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Sent: Tuesday, April 07, 2009 5:02 PM
To: walt.j.bell@navy.mil; Staszak, Janna/VBO; Jones, Adrienne/VBO
Cc: kmdoran@deq.virginia.gov
Subject: Site 2

Hey guys,

I talked this over with our regions head hydro and it appears we have some issues that need to be dealt with or clarified at site 2.

-She was absolutely not in agreement with using MNA at this site in any part of the plume without implementing an active remedy first.

-She also stated that MNA **may** be able to be used as a polishing step if the data supports its use (currently it does not).

Her suggestion were:

-The extent of the DNAPL area needs to be defined by monitoring points and not interpolation

-Reason being, any remedy that is implemented will not be able to be effectively implemented, monitored, or understood post RA unless the DNAPL area is completely defined or understood (from sampling data).

-There is extreme variation in the plume and there is no definitive reason to why

-Kathy suggested plotting the wells on a cross section (along with the stratigraphy) and showing the detects at the screened interval (including temp points). Do this for both the dissolved and DNAPL plumes

-For ERD as a remedy, what makes us think carbon is the limiting factor? The leading edge of the plume (14s) has no definitive detect of VC which shows the bugs may be the limiting factor (additionally the extremely high levels of CIS further support this). Further, we have not consistently analyzed for the field parameters that support MNA and give us an idea of what may be the limiting factor at this site. I tried to score the site (using the ORD document from Sept 1998 titled protocol for Remediation of CVOC's through MNA) and it was nearly impossible b/c we do not have this data either because it was not definitively defined (qualifiers), analyzed for, or it just did not meet the criteria.

Walt, just curious, has Dan been involved in discussions of this site, and was he on board with MNA?

If would like further explanation of this or think you may be able to get Kathy onboard with MNA in the "low concentration area" of 10ppm she would be more than happy and willing to hear you out. She is available next Thursday afternoon if you guys have time

Regards,

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