

U.S. EPA Comments
Thornapple Valley (B5H4)
Summary Scope of Work – Environmental Investigation
9/10/2008

Overall Project

- 1) Transportation and Disposal of the roll-off boxes and frac tank must be completed by September 26, 2008. Copies of the manifests and/or bills of lading to be provided to U.S. EPA and MDEQ within 10 days of final disposal.
- 2) A revised Environmental Investigation (EI) plan must be submitted to MDEQ and U.S. EPA by September 26, 2008. Respondent Party (Fodale LLC) shall not proceed with the investigation activities until the revised EI plan is approved by U.S. EPA and MDEQ.
- 3) Following T&D of the roll-off boxes and frac tank and approval of the EI, MDEQ will oversee the investigation and contaminate removal. Your contact for this project is Jeff Lippert of the MDEQ (586) 753-3857. U.S. EPA is withholding issuance of an order in favor of MDEQ oversight.

Task 1: Pre Investigation Activities

- The document provided is a general scope of work outline. A summary of background information and rationale for sampling must be provided in the revised EI plan.

Task 2: Limited Phase II Subsurface Investigation

1. In addition to use of “historical aerial photographs,” current site conditions should be documented and included. Please provide the historical aerial photographs and a current staining map.
2. Taking into consideration comment 1, please provide a map showing the locations for proposed soil borings. Additional borings should be planned if the currently proposed borings do not define the extent of release.
3. The justification for a 4-foot maximum soil boring depth is not provided. The boring termination depth should extend through the visually impacted soil and be confirmed by analytical results.
4. Criteria for “potential laboratory analysis” are not defined. All samples should be sent for laboratory analysis or field screening for PCBs should be included in addition to the geologist’s examination and PID use. The rationale for selecting samples for analysis should be discussed. PID results are not an acceptable method for PCB field screening.
5. Laboratory Analyses: all laboratory-submitted samples should be analyzed for PCBs. Use of the PID should indicate sample to be submitted for VOC laboratory

analysis. In addition, a subset of samples, at a minimum, should include PNA and Michigan 10 Metals analysis.

6. Equipment Decontamination: please discuss disposal procedures for decontamination water and soil cuttings.
7. The HASP and QA/QC plan must be approved by MDEQ prior to initiation of the EI.
8. U.S. EPA or MDEQ may request or perform split sampling or confirmation sampling.

Task 3: Subsurface Investigation Summary Report

- Please provide regulatory criteria to compare results.
- The Summary Report must include the extent of contamination based on the field investigation; provisions for additional investigation, as necessary; the proposed approach for contaminant removal, and a schedule for completion of work. Removal of PCBs to below 1 ppm is required along with confirmation sampling. Other contaminant removal levels and confirmation sampling must be approved by Mr. Lippert. The Summary Report with proposed contaminant removal, confirmation sampling, and schedule must be approved by MDEQ.
- Within 60 days following completion of contaminate removal a final report with the results of the confirmation sampling must be submitted to MDEQ and U.S. EPA.

Schedule: Please provide specific dates.

If you have any questions about these comments, please contact me at (734) 740-9019.

Brian Kelly
U.S. EPA