



January 29, 2016

Ms. Shelly Lam, LPG
On-Scene Coordinator
United States Environmental Protection Agency, Region 5
Emergency Response Branch #1
2525 N. Shadeland Avenue, Suite 100
Indianapolis, IN 46219

**RE: Additional Soil Borings-Excavation #1 Work Plan-Revised
Kokomo Dump Site
1130 South Dixon Road
Kokomo, Indiana 46901
U.S. EPA Site Spill ID #C564
SESCO Project #4108**

Dear Ms. Lam:

SESCO is pleased to submit this *Additional Soil Borings-Excavation #1 Work Plan* for your review for the above-referenced facility (hereafter referred to as the "Site"). This plan was requested by you during a telephone conversation on January 8, 2016.

Background

In accordance with the approved *Work Plan*, six (6) excavations were completed between August 31, 2015, and September 3, 2015. Confirmation soil samples were collected from each excavation and were submitted for laboratory analysis per the approved *Work Plan*. Due to an elevated benzo(a)pyrene concentration in soil sample KD-EXC-1-9 collected from Excavation #1 (see **Figure 1**), SESCO completed additional soil excavation and disposal of approximately four (4) tons of soil from Excavation #1 on November 17, 2015. Soil confirmation samples collected on November 17, 2015, indicated that benzo(a)pyrene in one (1) soil sample collected from the north side of the excavation exceeded the Indiana Department of Environmental Management (IDEM) Remediation Closure Guide (RCG) Industrial Direct Contact Screening Level (IDCSL), which is the approved soil cleanup criteria per the approved *Work Plan*.

Proposed Soil Boring Advancement

As discussed with the U.S. EPA On-Scene Coordinator (OSC), SESCO proposes to advance six (6) additional soil borings north of Excavation #1, as depicted on **Figure 1**. The goal of the soil borings will be to delineate the extent of benzo(a)pyrene impacts in soil. The borings will be stepped out 20 feet to the north in a series of two (2) borings per step-out. The borings will be advanced with a direct-push drilling rig to a depth of two (2) feet below ground surface (bgs) using

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procedures set forth in Section 3.3.6 of the approved *Work Plan*. One (1) soil sample will be collected from each boring at one (1) foot bgs. Each soil sample will be field screened with a flame ionization detector (FID) to detect the presence of Semi-Volatile Organic Compounds (SVOCs).

Soil Sample Analysis

Soil samples will be placed into laboratory-supplied sample containers. The samples will be packed in an iced cooler, maintained at a maximum of 4°C, and submitted, with appropriate chain-of-custody documentation, to Pace Analytical Services, Inc. (Pace) for analysis of the following constituents. One (1) duplicate and one (1) matrix spike/matrix spike duplicate (MS/MSD) soil sample, and one (1) equipment blank (water sample) will be collected and submitted for analysis.

- Benzo(a)pyrene using U.S. EPA Method 8270

All collected soil samples will be submitted to the laboratory. The soil samples from the first two (2) borings located north of the excavation will be analyzed for benzo(a)pyrene. Upon receipt of those results, if the benzo(a)pyrene concentration in either sample exceeds the IDEM RCG IDCSL, then the next two (2) soil samples north will be analyzed for benzo(a)pyrene. This process will continue for the last set of soil samples, if needed. In the event that all three (3) sets of soil samples exceed the IDCSL, the soil data from soil boring KD-SS-02, located further north, will be utilized, indicating that the soil at that point does not exceed the IDCSL. It is anticipated that the soil data from the additional soil borings will be used as confirmation soil samples for future additional excavation work.

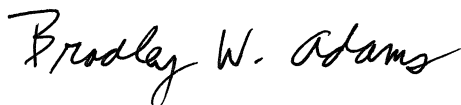
Upon receipt of laboratory analytical results, data will be evaluated and provided to the U.S. EPA for review. In addition, the laboratory data will undergo third party data validation.

Additional Soil Excavation & Disposal

Once the extent of benzo(a)pyrene impacts is known, SESCO will submit a subsequent work plan to the U.S. EPA to address the excavation and disposal of additional soil that exceeds the IDCSL.

If you have any questions regarding this work plan, please contact either of the following at (317) 347-9590.

