



Jackson, Hylton <hylton.jackson@dnr.iowa.gov>

RE: Revised Midwest Manufacturing/North Farm Federal Superfund Site Groundwater Report

1 message

Johnson, Bradley <Johnson.Bradley@epa.gov>

Thu, Jul 28, 2022 at 2:13 PM

To: Emily Brickman <ebrickman@ensafe.com>, Dana Miller <dmiller@ensafe.com>

Cc: Hylton Jackson <hylton.jackson@dnr.iowa.gov>

Good afternoon Emily and Dana,

Below are comments related to the Midwest Manufacturing/North Farm report titled "Groundwater Monitoring and Site Inspection Report, April 2022" dated June 15, 2022 (received via email by EPA on June 16, 2022 with subsequent figure/table revisions on June 19, 2022 and June 27, 2022).

Please review and incorporate the necessary changes. Please let me know if anything seems inconsistent with how previous reports were finalized or if you have any questions, comments or if I can seek any clarification from our Applied Sciences Branch on any of the comments. Some of the comments below may seem similar (one set was prepared by the site's assigned hydrogeologist and the other by the Human Health Risk Assessor). Please note, with respect to the comments related to Tables 5-5 and 5-6 (first bullets), I've attached the latest VI VISL/RML Decision Matrix.

- A. Section 1.0 – Provide brief explanation that the investigative activities in this report were only conducted on OU2.
- B. Section 1.1 – Provide brief explanation that OU1 has been delisted.
- C. Throughout the report – the document has various conflicting statements regarding VI-2 vapor point. At times it mentions it was destroyed and other times it mentions it was unable to be located. Please review and revise the report to be consistent with the status of VI-2. Specifically in Sections 3.1, 3.10, 3.12, and 5.5.
- D. Section 3.9 – Clarifying/stating that the interface probe was also decontaminated. Text only states static water level indicator was decontaminated.
- E. Section 4.1 – Only describes OU2. Recommend briefly stating OU1 was not addressed during this report.
- F. Section 4.2 – list the name of the bedrock formation and brief description of the formation at the site.
- G. Section 4.3 – if information is available on the hydraulic connection between the upper and lower aquifers it should be discussed.
- H. Figures – recommend including the OU boundary information to clearly depict what is onsite and what is offsite. Unclear if the fence line is the OU boundary.

I. **Sections 3.1 (p. 3-1), 3.3 (p. 3-2), and 3.12 (p. 3-11).** Section 3.1 indicates that, in March 2022, a hole was drilled in the vicinity of VI-2, a vapor pin was installed, and grout was poured around the riser. However, Sections 3.3 and 3.12 indicate that, in April 2022, a sub-slab vapor sample could not be collected from the VI-2 port because its location could not be found. Explain why a sub-slab vapor sample was not collected from the new location installed the previous month in the vicinity of VI-2.

J. **Section 3.2. (p. 3-1) and Figure 3-1.** Section 3.2 states that the monitoring well, soil vapor, and ambient air sampling locations are depicted on Figure 3-1, but only the monitoring well locations were shown. Please include the locations of the soil vapor, indoor air, and outdoor air samples on Figure 3-1.

K. **Section 5.5 (p. 5-8).** The first paragraph of Section 5.5 mentions that the April 2022 sampling results indicate that inorganic constituents remain present in the dissolved phase of surface water (as well as groundwater), but surface water samples were not collected in April 2022. Revise.

L. **Section 5.5 (p. 5-8).** The third paragraph of Section 5.5. states that groundwater trends are stable to decreasing with exceptions. Please provide the statistical trend analyses as justification. Particularly since the y-axes of Figure 5-5 through 5-8 are logarithmic, the wells with the highest TCE concentrations appear stable to increasing, not stable to decreasing.

M. **Table 5-3.**

- **Aluminum.** The tap water Regional Screening Level, based on a non-cancer hazard quotient (HQ) of 1 is 20,000 µg/L.
- **Molybdenum.** The tap water Regional Screening Level, based on a non-cancer HQ of 1 is 100 µg/L.

