From: Deborah Hilsman
To: Rob Rau
Subject: Re: Fw: Toppenish: Docket No. RCRA-10-2010-0136
Date: 10/05/2010 07:21 PM

Thanks for forwarding this Rob. After you and Mike Chun reach agreement on the schedule, I can work with you on amending the AOC.
Deborah

▼ Rob Rau---10/05/2010 03:48:59 PM---Hi Michael: I reviewed the Proposed Supplemental Remedial Investigation Work Plan - 2nd Phase dated

From: Rob Rau/R10/USEPA/US
To: "Michael Chun" <MChun@aegwa.com>
Cc: sue@rhsmith.com, "Yen-Vy Van" <YVan@aegwa.com>, ZHiatt@GrahamDunn.com, Deborah Hilsman/R10/USEPA/US@EPA
Date: 10/05/2010 03:48 PM
Subject: Fw: Toppenish: Docket No. RCRA-10-2010-0136

Hi Michael:

I reviewed the Proposed Supplemental Remedial Investigation Work Plan - 2nd Phase dated October 1, 2010. Thank you for providing this document.

Overall, I believe that the document provides a good outline of the work that you are proposing. Provided below are my comments. I will be out of the office all next week, but perhaps we can discuss these comments later this week and come to a conclusion such that we can approve this document by weeks end and proceed quickly with planning and executing the field work.

1) While the document provides an overview of the proposed work, many of the details such as QA/QC and sampling procedures are missing. I assume that AEG has some SOP's or manuals for this that can be incorporated by reference. If so, please reference these documents in the proposed plan. Also, the proposed plan should provide a reference section, and the objectives of this investigation should be clearly identified up front.

2) I believe this document is the first time that EPA has seen the results of the July 2010 direct push investigation. Is there another report that we are missing? Soil and groundwater results are summarized in Tables 1 & 2, but the results are not mapped. Although the text mentions a "groundwater plume", there is no plume map presented anywhere. Putting soil results on a map would also be helpful. Similarly, a summary table showing all of the soil and groundwater samples collected (both environmental and control samples), along with information such as sample location, depth, field screening results, odors, groundwater level, analyses, etc.., that would be very helpful.

3) On page 2, the text mentions that some soil borings were not advanced due to the lack of adequate property access. However, it is not clear which borings (if any) shown on Figure 2 were not advanced. Figure 2 shows "proposed" boring locations, but it is not clear if this is where they were actually advanced.

4) With regard to soil sampling, there needs to be some discussion of sample collection in the vadose vs. the saturated zone. To this end, a conceptual site model (CSM) would also be very helpful and important to present. The CSM should be revised as the RI and CAP progress. For example, with the interim

remedial action (i.e., tank pull and PCS removal) complete, are you of the belief that vadose PCS is largely gone from the site except perhaps under the building? How does the large, seasonal groundwater fluctuation affect your proposed remedies? Preparing a CSM is important as the model will drive your idea of sample location and frequency for the ensuing investigation. Indenting the seasonal groundwater fluctuation along with the smear zone is an important part of this as well. On page 3, you note the smear zone is 11-15 feet. Is there a reason why it is much thinner than the seasonal fluctuation?

5) I do not agree that 4 quarters of groundwater monitoring are necessary in order to define the gradient and prepare/implement a CAP. Previous White Shield and Noll reports have quantified the hydraulic gradient as being towards either the east or southeast. These measurements are consistent with groundwater gradients measured over time (decades) throughout the Toppenish area, and there is no reason to believe they are different at Smitty's. What type of presumptive groundwater remedies are you considering (i.e., bottom of page 3) that would justify measuring gradient for one year before you are prepared to design and implement a system? Perhaps two groundwater sampling events may be warranted (1 when the wells are installed and another 3 months later), but not more than that. Also, whatever groundwater remedies you are considering, for the sake of timely planning, I would assume gradients will be consistent with what has been previously measured unless you find something different (i.e., northeast) after well installation.

6) Page 4, 3rd bullet: what sample interval is being proposed ?

7) page 4, 7th bullet: what is the rational for proposing a 15' well screen. Is the seasonal fluctuation this much, and if so, why is the smear zone only 4' thick? When doing low flow sampling, where in the screen section will the pump intake be placed? How will the wells be developed?

8) Analyses in MTCA Table 830-1 are referenced, but the actual analytical method (other than the 5035 prep method) is not mentioned. I assume NW methods will be used for fuels, and 8260 will be used for VOCs, but his should be noted.

Thank you Michael. Please give me a call later this week so we can discuss this further

Rob Rau

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----- Forwarded by Rob Rau/R10/USEPA/US on 10/05/2010 02:57 PM -----

From: Rob Rau/R10/USEPA/US
To: "Michael Chun" <MChun@aegwa.com>
Cc: Deborah Hilsman/R10/USEPA/US@EPA, sue@rhsmith.com, "Yen-Vy Van" <YVan@aegwa.com>, ZHiatt@GrahamDunn.com
Date: 09/10/2010 04:15 PM
Subject: Re: Toppenish: Docket No. RCRA-10-2010-0136

Hi Michael:

Thanks for the message. I am on my way out the door, and will be out for the next two weeks, but I will get back to you soon regarding this proposed schedule after discussion with Deborah. Assuming that we approve the Supplemental Site Investigation Plan within a few days after you submit it on October 4, the rest of the schedule pencils out like this:

Submit Supplemental Site Assessment Plan	10/4/2010
EPA Approval Of SI Plan	10/8/2010
Field Work Completed	1/2/2011
Submit Cap & 2 GW Monitoring events	5/2/2011
Implement CAP	10/29/2011

My initial thought is that this schedule looks reasonable with the exception of the 6 months separating CAP submittal and approval. This seems a bit excessive. Nevertheless, I will get back to you soon on this. In the mean time, lets move forward with the October 4 date for submittal of the supplemental site assessment plan.

rob

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R10 Dive Team: http://yosemite.epa.gov/r10/oea.nsf/webpage/dive+team

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▼ "Michael Chun" ---09/10/2010 03:40:30 PM---Rob,

From: "Michael Chun" <MChun@aegwa.com>
To: Rob Rau/R10/USEPA/US@EPA, Deborah Hilsman/R10/USEPA/US@EPA, <ZHiatt@GrahamDunn.com>, <sue@rhsmith.com>, "Yen-Vy Van" <YVan@aegwa.com>
Date: 09/10/2010 03:40 PM
Subject: Toppenish: Docket No. RCRA-10-2010-0136

Rob,

The following are the proposed schedule for completing an approvable Corrective Action Plan (CAP) for the Smitty's Toppenish site:

- Develop an Supplemental Site Assessment Plan and submit to EPA Region 10 for approval – **October 4, 2010**

- Upon approval of the Supplemental Site Assessment Plan by EPA Region 10, the proposed field work will be completed in 90 days. This would include the site access agreements, groundwater monitoring well placements and professional site survey.

- Within 120 days of completing the Supplemental Site Assessment, RH Smith will complete 2 quarterly groundwater monitoring events and submit to EPA Region 10 an approvable CAP.

- Within 180 days after the CAP is approved by EPA, RH Smith will implement the approved CAP.

I would like to request a meeting to discuss the proposed schedule. Please let me know your availability and I will coordinate with Zach and Yen-Vy. Thanks

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