has received their initial down payment of $24K towards their partial outstanding balance of approved but hitherto uncompensated work - so they have now officially re-engaged in the project) a meeting is in order to update the public on a variety of topics, including at least the following:

1. Your existence, role, previous experience with such sites, etc.
2. The fact that after a very long delay, PINES Group has secured funding to become active in the process once again and what this means to the process.
3. Providing the public with an overview of the work that has been completed since the PINES was sidelined and an overview of remaining work to be completed, anticipated time line for completion, etc.
4. The PINES Group will be able to explain to the public who their technical advisor is to be for the remaining work and perhaps provide a brief overview of any issues /concerns identified by their technical advisors by the date of the meeting, etc.
5. Providing the public with a status report regarding the efforts undertaken to secure Yard 520's previously identified active seeps, access control concerns, etc - these were issues previously identified by your predecessor - and for which Brown Inc was cited by IDEM and for which it appears little has been done.

I am sure that there will be even more topics to discuss as we close in on a meeting date.

So please take a look at your calendar and let me know if we can get this scheduled - now likely early June would be best. As I stated before, I would favor the PINES Board having an opportunity to meet with you prior to the public meeting to discuss logistics, status, etc.

I look forward to hearing from you on this and thanks,

Paul Kysel

> Subject: Re: Possible public meeting dates for Pines Yard 520 project
> To: [redacted]
> CC: cnorris@geo-hydro.com; [redacted]; kim.ferraro@leafindiana.org; [redacted]; [redacted]; [redacted]; Thurlow.Timothy@epamail.epa.gov; Pope.Janet@epamail.epa.gov
> From: Ohl.Matthew@epamail.epa.gov
> Date: Thu, 5 May 2011 14:32:34 -0500
>
> Hi Paul:
> I think there is a misunderstanding. I didn't request a public meeting.
> There isn't much to report since the last public meeting due to the
> funding dispute. I am interested in receiving any comments PINES may
> have on the risk assessments as soon as possible now that funding is
> available. I would be happy to meet with PINES if that would be
> helpful. If PINES is interested in meeting, are there any dates next
> week that would work.
> Thank you.
> Matthew J. Ohl

> Remedial Project Manager
> United States Environmental Protection Agency
> 77 West Jackson Boulevard, SR-6J
> Chicago, IL 60604-3590
>
> phone: 312.886.4442
> fax: 312.692.2447
> e-mail: ohl.matthew@epa.gov
>
>
>
> From: Paul Kysel <[redacted] Exemption 6 >
>
> To: Matthew Ohl/R5/USEPA/US@EPA
>
> Cc: Kim Ferraro-LEAF <kim.ferraro@leafindiana.org>, Jan Nona
<[redacted] Exemption 6 >, Nancy Kolasa
> <[redacted] Exemption 6 >, Bud Prast <[redacted] Exemption 6 >, Chuck
Norris <cnorris@geo-hydro.com>, Mark
> Hutson <[redacted] Exemption 6 @geo-hydro.com>, Peggy Richardson
<[redacted] Exemption 6 >
>
> Date: 04/29/2011 11:38 AM
>
> Subject: Possible public meeting dates for Pines Yard 520 project
>
>
>
>
>
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> Hi Matt. Kim Ferraro has communicated your expressed interest in
> scheduling a public meeting to announce / review recent positive
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> assigned project manager and to provide the public with an overview of
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> public meetings and I think this will once again be a good choice - it
> is just down the road from Yard 520.
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> meeting, if possible, to discuss status, etc. If we started the public
> meeting at say 7 pm, perhaps we could meet beforehand at say 6:30?
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> Please shoot me some dates ASAP within that time frame that would work

> for you and I'll try and get back to you with our best choices early
> next week.
>
> If the suggested time frame is too ambitious, please let me know and
> we'll look at other potential dates instead.
>
> Respectfully,
>
> Paul Kysel - PINES President
> Exemption 6
>
>

EPA-R5-2013-003300RR-394

Matthew Ohl /R5/USEPA/US
05/10/2011 06:36 AM

To kim.ferraro
cc "'Paul Kysel'", "'Chuck Norris'", "'Nancy Kolasa'", "'Mark Hutson'", "'Peggy Richardson'", "'Jan Nona'", "'Bud Prast'", Timothy Thurlow, Janet Pope
bcc ohl.matthew
Subject Pines Site Conference Call

Kim and Paul:
I think a conference call would be helpful. It is important that we understand how the process will work going forward through the end of the RI/FS. As a first step we need to set a date to ensure we receive comments on the risk assessments in a reasonable timeframe, e.g., within 30 days of funding being made available to the technical advisor.
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

-----"Kim Ferraro" <kim.ferraro@leafindiana.org> wrote: -----

To: "'Paul Kysel'" <[redacted]>, Matthew Ohl/R5/USEPA/US@EPA
From: "Kim Ferraro" <kim.ferraro@leafindiana.org>
Date: 05/09/2011 10:13AM
cc: "'Chuck Norris'" <cnorris@geo-hydro.com>, "'Nancy Kolasa'" <[redacted]>, "'Mark Hutson'" <[redacted]@geo-hydro.com>, "'Peggy Richardson'" <[redacted]>, "'Jan Nona'" <[redacted]>, "'Bud Prast'" <[redacted]>, Timothy Thurlow/R5/USEPA/US@EPA, Janet Pope/R5/USEPA/US@EPA
Subject: RE: Possible public meeting dates for Pines Yard 520 project

Paul and Matt,

Would it be helpful to have a conference call to discuss?

Regards,

Kim Ferraro

Executive Director

Legal Environmental Aid Foundation (LEAF) of Indiana, Inc.

150 Lincolnway, Suite 3002

Valparaiso, IN 46383

219/464-0104

fax: 464-0115

From: Paul Kysel [mailto: Exemption 6]
Sent: Friday, May 06, 2011 10:27 AM
To: Matt Ohl
Cc: Chuck Norris; Nancy Kolasa; Kim Ferraro-LEAF; Mark Hutson; Peggy Richardson; Jan Nona; Bud Prast; thurlow.timothy@epamail.epa.gov; Janet Pope
Subject: Re: Possible public meeting dates for Pines Yard 520 project

Matt, I guess there is - but maybe just on your side of the equation. Actually I think we are now perfectly poised to hold a public meeting. Much time has gone by since the last meeting. I think it would have been best to hold a meeting upon your appointment as project manager but I did not push for that since we were no longer active - so who was I to suggest such a meeting?

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So please take a look at your calendar and let me know if we can get this scheduled - now likely early June would be best. As I stated before, I would favor the PINES Board having an opportunity to meet with you prior to the public meeting to discuss logistics, status, etc.

I look forward to hearing from you on this and thanks,

Paul Kysel

> Subject: Re: Possible public meeting dates for Pines Yard 520 project
> To: [redacted]
> CC: cnorris@geo-hydro.com; [redacted]; kim.ferraro@leafindiana.org; [redacted]@geo-hydro.com; [redacted]; [redacted]; [redacted]; Thurlow.Timothy@epamail.epa.gov; Pope.Janet@epamail.epa.gov
> From: Ohl.Matthew@epamail.epa.gov
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> week that would work.
> Thank you.
> Matthew J. Ohl
> Remedial Project Manager
> United States Environmental Protection Agency
> 77 West Jackson Boulevard, SR-6J
> Chicago, IL 60604-3590
>
> phone: 312.886.4442
> fax: 312.692.2447
> e-mail: ohl.matthew@epa.gov
>
>
>
> From: Paul Kysel <[redacted]>
>
> To: Matthew Ohl/R5/USEPA/US@EPA
>
> Cc: Kim Ferraro-LEAF <kim.ferraro@leafindiana.org>, Jan Nona <[redacted]>, Nancy Kolasa

> <[redacted]>, Bud Prast <[redacted]>, Chuck Norris <cnorris@geo-hydro.com>, Mark
> Hutson <[redacted]@geo-hydro.com>, Peggy Richardson <[redacted]>
>
> Date: 04/29/2011 11:38 AM

>
> Subject: Possible public meeting dates for Pines Yard 520 project
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>
>
>
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> Hi Matt. Kim Ferraro has communicated your expressed interest in
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> we'll look at other potential dates instead.
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> Respectfully,
>
> Paul Kysel - PINES President
> Exemption 6
>
>

EPA-R5-2013-003300RR-395

"Mark Hutson"
<[redacted]@geo-hydro.com>
05/13/2011 10:00 AM

To Matthew Ohl, "Paul Kysel", "Charles Norris", "Kim Ferraro"
cc
bcc
Subject Pines Conference call

Ok I think we have a call put together for 10:30 am Chicago time.

Call in number 800-377-8846

Participant code 71083079 #

The identified topics are
1) Schedule for review of the Risk Assessments,
and
2) A possible public meeting at Pines

I'll talk with all of you in half an hour.

Thanks
Mark

Mark Hutson
Geo-Hydro, Inc
303-948-1417
[redacted]@geo-hydro.com

EPA-R5-2013-003300RR-396

Matthew Ohl /R5/USEPA/US
05/13/2011 11:51 AM

To EUGENE JABLONOWSKI
cc Eric.Morton, david.homer, cgorman
bcc
Subject Pines Site

Hi Gene:
I need to know about your review of the radiation study and questions provided by Larry Jensen and how these issues were resolved.
Thank you.

Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

Gamma_survey_LJensen.PDF

Rad Questions for EPA.pdf

EPA-R5-2013-003300RR-397

Matthew Ohl /R5/USEPA/US
05/17/2011 09:17 AM

To Paul Kysel
cc Chuck Norris, Nancy Kolasa, Janet Pope, Kim Ferraro-LEAF, Mark Hutson, Peggy Richardson, Jan Nona, Bud Prast, Timothy Thurlow, ASnyder
bcc
Subject Yard 520 Site Assessment

Paul:
In follow-up to our call on Friday, May 13, I just spoke with Ashley Snyder of IDEM. The site assessment work is expected to start this summer.
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

EPA-R5-2013-003300RR-398

Paul Kysel
Exemption 6
06/08/2011 06:57 PM

To Matthew Ohl
cc
bcc
Subject questions regarding Yard 520 and the Pines Group's role

Hi Matt. A number of points for you to know and some to respond to:
1. We've decided to hold off on a public meeting of our own until GeoHydro has completed its preliminary reviews. I wanted to follow up with you regarding the status of efforts you hopefully have undertaken since our last conversation as it relates to Larry Jensen's radiation report and expressed concerns.
2. You had indicated that you were going follow up on Larry's report and get back to me, are you ready to do that?
3. Did you get an update status from IDEM regarding their previous citation of Brown Inc for active seeps, access control improvement, etc?
4. I have read and re-read the final agreement that was entered into between PINES and the PRPS and do not find any ongoing requirement for PINES Group to provide them with any monthly summary reports of our activities. Am I missing something or has this previous requirement been dropped?

I look forward to hearing back when convenient,

Paul Kysel, PINES Group President

EPA-R5-2013-003300RR-399

Matthew Ohl /R5/USEPA/US
06/09/2011 06:33 AM

To ASnyder
cc
bcc
Subject Pines Site: questions regarding Yard 520 and the Pines Group's role

Hi Ashley:
Could you provide an update on the item 3 in the attached message?
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov
----- Forwarded by Matthew Ohl/R5/USEPA/US on 06/09/2011 06:31 AM -----

From: Paul Kysel < Exemption 6 >
To: Matthew Ohl/R5/USEPA/US@EPA
Date: 06/08/2011 06:57 PM
Subject: questions regarding Yard 520 and the Pines Group's role

---

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1. We've decided to hold off on a public meeting of our own until GeoHydro has completed its preliminary reviews. I wanted to follow up with you regarding the status of efforts you hopefully have undertaken since our last conversation as it relates to Larry Jensen's radiation report and expressed concerns.
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I look forward to hearing back when convenient,

Paul Kysel, PINES Group President

EPA-R5-2013-003300RR-400

Matthew Ohl /R5/USEPA/US
06/09/2011 07:26 AM

To "Bradley, Lisa"
cc
bcc
Subject Gamma Count Rate Survey

Gamma_survey_LJensen.PDF

Lisa:
Did AECOM provide a response to this report? If so, could you provide a copy?
Thanks,
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

EPA-R5-2013-003300RR-401

"Snyder, Ashley"
<ASnyder@idem.IN.gov>

06/09/2011 08:27 AM

To Matthew Ohl

cc

bcc

Subject RE: Pines Site: questions regarding Yard 520 and the Pines Group's role

Good Morning Matthew,

I apologize on the time it is taking to get the approved plan for the investigation into the cause of the seep area ready for release. I am still waiting for an approval to release it. I will follow-up again today on this.

I do want to let you know that The facility repaired the rills/gullies at the site and the ruts made by ATV activity. No trespassing signage has been reposted at the site on gates and it was determined that access to the landfill could not occur from the south due to the ditch that wraps the property. For this reason and the fact that the installation of a fence may disturb the cap no fencing was required on that portion. The seep area was repaired by regarding and filling with bentonite clay, however due to further concern the assessment plan was required.

I can pull together my follow-up inspection reports and try to get a packet approved for release so you have documentation to show the PINES group.

Thanks,

Ashley R. Snyder
Agricultural and Solid Waste Inspector
Indiana Department of Environmental Management
Northwest Regional Office
8380 Louisiana Street
Merrillville, IN 46410
ph: 219/757-0276
fax: 219/757-0267

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- Please consider the environment before printing this e-mail

-----Original Message-----
From: Ohl.Matthew@epamail.epa.gov [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Thursday, June 09, 2011 6:34 AM
To: Snyder, Ashley
Subject: Pines Site: questions regarding Yard 520 and the Pines Group's role

Hi Ashley:
Could you provide an update on the item 3 in the attached message?
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov
----- Forwarded by Matthew Ohl/R5/USEPA/US on 06/09/2011 06:31 AM -----

From: Paul Kysel <Exemption 6>

To: Matthew Ohl/R5/USEPA/US@EPA

Date: 06/08/2011 06:57 PM

Subject: questions regarding Yard 520 and the Pines Group's role

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I look forward to hearing back when convenient,

Paul Kysel, PINES Group President

EPA-R5-2013-003300RR-402

Matthew Ohl /R5/USEPA/US
06/15/2011 09:24 AM

To Paul Kysel
cc Timothy Thurlow, kim.ferraro, ASnyder, EUGENE JABLONOWSKI, Janet Pope, KHERRON
bcc
Subject Re: questions regarding Yard 520 and the Pines Group's role

Good morning Paul:

I inquired about Larry Jensen's radiation report and I have been informed that AECOM previously responded to the issues raised in the report with oversight by EPA. I also understand that EPA's former Remedial Project Manager, Tim Drexler and Health Physicist, Gene Jablonowski reviewed AECOM's responses, held discussions with Larry Jensen several times, and determined that it was not appropriate to formerly include the report in the risk assessments due to data quality issues.

I asked Ashley Snyder of IDEM about the issues you raised regarding Yard 520. IDEM is preparing a packet of documentation regarding their responses to these issues.

In regard to monthly reporting requirements, I reviewed the Technical Assistance Plan of April 5, 2005, the First Amendment to the Technical Assistance Plan Agreement signed by P.I.N.E.S. on May 5, 2009, and the Settlement Agreement of April 22, 2011. Section II, paragraph T of the TAP agreement includes requirements for Progress Reports stating, "The P.I.N.E.S. must provide Respondents with monthly progress reports within 30 days of the end of each month, wherein the group provides a full description in chart or narrative format, see attached Exhibit 7 for an example of a Progress Report, of the progress the P.I.N.E.S. made in relation to its approved schedule, budget and the TAP Project milestones, including an explanation of special problems the P.I.N.E.S. encountered and any copies of technical documents or advisories generated in the 30 day period." I didn't see any language in the Settlement Agreement, that removes or otherwise affects this reporting requirement. Instead paragraph IV states, "Each of the Parties, on their own behalf and their respective successors and assigns, hereby agree that the TAP Agreement in its current form and content as of the date of this Settlement Agreement is the exclusive, complete, and binding agreement for the funding and conduct of P.I.N.E.S. activities as the Community Group designated pursuant to and in compliance with the terms and conditions of April 2004 Administrative Order on Consent (Docket no. V-W-04-C-784 ("AOC II") and the attached Statement of Work ("SOW") for the Pines Area of Investigation." You may want to discuss this further with your legal counsel.

Thank you.

Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442

fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

Paul Kysel	Hi Matt. A number of points for you to k...	06/08/2011 06:57:34 PM

From: Paul Kysel < Exemption 6 >
To: Matthew Ohl/R5/USEPA/US@EPA
Date: 06/08/2011 06:57 PM
Subject: questions regarding Yard 520 and the Pines Group's role

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I look forward to hearing back when convenient,

Paul Kysel, PINES Group President

EPA-R5-2013-003300RR-403

"Mark Hutson "
<[redacted]@geo-hydro.com>
06/27/2011 02:21 PM

To Matthew Ohl
cc "Paul Kysel", "Charles Norris", "Carolyn Fordham "
bcc
Subject PINES Comments on ERA and HHRA

Matt

On behalf of PINES I am forwarding the attached files that contain our comments on the Ecological Risk Assessment and Human Health Risk Assessment for the Pines Groundwater Plume Site. I believe that our comments are self explanatory, but please feel free to contact me with any questions.

