Vogel Paint Mtg
12/12/18

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→ Remedial Approach - 3 areas - ① original disposal area; ② rest of on-site source, ③ off-site plume
① Dense injection area
② Treatment zones, bio barrier
③ " , added "plume stop" at boundary wells
→ North Area Characterization - define northern component of plume

- Want to do outside of formal decision document process
- Goal is site deletion - meet closure criteria
- IDNR has allowed them to turn off the P&T system under the consent order

→ Believe bioremediation plan will get them there
Using 3RD criteria - EPA determine there is no HHE threat.

"Guidance for Evaluating Completion of Groundwater Restoration Remedial Actions"

+ Deletion Policy Guidance

ESD – " Criteria for ceasing remedial action (talking about selected remedy →) based on monitoring results were to be established as part of a GWM Program"

" Under the ESD, the GW P&T system will be discontinued only after a determination that GW cleanup goals have been met"

- enhanced free product removal – by soil excavation and SVE
- established MCLs as cleanup criteria
- established site property boundary as POC for meeting MCLs
- GWM Plan will be developed to decide on criteria to determine when active GW remedial P&T will stop
  - stable/decreasing concs throughout site
  - no > MCLs off site
  - no other potential of gw > MCLs to leave the site

ICs

1ST Want to get off NPL

2nd Want to get to site closure

They very much want NPL Deletion with NO ESD or RODA

→ EPA & IDNR will set up mtg together with HQ task force & program experts on site closure and deletions to see if this is possible

→ They want to pursue pilot study regardless