N. **Table 5-5.**

- Table 5-5 lists the target indoor air concentration as the lowest of the Vapor Intrusion Screening Level (VISL) based on an excess cancer risk of 1E-06 or the VISL based on a non-cancer hazard quotient of 1. Please clarify why a target HQ of 0.1 not used as the VISL and correct if necessary. (e.g. Screening Level vs. Removal Management Levels)
- **Vinyl Chloride.** The EPA Region 7 Action Level for indoor air is 280 µg/m³. The non-cancer VISL for indoor air is 350 µg/m³.
- **1,1,1-Trichloroethane.** This chemical is abbreviated 1,1,2-TCA, not 1,1,2-TCE.
- **Significant Digits.** Action Levels and VISLs are rounded to two significant digits.

O. **Table 5-6.**

- Table 5-6 lists the target sub-slab soil vapor concentration as the lowest of the VISL based on an excess cancer risk of 1E-06 or the VISL based on a non-cancer hazard quotient of 1. like for indoor air, please clarify why a target HQ of 0.1 not used as the VISL and correct if necessary. (e.g. Screening Level vs. Removal Management Levels)
- The VISLs in this table are for indoor air, not sub-slab soil vapor concentration. Calculate and present VISLs for the correct media. Use an attenuation factor of 0.03.
- **Tetrachloroethylene.** The EPA Region 7 Action Level for sub-slab soil vapor is 5,800 µg/m³.
- **Vinyl Chloride.** The EPA Region 7 Action Level for sub-slab soil vapor is 9,300 µg/m³.
- **1,1-Dichloroethylene.** The EPA Region 7 Action Level for sub-slab soil vapor is 29,000 µg/m³.
- **1,1,1-Trichloroethane.** This chemical is abbreviated 1,1,2-TCA, not 1,1,2-TCE.
- **Significant Digits.** Action Levels and VISLs are rounded to two significant digits.

Thank you both,

Brad

Brad Johnson | Remedial Project Manager

U.S. EPA Region 7 | Superfund and Emergency Management Division

Site Remediation Branch | Federal Facilities & Post Construction Section

[11201 Renner Blvd | Lenexa, KS 66219](#)

Phone: 913-551-7848

Johnson.Bradley@epa.gov

From: Emily Brickman <ebrickman@Ensafes.com>
Sent: Thursday, July 21, 2022 4:05 PM
To: Johnson, Bradley <Johnson.Bradley@epa.gov>; Dana Miller <dmiller@ensafes.com>
Subject: RE: Revised Midwest Manufacturing/North Farm Federal Superfund Site Groundwater Report

Hi Brad,

We have been billing once we achieve milestones; therefore, we will bill once the LMCG and MMNF reports are approved by you . Once approved we can bill for the gw sampling and reporting associated with ESO TO Sub-items 20001AA, 20001AB, and 2001AC (well repairs).

We typically see some documentation around this time of year related to EPA executing the next option period. Do you think we will see Option Perion 2 paperwork soon?

Thanks for working with us on this!

Emily

From: Johnson, Bradley <Johnson.Bradley@epa.gov>
Sent: Thursday, July 21, 2022 3:59 PM
To: Emily Brickman <ebrickman@Ensafes.com>; Dana Miller <dmiller@Ensafes.com>
Subject: RE: Revised Midwest Manufacturing/North Farm Federal Superfund Site Groundwater Report

Hi Emily,

Have you all submitted any invoices lately that have not been processed and you are waiting on (for Le Mars Coal Gas Plant and Midwest Manufacturing)?

I have not received any so I wanted to see if maybe they had been sent to Dave or Sandeep.

Also, have you all been doing monthly invoicing?

One other note: I had asked our Applied Sciences Branch (hydrogeologist, risk assessors) to take a look at the Le Mars Coal Gas Plant and Midwest Manufacturing reports you all submitted. I will be reviewing comments they submitted yesterday for Midwest Manufacturing and anticipate any comments they may have for Le Mars Coal Gas within the next week or so. I will be in touch with any feedback on the documents.

Thanks,

Brad

Brad Johnson | Remedial Project Manager

U.S. EPA Region 7 | Superfund and Emergency Management Division

Site Remediation Branch | Federal Facilities & Post Construction Section

[11201 Renner Blvd | Lenexa, KS 66219](#)

Phone: 913-551-7848

Johnson.Bradley@epa.gov

From: Emily Brickman <ebrickman@Ensafes.com>

Sent: Monday, June 27, 2022 8:24 AM

To: Johnson, Bradley <Johnson.Bradley@epa.gov>; Dana Miller <dmiller@ensafes.com>

Subject: RE: Revised Midwest Manufacturing/North Farm Federal Superfund Site Groundwater Report

Hi Brad,

Please see the attached.