Mark

Mark Hutson
Geo-Hydro, Inc
303-948-1417
[redacted]@geo-hydro.com

20110627 Pines Comments on the Draft Eco RA.pdf20110627 Pines Comments on the 2nd draft HHRA.pdf

EPA-R5-2013-003300RR-404

Matthew Ohl /R5/USEPA/US
06/28/2011 05:55 AM

To "Gorman, Cheryl"
cc
bcc
Subject Fw: PINES Comments on ERA and HHRA

Hi Cheryl:
Here are the comments from the PINES group.
Thanks,
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

-----Forwarded by Matthew Ohl/R5/USEPA/US on 06/28/2011 05:54AM -----

To: Matthew Ohl/R5/USEPA/US@EPA
From: "Mark Hutson" <[redacted]@geo-hydro.com>
Date: 06/27/2011 02:21PM
cc: "Paul Kysel" <[redacted]>, "Charles Norris" <cnorris@geo-hydro.com>, "Carolyn Fordham " <clfordham@terratech.com>
Subject: PINES Comments on ERA and HHRA

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20110627 Pines Comments on the Draft Eco RA.pdf20110627 Pines Comments on the 2nd draft HHRA.pdf

EPA-R5-2013-003300RR-405

"Snyder, Ashley"
<ASnyder@idem.IN.gov>

06/29/2011 08:48 AM

To Matthew Ohl

cc

bcc

Subject RE: Pines Site: questions regarding Yard 520 and the Pines Group's role

Good Morning Matt,

I did follow-up with our central file room after our last conversation and they were very confused. They thought the request for the documents came into the EPA and were confused why IDEM would be responding. I had to explain that I had all of the information and that it was to show how IDEM had responded to the seep, access control, and so on. There are quite a few documents in the packet and they have been reviewing them and making sure they are all in our virtual file cabinet. They were going to be getting back to me. That was on 16th. I would have just sent you the documents right away if they were not intended for release to the PINES group. There should be no issues with any of the documents for public release, but we do have like 3 or 4 documents from Weaver Boos on behalf of Yard 520 which I believe are taking longer to review. I will try and see where they are at with this today. I apologize for the time this is taking, I do promise you will get this packet of info.

Thanks,

Ashley R. Snyder
Agricultural and Solid Waste Inspector
Indiana Department of Environmental Management
Northwest Regional Office
8380 Louisiana Street
Merrillville, IN 46410
ph: 219/757-0276
fax: 219/757-0267

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- Please consider the environment before printing this e-mail

-----Original Message-----
From: Ohl.Matthew@epamail.epa.gov [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Wednesday, June 29, 2011 8:05 AM
To: Snyder, Ashley
Subject: RE: Pines Site: questions regarding Yard 520 and the Pines Group's role

Hi Ashley:
Were you able to find out the status of the information package?
Thanks you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

From: "Snyder, Ashley" <ASnyder@idem.IN.gov>

To: Matthew Ohl/R5/USEPA/US@EPA

Date: 06/09/2011 08:27 AM

Subject: RE: Pines Site: questions regarding Yard 520 and the Pines Group's role

Good Morning Matthew,

I apologize on the time it is taking to get the approved plan for the investigation into the cause of the seep area ready for release. I am still waiting for an approval to release it. I will follow-up again today on this.

I do want to let you know that The facility repaired the rills/gullies at the site and the ruts made by ATV activity. No trespassing signage has been reposted at the site on gates and it was determined that access to the landfill could not occur from the south due to the ditch that wraps the property. For this reason and the fact that the installation of a fence may disturb the cap no fencing was required on that portion. The seep area was repaired by regarding and filling with bentonite clay, however due to further concern the assessment plan was required.

I can pull together my follow-up inspection reports and try to get a packet approved for release so you have documentation to show the PINES group.

Thanks,

Ashley R. Snyder
Agricultural and Solid Waste Inspector
Indiana Department of Environmental Management
Northwest Regional Office
8380 Louisiana Street
Merrillville, IN 46410
ph: 219/757-0276
fax: 219/757-0267

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Please consider the environment before printing this e-mail

-----Original Message-----
From: Ohl.Matthew@epamail.epa.gov [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Thursday, June 09, 2011 6:34 AM
To: Snyder, Ashley
Subject: Pines Site: questions regarding Yard 520 and the Pines Group's role

Hi Ashley:
Could you provide an update on the item 3 in the attached message?
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov
----- Forwarded by Matthew Ohl/R5/USEPA/US on 06/09/2011 06:31 AM -----

From: Paul Kysel <Exemption 6>

To: Matthew Ohl/R5/USEPA/US@EPA

Date: 06/08/2011 06:57 PM

Subject: questions regarding Yard 520 and the Pines Group's role

Hi Matt. A number of points for you to know and some to respond to:
1. We've decided to hold off on a public meeting of our own until GeoHydro has completed its preliminary reviews. I wanted to follow up with you regarding the status of efforts you hopefully have undertaken since our last conversation as it relates to Larry Jensen's radiation report and expressed concerns.
2. You had indicated that you were going follow up on Larry's report and

get back to me, are you ready to do that?
3. Did you get an update status from IDEM regarding their previous citation of Brown Inc for active seeps, access control improvement, etc?
4. I have read and re-read the final agreement that was entered into between PINES and the PRPS and do not find any ongoing requirement for PINES Group to provide them with any monthly summary reports of our activities. Am I missing something or has this previous requirement been dropped?

I look forward to hearing back when convenient,

Paul Kysel, PINES Group President

EPA-R5-2013-003300RR-406

"Snyder, Ashley"
<ASnyder@idem.IN.gov>

06/29/2011 09:47 AM

To Matthew Ohl

cc

bcc

Subject RE: Pines Site: questions regarding Yard 520 and the Pines Group's role

Hi Matt,

Finally Success! Attached are all of the documents. It does not look like they copied into the email in order but they go from Dec. 2009 to May of 2011. Please let me know if you have any questions regarding the attachments.

Thanks,

Ashley R. Snyder
Agricultural and Solid Waste Inspector
Indiana Department of Environmental Management
Northwest Regional Office
8380 Louisiana Street
Merrillville, IN 46410
ph: 219/757-0276
fax: 219/757-0267

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Thanks you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442

fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

From: "Snyder, Ashley" <ASnyder@idem.IN.gov>

To: Matthew Ohl/R5/USEPA/US@EPA

Date: 06/09/2011 08:27 AM

Subject: RE: Pines Site: questions regarding Yard 520 and the Pines Group's role

Good Morning Matthew,

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I do want to let you know that The facility repaired the rills/gullies at the site and the ruts made by ATV activity. No trespassing signage has been reposted at the site on gates and it was determined that access to the landfill could not occur from the south due to the ditch that wraps the property. For this reason and the fact that the installation of a fence may disturb the cap no fencing was required on that portion. The seep area was repaired by regarding and filling with bentonite clay, however due to further concern the assessment plan was required.

I can pull together my follow-up inspection reports and try to get a packet approved for release so you have documentation to show the PINES group.

Thanks,

Ashley R. Snyder
Agricultural and Solid Waste Inspector
Indiana Department of Environmental Management
Northwest Regional Office
8380 Louisiana Street
Merrillville, IN 46410
ph: 219/757-0276
fax: 219/757-0267

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Please consider the environment before printing this e-mail

-----Original Message-----
From: Ohl.Matthew@epamail.epa.gov [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Thursday, June 09, 2011 6:34 AM
To: Snyder, Ashley
Subject: Pines Site: questions regarding Yard 520 and the Pines Group's role

Hi Ashley:
Could you provide an update on the item 3 in the attached message?
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov
----- Forwarded by Matthew Ohl/R5/USEPA/US on 06/09/2011 06:31 AM -----

From: Paul Kysel <Exemption 6>

To: Matthew Ohl/R5/USEPA/US@EPA

Date: 06/08/2011 06:57 PM

Subject: questions regarding Yard 520 and the Pines Group's role

Hi Matt. A number of points for you to know and some to respond to:
1. We've decided to hold off on a public meeting of our own until GeoHydro has completed its preliminary reviews. I wanted to follow up with you regarding the status of efforts you hopefully have undertaken since our last conversation as it relates to Larry Jensen's radiation report and expressed concerns.
2. You had indicated that you were going follow up on Larry's report and get back to me, are you ready to do that?
3. Did you get an update status from IDEM regarding their previous citation of Brown Inc for active seeps, access control improvement, etc?
4. I have read and re-read the final agreement that was entered into between PINES and the PRPS and do not find any ongoing requirement for PINES Group to provide them with any monthly summary reports of our activities. Am I missing something or has this previous requirement been dropped?

I look forward to hearing back when convenient,

Paul Kysel, PINES Group President

assessment plan approval letter 5-17-11.pdf extension request from Weaver Boos.pdf

IDEM Apr 2010 response letter.pdf Response Aug. 2010.pdf VFC Yard 520 remediation plan letter 3-17-10.pdf

Yard 520 10-7-10 VL (VFC).pdf Yard 520 Access Control Letter June 02, 2010.pdf

Yard 520 Complete violation letter Dec. 09.pdf Yard 520 corrective action plan follow-up inspection 6-30-2010.pdf

yard 520 extension letter Feb. 2010.pdf Yard 520 follow-up inspection July 27, 2010.pdf

Yard 520 pictures 9-21-10.pdf Yard 520 remediation plan Feb 2010.pdf

Yard 520 Seep Pictures from Tim Drexler pics.pdf Yard 520 site assessment plan.pdf

EPA-R5-2013-003300RR-407

Matthew Ohl /R5/USEPA/US
06/29/2011 11:19 AM

To Paul Kysel
cc ASnyder, Janet Pope, KHERRON, kim.ferraro, Timothy Thurlow
bcc
Subject Pines Site - Yard 520

Paul:
As mentioned in my e-mail message of June 15, 2011, here is the documentation IDEM prepared regarding their responses to the Yard 520 issues.
Thank you.

Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

Yard 520 site assessment plan.pdf
assessment plan approval letter 5-17-11.pdf
extension request from Weaver Boos.pdf
IDEM Apr 2010 response letter.pdf
Response Aug. 2010.pdf
VFC Yard 520 remediation plan letter 3-17-10.pdf
Yard 520 10-7-10 VL (VFC).pdf
Yard 520 Access Control Letter June 02, 2010.pdf
Yard 520 Complete violation letter Dec. 09.pdf
Yard 520 corrective action plan follow-up inspection 6-30-2010.pdf
yard 520 extension letter Feb. 2010.pdf
Yard 520 follow-up inspection July 27, 2010.pdf
Yard 520 pictures 9-21-10.pdf
Yard 520 remediation plan Feb 2010.pdf
Yard 520 Seep Pictures from Tim Drexler pics.pdf

EPA-R5-2013-003300RR-408

Matthew Ohl /R5/USEPA/US
06/29/2011 02:50 PM

To Janet Pope, Timothy Thurlow
cc
bcc
Subject Fw: May 2011 summary report from PINES Group

FYI

----- Forwarded by Matthew Ohl/R5/USEPA/US on 06/29/2011 02:50 PM -----

From: Paul Kysel <[redacted]>
To: Val Blumenfeld - Brown <vblumenfeld@bibtc.com>, Dan Sullivan-Nipsco <dsullivan@nisource.com>
Cc: Matthew Ohl/R5/USEPA/US@EPA, Kim Ferraro-LEAF <kim.ferraro@leafindiana.org>, Nancy Kolasa <[redacted]>
Date: 06/29/2011 02:44 PM
Subject: May 2011 summary report from PINES Group

With the renewed funding as the community group comes the responsibility to provide monthly summary reports. Enclosed is the May 2011 summary report. Future such reports will likely come from our Secretary, Ms. Nancy Kolosa.

Please contact me with any questions, etc.

Paul Kysel - PINES Group President

PINES Progress Report May 2011.doc

EPA-R5-2013-003300RR-409

Matthew Ohl /R5/USEPA/US
01/30/2012 06:18 AM

To Timothy Thurlow, Janet Pope, Keith Fusinski
cc
bcc
Subject Fw: Pines Site - Remedial Action Objectives Technical Memorandum

FYI
----- Forwarded by Matthew Ohl/R5/USEPA/US on 01/30/2012 06:08 AM -----

From: Paul Kysel <[redacted]>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: EDWARD KARECKI/R5/USEPA/US@EPA, Brenda Waters <brenda_waters@nps.gov>, Charles Morris-NPS <charles_morris@nps.gov>, Chuck Norris <cnorris@geo-hydro.com>, Mark Hutson <[redacted]@geo-hydro.com>, Kim Ferraro-LEAF <kim.ferraro@leafindiana.org>, Pete Penoyer-NPS <pete_penoyer@nps.gov>, Nancy Kolasa <[redacted]>, Larry Jensen <[redacted]>
Date: 01/27/2012 05:55 PM
Subject: RE: Pines Site - Remedial Action Objectives Technical Memorandum

---

Matt, it appears to the PINES Group that AECOM and PRP's are once again trying to game the Superfund process by submitting the Remedial Action Objectives (RAO) Technical Memorandum before the Risk Assessments are approved in their final form. The Administrative Order (AO) that they are working under says that the RAOs are ***due to EPA within 30 days of approval of the Risk Assessments*** - they appear to be attempting to take advantage of the fact that the AO is not explicity clear about having to wait until the Risk Assessments are approved - but it seems to us inferred by the AO document and Superfund process. How can they offer the conclusions they have when the drafted Risk Assessments are so flawed?

We're going to have to make numerous references to our comments previously supplied on the Risk Assessment drafts and repeat several of them in our comments on the RAOs to be sure that it is clear that we do not agree with the Risk Assessments we have reviewed to date. Though the assertions / conclusions / etc contained in the RAO memorandum echo the PRP's previous assertions that all is basically fine and that between providing municipal water to most of the affected residents and occasionally testing Yard 520 perimeter wells very little to no additional remedial actions will be necessary. This is exactly where they have been trying to drive the process since releasing the initial Site Management Strategy document. Our comments have consistently attempted to point out the weakness of AECOM's methodology and false assumptions. Garbage in garbage out.

Our techical advisors are working on their comments on the RAO document right now. As you know you created an extremely short window for comments, which of course only further works to the benefit of the PRP's.

Could you please provide us with some explanation as to why the PRP's would not be prevented or at least dissuaded from creating the RAO document prior to the the Risk Assessments taking their final form? I don't believe that you have even directed USEPA comments to the PRP's for the second draft RA's which seemed to share nearly all of the flaws of the first draft.

I look forward to hearing your explanation.

Paul Kysel - PINES Group President

> Subject: Pines Site - Remedial Action Objectives Technical Memorandum
> To: Karecki.Edward@epamail.epa.gov; Brenda_Waters@nps.gov; Charles_Morris@nps.gov; david.homer@tetratech.com; cnorris@geo-hydro.com; Exemption 6 @geo-hydro.com; kim.ferraro@leafindiana.org; Exemption 6
> From: Ohl.Matthew@epamail.epa.gov
> Date: Wed, 25 Jan 2012 12:42:14 -0600
>
>
> (See attached file: PinesRAOMemo_Final_2012-01-20.pdf)
> Good afternoon:
> If you intend to review the Remedial Action Objectives Technical
> Memorandum, please provide any comments you may have to EPA by
> Wednesday, February 8, 2012.
> Thank you.
> Matthew J. Ohl
> Remedial Project Manager
> United States Environmental Protection Agency
> 77 West Jackson Boulevard, SR-6J
> Chicago, IL 60604-3590
>
> phone: 312.886.4442
> fax: 312.692.2447
> e-mail: ohl.matthew@epa.gov

EPA-R5-2013-003300RR-410

Matthew Ohl /R5/USEPA/US
02/29/2012 04:25 PM

To pkysel, Charles Norris, "Mark Hutson", kim.ferraro, lisa.bradley, Timothy Thurlow, Janet Pope
cc
bcc
Subject Pines Site - Review of Response to Comments and Radiation Risk Estimate

Good afternoon:
Please see the attached letter.
Thank you.

Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

PINES Radiation Survey and Risk Assessment FINAL.pdf

EPA-R5-2013-003300RR-411

Janet Pope /R5/USEPA/US
03/01/2012 04:18 PM

To Matthew Ohl
cc
bcc
Subject Fw: Pines Site - Review of Response to Comments and Radiation Risk Estimate

Matt,

Can this document be turned into a world doc?

janet
----- Forwarded by Janet Pope/R5/USEPA/US on 03/01/2012 04:18 PM -----

From: r5websupport
To: Janet Pope/R5/USEPA/US@EPA
Date: 03/01/2012 12:09 PM
Subject: Re: Fw: Pines Site - Review of Response to Comments and Radiation Risk Estimate
Sent by: Karen Reshkin

Hi Janet,

Please resend the enclosure as a Word document so we can make a smaller PDF of this.

Thank you,
Karen

Janet Pope	Please post on Town of Pines Site web...	03/01/2012 08:40:14 AM

From: Janet Pope/R5/USEPA/US
To: r5websupport@EPA
Date: 03/01/2012 08:40 AM
Subject: Fw: Pines Site - Review of Response to Comments and Radiation Risk Estimate

---

Please post on Town of Pines Site web page.

janet
----- Forwarded by Janet Pope/R5/USEPA/US on 03/01/2012 08:38 AM -----

From: Matthew Ohl/R5/USEPA/US
To: [redacted] Exemption 6, Charles Norris <cnorris@geo-hydro.com>, "Mark Hutson" <[redacted] Exemptio...@geo-hydro.com>, kim.ferraro@leafindiana.org, lisa.bradley@aecom.com, Timothy Thurlow/R5/USEPA/US@EPA, Janet Pope/R5/USEPA/US@EPA
Date: 02/29/2012 04:25 PM
Subject: Pines Site - Review of Response to Comments and Radiation Risk Estimate

---

Good afternoon:
Please see the attached letter.
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

[attachment "PINES Radiation Survey and Risk Assessment FINAL.pdf" deleted by Karen Reshkin/R5/USEPA/US]

EPA-R5-2013-003300RR-412

"Stiker, Mary" <Mstiker@dhs.IN.gov>

03/27/2012 10:16 AM

To Matthew Ohl

cc

bcc

Subject Request from Pines

Thanks Matt for taking the time to talk with me. My main goal in this is to make sure we are all on the same page.

