From:	Rob Rau
To:	Yen-Vy Van
Cc:	Deborah Hilsman
Bcc:	Rob Rau
Subject:	Re: Smitty Toppenish (Spirit Gas), Toppenish, WA - REVISED Suppl RI Work Plan
Date:	12/14/2010 03:51 PM

Hi Yen-Vy:

Thank you for submitting the Revised Supplemental Remedial Investigation Work Plan (2nd Phase) for Smitty's Toppenish. Provided below are EPA's comments. Please note that the only substantial comment I have is regarding the proposed schedule. All other comments are for your information only, or can be addressed in the Draft Supplemental RI Report. In other words, I do not want to delay the start of field work.

1) It appears that comment #2 from my October 5th email was not addressed. I am copying it here again verbatim in italics:

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.

Based on our October 29 discussion, I was under the impression that this would be addressed in the revised plan. At this point however, I would rather move forward with the next phase of investigation rather than waste time revising the Work Plan. This information can be incorporated into the Draft Supplemental RI Report.

2) Page 4, Conceptual Site Model: The text indicates that PCS source material remains throughout the site at depths between 10 and 12 feet bgs. This is generally at an elevation above the groundwater smear zone which was stated as occurring from 11 to 15 feet bgs. Is this correct ? If so, it is quite possible that this remaining source material can be excavated during low groundwater conditions in late winter. Also, do you believe that there is active vadose PCS source material under the site building? Also, the last sentence of the 2nd paragraph on page 4 seems out of place.

3) Page 6, 1st bullet: States that select samples will be submitted to the lab for GRO. What will the selection be based on?

4) Page 6, 5th Bullet: Sampling of wells should follow development (rather than installation) after a 24 hour wait.

5) Page 7, Proposed Supplemental RI Schedule:

The proposed schedule is way to long and unacceptable to EPA. This is especially true for the period between the 2nd Quarter May 2001 groundwater monitoring event to the implementation of the CAP which spans almost one year to the end of

April 2012 (already into the following irrigation season). This excessive time length is unnecessary because preparation of the Draft CAP can commence while the supplemental RI and groundwater monitoring events are in progress. In fact, you should already have some presumptive remedies in mind to analyze in detail. If you don't, you should.

I realize that the schedule laid out in Section XXV is not as clear as it should be. I suggest that we (Deborah, myself, and your team) have a meeting sometime in the next few weeks and agree to a project schedule so that we can amend the Order. In the mean time, I would like to move forward with the tentatively agreed to January 2011 time frame for executing the Supplemental RI field work and 1st Quarter groundwater monitoring event. As a starting point for discussions during our next meeting, here is a revised schedule that I believe to very attainable and realistic:

1/4/2011	Work Plan Approval
1/24/2011	Begin Sup RI
3/15/2011	Draft RI Report (EPA Comments within 10 days)
4/20/2011	Final RI Report
5/15/2011	2nd Qtr Sampling
7/1/2011	Draft 2nd Qtr Sampling Report (EPA Commetns within 7 days)
7/23/2011	Fianl 2nd Qtr Sampling Report
8/13/2011	Draft CAP (EPA Comments within 14 days)
9/20/2011	EPA CAP Approval
11/19/2011	Implement CAP

While EPA believes that implementing the CAP November 2011 is very attainable, it may be advantageous to wait until late winter 2012 when water tables are lower depending on the proposed remedy (especially is more deep vadose excavation is to be done).

Thanks again for submitting this document, and let me know if you see any problem with starting the investigation next month. Also, feel free to propose a few meeting times and places, and Deborah and I will get back to you with what works for us.

Rob

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▼ "Yen-Vy Van" ---12/02/2010 04:49:43 PM---[attachment "Toppenish Suppl RI WkPlan 2nd phase FINAL 120210.pdf" deleted by Rob Rau/R10/USEPA/US]

From: "Yen-Vy Van" <YVan@aegwa.com>
To: Rob Rau/R10/USEPA/US@EPA
Cc: "Yen-Vy Van" <YVan@aegwa.com>
Date: 12/02/2010 04:49 PM
Subject: Smitty Toppenish (Spirit Gas), Toppenish, WA - REVISED Suppl RI Work Plan

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[attachment "Toppenish Suppl RI WkPlan 2nd phase FINAL 120210.pdf" deleted by Rob Rau/R10/USEPA/US]

Hi Rob

Please find attached for your review the REVISED Proposed Supplemental Remedial Investigation Work Plan – 2nd Phase for the former Spirit Gas Station (EPA Facility ID No. 4260087) as per our meeting and subsequent discussions. The current Work Plan incorporates the tasks and changes you had specified. Thank you again for your understanding and patience on the submittal of this document. Please do not hesitate to contact me at 360-352-9835 should you have questions. We look forward to receiving your approval for the proposed SOW and to schedule the field work phase in January 2011.

Sincerely,
Yen-Vy

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