Thanks,

Emily

Emily Brickman, PG

Senior Project Manager - Geologist

(214) 529 5600 – office

ebrickman@ensafe.com



creative thinking | custom solutions

From: Johnson, Bradley <Johnson.Bradley@epa.gov>

Sent: Friday, June 24, 2022 2:46 PM

To: Dana Miller <dmiller@Ensaf.com>

Cc: Emily Brickman <ebrickman@Ensaf.com>

Subject: RE: Revised Midwest Manufacturing/North Farm Federal Superfund Site Groundwater Report

Hi Dana and Emily,

I noted that the text in the report states: "Monitoring well, vapor, and ambient air locations are presented on Figure 3-1..."

It looks like the vapor and ambient air sample locations did not make it on to the figure (I do see them the November 2021 report though). Can you all update the figure in the report and send again please?

Thank you both,

Brad

Brad Johnson | Remedial Project Manager

U.S. EPA Region 7 | Superfund and Emergency Management Division

Site Remediation Branch | Federal Facilities & Post Construction Section

[11201 Renner Blvd | Lenexa, KS 66219](#)

Phone: 913-551-7848

Johnson.Bradley@epa.gov

From: Dana Miller <dmiller@Ensaf.com>

Sent: Sunday, June 19, 2022 8:41 PM

To: Johnson, Bradley <Johnson.Bradley@epa.gov>

Cc: Emily Brickman <ebrickman@Ensaf.com>

Subject: RE: Revised Midwest Manufacturing/North Farm Federal Superfund Site Groundwater Report

Brad,

On behalf of Emily Brinkman, please see the **revised** Midwest Manufacturing/North Farm Federal Superfund Site monitoring report for sampling conducted in April 2022. Again, I apologize for the error and please let us know if you have any questions and/or comments.

Respectfully,

Dana Miller | EnSafe Inc. | Chemist

[4545 Fuller Drive, Suite 342| Irving| TX | 75038](#)

dmiller@ensaf.com

972-791-3222 (main) | 972-865-4857 (direct)

Please consider the environment before printing this e-mail.

From: Johnson, Bradley <Johnson.Bradley@epa.gov>

Sent: Friday, June 17, 2022 7:59 AM

To: Dana Miller <dmiller@Ensaf.com>

Cc: Emily Brickman <ebrickman@Ensaf.com>

Subject: RE: Midwest Manufacturing/North Farm Federal Superfund Site Groundwater Report

Good morning Dana,

Thanks for sending over the reports. I opened them and quickly scrolled through just to make sure the documents would load/appeared to have all pages, etc. (just from a downloading perspective) but I did notice that it appears the Le Mars Figures/Tables (sampling forms, etc.) have been included in the Midwest Manufacturing/North Farm report (rather than the Midwest Manufacturing Figures, Tables, etc.)

Thanks,

Brad

Brad Johnson | Remedial Project Manager

U.S. EPA Region 7 | Superfund and Emergency Management Division

Site Remediation Branch | Federal Facilities & Post Construction Section

11201 Renner Blvd | Lenexa, KS 66219

Phone: 913-551-7848

Johnson.Bradley@epa.gov

From: Dana Miller <dmiller@Ensafes.com>

Sent: Thursday, June 16, 2022 8:53 PM

To: Johnson, Bradley <Johnson.Bradley@epa.gov>

Cc: Emily Brickman <ebrickman@Ensafes.com>

Subject: Midwest Manufacturing/North Farm Federal Superfund Site Groundwater Report

Brad,

On behalf of Emily Brinkman, please see the attached Midwest Manufacturing/North Farm Federal Superfund Site monitoring report for sampling conducted in April 2022. Please let us know if you have any questions and/or comments.

Respectfully,

Dana Miller | EnSafe Inc. | Chemist

4545 Fuller Drive, Suite 342| Irving| TX | 75038

dmiller@ensafes.com

972-791-3222 (main) | 972-865-4857 (direct)

Please consider the environment before printing this e-mail.



2-R7 VI VISLs RMLs Decision Matrix_2022_05.pdf
212K