Mary Stiker

Town of Pines.pdf

EPA-R5-2013-003300RR-413

Matthew Ohl /R5/USEPA/US
04/25/2012 12:37 PM

To pkysel, "Mark Hutson", lisa.bradley, Timothy Thurlow, Janet Pope, KHERRON
cc
bcc
Subject Response to PINES on Risk Assessment Comments and Independent Risk Assessments

Response to PINES Comments on Risk Assessments and Independent Risk Assessments FINAL.pdf

Good afternoon:
Please see the attached letter.
Thank you.

Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

EPA-R5-2013-003300RR-414

Matthew Ohl /R5/USEPA/US
04/25/2012 12:48 PM

To "Bradley, Lisa"
cc
bcc
Subject Pines Site - Word Docs

Response to PINES Comments on Risk Assessments and Independent Risk Assessments FINAL.doc

RAO Tech Memo Comments FINAL.docx

HHRA and SERA Modifications FINAL.docx

Hi Lisa:
Please see the attached Word versions of the letters you requested.
Thanks,
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

"Bradley, Lisa" Hi Matt! Would it be possible to get thi... 04/24/2012 09:24:49 AM

From: "Bradley, Lisa" <lisa.bradley@aecom.com>
To: Matthew Ohl/R5/USEPA/US@EPA
Date: 04/24/2012 09:24 AM
Subject: RE: Pines Site - Remedial Action Objectives

Hi Matt! Would it be possible to get this in a word version? And while I'm at it, could we get the risk assessment letter in word as well? Thanks! :)A Lsi

From: Matthew Ohl [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Wednesday, April 18, 2012 2:19 PM
To: Bradley, Lisa; [redacted]; Mark Hutson; Charles_Morris@nps.gov; Brenda_Waters@nps.gov; Timothy Thurlow; Janet Pope
Subject: Pines Site - Remedial Action Objectives

(See attached file: RAO Tech Memo Comments FINAL.pdf)

Good afternoon:
Please see the attached letter.
Thank you.
Matthew J. Ohl

Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

EPA-R5-2013-003300RR-415

"Mark Hutson"
<[redacted]@geo-hydro.com>
04/25/2012 04:34 PM

To Matthew Ohl
cc
bcc
Subject RE: Response to PINES on Risk Assessment Comments and Independent Risk Assessments

Thanks Matt

I had forgotten that we hadn't already seen EPA's official responses to our Risk Assessment comments . How are things going over at your end? We generally liked the final RAO Technical Memorandum that you sent out.

Mark

From: Matthew Ohl [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Wednesday, April 25, 2012 11:38 AM
To: [redacted]; Mark Hutson; lisa.bradley@aecom.com; Timothy Thurlow; Janet Pope; KHERRON@idem.IN.gov
Subject: Response to PINES on Risk Assessment Comments and Independent Risk Assessments

(See attached file: Response to PINES Comments on Risk Assessments and Independent Risk Assessments FINAL.pdf)
Good afternoon:
Please see the attached letter.
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

EPA-R5-2013-003300RR-416

George Adey
<[redacted]
04/27/2012 04:05 PM

To Matthew Ohl
cc
bcc
Subject Water Test Results

Matt,

The Town of Pines is looking at connecting to the Michigan City sewer system. The City of Michigan City is very receptive to hooking us to their system. As part of our preliminary talks they have requested I supply them with water testing results for the sample wells located in our Town. Since our ground water could possibly seep into this proposed system, I feel this is a valid request. Could you please send copies of results for the latest testing done on these wells so I could forward them to Michigan City.
Thank you for your time on this matter. Please feel free to contact me if you need more information or I can be of any help.

Sincerely,
George Adey
Town Council President
Town of Pines
Home phone: [redacted]
(Town of Pines)
[redacted]

Take good care of Mother Earth.
We only borrow her from our Grandchildren.

EPA-R5-2013-003300RR-417

Matthew Ohl /R5/USEPA/US
05/01/2012 01:31 PM

To Gordon Clarke
cc Timothy Thurlow
bcc
Subject Pines Site AR Update

From: Matthew Ohl/R5/USEPA/US
To: Exemption 6
Cc: EUGENE JABLONOWSKI/R5/USEPA/US@EPA, Janet Pope/R5/USEPA/US@EPA, Timothy Thurlow/R5/USEPA/US@EPA, kim.ferraro@leafindiana.org
Date: 10/12/2011 06:03 AM
Subject: Gamma Count Rate Survey Report, Pines, Indiana

Hi Paul:
As president of the community group, People In Need of Environmental Safety (PINES) you requested a review of the report titled, "Gamma Count Rate Survey, Pines, Indiana. In reviewing the report there appears to be significant weaknesses in instrumentation, survey methodology and interpretation, and conclusions and recommendations. Please see the comments below.
Thank you.

Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

INSTRUMENTATION

The calibration of the survey instrument is unusual because the probe and electronics were calibrated separately and not as a single survey instrument. The documentation in the report is silent on the operating point of the probe and the settings of the electronics when the detector was connected. Without the instrument having been calibrated as a single unit, and readings correlated with the concentration of radionuclides of interest, quantitative interpretation of instrument readings is not possible. The probe was calibrated using cesium 137 (Cs-137), a man-made radionuclide. Cs-137 is not a radionuclide of interest in the Pines surveys. No calibration with the radionuclides of interest is reported.

The probe background when calibrated was reported as 10,370 counts-per-minute (cpm). The instrument sensitivity is approximately 9650 counts per minute per microcurie of Cs-137. This calibration offers no indication of the instruments performance in the presence of the radionuclides of interest. Without information about the sensitivity of the instrument to the radionuclides of interest, their concentrations above the reported background cannot be determined. An instrument with a low background and high sensitivity may double its readings in the presence of a slightly elevated concentration of radionuclides of interest. An instrument

with a high background and low sensitivity may have no perceptible increase in reading when the concentration is much higher than the nominal background concentration. For this reason of the readings reported during the survey cannot be treated as quantitative and, at best, may be considered relative.

SURVEY METHODOLOGY AND INTERPRETATION

Survey methodology is questionable and the use of double background as an indication of elevated concentrations of radionuclides of interest is not quantitative. Table 1 provides the range of background readings at the three background sites identified in the report.

Table 1. Background Reading Levels

Background Site	**Background response (cpm)**
Carolina Ave & Bike Trail	3,052 – 11,684
1602 North	4835
1674 Alabama	4458

Multiple measurements were recorded for one of the three background sites. The range of background measurements was 3052 cpm to 11,684 cpm. Selection of an average of the lowest readings may bias the results toward over-reporting the possible presence of radionuclides of interest. If the full range of background is considered, most of the investigation sites fall with in the range of background. No investigation site measurement was double the upper range of background reading. Table 2. provides the range of readings at thirteen investigation sites.

The interpretation of results is ambiguous because the survey teams identify what is described as a glistening black material as either fly ash or sandblasting grit. The relationship between sandblasting grit and the fly ash that may have originated from burning coal is not established. On the investigation sites, the survey results range from below the lowest background value to slightly above the highest background value. Concluding that the investigation sites have elevated concentration of the radionuclides of interest is difficult. Elevated readings appear to be localized and the data do not indicate if the cause is fly ash, sand blasting grit or naturally occurring material.

Table 2. Readings at Investigation Sites

Investigation Site	**Recorded Meter Response (cpm)**
[redacted]	9,500 – 10k
	3,000 – 11,000
	4,500 – 6,000
	4,000 – 8,500
	4,500 – 14,000
	4,000 – 5,000

Exemption 6

Exemption 6	4,500 – 12,000
	3,500 – 11,000
	8,500 – 12,000
	4,500 – 12,103
Site SS018	5,000 – 9,000
Site SS021	9,423
Exemption 6	4,500 – 13,000

CONCLUSIONS AND RECOMMENDATIONS

The possible interpretations of the results range from no detectable concentrations of radionuclides of interest above background levels to low concentrations of the radionuclides of interest slightly above the concentrations of those radionuclides at the background sites. The significance of the presence of this material is not explored and human exposure pathways are not discussed in the report. The report states that fly ash may have been used in construction of roads but does not discuss whether or not a human pathway exists or if the use in construction of roads may present some potential health risk. The absence of a discussion of pathways or human health risk is a weakness of the survey.

The first recommendation is that confirmation be made of the PINES' data. The recommendation does not identify what is to be confirmed or the significance of the data.

The second recommendation is that a determination be made as to the component giving elevated Gamma count rates (e.g. black glittery material). The survey should have made this determination because the report does not contain any information relating the black glittery material to the sites where fly ash from burning coal is known to be present.

The third recommendation is that determination be made by Gamma spectroscopy as to the isotopic identities of the gamma-ray emitters. If this were needed, samples should have been collected during the survey. This easily performed task would have clarified whether the elevated readings observed during the survey are due to radionuclides of interest or naturally occurring potassium 40 whose content in soil is variable.

The fourth recommendation is a restatement of the third. This determination may establish the radionuclides present but not the source. These radionuclides are ubiquitous in soil and it may not indicate that they are related to CCBs.

The fifth recommendation that a review be made of well data to determine the concentration of radium-226, radium-228, uranium-238, uranium-234, and uranium-235. The presence of these radionuclides in water is a human health hazard. The drinking water supply provides a human pathway independent of the origins of the radionuclides. Water analysis itself will not indicate which of the radionuclides are inherent in the well water.

EPA-R5-2013-003300RR-418

Matthew Ohl /R5/USEPA/US
05/01/2012 01:33 PM

To Gordon Clarke
cc Timothy Thurlow
bcc
Subject Pines Site AR update

PINES Radiation Survey and Risk Assessment FINAL.pdf

Response to PINES Comments on Risk Assessments and Independent Risk Assessments FINAL.pdf

EPA-R5-2013-003300RR-419

Matthew Ohl /R5/USEPA/US
05/01/2012 01:47 PM

To [redacted]
cc Janet Pope, Timothy Thurlow
bcc
Subject Pines Site

Good afternoon George:
The latest groundwater results along with the results from the remedial investigation are posted on our website under the heading, 'Technical Documents'. http://www.epa.gov/region5/cleanup/pines/
Please let me know if you need any further information.
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

George Adey	Matt,	04/27/2012 04:05:33 PM

From: George Adey <[redacted]>
To: Matthew Ohl/R5/USEPA/US@EPA
Date: 04/27/2012 04:05 PM
Subject: Water Test Results

Matt,

The Town of Pines is looking at connecting to the Michigan City sewer system. The City of Michigan City is ver
they have requested I supply them with water testing results for the sample wells located in our Town. Since our
a valid request. Could you please send copies of results for the latest testing done on these wells so I could forwa
Thank you for your time on this matter. Please feel free to contact me if you need more information or I can be o

Sincerely,
George Adey
Town Council President
Town of Pines
Home phone: [redacted]
(Town of Pines)
[redacted]

Take good care of Mother Earth.
We only borrow her from our Grandchildren.

EPA-R5-2013-003300RR-420

SFDIO
Sent by: Bertanna Louie

05/09/2012 04:42 PM

To Matthew Ohl, EUGENE JABLONOWSKI, Janet Pope, Timothy Thurlow

cc

bcc

Subject Final Version - Control # R5-12-000-7371

Good afternoon everyone,

Attached is the final signed version of Control #R5-12-000-7371 to Mr. Paul Kysel regarding the Town of Pines Superfund Alternative Site.

Thanks,
SFDIO

Control R5-12-000-7371.pdf

EPA-R5-2013-003300RR-421

Matthew Ohl /R5/USEPA/US
05/09/2012 04:42 PM

To EUGENE JABLONOWSKI, Janet Pope, Timothy Thurlow
cc
bcc
Subject control response

kysel response_1.pdf

FYI: please see the attached letter.

Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

EPA-R5-2013-003300RR-422

SFDIO
Sent by: Lauren Bumba

05/10/2012 10:30 AM

To Matthew Ohl, KAREN JEFFRIES

cc Joan Tanaka, Ruth Muhtsun

bcc

Subject Final Version - Control # R5-12-000-7371

Good morning,

Attached is the final signed version of Control # R5-12-000-7371 to Paul Kysel regarding the Town of Pines Superfund Alternative Site.

Thanks,
SFD IO

Control R5-12-000-7371.pdf

EPA-R5-2013-003300RR-423

Matthew Ohl /R5/USEPA/US
05/24/2012 04:24 PM

To cgorman
cc
bcc
Subject Pines Site

kysel response_1.pdf

Hi Cheryl:
Here's the letter you were asking for.
Thanks,
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

EPA-R5-2013-003300RR-424

"Kysel Paul"
Exemption 6

07/06/2012 09:21 AM

To Matthew Ohl

cc

bcc

Subject Accepted: PINES Call 1-866-299-3188, Conference Code 3128862064

Matt I will also be inviting Larry Jensen to participate.
Paul

_____
This electronic message from QBE North America and any attachment to it is intended exclusively for the individual or entity to which it is addressed. It may contain information that is privileged, confidential and exempt from disclosure under applicable law. Any unauthorized disclosure, copying, distribution or use of this electronic message or any attachment is prohibited. If you have received this message in error, please return it to the sender and delete this original from your system.

winmail.dat message_body.rtf

EPA-R5-2013-003300RR-425

"Mark Hutson"
<[redacted]@geo-hydro.com>
07/09/2012 04:48 PM

To Matthew Ohl
cc "Charles Norris", "Paul Kysel"
bcc
Subject PINES Comments on Alternatives Screening Technical Memorandum

Matt

On behalf of P.I.N.E.S. I am attaching our comments on the Alternatives Screening Technical Memorandum dated June 2012. I think it's safe to say that it lived-up to all our expectations.

Please let me know if you have any questions.

Mark

Mark Hutson
Geo-Hydro, Inc
303-948-1417
[redacted]@geo-hydro.com

20120709 Pines Comments on Draft Alternatives Screening Memo FNL.pdf

EPA-R5-2013-003300RR-426

"Mark Hutson"
<[redacted]@geo-hydro.com>
08/31/2012 12:20 PM

To Matthew Ohl
cc
bcc
Subject RE: Pines Site - Alternatives Screening Technical Memorandum

Thanks Matt.

Mark

From: Matthew Ohl [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Friday, August 31, 2012 10:48 AM
To: lisa.bradley@aecom.com; Mark Hutson; [redacted]; Charles_Morris@nps.gov; Janet Pope; Timothy Thurlow
Subject: Pines Site - Alternatives Screening Technical Memorandum

(See attached file: Alternatives Screening Technical Memorandum Comments FINAL 8 31 2012.pdf)

Good morning:
Please see the attached letter.
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

EPA-R5-2013-003300RR-427

Matthew Ohl /R5/USEPA/US
09/12/2012 04:51 PM

To pkysel, "Mark Hutson", lisa.bradley, Timothy Thurlow, Janet Pope, KHERRON
cc
bcc
Subject Pines Site - Letter to PINES Group

Response to PINES Comments on Alternatives Screening Technical Memorandum FINAL.pdf

Good afternoon:
Please see the attached letter.
Thank you.

Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

EPA-R5-2013-003300RR-428

"Mark Hutson"
<[redacted]@geo-hydro.com>
10/01/2012 04:15 PM

To Matthew Ohl
cc "Charles Norris", "Paul Kysel", "Pete Penoyer"
bcc
Subject Pines Alternatives Screening Additional Information

Matt

I am attaching a file that provides the additional information requested by EPA in your responses to our comments not included in comments to the PRPs. Please let me know if you have additional questions.

Mark

Mark Hutson
Geo-Hydro, Inc
303-948-1417
[redacted]@geo-hydro.com

20121001 GHI Responses to Requests for Additional Information FNL.pdf

EPA-R5-2013-003300RR-429

Matthew Ohl /R5/USEPA/US
10/01/2012 04:21 PM

To cgorman
cc Eric.Morton
bcc
Subject Fw: Pines Alternatives Screening Additional Information

Good afternoon:
Please review.
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov
----- Forwarded by Matthew Ohl/R5/USEPA/US on 10/01/2012 04:20 PM -----

From: "Mark Hutson" <[redacted]@geo-hydro.com>
To: Matthew Ohl/R5/USEPA/US@EPA,
Cc: "Charles Norris" <cnorris@geo-hydro.com>, "Paul Kysel" <[redacted]>, "Pete Penoyer " <pete_penoyer@nps.gov>
Date: 10/01/2012 04:18 PM
Subject: Pines Alternatives Screening Additional Information

Matt

I am attaching a file that provides the additional information requested by EPA in your responses to our comments not included in comments to the PRPs. Please let me know if you have additional questions.

Mark

Mark Hutson
Geo-Hydro, Inc
303-948-1417
[redacted]@geo-hydro.com

20121001 GHI Responses to Requests for Additional Information FNL.pdf

EPA-R5-2013-003300RR-430

"Mark Hutson"
<[redacted]@geo-hydro.com>
10/14/2012 11:24 AM

To Matthew Ohl
cc
bcc
Subject RE: Pines Site - Extension of Time

Matt

Did you receive the modified Alternatives Screening Technical Memorandum? We haven't seen it yet and I was wondering if you had.

