

Sager, John E

From: Mould.Kevin@epamail.epa.gov(SMTP:Mould.Kevin@epamail.epa.gov)
Sent: Tuesday, January 04, 2000 4:35 PM
To: PETERSON.JON@EPAMAIL.EPA.GOV
Subject: Better Brite

Comments on Better Brite PCOR:

In the CERCLIS database, this site shows two RODS (OU1 on 9/24/96, and OU2 on 6/28/91). The PCOR only discusses the OU1 ROD. It should include a discussion of the components of the earlier ROD and the construction activities.

What are the cleanup goals (or containment goal) for the groundwater? How long do we expect to pump/treat and monitor the groundwater at the two sites?

Are there institutional controls restricting site use or groundwater use?

?Activities and Schedule for Site Completion? needs to include the dates of milestones to get to site deletion: such as Final RA report, approval of O&M plan, FCOR, achievement of cleanup goals, deletion date. And who (EPA, state or prp) is responsible for each milestone.

The 5 year review should be scheduled for 5 years after the beginning of on-site remedial work. If the earlier ROD included remedial construction, then the first 5 year review is probably already overdue.

Sager, John E

From: Sager, John E
Sent: Wednesday, January 05, 2000 8:38 AM
To: 'peterson.jon@epamail.epa.gov'
Subject: FW: Better Brite PCOR

Hi Jon,

I have a few questions about these comments maybe you can help me with. I put my questions in blue.

Comments on Better Brite PCOR:

In the CERCLIS database, this site shows two RODS (OU1 on 9/24/96, and OU2 on 6/28/91). The PCOR only discusses the OU1 ROD. It should include a discussion of the components of the earlier ROD and the construction activities.

I was under the impression that the work done at the site in the early 1990s was a removal action and the pump and treat systems were installed as part of the removal action. Are you sure that this PCOR should include the work that was done in 1992???? If so, how detailed does it have to be???

What are the cleanup goals (or containment goal) for the groundwater? How long do we expect to pump/treat and monitor the groundwater at the two sites?

Is it OK to put 30 years as the time for pump and treat? HSI estimates that it will take longer but it is difficult to estimate past 30 years. This information was not in the sample PCORs that I received from you so I did not include it in this one.

Are there institutional controls restricting site use or groundwater use?

Not yet.....I will add something stating this

?Activities and Schedule for Site Completion? needs to include the dates of milestones to get to site deletion: such as Final RA report, approval of O&M plan, FCOR, achievement of cleanup goals, deletion date. And who (EPA, state or prp) is responsible for each milestone.

This was not included in the sample PCORs either. I believe that WI takes financial control of the site after one year past the construction activities. As far as the other comments. If we are essentially going to be pumping groundwater for the foreseeable future and monitoring the groundwater for years, how do I estimate a date for these milestones????

The 5 year review should be scheduled for 5 years after the beginning of on-site remedial work. If the earlier ROD included remedial construction, then the first 5 year review is probably already overdue.

You know the details behind this one. The 5 year review for the work done prior to this year was just completed. so I put the next review to be completed five years from now. Is this correct???