

Pine River Superfund Citizen Task Force
P.O. Box 172
St. Louis, MI 48880

May 29, 2004

Stephanie Ball, Project Manager
U.S. Environmental Protection Agency
Region 5 Office
77 West Jackson Blvd
Chicago, IL 60604-3590

Dear Stephanie,

Enclosed are comments from the Technical Advisory Committee (TAG) of the Velsicol Superfund CAG regarding the draft Joint Sampling and Analysis Plan (JSAP) and Source Migration Investigation presented by U.S. EPA and CH2MHill at the last CAG meeting in St. Louis, Michigan on May 19, 2004. Many of our concerns and questions regarding the draft JSAP were discussed at the last TAG meeting, but I would like to outline the main points below.

Concurrence With Comments From Fred Brown, Ph.D.

Attached, you will find written comments made by Fred Brown dated May 18, 2004. With regard to Dr. Brown's comments, I would like to emphasize the following points:

- **Natural Attenuation** – The JSAP includes discussion of natural attenuation with regard to migration of NAPL and other contaminants vertically and horizontally through differing geologic units. I agree with all of Dr. Brown's comments regarding the specific treatment of NAPL migration in the context of attenuation. I would like to add, however, that naturally attenuation as it describes possible scenarios of NAPL migration and natural attenuation as a remedy should be treated as two very different things. The CAG feels very strongly about natural attenuation as a potential remedy for this site. If you refer to our comments made in April of 2003 regarding U.S. EPA *Contaminated Sediment Remediation Guidance for Hazardous Waste Sites Draft (OSWER 9355.0-85)*, we stated that natural attenuation (monitored natural recovery) should be stricken as a "cleanup" method alternative by U.S. EPA. I believe this point will need to be addressed if EPA feels natural attenuation is a viable mechanism for contaminant mitigation as a result of the JSAP.
- **Mechanisms of DNAPL Contamination of Groundwater** - Again, I agree with Dr. Brown's comments on this issue. I would like to add that the CAG feels that the JSAP provides a good opportunity to investigate not only the occurrence of, migration of and nature of NAPLs, but also the source and potential formation of the NAPL on (or in) the former plant site. If the question could be answered of how the NAPL forms and whether or not it is or has potential for forming today, it would provide key data in the selection of an ultimate remedy, ie. whether or not source material can remain in place or must be removed or "cleaned" in some way.

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TAG Comments

In general, the JSAP appears to be a well thought-out plan for addressing a very important unknown (or unknowns) related to contaminant migration from the former Velsicol plant site. I believe I speak for the CAG when I say that we are very happy to see this kind of investigation *before* a remedy is selected. With regard to that, I would like to add the following point:

- **Purpose of Data Gap Analysis** - The JSAP states that the purpose or goal of the plan is to “Conduct a data gap analysis of existing data *relative to preliminary remedial alternative components considered in discussions* between the Michigan Department of Environmental Quality (MDEQ) and USEPA.” This purports that U.S. EPA and MDEQ has a specific remedial alternative (or a select few alternatives) in mind regarding the site. From this point, I believe U.S. EPA needs to be very clear about whether or not the JSAP is filling in data gaps in order to develop *any* remedial alternative(s) (including alternatives not already considered) or whether or not the JSAP is designed to collect data to support only the alternatives already discussed and being considered.

This is not a simple issue of semantics. The CAG needs to know whether or not any remedial alternatives are equally viable (including alternatives not considered in discussions with EPA and MDEQ) until the results of this sampling plan are known or if the field of alternative choices is narrowed to the point at which the JSAP is merely facilitating the selection of one alternative already considered over another.

Again, I want to thank the U.S. EPA and CH2MHill for embarking on this data gap investigation in order to support a truly successful remedial alternative. I would ask that the U.S. EPA and CH2MHill be diligent about updating the TAG and CAG on the progress of this study and that you remain open to comments and ideas as the JSAP progresses. Thank you again.

Sincerely,

Murray C. Borrello, Chair, Technical Advisory Committee
Pine River Superfund Citizen Task Force

Cc: Theo Von Wallmenich, CH2MHill
Senator Carl Levin
Senator Debbie Stabenow
Governor Jennifer Granholm
U.S. Representative Dave Camp
Michigan State Senator Mike Goschka
Michigan State Representative Scott Hummel
City Manager, St. Louis, Dennis Collison
MDEQ Director, Steve Chester