Mark

From: Matthew Ohl [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Wednesday, October 03, 2012 11:52 AM
To: lisa.bradley@aecom.com; [redacted]; kim.ferraro@leafindiana.org; Mark Hutson; Charles_Morris@nps.gov; Timothy Thurlow; Janet Pope; KHERRON@idem.IN.gov
Subject: Pines Site - Extension of Time

(See attached file: Extension of Time Alt Screen Mods FINAL.pdf)
Good afternoon:
Please see the attached letter.
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

EPA-R5-2013-003300RR-431

Matthew Ohl /R5/USEPA/US
10/15/2012 09:48 AM

To "Mark Hutson"
cc
bcc
Subject RE: Pines Site - Extension of Time

PinesAltScreenMemo_October2012_RLSO.pdf

PinesAltScreenMemo_October2012_All.pdf

Hi Mark:
The documents are attached. The PRPs position is that this revision was not required by the Consent Order.
Thanks.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

"Mark Hutson"	Matt	10/14/2012 11:24:56 AM

From: "Mark Hutson" <[redacted]@geo-hydro.com>
To: Matthew Ohl/R5/USEPA/US@EPA,
Date: 10/14/2012 11:24 AM
Subject: RE: Pines Site - Extension of Time

Matt

Did you receive the modified Alternatives Screening Technical Memorandum? We haven't seen it yet and I was wondering if you had.

Mark

From: Matthew Ohl [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Wednesday, October 03, 2012 11:52 AM
To: lisa.bradley@aecom.com; [redacted]; kim.ferraro@leafindiana.org; Mark Hutson; Charles_Morris@nps.gov; Timothy Thurlow; Janet Pope; KHERRON@idem.IN.gov
Subject: Pines Site - Extension of Time

(See attached file: Extension of Time Alt Screen Mods FINAL.pdf)
Good afternoon:
Please see the attached letter.
Thank you.
Matthew J. Ohl

Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

EPA-R5-2013-003300RR-432

"Mark Hutson"
<[redacted]@geo-hydro.com>
10/15/2012 10:43 AM

To Matthew Ohl
cc
bcc
Subject RE: Pines Site - Extension of Time

Thanks Matt,

So will EPA be reviewing the revised document and potentially requiring changes or should I assume that this will be it?

Mark

From: Matthew Ohl [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Monday, October 15, 2012 8:49 AM
To: Mark Hutson
Subject: RE: Pines Site - Extension of Time

(See attached file: PinesAltScreenMemo_October2012_RLSO.pdf)(See attached file: PinesAltScreenMemo_October2012_All.pdf)
Hi Mark:
The documents are attached. The PRPs position is that this revision was not required by the Consent Order.
Thanks.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

"Mark Hutson" ---10/14/2012 11:24:56 AM---Matt

From: "Mark Hutson" <[redacted]@geo-hydro.com>
To: Matthew Ohl/R5/USEPA/US@EPA,
Date: 10/14/2012 11:24 AM
Subject: RE: Pines Site - Extension of Time

Matt

Did you receive the modified Alternatives Screening Technical Memorandum? We haven't seen it yet and I was wondering if you had.

Mark

From: Matthew Ohl [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Wednesday, October 03, 2012 11:52 AM
To: lisa.bradley@aecom.com; [redacted]; kim.ferraro@leafindiana.org; Mark Hutson; Charles_Morris@nps.gov; Timothy Thurlow; Janet Pope; KHERRON@idem.IN.gov
Subject: Pines Site - Extension of Time

(See attached file: Extension of Time Alt Screen Mods FINAL.pdf)
Good afternoon:
Please see the attached letter.
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

EPA-R5-2013-003300RR-433

Matthew Ohl /R5/USEPA/US
10/30/2012 06:32 AM

To EUGENE JABLONOWSKI
cc
bcc
Subject Pines Site

Hi Gene:
Would you be available for this November 1 meeting?
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov
----- Forwarded by Matthew Ohl/R5/USEPA/US on 10/30/2012 06:31 AM -----

From: '[redacted]' <[redacted]>
To: Janet Pope/R5/USEPA/US@EPA, [redacted], Matthew Ohl/R5/USEPA/US@EPA
Date: 10/26/2012 10:32 AM
Subject: Yard 520

Hello Janet and Matthew,
You are listed on the EPA website as the Community Involvement Coordinator and Project Manager for Yard 520. I have some folks from The Pines that would like to give a presentation at the November 1st Northwestern Indiana Regional Planning Commission Environmental Management and Policy Committee meeting about their personal investigations into radiation problems in their community related to that site. Is this an issue you are familiar with? I like to have someone available with some balance for this kind of presentation. I am available today by cell at [redacted].

Kathy Luther
Director of Environmental Programs
NIRPC

Connected by DROID on Verizon Wireless

EPA-R5-2013-003300RR-434

EUGENE JABLONOWSKI /R5/USEPA/US

10/30/2012 08:30 AM

To Matthew Ohl
cc
bcc
Subject Re: Pines Site

Hi Matt,

I can attend, the earlier the better.

Please give me a call this morning on my cell phone.

Thanks,

Eugene Jablonowski, MS
Health Physicist
U.S. EPA Region 5 Emergency Response
77 W. Jackson Blvd. (SMF-5J)
Chicago, IL 60604
(312) 886-4591 office
(312) 493-4363 cell
(312) 692-2466 fax
jablonowski.eugene@epa.gov

Matthew Ohl | Hi Gene: Would you be available for thi... | 10/30/2012 07:32:21 AM

From: Matthew Ohl/R5/USEPA/US
To: EUGENE JABLONOWSKI/R5/USEPA/US@EPA
Date: 10/30/2012 07:32 AM
Subject: Pines Site

Hi Gene:
Would you be available for this November 1 meeting?
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov
----- Forwarded by Matthew Ohl/R5/USEPA/US on 10/30/2012 06:31 AM -----

From: '[redacted]' <[redacted]>
To: Janet Pope/R5/USEPA/US@EPA, [redacted] Matthew Ohl/R5/USEPA/US@EPA
Date: 10/26/2012 10:32 AM
Subject: Yard 520

Hello Janet and Matthew,
You are listed on the EPA website as the Community Involvement Coordinator and Project Manager for Yard 520. I have some folks from The Pines that would like to give a presentation

at the November 1st Northwestern Indiana Regional Planning Commission Environmental Management and Policy Committee meeting about their personal investigations into radiation problems in their community related to that site. Is this an issue you are familiar with? I like to have someone available with some balance for this kind of presentation. I am available today by cell at [redacted].

Kathy Luther
Director of Environmental Programs
NIRPC

Connected by DROID on Verizon Wireless

EPA-R5-2013-003300RR-435

Matthew Ohl /R5/USEPA/US
10/30/2012 12:19 PM

To "[redacted]"
cc geofbenson, EUGENE JABLONOWSKI
bcc
Subject Pines Site

PINES Radiation Survey and Risk Assessment FINAL.pdf

Good afternoon:
As we discussed, here is our response to the radiation survey and risk assessment provided by the PINES group. Please don't hesitate to call me with any questions you may have.
Thank you.

Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

"[redacted]" Hello Janet and Matthew, You ar... 10/26/2012 10:32:35 AM

From: "[redacted]" <[redacted]>
To: Janet Pope/R5/USEPA/US@EPA, [redacted], Matthew Ohl/R5/USEPA/US@EPA
Date: 10/26/2012 10:32 AM
Subject: Yard 520

Hello Janet and Matthew,
You are listed on the EPA website as the Community Involvement Coordinator and Project Manager for Yard 520. I have some folks from The Pines that would like to give a presentation at the November 1st Northwestern Indiana Regional Planning Commission Environmental Management and Policy Committee meeting about their personal investigations into radiation problems in their community related to that site. Is this an issue you are familiar with? I like to have someone available with some balance for this kind of presentation. I am available today by cell at [redacted].

Kathy Luther
Director of Environmental Programs
NIRPC

Connected by DROID on Verizon Wireless

EPA-R5-2013-003300RR-436

Janet Pope /R5/USEPA/US
10/31/2012 09:47 AM

To Matthew Ohl, EUGENE JABLONOWSKI
cc
bcc
Subject Fw: Yard 520

Can one of you get back with her.

thanks
----- Forwarded by Janet Pope/R5/USEPA/US on 10/31/2012 09:46 AM -----

From: "[redacted]" <[redacted]>
To: Janet Pope/R5/USEPA/US@EPA, [redacted], Matthew Ohl/R5/USEPA/US@EPA,
Date: 10/26/2012 10:32 AM
Subject: Yard 520

Hello Janet and Matthew,
You are listed on the EPA website as the Community Involvement Coordinator and Project Manager for Yard 520. I have some folks from The Pines that would like to give a presentation at the November 1st Northwestern Indiana Regional Planning Commission Environmental Management and Policy Committee meeting about their personal investigations into radiation problems in their community related to that site. Is this an issue you are familiar with? I like to have someone available with some balance for this kind of presentation. I am available today by cell at [redacted].

Kathy Luther
Director of Environmental Programs
NIRPC

Connected by DROID on Verizon Wireless

EPA-R5-2013-003300RR-437

Matthew Ohl /R5/USEPA/US
10/31/2012 11:48 AM

To hkuss
cc KHERRON, EUGENE JABLONOWSKI, Janet Pope
bcc
Subject Pines Site

PINES Radiation Survey and Risk Assessment FINAL.pdf

Good morning Hala:
As we discussed, here is our response to the last radiation survey and risk assessment provided by the PINES group. Please don't hesitate to call me with any questions you may have.
Thank you.

Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

EPA-R5-2013-003300RR-438

Geof Benson
[redacted] Exemption 6
11/02/2012 11:28 AM

To Kathy Luther, Meredith Stilwell
cc Matthew Ohl
bcc
Subject Fwd: Pines Site

Please distribute this email and attachment to the whole EMPC list. It is also available on the EPA website at

http://www.epa.gov/region5/cleanup/pines/pdfs/pines_rsra.pdf

Thank you.

Geof

Begin forwarded message:

From: Ohl.Matthew@epamail.epa.gov
Subject: Pines Site
Date: October 30, 2012 12:19:55 PM CDT
To: "[redacted] Exemption 6" <[redacted] Exemption 6>
Cc: [redacted] Exemption 6, Jablonowski.Eugene@epamail.epa.gov

(See attached file: PINES Radiation Survey and Risk Assessment FINAL.pdf)

Good afternoon:
As we discussed, here is our response to the radiation survey and risk assessment provided by the PINES group. Please don't hesitate to call me with any questions you may have.
Thank you.

Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

graycol.gif "[redacted] Exemption 6" ---10/26/2012 10:32:35 AM---Hello Janet and Matthew, You are listed on the EPA website as the Community Involvement Coordinator

From: "[redacted] Exemption 6" <[redacted] Exemption 6>
To: Janet Pope/R5/USEPA/US@EPA, [redacted] Exemption 6, Matthew Ohl/R5/USEPA/US@EPA
Date: 10/26/2012 10:32 AM
Subject: Yard 520

Hello Janet and Matthew,
You are listed on the EPA website as the Community Involvement Coordinator and Project Manager for Yard 520. I have some folks from The Pines that would like to give a

presentation at the November 1st Northwestern Indiana Regional Planning Commission Environmental Management and Policy Committee meeting about their personal investigations into radiation problems in their community related to that site. Is this an issue you are familiar with? I like to have someone available with some balance for this kind of presentation. I am available today by cell at Exemption 6.

Kathy Luther
Director of Environmental Programs
NIRPC

Connected by DROID on Verizon Wireless PINES Radiation Survey and Risk Assessment FINAL.pdf

EPA-R5-2013-003300RR-439

Paul Kysel
Exemption 6
11/26/2012 02:56 PM

To Matthew Ohl
cc Kim Ferraro, Mark Hutson, Chuck Norris, Larry Jensen
bcc
Subject PINES Group's latest round of radiation testing

Matt:

Attached to this email are the People in Need of Environmental Safety's (PINES) latest radiation survey completed in October of 2012 and responses to the USEPA's contractor review of PINES 2009 radiation survey. PINES Group remains outraged that USEPA5 continues to ignore a potential health risk to a community already compromised by the presence of coal combustion wastes (CCW) throughout its community.

PINES Group formally requests that the U.S. Environmental Protection Agency Region 5 (USEPA5) Superfund Program verify radiation readings that PINES has made in residential and municipal property in the Town of Pines, as we requested for our 2009 radiation survey of streets and street easements.

Once USEPA5 has verified our surveys, we request USEPA5 follow through with analyses that will isolate the soil component(s) with elevated radioactivity, the responsible radionuclides, and the concentrations of these radionuclides. We have not the resources available to complete a thorough assessment of the scope or source of the radiation issue, only that it merits thorough analysis to determine source, scope and possible linkage to the CCW present. Indeed it may prove to be unrelated to the presence of CCW and represent yet another health risk to the community. A comprehensive survey can resolve these issues.

As previously reported in 2009 and once again born out with our 2012 work, many of the readings are statistically distinct from natural background radiation readings, indicating radioactive material that may present a health hazard to residents and work crews.

The PINES Group will not rest until this issue is adequately addressed through the Superfund process.

Respectfully,

Paul Kysel - PINES Group President
Exemption 6

Exemption 6 Attachment 2 PINES rad survey Oct 21 - 24, 2012.docx

Attachment 3 Response by PINES Group Feb 29 2012 USEPA5 letter b.docx

EPA-R5-2013-003300RR-440

Matthew Ohl /R5/USEPA/US
11/29/2012 07:22 PM

To EUGENE JABLONOWSKI
cc Timothy Thurlow
bcc
Subject Fw: PINES Group's latest round of radiation testing

Good evening:
Please review this request and let's discuss.
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov
----- Forwarded by Matthew Ohl/R5/USEPA/US on 11/29/2012 07:21 PM -----

From: Paul Kysel < Exemption 6 >
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: Kim Ferraro <kferraro@hecweb.org>, Mark Hutson < Exemptio... @geo-hydro.com>, Chuck Norris <cnorris@geo-hydro.com>, Larry Jensen < Exemption 6 >
Date: 11/26/2012 02:56 PM
Subject: PINES Group's latest round of radiation testing

Matt:

Attached to this email are the People in Need of Environmental Safety's (PINES) latest radiation survey completed in October of 2012 and responses to the USEPA's contractor review of PINES 2009 radiation survey. PINES Group remains outraged that USEPA5 continues to ignore a potential health risk to a community already compromised by the presence of coal combustion wastes (CCW) throughout its community.

PINES Group formally requests that the U.S. Environmental Protection Agency Region 5 (USEPA5) Superfund Program verify radiation readings that PINES has made in residential and municipal property in the Town of Pines, as we requested for our 2009 radiation survey of streets and street easements.

Once USEPA5 has verified our surveys, we request USEPA5 follow through with analyses that will isolate the soil component(s) with elevated radioactivity, the responsible radionuclides, and the concentrations of these radionuclides. We have not the resources available to complete a thorough assessment of the scope or source of the radiation issue, only that it merits thorough analysis to determine source, scope and possible linkage to the CCW present. Indeed it may prove to be unrelated to the presence of CCW and represent yet another health risk to the community. A comprehensive survey can resolve these issues.

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Respectfully,

Paul Kysel - PINES Group President

Exemption 6

Exemption 6

Attachment 2 PINES rad survey Oct 21 - 24, 2012.docx

Attachment 3 Response by PINES Group Feb 29 2012 USEPA5 letter b.docx

EPA-R5-2013-003300RR-441

Matthew Ohl /R5/USEPA/US
11/30/2012 10:11 AM

To ckondreck
cc Eric.Morton
bcc
Subject Fw: PINES Group's latest round of radiation testing

Good morning:
Please have this reviewed by December 12, if possible.
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov
----- Forwarded by Matthew Ohl/R5/USEPA/US on 11/30/2012 10:09 AM -----

From: Paul Kysel <[redacted]>
To: Matthew Ohl/R5/USEPA/US@EPA,
Cc: Kim Ferraro <kferraro@hecweb.org>, Mark Hutson <[redacted]@geo-hydro.com>, Chuck Norris <cnorris@geo-hydro.com>, Larry Jensen <[redacted]>
Date: 11/26/2012 02:56 PM
Subject: PINES Group's latest round of radiation testing

Matt:

Attached to this email are the People in Need of Environmental Safety's (PINES) latest radiation survey completed in October of 2012 and responses to the USEPA's contractor review of PINES 2009 radiation survey. PINES Group remains outraged that USEPA5 continues to ignore a potential health risk to a community already compromised by the presence of coal combustion wastes (CCW) throughout its community.

PINES Group formally requests that the U.S. Environmental Protection Agency Region 5 (USEPA5) Superfund Program verify radiation readings that PINES has made in residential and municipal property in the Town of Pines, as we requested for our 2009 radiation survey of streets and street easements.

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Respectfully,

Paul Kysel - PINES Group President

Exemption 6

Exemption 6

Attachment 2 PINES rad survey Oct 21 - 24, 2012.docx

Attachment 3 Response by PINES Group Feb 29 2012 USEPA5 letter b.docx

EPA-R5-2013-003300RR-442

"Kondreck, Cheryl" <ckondreck@onesullivan.com>

11/30/2012 11:31 AM

To Matthew Ohl
cc
bcc
Subject RE: PINES Group's latest round of radiation testing

Hi Matt,

I have emailed Eli regarding his availability and will get back to you when I hear from him.