Sincerely,
SESCO Group



Bradley W. Adams, CHMM #13162
Project Manager



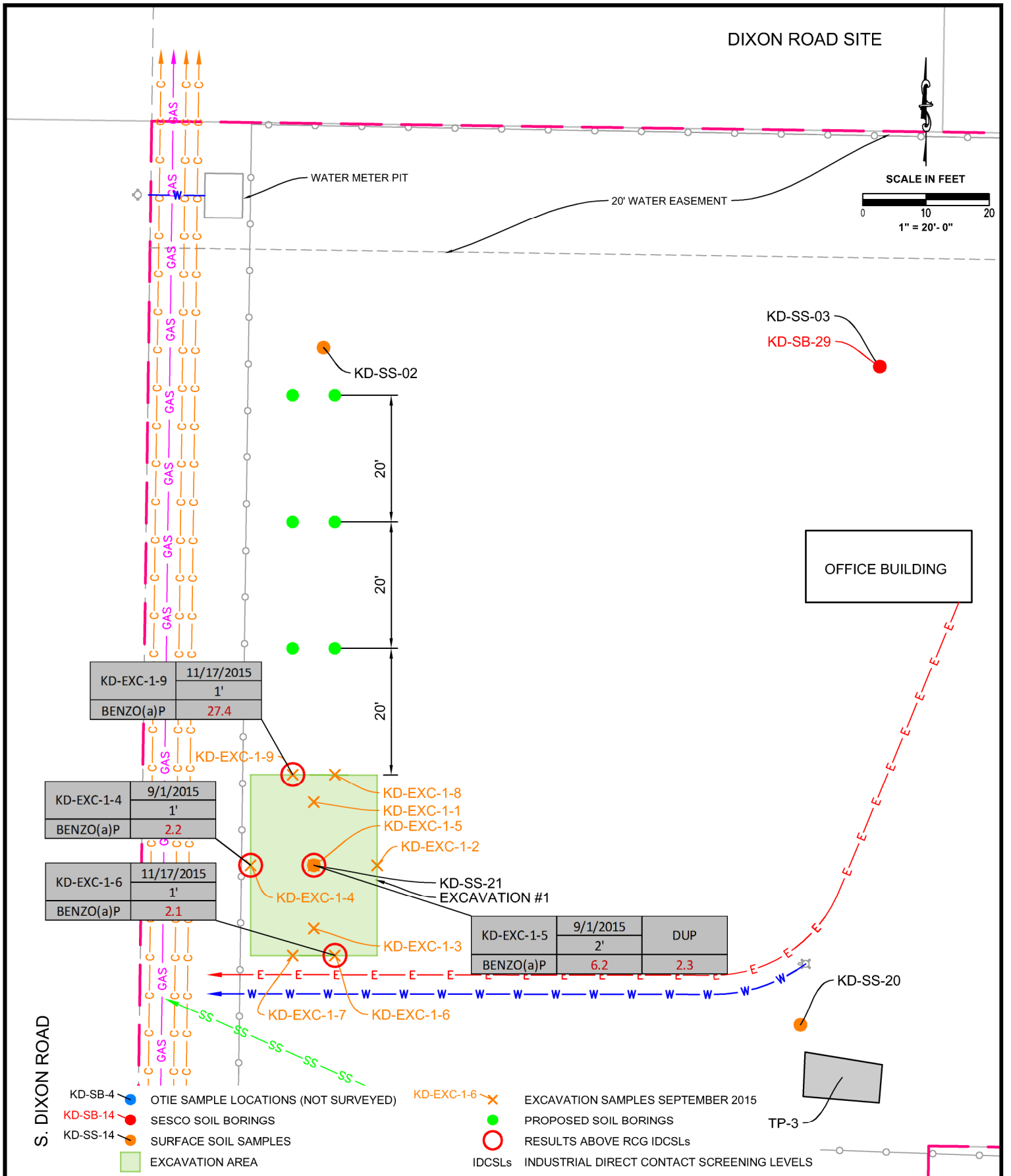
William D. Pickard, LPG #2141
Senior Project Manager

CC: Mr. David L. Guevara, Ph.D., Taft Stettinius & Hollister LLP
Project File

Figure 1

Proposed Soil Borings

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LEGEND

	APPROXIMATE PROPERTY BOUNDARY		COMMUNICATION LINE
	FENCE LINE		ELECTRIC LINE
	RIGHT OF WAY		GAS LINE
	FIRE HYDRANT		STORM SEWER LINE
	WATER SPIGOT		WATER LINE
	TEST PITS		TEST PITS

PROPOSED SOIL BORINGS	
KOKOMO DUMP SITE 1130 S. DIXON ROAD KOKOMO, INDIANA	
PROJECT # 4108	FIGURE # 1