Thank you,
Cheryl

From: Ohl.Matthew@epamail.epa.gov [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Friday, November 30, 2012 10:12 AM
To: Kondreck, Cheryl
Cc: Eric.Morton@tetratech.com
Subject: Fw: PINES Group's latest round of radiation testing

Good morning:
Please have this reviewed by December 12, if possible.
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

----- Forwarded by Matthew Ohl/R5/USEPA/US on 11/30/2012 10:09 AM -----

From: Paul Kysel <[redacted]>
To: Matthew Ohl/R5/USEPA/US@EPA,
Cc: Kim Ferraro <kferraro@hecweb.org>, Mark Hutson <[redacted]@geo-hydro.com>, Chuck Norris <cnorris@geo-hydro.com>, Larry Jensen <[redacted]>
Date: 11/26/2012 02:56 PM
Subject: PINES Group's latest round of radiation testing

Matt:

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Respectfully,

Paul Kysel - PINES Group President

[redacted] *Exemption 6*

(See attached file: Attachment 2 PINES rad survey Oct 21 - 24, 2012.docx)(See attached file: Attachment 3 Response by PINES Group Feb 29 2012 USEPA5 letter b.docx)

EPA-R5-2013-003300RR-443

Matthew Ohl /R5/USEPA/US
11/30/2012 03:21 PM

To Paul Kysel
cc Timothy Thurlow, Janet Pope, "Mark Hutson"
bcc
Subject PINES Group's latest round of radiation testing

Paul:
Thank your for your letter. After recent discussions with the responsible parties they agreed to add some residential yard sampling to the Feasibility Study. It is located in appendix G of the FS. Please provide any comments you may have on the FS within thirty days.
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

Paul Kysel | Matt: | 11/26/2012 02:56:23 PM

From: Paul Kysel <[redacted]>
To: Matthew Ohl/R5/USEPA/US@EPA,
Cc: Kim Ferraro <kferraro@hecweb.org>, Mark Hutson <[redacted]@geo-hydro.com>, Chuck Norris <cnorris@geo-hydro.com>, Larry Jensen <[redacted]>
Date: 11/26/2012 02:56 PM
Subject: PINES Group's latest round of radiation testing

Matt:

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Respectfully,

Paul Kysel - PINES Group President

Exemption 6

Exemption 6 [attachment "Attachment 2 PINES rad survey Oct 21 - 24, 2012.docx" deleted by Matthew Ohl/R5/USEPA/US] [attachment "Attachment 3 Response by PINES Group Feb 29 2012 USEPA5 letter b.docx" deleted by Matthew Ohl/R5/USEPA/US]

EPA-R5-2013-003300RR-444

EUGENE JABLONOWSKI /R5/USEPA/US

12/03/2012 12:16 PM

To Matthew Ohl
cc Timothy Thurlow
bcc
Subject Re: Fw: PINES Group's latest round of radiation testing

How do you want to handle this?

Eugene Jablonowski, MS
Health Physicist
U.S. EPA Region 5 Emergency Response
77 W. Jackson Blvd. (SMF-5J)
Chicago, IL 60604
(312) 886-4591 office
(312) 493-4363 cell
(312) 692-2466 fax
jablonowski.eugene@epa.gov

Matthew Ohl	Good evening: Please review this requ...	11/29/2012 07:20:41 PM

From: Matthew Ohl/R5/USEPA/US
To: EUGENE JABLONOWSKI/R5/USEPA/US@EPA
Cc: Timothy Thurlow/R5/USEPA/US@EPA
Date: 11/29/2012 07:20 PM
Subject: Fw: PINES Group's latest round of radiation testing

Good evening:
Please review this request and let's discuss.
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov
----- Forwarded by Matthew Ohl/R5/USEPA/US on 11/29/2012 07:21 PM -----

From: Paul Kysel <[redacted]>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: Kim Ferraro <kferraro@hecweb.org>, Mark Hutson <[redacted]@geo-hydro.com>, Chuck Norris <cnorris@geo-hydro.com>, Larry Jensen <[redacted]>
Date: 11/26/2012 02:56 PM
Subject: PINES Group's latest round of radiation testing

Matt:

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Respectfully,

Paul Kysel - PINES Group President
[redacted] [attachment "Attachment 2 PINES rad survey Oct 21 - 24, 2012.docx" deleted by EUGENE JABLONOWSKI/R5/USEPA/US] [attachment "Attachment 3 Response by PINES Group Feb 29 2012 USEPA5 letter b.docx" deleted by EUGENE JABLONOWSKI/R5/USEPA/US]

EPA-R5-2013-003300RR-445

Geof Benson
[redacted] Exemption 6
12/03/2012 04:47 PM

To Matthew Ohl, EUGENE JABLONOWSKI
cc
bcc
Subject Fwd: November 6th Environmental Management and Policy Committee Meeting

Begin forwarded message:

From: Kathy Luther <kluther@nirpc.org>
Subject: November 6th Environmental Management and Policy Committee Meeting
Date: December 3, 2012 4:15:54 PM CST
To: "(bill.moran@in.usda.gov)" <bill.moran@in.usda.gov>, "([redacted] Exemption 6)" <[redacted] Exemption 6>, "Abigail Derby-Lewis" <aderby@fieldmusuem.org>, "Adey, George " <[redacted] Exemption 6 Exemption 6>, 'Alex Da Silva' <adasilva@ccsj.edu>, Amanda Pollard <aperegrine@nirpc.org>, Angela Larsen <ALarsen@greatlakes.org>, Benjamin Bolton <dabenb@aol.com>, Betty Lou Nault <[redacted] Exemption 6>, "Bob Daum (Bob_Daum@nps.gov)" <Bob_Daum@nps.gov>, Bob Newport <Newport.bob@epa.gov>, Bryant Mitol <[redacted] Exemption 6>, "Carey, Dorreen" <[redacted] Exemption 6>, Carl Lisek <[redacted] Exemption 6>, Cathy Csatari <ccsatari@idem.in.gov>, "Celina Weatherwax" <Celina_Weatherwax@lugar.senate.gov>, CES Porter County <porterces@purdue.edu>, "'Charles_Morris@nps.gov'" <'Charles_Morris@nps.gov'>, "Charlotte Read ([redacted] Exemption 6)" <[redacted] Exemption 6>, Chris Mulvaney <cmulvaney@chicagobotanic.org>, Christine Livingston <christine@indianadunes.com>, Cindy Bush <[redacted] Exemption 6>, "constantine_dillon@nps.gov" <constantine_dillon@nps.gov>, Dale B Engquist <dbengquist[redacted] Exemption 6>, Daniel Goldfarb <dgoldfarb@wildlifehc.org>, Daniel Vicari <vicaridf@cdm.com>, "Denarie Kane (hobdev@city.hobart.in.us)" <hobdev@city.hobart.in.us>, "dkplath@nisource.com" <dkplath@nisource.com>, "Dorworth, Leslie " <dorworth@purduecal.edu>, "Doug Bley (Douglas.Bley@arcelormittal.com)" <Douglas.Bley@arcelormittal.com>, "Dr. Mark Reskin" <[redacted] Exemption 6>, "Ed Glatfelter (eglatfelter@greatlakes.org)" <eglatfelter@greatlakes.org>, Edgar Corns <[redacted] Exemption 6>, Edward S Pierson <pierson@calumet.purdue.edu>, Ellen Szarleta <eszarlet@iun.edu>, "Freeman-Wilson, Karen" <kfreemanwilson@ci.gary.in.us>, "'gardnde@lakecountyin.org'" <'gardnde@lakecountyin.org'>, Geof Benson <[redacted] Exemption 6>, "Greg Quartucci (greg.quartucci@cardno.com)" <greg.quartucci@cardno.com>, "Hendricks, Anthony" <ahendricks@laportecounty.org>, Hobart Engineer's Office <hobeng@cityofhobart.org>, "Jabo, Michael" <mjabo@dlz.com>, "James G. Ton ([redacted] Exemption 6)" <[redacted] Exemption 6>, Jeanann Ficker <[redacted] Exemption 6>, "Jeff Edstrom (jedstrom@ectinc.com)" <jedstrom@ectinc.com>, Jennifer Birchfield <water@savedunes.org>, "Jennifer.kharchaf@esph.com" <Jennifer.kharchaf@esph.com>, Jenny Orsburn <jorsburn@portage-in.com>, Jerome Houseworth <[redacted] Exemption 6>, "'jflannery@nwiqlc.org'" <'jflannery@nwiqlc.org'>, Jody Melton <jmelton@nirpc.org>, Joe Exl <jexl@nirpc.org>, John Ervin <jervin@dnr.IN.gov>, John Hayes <

jhayes@duneslearningcenter.org>, "John Swanson" <jswanson@nirpc.org>, Julie Roesler <[redacted]>, "Kathy DeGuilio-Fox" <kjdeguilio-fox@prf.org>, Kathy Luther <kluther@nirpc.org>, "Kay Nelson" <knelson@nwiforum.org>, " kbreitzke@porterco.org" <kbreitzke@porterco.org>, Kristopher Krouse < land@heinzetrust.org>, "Kuss, Hala" <hkuss@idem.IN.gov>, "Kuss, Michael " < mkuss@mcsan.org>, "Lauren Riga (lriga@ci.gary.in.us)" <lriga@ci.gary.in.us>, "Lee Botts ([redacted])" <[redacted]>, "Leigh E. Morris (lemorris@iedc.in.gov)" <lemorris@iedc.in.gov>, Linda Wilson <wilsonlj@bp.com>, "Maggie Byrne (mbyrne@dnr.in.gov)" <mbyrne@dnr.in.gov>, Martin Jaffe < mjaffe@uic.edu>, "'MCaldwel@idem.IN.gov'" <'MCaldwel@idem.IN.gov'>, Melanie Kroczek <mkroczek@monosol.com>, "Mikus, Matt " <mmikus@post-trib.com>, "Molnar, Mike" <mmolnar@dnr.IN.gov>, "ndernik@nisource.com" < ndernik@nisource.com>, Nicole Barker <nicole@savedunes.org>, "Novak, Brian " < bnovak@highland.in.gov>, Paul Labus <plabus@tnc.org>, "Pearson, Arthur " < apearson@gddf.org>, "Pelloso, Andrew " <apelloso@geosyntec.com>, Pete Julovich < pjulovich@CI.GARY.IN.US>, "Richard Morrisroe ([redacted])" < [redacted]>, Robert McCormick <rmccormi@purdue.edu>, Robin Scribailo < rscribailo@pnc.edu>, Ron S Faibish <rfaibish@anl.gov>, "ruddbolin[redacted]" < ruddbolin[redacted]>, "Sandy O'Brien" <ecorealm@msn.com>, "' sarah.tompkins@nwi.com'" <'sarah.tompkins@nwi.com'>, "Schmitt, Tom " < tschmitt@Schererville.org>, Sherry Smith <ssmith@ci.gary.in.us>, Sherryl Doerr < sdoerr@ciryofhobart.org>, Shirley Standford <shirley@Garysan.com>, "Snyder, Ashley" <ASnyder@idem.IN.gov>, Stan Dobosz <griffithtowncouncil[redacted]>, "Steve Barker (steve@coffeecreekwc.org)" <steve@coffeecreekwc.org>, Steve Millick < dollyandsteve@att.net>, "Sullivan, Casey J." <csullivan@anl.gov>, "Susan MiHalo (smihal763@frontier.com)" <smihal763@frontier.com>, "Sweeney, Jim " < jpbiod[redacted]>, Terry Coleman <tcoleman@qepi.com>, Therese Davis < tdavis@porterco.org>, Thomas Easterly <teasterly@idem.in.gov>, "Tim Sutherland" < sutherla@iun.edu>, Tim Zorn <tzorn@post-trib.com>, Tina Rongers < tina@karnerblueera.com>, "Tom Anderson (tom@conservationconnections.net)" < tom@conservationconnections.net>, Tom Keilman <keilmatp@bp.com>, Tom Redar < tredar@stjohnin.com>, "Viswanathan, Chandramouli" <cviswana@purduecal.edu>, Walt Breitinger <[redacted]>, Wendy Smith <Wendy_W_Smith@nps.gov>, "Whitesell, Leanne" <lwhitese@idem.IN.gov>, Will Rieger <[redacted]>, "ZEPEDA, LETTY" <LZEPEDA@idem.IN.gov>

Dear EMPC Participants,

Several items pertaining to the November 6th EMPC meeting are attached. Please take a few moments to review these materials prior to the meeting if you are able to maximize use of discussion time.

After the last meeting, several people approached me with questions about whether they were members, or whether they could vote or not. NIRPC does not have actual by-laws or voting rules for its advisory committees. Since I have been at NIRPC, we have generally followed a procedure of inviting new members at the approval of the NIRPC chair on an as-needed basis. Generally this occurs when an organization or individual requests a change or an addition due

to organizational staffing changes. Some folks have been members for many years long before this process was introduced. Others have been mainstays despite moving through different organizations, these we consider to be members "at large" or "emeritus" based on their extensive knowledge and experience with environmental issues in the region. State and Federal Agency staff have in the past indicated they prefer not to vote. I have attempted to clean-up and update the list, indicating who I think can vote or not. I have also adopted a strategy our other advisory committees use of only allowing one vote per organization where applicable. Please let me know if you think I have missed or misrepresented you or your organization.

Thank you,

Attachments:

- Agenda
- Nov 1 Minutes
- 2012 QLC Indicators Report-Environmental Excerpt
- One Region Indicators Report follow up
- 2012-2013 Membership list
- Draft Pines Letter

Kathy Luther
Director of Environmental Programs
Northwestern Indiana Regional Planning Commission
6100 Southport Road
Portage, IN 46368
ph: (219) 763-6060 x 127
fx: (219) 762-1653

together we make the difference

********** ATTACHMENT NOT DELIVERED **********

This Email message contained an attachment named
image001.jpg
which may be a computer program. This attached computer program could
contain a computer virus which could cause harm to EPA's computers,
network, and data. The attachment has been deleted.

This was done to limit the distribution of computer viruses introduced
into the EPA network. EPA is deleting all computer program attachments
sent from the Internet into the agency via Email.

If the message sender is known and the attachment was legitimate, you

should contact the sender and request that they rename the file name
extension and resend the Email with the renamed attachment. After
receiving the revised Email, containing the renamed attachment, you can
rename the file extension to its correct name.

For further information, please contact the EPA Call Center at
(866) 411-4EPA (4372). The TDD number is (866) 489-4900.

********** ATTACHMENT NOT DELIVERED **********

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(866) 411-4EPA (4372). The TDD number is (866) 489-4900.

********** ATTACHMENT NOT DELIVERED **********

image002.png image003.png

INvolve NWI - FB

2012 QLC Environment.pdf Agenda-12.6.2012.pdf

Oneregionindicatorsreportfollowupengagementformenvironment110212.doc PINES EMPC Letter.doc

2012-2013 EMPC Membership.xlsx EMPC 11-1-2012.pdf

EPA-R5-2013-003300RR-446

Larry Jensen
Exemption 6
12/06/2012 07:20 AM

To Matthew Ohl
cc Paul Kysel
bcc
Subject Pines reviews

Matt, Paul Kysel of the PINES Group has asked me to review the documents you sent him.

PinesFS_Appendices_November 29_2012;
PinesFS_Figures_November 29_2012;
PinesFS_Text_November 29_2012;
Pines RAO Memo_Final_2012_01_02

In doing so I found I needed other, related, documents such as the HHRA and the RI. I looked in the Michigan City Library Repository but found almost nothing there. I am stranded without these documents. Can you provide these to the Repository so that I can do my review?

In the meantime I would like to request you suspend the 30 day deadline until the documents are available and then restart the 30 day clock from that time.

Your assistance would be sincerely appreciated as the PINES Group wishes to provide USEPA Region 5 with a credible review.

Thanks

Larry Jensen

EPA-R5-2013-003300RR-447

Matthew Ohl /R5/USEPA/US
12/06/2012 08:24 AM

To Larry Jensen
cc
bcc
Subject Re: Pines reviews

http://www.epa.gov/region5/cleanup/pines/

Good morning Larry:
This is the link to the website that contains most of the documents you request. I'll look into how to best provide the documents that may be too large for e-mail.
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

Larry Jensen | Matt, Paul Kysel of the PINES... | 12/06/2012 07:20:21 AM

From: Larry Jensen < Exemption 6 >
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: Paul Kysel < Exemption 6 >
Date: 12/06/2012 07:20 AM
Subject: Pines reviews

Matt, Paul Kysel of the PINES Group has asked me to review the documents you sent him.

PinesFS_Appendices_November 29_2012;
PinesFS_Figures_November 29_2012;
PinesFS_Text_November 29_2012;
Pines RAO Memo_Final_2012_01_02

In doing so I found I needed other, related, documents such as the HHRA and the RI. I looked in the Michigan City Library Repository but found almost nothing there. I am stranded without these documents. Can you provide these to the Repository so that I can do my review?

In the meantime I would like to request you suspend the 30 day deadline until the documents are available and then restart the 30 day clock from that time.

Your assistance would be sincerely appreciated as the PINES Group wishes to provide USEPA Region 5 with a credible review.

Thanks

Larry Jensen

EPA-R5-2013-003300RR-448

Matthew Ohl /R5/USEPA/US
12/06/2012 08:27 AM

To Janet Pope
cc
bcc
Subject Fw: Pines reviews

Hi Janet:
Do you have CDs of the RI report appendices that were not placed on the website due to filesize? If so, could you send one to Larry?
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov
----- Forwarded by Matthew Ohl/R5/USEPA/US on 12/06/2012 08:25 AM -----

From: Larry Jensen <[redacted]>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: Paul Kysel <[redacted]>
Date: 12/06/2012 07:20 AM
Subject: Pines reviews

Matt, Paul Kysel of the PINES Group has asked me to review the documents you sent him.

PinesFS_Appendices_November 29_2012;
PinesFS_Figures_November 29_2012;
PinesFS_Text_November 29_2012;
Pines RAO Memo_Final_2012_01_02

In doing so I found I needed other, related, documents such as the HHRA and the RI. I looked in the Michigan City Library Repository but found almost nothing there. I am stranded without these documents. Can you provide these to the Repository so that I can do my review?

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Your assistance would be sincerely appreciated as the PINES Group wishes to provide USEPA Region 5 with a credible review.

Thanks

Larry Jensen

EPA-R5-2013-003300RR-449

Janet Pope /R5/USEPA/US
12/06/2012 08:30 AM

To Matthew Ohl
cc
bcc
Subject Re: Fw: Pines reviews

no i dont have it.

Matthew Ohl	Hi Janet: Do you have CDs of the RI re...	12/06/2012 08:25:50 AM

From: Matthew Ohl/R5/USEPA/US
To: Janet Pope/R5/USEPA/US@EPA,
Date: 12/06/2012 08:25 AM
Subject: Fw: Pines reviews

Hi Janet:
Do you have CDs of the RI report appendices that were not placed on the website due to filesize? If so, could you send one to Larry?
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov
----- Forwarded by Matthew Ohl/R5/USEPA/US on 12/06/2012 08:25 AM -----

From: Larry Jensen <[redacted]>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: Paul Kysel <[redacted]>
Date: 12/06/2012 07:20 AM
Subject: Pines reviews

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PinesFS_Appendices_November 29_2012;
PinesFS_Figures_November 29_2012;
PinesFS_Text_November 29_2012;
Pines RAO Memo_Final_2012_01_02

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In the meantime I would like to request you suspend the 30 day deadline until the documents are available and then restart the 30 day clock from that time.

Your assistance would be sincerely appreciated as the PINES Group wishes to provide USEPA Region 5 with a credible review.

Thanks
Larry Jensen

EPA-R5-2013-003300RR-450

Timothy Prendiville /R5/USEPA/US
12/06/2012 08:32 AM

To Matthew Ohl
cc
bcc
Subject Re: Pines Repository

O.K.

Tim Prendiville, Chief
Remedial Response Section 2
Superfund Division
U.S. EPA (SR-6J)
77 W. Jackson Blvd.
Chicago, IL 60604
(312) 886-5122
toll free (800) 621-8431 ext 65122

Matthew Ohl	Hi Tim: I'll enter a local TA in GovTrip t...	12/06/2012 08:28:35 AM

From: Matthew Ohl/R5/USEPA/US
To: Timothy Prendiville/R5/USEPA/US@EPA,
Date: 12/06/2012 08:28 AM
Subject: Pines Repository

Hi Tim:
I'll enter a local TA in GovTrip to see what happened to the repository.
Thanks,
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov
----- Forwarded by Matthew Ohl/R5/USEPA/US on 12/06/2012 08:28 AM -----

From: Larry Jensen <[redacted]>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: Paul Kysel <[redacted]>
Date: 12/06/2012 07:20 AM
Subject: Pines reviews

Matt, Paul Kysel of the PINES Group has asked me to review the documents you sent him.

PinesFS_Appendices_November 29_2012;
PinesFS_Figures_November 29_2012;
PinesFS_Text_November 29_2012;
Pines RAO Memo_Final_2012_01_02

In doing so I found I needed other, related, documents such as the HHRA and the RI. I looked in

the Michigan City Library Repository but found almost nothing there. I am stranded without these documents. Can you provide these to the Repository so that I can do my review?

In the meantime I would like to request you suspend the 30 day deadline until the documents are available and then restart the 30 day clock from that time.

Your assistance would be sincerely appreciated as the PINES Group wishes to provide USEPA Region 5 with a credible review.

Thanks

Larry Jensen

EPA-R5-2013-003300RR-451

Geof Benson
Exemption 6
12/06/2012 05:16 PM

To Matthew Ohl, EUGENE JABLONOWSKI
cc Valerie Blumenfeld
bcc
Subject EMPC Today

http://www.nwitimes.com/news/local/porter/duneland/the-pines/nirpc-committee-delays-request-to-epa-for-study-of-radiation/article_9a9b898d-8a41-5248-9b90-db8a97c83436.html

EPA-R5-2013-003300RR-452

Geof Benson
Exemption 6
12/06/2012 09:46 PM

To Matthew Ohl, EUGENE JABLONOWSKI
cc Valerie Blumenfeld
bcc
Subject EMPC Today

http://www.nwitimes.com/news/local/porter/duneland/the-pines/nirpc-committee-delays-request-to-epa-for-study-of-radiation/article_9a9b898d-8a41-5248-9b90-db8a97c83436.html

EPA-R5-2013-003300RR-453

Larry Jensen
Exemption 6
12/13/2012 11:26 AM

To Matthew Ohl
cc Paul Kysel
bcc
Subject EPA documents

Matt, I had emailed you previously about obtaining EPA documents on the Yard 520 site. You emailed back that all but one could be obtained on the Pines website. One item was too big and you were going to look into another way of getting that to me. This item was necessary for me to complete my review of the FS items you sent Paul Kysel of the PINES Group. I am writing to see if you have found a way to get this to me. Depending upon the amount of time it takes me to use this document I may need to ask for a time extension on the deadline date you had given Paul Kysel.

Larry

EPA-R5-2013-003300RR-454

Matthew Ohl /R5/USEPA/US
12/13/2012 12:04 PM

To Larry Jensen
cc Paul Kysel
bcc
Subject Pines Site Documents

Larry:
I asked the PRPs to make the files available for download. In the interim I thought the PINES group would have copies of the documents. Were they unable to locate them?
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

Larry Jensen	Matt, I had emailed you previous...	12/13/2012 11:26:44 AM

From: Larry Jensen <[redacted]>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: Paul Kysel <[redacted]>
Date: 12/13/2012 11:26 AM
Subject: EPA documents

Matt, I had emailed you previously about obtaining EPA documents on the Yard 520 site. You emailed back that all but one could be obtained on the Pines website. One item was too big and you were going to look into another way of getting that to me. This item was necessary for me to complete my review of the FS items you sent Paul Kysel of the PINES Group. I am writing to see if you have found a way to get this to me. Depending upon the amount of time it takes me to use this document I may need to ask for a time extension on the deadline date you had given Paul Kysel.

Larry

EPA-R5-2013-003300RR-455

Larry Jensen
[redacted] Exemption 6
12/13/2012 12:28 PM

To Matthew Ohl
cc Paul Kysel
bcc
Subject Re: Pines Site Documents

Sorry, Matt, I went through all the items on the EPA/Pines website. The one not there, and not in our files, is the Remedial Investigation Report - Report Addendum. That is the only one I need. Again, depending upon when I receive and am able to review this addendum, I may need to ask for extra time.

Larry

On Thu, Dec 13, 2012 at 12:04 PM, <Ohl.Matthew@epamail.epa.gov> wrote:

Larry:
I asked the PRPs to make the files available for download . In the interim I thought the PINES group would have copies of the documents . Were they unable to locate them ?
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

Larry Jensen ---12/13/2012 11:26:44 AM---Matt, I had emailed you previously about obtaining EPA documents on the Yard 520 site. Y

From: Larry Jensen <[redacted] Exemption 6>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: Paul Kysel <[redacted] Exemption 6>
Date: 12/13/2012 11:26 AM
Subject: EPA documents

Matt, I had emailed you previously about obtaining EPA documents on the Yard 520 site. You emailed back that all but one could be obtained on the Pines website. One item was too big and you were going to look into another way of getting that to me. This item was necessary for me to complete my review of the FS items you sent Paul Kysel of the PINES Group. I am writing to see if you have found a way to get this to me. Depending upon the amount of time it takes me to use this document I may need to ask for a time extension on the deadline date you had given Paul Kysel.

Larry

EPA-R5-2013-003300RR-456

Matthew Ohl /R5/USEPA/US
12/18/2012 07:27 AM

To Larry Jensen
cc Paul Kysel
bcc
Subject Re: Pines Site Documents

Hi Larry:
The two-page addendum is available on the website.
http://www.epa.gov/region5/cleanup/pines/index.htm
I'm attaching it to this message for your convenience.

pines_ri_201003_report_addendum.pdf

Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

Larry Jensen	Sorry, Matt, I went through al...	12/13/2012 12:29:01 PM

From: Larry Jensen <[redacted] Exemption 6 >
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: Paul Kysel <[redacted] Exemption 6 >
Date: 12/13/2012 12:29 PM
Subject: Re: Pines Site Documents

Sorry, Matt, I went through all the items on the EPA/Pines website. The one not there, and not in our files, is the Remedial Investigation Report - Report Addendum. That is the only one I need. Again, depending upon when I receive and am able to review this addendum, I may need to ask for extra time.

Larry

On Thu, Dec 13, 2012 at 12:04 PM, <Ohl.Matthew@epamail.epa.gov> wrote:

Larry:
I asked the PRPs to make the files available for download . In the interim I thought the PINES group would have copies of the documents . Were they unable to locate them?
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

Larry Jensen ---12/13/2012 11:26:44 AM---Matt, I had emailed you previously about obtaining EPA documents on the Yard 520 site. Y

From: Larry Jensen <[redacted]>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: Paul Kysel <[redacted]>
Date: 12/13/2012 11:26 AM
Subject: EPA documents

Matt, I had emailed you previously about obtaining EPA documents on the Yard 520 site. You emailed back that all but one could be obtained on the Pines website. One item was too big and you were going to look into another way of getting that to me. This item was necessary for me to complete my review of the FS items you sent Paul Kysel of the PINES Group. I am writing to see if you have found a way to get this to me. Depending upon the amount of time it takes me to use this document I may need to ask for a time extension on the deadline date you had given Paul Kysel.

Larry

EPA-R5-2013-003300RR-457

"Mark Hutson"
<[redacted]@geo-hydro.com>
12/26/2012 02:17 PM

To Matthew Ohl
cc "Paul Kysel", "Charles Norris"
bcc
Subject PINES Comments on Feasibility Study

Matt
On behalf of People in Need of Environmental Security (PINES), I am attaching comments of the Feasibility Study on the Pines site.
Please let me know if you have questions or need additional information.

Mark

Mark Hutson
Geo-Hydro, Inc
303-948-1417
[redacted]@geo-hydro.com

20121226 PINES COMMENTS ON FS FNL.pdf

EPA-R5-2013-003300RR-458

Matthew Ohl /R5/USEPA/US
01/08/2013 09:43 AM

To ckondreck
cc Eric.Morton
bcc
Subject Fw: PINES Comments on Feasibility Study

Good morning:
Please see the comments from PINES.
Thanks,
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov
----- Forwarded by Matthew Ohl/R5/USEPA/US on 01/08/2013 09:42 AM -----

From: "Mark Hutson" <[redacted]@geo-hydro.com>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: "Paul Kysel" <[redacted]>, "Charles Norris" <cnorris@geo-hydro.com>
Date: 12/26/2012 02:18 PM
Subject: PINES Comments on Feasibility Study

Matt
On behalf of People in Need of Environmental Security (PINES), I am attaching comments of the Feasibility Study on the Pines site.
Please let me know if you have questions or need additional information.

Mark

Mark Hutson
Geo-Hydro, Inc
303-948-1417
[redacted]@geo-hydro.com

20121226 PINES COMMENTS ON FS FNL.pdf

EPA-R5-2013-003300RR-459

Matthew Ohl /R5/USEPA/US
01/09/2013 03:20 PM

To ckondreck
cc
bcc
Subject Pines Council Letter

Hi Cheryl:
Here's the letter we discussed.
Thanks
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

----- Forwarded by Matthew Ohl/R5/USEPA/US on 01/09/2013 03:17 PM -----

From: R5-06-01@EPA.GOV
To: Matthew Ohl/R5/USEPA/US@EPA,
Date: 01/09/2013 12:05 PM
Subject: Message from "R5-06-01"

This E-mail was sent from "R5-06-01" (Aficio MP 6001).

Scan Date: 01.09.2013 11:50:04 (-0500)

Queries to: R5-06-01@EPA.GOV

20130109115005023.pdf

EPA-R5-2013-003300RR-460

Cathi Murray
Exemption 6

01/16/2013 09:07 PM

To Matthew Ohl
cc George Adey, Vicki Kuzio, townofpines
bcc
Subject Ardendale Culvert - Town of Pines

Hello Mr. Ohl,

Attached to this email you will find a drawing of the Ardendale culvert from when the town had it inspected in July 2012 and a copy from the Project Manual from when the water lines were installed per EPA order. Please note that the project plan specifically states that "Culverts, field tile, or other drainage pipe removed or cut during the course of the work shall be reinstalled. Those culverts, field tile or other drains damaged by the Contractor ***shall be repaired to a condition equal to or better than the condition of the original pipes, or replaced with a new pipe of the same material, size and length.***

It is quite obvious that the culvert was neither repaired or replaced correctly according to the Project Manual. The condition this culvert was left in has cost the town time and quite a bit of money to keep it flowing properly. Currently the culvert is clog again and causing water from Brown ditch to back up onto a residents private property. It is my understanding that Brown ditch contains contaminates from the CCW in the Yard 520 landfill. Therefore, contaminating this residents property! This situation is unacceptable for the resident, the Town of Pines Council, and all who have been made aware of this situation.

The Building Commissioner has asked you to address this several times to no avail. As the Vice President of the Town of Pines Council, I am asking you to address this matter as well. The Council is requesting you attend the February 6th Council meeting to address our concerns and questions. The meeting begins at 6:30 pm in the Town Hall located at 1519 Delaware. If your schedule does not permit you to attend this meeting, please provide the Council with alternative dates that you are available to meet with us. Thank you for your attention to this matter.

Regards,

Cathi Murray
Town of Pines Council Vice President

Exemption 6 Ardendale Culvert.PDF

EPA-R5-2013-003300RR-461

"Mark Hutson"
<[redacted]@geo-hydro.com>
01/17/2013 11:01 AM

To "Paul Kysel"
cc "Larry Jensen", "Charles Norris", Matthew Ohl
bcc
Subject Release of PINES FS Comments

Paul
I talked on the phone with Matt Ohl this morning about the request from Dan Sullivan for a copy of PINES comments on the Feasibility Study. Matt indicated that he was unaware that the PRP's were going to ask for a copy of all of our comments. He did wonder why they would be asking for the comments now, but did not know of any reason for the request. He said that if they had asked him for comments he would release them since the comments are a public document once they are submitted to EPA as part of the process. So, unless you indicate otherwise I will send the comments to Dan. Let me know how you'd like to proceed.

Mark

Mark Hutson
Geo-Hydro, Inc
303-948-1417
[redacted]@geo-hydro.com

EPA-R5-2013-003300RR-462

Paul Kysel
[redacted]
01/17/2013 12:32 PM

To Mark Hutson
cc Larry Jensen, Chuck Norris, Matthew Ohl
bcc
Subject RE: Release of PINES FS Comments

Mark, based upon your feedback stemming from the conversation with Matt Ohl, please go ahead and send Dan the requested comments.
Paul

From: [redacted]@geo-hydro.com
To: [redacted]
CC: [redacted]; cnorris@geo-hydro.com; Ohl.Matthew@epamail.epa.gov
Subject: Release of PINES FS Comments
Date: Thu, 17 Jan 2013 10:01:49 -0700

Paul
I talked on the phone with Matt Ohl this morning about the request from Dan Sullivan for a copy of PINES comments on the Feasibility Study. Matt indicated that he was unaware that the PRP's were going to ask for a copy of all of our comments. He did wonder why they would be asking for the comments now, but did not know of any reason for the request. He said that if they had asked him for comments he would release them since the comments are a public document once they are submitted to EPA as part of the process. So, unless you indicate otherwise I will send the comments to Dan. Let me know how you'd like to proceed.

Mark

Mark Hutson
Geo-Hydro, Inc
303-948-1417
[redacted]@geo-hydro.com

EPA-R5-2013-003300RR-463

"Val Blumenfeld " <VBLUMENFELD @bulktransportcorp .com>
01/22/2013 12:06 PM

To Matthew Ohl
cc DSullivan, "Bradley, Lisa", Timothy Thurlow
bcc
Subject RE: Ardendale Culvert - Town of Pines

Matt-
Thanks. I have a meeting with the engineer later this week to discuss.
Val

From: Ohl.Matthew@epamail.epa.gov [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Tuesday, January 22, 2013 6:03 AM
To: Val Blumenfeld; Bradley.Brad@epamail.epa.gov; DSullivan@NiSource.com
Subject: Fw: Ardendale Culvert - Town of Pines

Good morning:
Here is the message with attachment as you requested.
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

----- Forwarded by Matthew Ohl/R5/USEPA/US on 01/22/2013 06:01 AM -----

From: Cathi Murray <[redacted]>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: George Adey <[redacted]>, Vicki Kuzio <[redacted]>, townofpines[redacted]
Date: 01/16/2013 09:11 PM
Subject: Ardendale Culvert - Town of Pines

Hello Mr. Ohl,

Attached to this email you will find a drawing of the Ardendale culvert from when the town had it inspected in July 2012 and a copy from the Project Manual from when the water lines were installed per EPA order. Please note that the project plan specifically states that "Culverts, field tile, or other drainage pipe removed or cut during the course of the work shall be reinstalled. Those culverts, field tile or other drains damaged by the Contractor ***shall be repaired to a condition equal to or better than the condition of the original pipes, or replaced with a new pipe of the same material, size and length.***

It is quite obvious that the culvert was neither repaired or replaced correctly according to the Project Manual. The condition this culvert was left in has cost the town time and quite a bit of money to keep it flowing properly. Currently the culvert is clog again and causing water from Brown ditch to back up onto a residents private property. It is my understanding that Brown ditch contains contaminates from the CCW in the Yard 520 landfill. Therefore, contaminating this residents property! This situation is unacceptable for the resident, the Town of Pines Council, and all who have been made aware of this situation.

The Building Commissioner has asked you to address this several times to no avail. As the Vice President of the Town of Pines Council, I am asking you to address this matter as well. The Council is requesting you attend the February 6th Council meeting to address our concerns and questions. The meeting begins at 6:30 pm in the Town Hall located at 1519 Delaware. If your schedule does not permit you to attend this meeting, please provide the Council with alternative dates that you are available to meet with us. Thank you for your attention to this matter.

Regards,

Cathi Murray
Town of Pines Council Vice President
Exemption 6 *(See attached file: Ardendale Culvert.PDF)*

EPA-R5-2013-003300RR-464

Matthew Ohl /R5/USEPA/US
01/24/2013 11:09 AM

To ckondreck, Eric.Morton, david.homer
cc
bcc
Subject Fw: Ardendale Culvert - Town of Pines

FYI
----- Forwarded by Matthew Ohl/R5/USEPA/US on 01/24/2013 11:09 AM -----

From: Cathi Murray <[redacted]>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: George Adey <[redacted]>, Vicki Kuzio <[redacted]>, townofpines [redacted]
Date: 01/16/2013 09:11 PM
Subject: Ardendale Culvert - Town of Pines

Hello Mr. Ohl,

Attached to this email you will find a drawing of the Ardendale culvert from when the town had it inspected in July 2012 and a copy from the Project Manual from when the water lines were installed per EPA order. Please note that the project plan specifically states that "Culverts, field tile, or other drainage pipe removed or cut during the course of the work shall be reinstalled. Those culverts, field tile or other drains damaged by the Contractor ***shall be repaired to a condition equal to or better than the condition of the original pipes, or replaced with a new pipe of the same material, size and length.***

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The Building Commissioner has asked you to address this several times to no avail. As the Vice President of the Town of Pines Council, I am asking you to address this matter as well. The Council is requesting you attend the February 6th Council meeting to address our concerns and questions. The meeting begins at 6:30 pm in the Town Hall located at 1519 Delaware. If your schedule does not permit you to attend this meeting, please provide the Council with alternative dates that you are available to meet with us. Thank you for your attention to this matter.

Regards,

Cathi Murray
Town of Pines Council Vice President

[redacted] Ardendale Culvert.PDF

EPA-R5-2013-003300RR-465

"Val Blumenfeld " <VBLUMENFELD @bulktransportcorp .com> 01/24/2013 02:10 PM	To	Matthew Ohl
	cc	DSullivan, "Bradley, Lisa", Timothy Thurlow
	bcc	
	Subject	RE: Ardendale Culvert - Town of Pines

Matt-
Tim Haas would like to take a refresher look at the Ardendale culvert early next week. I will meet him there and get back to you with his recommendation soon.
Val

From: Ohl.Matthew@epamail.epa.gov [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Tuesday, January 22, 2013 12:13 PM
To: Val Blumenfeld
Cc: DSullivan@NiSource.com; Bradley, Lisa; Thurlow.Timothy@epamail.epa.gov
Subject: RE: Ardendale Culvert - Town of Pines

Val:
Thank you for your response and following up with the engineer for the project.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

"Val Blumenfeld" ---01/22/2013 12:07:03 PM---Matt- Thanks. I have a meeting with the engineer later this week to discuss.

From: "Val Blumenfeld" <VBLUMENFELD@bulktransportcorp.com>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: <DSullivan@NiSource.com>, "Bradley, Lisa" <lisa.bradley@aecom.com>, Timothy Thurlow/R5/USEPA/US@EPA
Date: 01/22/2013 12:07 PM
Subject: RE: Ardendale Culvert - Town of Pines

Matt-
Thanks. I have a meeting with the engineer later this week to discuss.
Val

From: Ohl.Matthew@epamail.epa.gov [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Tuesday, January 22, 2013 6:03 AM
To: Val Blumenfeld; Bradley.Brad@epamail.epa.gov; DSullivan@NiSource.com
Subject: Fw: Ardendale Culvert - Town of Pines

Good morning:
Here is the message with attachment as you requested.
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov
----- Forwarded by Matthew Ohl/R5/USEPA/US on 01/22/2013 06:01 AM -----

From: Cathi Murray <[redacted]>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: George Adey <[redacted]>, Vicki Kuzio <[redacted]>, townofpines[redacted]
Date: 01/16/2013 09:11 PM
Subject: Ardendale Culvert - Town of Pines

Hello Mr. Ohl,

Attached to this email you will find a drawing of the Ardendale culvert from when the town had it inspected in July 2012 and a copy from the Project Manual from when the water lines were installed per EPA order. Please note that the project plan specifically states that "Culverts, field tile, or other drainage pipe removed or cut during the course of the work shall be reinstalled. Those culverts, field tile or other drains damaged by the Contractor ***shall be repaired to a condition equal to or better than the condition of the original pipes, or replaced with a new pipe of the same material, size and length.***

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The Building Commissioner has asked you to address this several times to no avail. As the Vice President of the Town of Pines Council, I am asking you to address this matter as well. The Council is requesting you attend the February 6th Council meeting to address our concerns and questions. The meeting begins at 6:30 pm in the Town Hall located at 1519 Delaware. If your schedule does not permit you to attend this meeting, please provide the Council with alternative dates that you are available to meet with us.

Thank you for your attention to this matter.

Regards,

Cathi Murray
Town of Pines Council Vice President
Exemption 6 *(See attached file: Ardendale Culvert.PDF)*

EPA-R5-2013-003300RR-466

Cathi Murray
Exemption 6

01/28/2013 02:18 PM

To Matthew Ohl
cc Vicki Kuzio, George Adey, townofpines
bcc
Subject Fwd: Ardendale Culvert - Town of Pines

Mr. Ohl,

I'm checking with you to make sure you received this original email sent to you Jan. 16th. The council is anxious for you response as to whether or not you will be attending the Feb. council meeting as asked. Thank you for your attention to this matter.

Respectfully,
Cathi Murray
Town of Pines Council Vice President
Exemption 6
Exemption 6

---------- Forwarded message ----------
From: **Cathi Murray** <Exemption 6>
Date: Wed, Jan 16, 2013 at 9:07 PM
Subject: Ardendale Culvert - Town of Pines
To: Ohl.matthew@epa.gov
Cc: George Adey <Exemption 6>, Vicki Kuzio <Exemption 6>,
townofpines Exemption 6

Hello Mr. Ohl,

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Regards,

Cathi Murray
Town of Pines Council Vice President
Exemption 6

Ardendale Culvert.PDF

EPA-R5-2013-003300RR-467

Matthew Ohl /R5/USEPA/US
01/29/2013 08:45 AM

To KHERRON
cc
bcc
Subject Fw: Ardendale Culvert - Town of Pines

Hi Kevin:
Are you available to participate in the meeting on February 6 at 6:30 pm?
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov
----- Forwarded by Matthew Ohl/R5/USEPA/US on 01/29/2013 08:43 AM -----

From: Cathi Murray <[redacted]>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: Vicki Kuzio <[redacted]>, George Adey <[redacted]>, townofpines [redacted]
Date: 01/28/2013 02:22 PM
Subject: Fwd: Ardendale Culvert - Town of Pines

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Respectfully,
Cathi Murray
Town of Pines Council Vice President
[redacted]

---------- Forwarded message ----------
From: **Cathi Murray** <[redacted]>
Date: Wed, Jan 16, 2013 at 9:07 PM
Subject: Ardendale Culvert - Town of Pines
To: Ohl.matthew@epa.gov
Cc: George Adey <[redacted]>, Vicki Kuzio <[redacted]>, townofpines [redacted]

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Regards,

Cathi Murray
Town of Pines Council Vice President

Exemption 6

Ardendale Culvert.PDF

EPA-R5-2013-003300RR-468

"Val Blumenfeld " <VBLUMENFELD @bulktransportcorp .com>	To	Matthew Ohl
	cc	"Dan Sullivan", "Bradley, Lisa", Timothy Thurlow
01/31/2013 12:37 PM	bcc	
	Subject	FW: Ardendale Culvert - Town of Pines

Matt-

Because Town of Pines wants you to attend a meeting next Wed. I am again updating you a bit prematurely on our review of the situation. The engineer is making a report of what we saw at the culvert on Tuesday. He will send it to me by Friday. D&M was there as well. I have seen video from a camera inserted into the pipe. The contractor who cleans out the culvert was there earlier this week. Water is flowing. After seeing the report I may talk to the County Surveyor and discuss a remedy.

Val Blumenfeld

From: Val Blumenfeld
Sent: Thursday, January 24, 2013 2:10 PM
To: 'Ohl.Matthew@epamail.epa.gov'
Cc: DSullivan@NiSource.com; Bradley, Lisa; Thurlow.Timothy@epamail.epa.gov
Subject: RE: Ardendale Culvert - Town of Pines

Matt-
Tim Haas would like to take a refresher look at the Ardendale culvert early next week. I will meet him there and get back to you with his recommendation soon.
Val

From: Ohl.Matthew@epamail.epa.gov [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Tuesday, January 22, 2013 12:13 PM
To: Val Blumenfeld
Cc: DSullivan@NiSource.com; Bradley, Lisa; Thurlow.Timothy@epamail.epa.gov
Subject: RE: Ardendale Culvert - Town of Pines

Val:
Thank you for your response and following up with the engineer for the project.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

"Val Blumenfeld" ---01/22/2013 12:07:03 PM---Matt- Thanks. I have a meeting with the engineer later this week to discuss.

From: "Val Blumenfeld" <VBLUMENFELD@bulktransportcorp.com>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: <DSullivan@NiSource.com>, "Bradley, Lisa" <lisa.bradley@aecom.com>, Timothy Thurlow/R5/USEPA/US@EPA
Date: 01/22/2013 12:07 PM
Subject: RE: Ardendale Culvert - Town of Pines

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Thanks. I have a meeting with the engineer later this week to discuss.
Val

From: Ohl.Matthew@epamail.epa.gov [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Tuesday, January 22, 2013 6:03 AM
To: Val Blumenfeld; Bradley.Brad@epamail.epa.gov; DSullivan@NiSource.com
Subject: Fw: Ardendale Culvert - Town of Pines

Good morning:
Here is the message with attachment as you requested.
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov
----- Forwarded by Matthew Ohl/R5/USEPA/US on 01/22/2013 06:01 AM -----

From: Cathi Murray <[redacted]>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: George Adey <[redacted]>, Vicki Kuzio <[redacted]>, townofpines[redacted]
Date: 01/16/2013 09:11 PM
Subject: Ardendale Culvert - Town of Pines

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Regards,

Cathi Murray
Town of Pines Council Vice President
Exemption 6 *(See attached file: Ardendale Culvert.PDF)*

EPA-R5-2013-003300RR-469

Matthew Ohl /R5/USEPA/US
01/31/2013 04:41 PM

To Cathi Murray
cc George Adey, Vicki Kuzio, townofpines
bcc
Subject Re: Fwd: Ardendale Culvert - Town of Pines

Dear Ms. Murray:
Thank you for your message of January 16, 2013 concerning the Ardendale culvert.
Representatives from EPA can attend the council meeting to discuss this matter.

Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

Cathi Murray	Mr. Ohl, I'm checking with you to make...	01/28/2013 02:22:13 PM

From: Cathi Murray <[redacted]>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: Vicki Kuzio <[redacted]>, George Adey <[redacted]>, townofpines [redacted]
Date: 01/28/2013 02:22 PM
Subject: Fwd: Ardendale Culvert - Town of Pines

Mr. Ohl,
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Respectfully,
Cathi Murray
Town of Pines Council Vice President
[redacted]

---------- Forwarded message ----------
From: **Cathi Murray** <[redacted]>
Date: Wed, Jan 16, 2013 at 9:07 PM
Subject: Ardendale Culvert - Town of Pines
To: Ohl.matthew@epa.gov
Cc: George Adey <[redacted]>, Vicki Kuzio [redacted], townofpines [redacted]

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Cathi Murray
Town of Pines Council Vice President
Exemption 6

EPA-R5-2013-003300RR-470

Cathi Murray
[redacted] Exemption 6

02/01/2013 02:03 PM

To Matthew Ohl
cc George Adey, Vicki Kuzio, townofpines
bcc
Subject Re: Fwd: Ardendale Culvert - Town of Pines

Mr. Ohl,
Thank you very much! We look forward to meeting with your representatives.
Sincerely,
Cathi Murray

On Thu, Jan 31, 2013 at 4:41 PM, <Ohl.Matthew@epamail.epa.gov> wrote:

Dear Ms. Murray:
Thank you for your message of January 16, 2013 concerning the Ardendale culvert.
Representatives from EPA can attend the council meeting to discuss this matter.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

Cathi Murray ---01/28/2013 02:22:13 PM---Mr. Ohl, I'm checking with you to make sure you received this original email sent to

From: Cathi Murray <[redacted] Exemption 6>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: Vicki Kuzio <[redacted] Exemption 6>, George Adey <[redacted] Exemp... emption 6>, townofpines [redacted] Exemption 6
Date: 01/28/2013 02:22 PM
Subject: Fwd: Ardendale Culvert - Town of Pines

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Cathi Murray
Town of Pines Council Vice President

Exemption 6
Exemption 6

---------- Forwarded message ----------
From: **Cathi Murray** <Exemption 6>
Date: Wed, Jan 16, 2013 at 9:07 PM
Subject: Ardendale Culvert - Town of Pines
To: Ohl.matthew@epa.gov
Cc: George Adey <Exemption 6>, Vicki Kuzio <Exemption 6>,
townofpines Exemption 6

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Cathi Murray
Town of Pines Council Vice President
Exemption 6
[attachment "Ardendale Culvert.PDF" deleted by Matthew Ohl/R5/USEPA/US]

EPA-R5-2013-003300RR-471

"Val Blumenfeld " <VBLUMENFELD @bulktransportcorp .com>	To Matthew Ohl
02/04/2013 02:12 PM	cc "Dan Sullivan", "Bradley, Lisa", Timothy Thurlow
	bcc
	Subject RE: FW: Ardendale Culvert - Town of Pines

Matt-
After I spoke with you this morning, I called and left a message with the County Surveyor. I am waiting for his call back. I will notify you as soon as I hear from him.
Val

From: Ohl.Matthew@epamail.epa.gov [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Monday, February 04, 2013 8:44 AM
To: Val Blumenfeld
Cc: Dan Sullivan; Bradley, Lisa; Thurlow.Timothy@epamail.epa.gov
Subject: Re: FW: Ardendale Culvert - Town of Pines

Val:
Do you have any cost estimates for repair or replacement of the culvert?
Thanks.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

"Val Blumenfeld" ---01/31/2013 12:37:23 PM---Matt-

From: "Val Blumenfeld" <VBLUMENFELD@bulktransportcorp.com>
To: Matthew Ohl/R5/USEPA/US@EPA,
Cc: "Dan Sullivan" <dsullivan@nisource.com>, "Bradley, Lisa" <lisa.bradley@aecom.com>, Timothy Thurlow/R5/USEPA/US@EPA
Date: 01/31/2013 12:37 PM
Subject: FW: Ardendale Culvert - Town of Pines

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From: Val Blumenfeld
Sent: Thursday, January 24, 2013 2:10 PM
To: 'Ohl.Matthew@epamail.epa.gov'
Cc: DSullivan@NiSource.com; Bradley, Lisa; Thurlow.Timothy@epamail.epa.gov
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Sent: Tuesday, January 22, 2013 12:13 PM
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Subject: RE: Ardendale Culvert - Town of Pines

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Matthew J. Ohl
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77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

"Val Blumenfeld" ---01/22/2013 12:07:03 PM---Matt- Thanks. I have a meeting with the engineer later this week to discuss.

From: "Val Blumenfeld" <VBLUMENFELD@bulktransportcorp.com>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: <DSullivan@NiSource.com>, "Bradley, Lisa" <lisa.bradley@aecom.com>, Timothy Thurlow/R5/USEPA/US@EPA
Date: 01/22/2013 12:07 PM
Subject: RE: Ardendale Culvert - Town of Pines

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Sent: Tuesday, January 22, 2013 6:03 AM
To: Val Blumenfeld; Bradley.Brad@epamail.epa.gov; DSullivan@NiSource.com
Subject: Fw: Ardendale Culvert - Town of Pines

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Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov
----- Forwarded by Matthew Ohl/R5/USEPA/US on 01/22/2013 06:01 AM -----

From: Cathi Murray <[redacted]>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: George Adey <[redacted]>, Vicki Kuzio <[redacted]>, townofpines[redacted]
Date: 01/16/2013 09:11 PM
Subject: Ardendale Culvert - Town of Pines

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Regards,

Cathi Murray
Town of Pines Council Vice President
Exemption 6 *(See attached file: Ardendale Culvert.PDF)*

EPA-R5-2013-003300RR-472

"Mark Hutson"
<[redacted]@geo-hydro.com>
02/05/2013 11:37 AM

To Matthew Ohl
cc
bcc
Subject FW: Updated FS comments

Matt
A letter that you sent to the Pines town council prompted Larry Jensen and Paul Kysel to realize that there were workplans buried in the appendices of the FS that they hadn't looked at. I know it's well after the official comment period, but thought you might want to see Larry's updated FS comments that include his concerns on the workplans.

Has EPA thought about potentially using radiologic survey equipment to guide sample location selection in the residential yards rather than going on a 5-spot grid sampling?

Have a good day.

Mark

From: Paul Kysel [mailto:[redacted]]
Sent: Monday, February 04, 2013 4:54 PM
To: Mark Hutson
Subject: FW: Updated FS comments

Mark, if it isn't oo late for these comments from Larry, please forward on to Matt

Hope you're feeling better,

Paul

Date: Mon, 4 Feb 2013 09:42:37 -0600
Subject: Updated FS comments
From: [redacted]
To: [redacted]

Paul, Here are my updated comments on the FS, adding comments on Appendix F, Appendix G, and Attachment A to Appendix G. Please forward these on.

Larry Comments on PinesFS November 29 2012 Original.docx

EPA-R5-2013-003300RR-473

"Val Blumenfeld " <VBLUMENFELD @bulktransportcorp .com>

02/05/2013 12:48 PM

To Matthew Ohl

cc "Dan Sullivan", "Bradley, Lisa", Timothy Thurlow

bcc

Subject FW: Ardendale Culvert - Town of Pines

Matt-

I have not received a response from the County Surveyor. I am looking for a solution to the problem and Porter County will be a deciding factor in what will be allowed to remedy the situation, if there is a remedy at all. Brown Ditch is a regulated drain and the Town of Pines may not have authority concerning construction in county ditches. The Town is now concerned with high levels of water there and specifically a residential property (see photo) located near. They believe that the flooding is due to materials and methods used during the water main extension in 2005. They also believe that the property is being contaminated.

I understand that you are planning to attend the Town of Pines Council meeting on Wed. 2-6-13. They will have questions about the culvert at Ardendale Ave. and the construction performed there. At this time I can only give you the following information:

- The area east of the Ardendale culvert was a wet area even at the time of installation of the Michigan City Municipal water main (2004-2005). The east branch of Brown Ditch flows here. The county does not clean ditches and culverts as often as we residents would like. Flooding is not uncommon in the entire Ditch system all the way north through Beverly Shores. The existing 48" culvert is old and rusted. According to the engineer on the project the east side of the culvert is corroded and is one inch lower than the west pipe invert (water flows west at this point). It was not in our scope of work to replace the culvert at Ardendale Ave. We installed the City lines around it. High water in this area is not because of anything done during construction.
- All proper materials were used. All work was done properly and with approval when changes were needed. The Michigan City Water Dept. was on site during this phase and the EPA provided oversight. No damage was done to the Ardendale culvert during construction. We found it in very poor condition. It was restored to a condition equal to or better than the condition of the existing pipe.
- Destructive and aggressive methods (see photo.telephone pole can be seen lying there for future use) of cleaning have been used multiple times on this culvert. If a joint has failed it could be due to damage related to this type maintenance work. The "sinkhole" sighted in a Town 2011 could very well have also been caused by maintenance such as this.
- The "sinkhole" complaint has now become a complaint about flooding.

What I can do at this time is to offer to purchase a new culvert for the county. A new culvert will also get clogged from time to time. A new culvert may not even relieve flooding at the ditch. If the Porter County Surveyor could arrange to do the installation, it could be placed to achieve maximum flow from east to west.

When I speak to the Surveyor I may have a more definite answer.

Val Blumenfeld
Project Coordinator Michigan City Municipal Water Extension 2004-05

From: Val Blumenfeld
Sent: Monday, February 04, 2013 2:13 PM
To: 'Ohl.Matthew@epamail.epa.gov'
Cc: Dan Sullivan; Bradley, Lisa; Thurlow.Timothy@epamail.epa.gov
Subject: RE: FW: Ardendale Culvert - Town of Pines

Matt-
After I spoke with you this morning, I called and left a message with the County Surveyor. I am waiting for his call back. I will notify you as soon as I hear from him.
Val

From: Ohl.Matthew@epamail.epa.gov [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Monday, February 04, 2013 8:44 AM
To: Val Blumenfeld
Cc: Dan Sullivan; Bradley, Lisa; Thurlow.Timothy@epamail.epa.gov
Subject: Re: FW: Ardendale Culvert - Town of Pines

Val:
Do you have any cost estimates for repair or replacement of the culvert?
Thanks.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

"Val Blumenfeld" ---01/31/2013 12:37:23 PM---Matt-

From: "Val Blumenfeld" <VBLUMENFELD@bulktransportcorp.com>
To: Matthew Ohl/R5/USEPA/US@EPA,
Cc: "Dan Sullivan" <dsullivan@nisource.com>, "Bradley, Lisa" <lisa.bradley@aecom.com>, Timothy Thurlow/R5/USEPA/US@EPA
Date: 01/31/2013 12:37 PM
Subject: FW: Ardendale Culvert - Town of Pines

Matt-

Because Town of Pines wants you to attend a meeting next Wed. I am again updating you a bit prematurely on our review of the situation. The engineer is making a report of what we saw at the culvert on Tuesday. He will send it

to me by Friday. D&M was there as well. I have seen video from a camera inserted into the pipe. The contractor who cleans out the culvert was there earlier this week. Water is flowing. After seeing the report I may talk to the County Surveyor and discuss a remedy.

Val Blumenfeld

From: Val Blumenfeld
Sent: Thursday, January 24, 2013 2:10 PM
To: 'Ohl.Matthew@epamail.epa.gov'
Cc: DSullivan@NiSource.com; Bradley, Lisa; Thurlow.Timothy@epamail.epa.gov
Subject: RE: Ardendale Culvert - Town of Pines

Matt-
Tim Haas would like to take a refresher look at the Ardendale culvert early next week. I will meet him there and get back to you with his recommendation soon.
Val

From: Ohl.Matthew@epamail.epa.gov [mailto:Ohl.Matthew@epamail.epa.gov]
Sent: Tuesday, January 22, 2013 12:13 PM
To: Val Blumenfeld
Cc: DSullivan@NiSource.com; Bradley, Lisa; Thurlow.Timothy@epamail.epa.gov
Subject: RE: Ardendale Culvert - Town of Pines

Val:
Thank you for your response and following up with the engineer for the project.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

"Val Blumenfeld" ---01/22/2013 12:07:03 PM---Matt- Thanks. I have a meeting with the engineer later this week to discuss.

From: "Val Blumenfeld" <VBLUMENFELD@bulktransportcorp.com>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: <DSullivan@NiSource.com>, "Bradley, Lisa" <lisa.bradley@aecom.com>, Timothy Thurlow/R5/USEPA/US@EPA
Date: 01/22/2013 12:07 PM
Subject: RE: Ardendale Culvert - Town of Pines

Matt-
Thanks. I have a meeting with the engineer later this week to discuss.
Val

From: Ohl.Matthew@epamail.epa.gov [mailto:Ohl.Matthew@epamail.epa.gov]

Sent: Tuesday, January 22, 2013 6:03 AM
To: Val Blumenfeld; Bradley.Brad@epamail.epa.gov; DSullivan@NiSource.com
Subject: Fw: Ardendale Culvert - Town of Pines

Good morning:
Here is the message with attachment as you requested.
Thank you.
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov
----- Forwarded by Matthew Ohl/R5/USEPA/US on 01/22/2013 06:01 AM -----

From: Cathi Murray <[redacted]>
To: Matthew Ohl/R5/USEPA/US@EPA
Cc: George Adey <[redacted]>, Vicki Kuzio <[redacted]>, townofpines[redacted]
Date: 01/16/2013 09:11 PM
Subject: Ardendale Culvert - Town of Pines

Hello Mr. Ohl,

Attached to this email you will find a drawing of the Ardendale culvert from when the town had it inspected in July 2012 and a copy from the Project Manual from when the water lines were installed per EPA order. Please note that the project plan specifically states that "Culverts, field tile, or other drainage pipe removed or cut during the course of the work shall be reinstalled. Those culverts, field tile or other drains damaged by the Contractor ***shall be repaired to a condition equal to or better than the condition of the original pipes, or replaced with a new pipe of the same material, size and length.***

It is quite obvious that the culvert was neither repaired or replaced correctly according to the Project Manual. The condition this culvert was left in has cost the town time and quite a bit of money to keep it flowing properly. Currently the culvert is clog again and causing water from Brown ditch to back up onto a residents private property. It is my understanding that Brown ditch contains contaminates from the CCW in the Yard 520 landfill. Therefore, contaminating this residents property! This situation is unacceptable for the resident, the Town of Pines Council, and all who have been made aware of this situation.

The Building Commissioner has asked you to address this several times to no avail. As the Vice President of the Town of Pines Council, I am asking you to address this matter

as well. The Council is requesting you attend the February 6th Council meeting to address our concerns and questions. The meeting begins at 6:30 pm in the Town Hall located at 1519 Delaware. If your schedule does not permit you to attend this meeting, please provide the Council with alternative dates that you are available to meet with us. Thank you for your attention to this matter.

Regards,

Cathi Murray
Town of Pines Council Vice President

Exemption 6 *(See attached file: Ardendale Culvert.PDF)* Ardendale house Jan 2013.JPG

Ardendale Culvert 1-29-2013.JPG

EPA-R5-2013-003300RR-474

Matthew Ohl /R5/USEPA/US
02/06/2013 03:56 PM

To ckondreck
cc Eric.Morton, EUGENE JABLONOWSKI
bcc
Subject Fw: Updated FS comments

Good afternoon:
Here are some additional PINES comments.
Thanks,
Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov
----- Forwarded by Matthew Ohl/R5/USEPA/US on 02/06/2013 03:54 PM -----

From: "Mark Hutson" <[redacted]@geo-hydro.com>
To: Matthew Ohl/R5/USEPA/US@EPA
Date: 02/05/2013 11:37 AM
Subject: FW: Updated FS comments

Matt
A letter that you sent to the Pines town council prompted Larry Jensen and Paul Kysel to realize that there were workplans buried in the appendices of the FS that they hadn't looked at. I know it's well after the official comment period, but thought you might want to see Larry's updated FS comments that include his concerns on the workplans.

Has EPA thought about potentially using radiologic survey equipment to guide sample location selection in the residential yards rather than going on a 5-spot grid sampling?

Have a good day.

Mark

From: Paul Kysel [mailto:[redacted]]
Sent: Monday, February 04, 2013 4:54 PM
To: Mark Hutson
Subject: FW: Updated FS comments

Mark, if it isn't oo late for these comments from Larry, please forward on to Matt

Hope you're feeling better,

Paul

Date: Mon, 4 Feb 2013 09:42:37 -0600
Subject: Updated FS comments
From: [redacted]

To: [redacted]

Paul, Here are my updated comments on the FS, adding comments on Appendix F, Appendix G, and Attachment A to Appendix G. Please forward these on.

Larry Comments on PinesFS November 29 2012 Original.docx

EPA-R5-2013-003300RR-475

Matthew Ohl /R5/USEPA/US
02/13/2013 12:39 PM

To Cathi Murray, George Adey, Vicki Kuzio, townofpines
cc Timothy Thurlow, EUGENE JABLONOWSKI, Janet Pope
bcc
Subject Pines Area of Investigation - Draft Feasibility Study Files

Good afternoon:

Thank you for the opportunity to meet with you at the Town Council meeting on February 6, 2013. As you requested, the draft Feasibility Study report is being made available to you by the potentially responsible parties. The FS report is draft and will be under review until after our next meeting. Because the document is draft and will likely change after our review we would appreciate your cooperation in limiting its distribution to council members. I look forward to our next meeting on March 6, 2013.

Thank you.

Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

EPA-R5-2013-003300RR-476

Janet Pope /R5/USEPA/US
02/13/2013 01:02 PM

To Matthew Ohl
cc
bcc
Subject Re: Pines Area of Investigation - Draft Feasibility Study Files

Matt,

Do you fill out a TA when you go the the Pines?

janet

Matthew Ohl | Good afternoon: Thank you for the opp... | 02/13/2013 12:38:23 PM

From: Matthew Ohl/R5/USEPA/US
To: Cathi Murray <[redacted] Exemption 6 [redacted]>, George Adey <[redacted] Exempti... Exemption 6 [redacted]>, Vicki Kuzio <[redacted] Exemption 6 [redacted]>, townofpines [redacted] Exemption 6 [redacted]
Cc: Timothy Thurlow/R5/USEPA/US@EPA, EUGENE JABLONOWSKI/R5/USEPA/US@EPA, Janet Pope/R5/USEPA/US@EPA
Date: 02/13/2013 12:38 PM
Subject: Pines Area of Investigation - Draft Feasibility Study Files

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Thank you.

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fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

EPA-R5-2013-003300RR-477

George Adey
<[redacted]>
02/13/2013 05:59 PM
Please respond to
George Adey
<[redacted]>

To Matthew Ohl, Cathi Murray, Vicki Kuzio, "townofpines[redacted]"
cc Timothy Thurlow, EUGENE JABLONOWSKI, Janet Pope
bcc
Subject Re: Pines Area of Investigation - Draft Feasibility Study Files

Good Evening Matt,

Thank you for your attention on getting us access to the the Draft Feasibility Study. It's a very lengthy document. I understand this is a draft document. Therefore, I also understand your confidentiality concerns. Howerver, I do have several questions.

How are we to interpret this document with out some independant expert opinion? With your okay, I would like to pursue this.

Will the Town be allowed any input in this document before it is finalized?

The Town has a vested intrest in the outcome of this process. Why aren't we part of it? The residents of our Town are the "most affected" and Town Government should be part of this process. At our last town meeting we discussed an issue with you that was directly due to no communication, or consultation, with our town.

I await your response as I know time is short.
Thank you in advance for your time.

Best Reguards,
George Adey
Town Council President
Town of Pines

Take good care of Mother Earth.
We only borrow her from our Grandchildren.

From: "Ohl.Matthew@epamail.epa.gov" <Ohl.Matthew@epamail.epa.gov>
To: Cathi Murray <[redacted]>; George Adey <[redacted]>; Vicki Kuzio <[redacted]>; townofpines[redacted]
Cc: Thurlow.Timothy@epamail.epa.gov; Jablonowski.Eugene@epamail.epa.gov; Pope.Janet@epamail.epa.gov
Sent: Wednesday, February 13, 2013 12:39 PM
Subject: Pines Area of Investigation - Draft Feasibility Study Files

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Thank you.

Matthew J. Ohl
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United States Environmental Protection Agency
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fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

EPA-R5-2013-003300RR-478

Matthew Ohl /R5/USEPA/US
02/14/2013 01:49 PM

To George Adey
cc Cathi Murray, EUGENE JABLONOWSKI, Janet Pope, Vicki Kuzio, Timothy Thurlow, "townofpines Exemption 6 "
bcc
Subject Re: Pines Area of Investigation - Draft Feasibility Study Files

George:

Thank you for your response regarding the Feasibilty Study (FS). You raise an important concern about how the community and its Town Council may be involved in the process. Such involvement is valued by the U.S. Environmental Protection Agency. As part of a settlement agreement EPA required a Technical Assistance Plan (TAP) between the potentially responsible parties and People in Need of Environmental Safety (PINES). Under the agreement PINES is funded and empowered to hire an independent technical advisor to review documents, including the FS, and involve the community. The intent of the TAP is that PINES will work with the community, including the Town Council, to ensure they understand the process (including documents like the FS) and inform EPA of any concerns they may have. Your message raises concern for EPA that this is not happening as effectively as it should. Rather than having the Town Council pay for another independent consultant to review documents, you may want to consider whether the PINES technical review could addresses your concerns. Please let me know whether you think PINES is actively involving the Town Council and the community, or if they are engaging you but you are looking for something more. If PINES is not engaging the Council I can contact PINES to make sure your concerns are addressed. If you would like you can contact them directly through PINES President Paul Kysel at Exemption 6 .

Independent of the TAP, EPA will be reaching out to the Council and community throughout the cleanup decision process. EPA is committed to solicit and consider public comments on a proposed cleanup plan before any final decision is made. So there will be opportunities outside of the TAP to provide input to the Agency on the decisions. If you would like to discuss this further please let me know.

Thank you.

Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov

George Adey	Good Evening Matt,	02/13/2013 06:05:30 PM

From: George Adey <[redacted]>
To: Matthew Ohl/R5/USEPA/US@EPA, Cathi Murray <[redacted]>, Vicki Kuzio <[redacted]>, "townofpines[redacted]" <townofpines[redacted]>
Cc: Timothy Thurlow/R5/USEPA/US@EPA, EUGENE JABLONOWSKI/R5/USEPA/US@EPA, Janet Pope/R5/USEPA/US@EPA
Date: 02/13/2013 06:05 PM
Subject: Re: Pines Area of Investigation - Draft Feasibility Study Files

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George Adey
Town Council President
Town of Pines

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From: "Ohl.Matthew@epamail.epa.gov" <Ohl.Matthew@epamail.epa.gov>
To: Cathi Murray <[redacted]>; George Adey <[redacted]>; Vicki Kuzio <[redacted]>; townofpines[redacted]
Cc: Thurlow.Timothy@epamail.epa.gov; Jablonowski.Eugene@epamail.epa.gov; Pope.Janet@epamail.epa.gov
Sent: Wednesday, February 13, 2013 12:39 PM
Subject: Pines Area of Investigation - Draft Feasibility Study Files

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Thank you.

Matthew J. Ohl
Remedial Project Manager
United States Environmental Protection Agency
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

phone: 312.886.4442
fax: 312.692.2447
e-mail: ohl.matthew@epa.gov