

Jennifer Thies

From: Lagas, Phil [PLagas@brwncald.com]
Sent: Tuesday, December 30, 2008 1:47 PM
To: Jennifer Thies
Cc: Luke Narducci; Kevin C. Snyder; Pete Polean
Subject: Comments on the Draft Remedial Investigation Report, West Van Buren Area WQARF Registry Site

Jennifer:

Listed below are some comments on the Draft Remedial Investigation Report for the West Van Buren WQARF Registry Site dated October 2008.

Section 1.3.2.4, Page 1-7 and 1-8

1. The draft RI incorrectly states that Dolphin's manufacturing facility, including areas identified as Dolphin I, III, IV, VI, and VII, encompasses approximately 50 acres. The correct acreage for this area is approximately 13.5 acres. Please note that the building known as Dolphin IV was never used for manufacturing operations and was demolished several years ago. The areas identified as Dolphin I, III, VI, and VII consist of manufacturing facilities, offices, and warehouses. The vapor degreaser was a small unit inside one of the manufacturing buildings and was removed from the site in 1994 when Dolphin discontinued use of chlorinated solvents at the site. Two sewer interceptors were formerly used to remove solids from facility wastewater and were closed in the 1990's.
2. The draft RI incorrectly states that chromium was used in the investment casting process. Chromium is not a raw material used by Dolphin in its manufacturing process. Chromium is present in the steel used by Dolphin to manufacture its products.
3. The draft RI incorrectly states that the site contains 19 buildings that were constructed specifically for Dolphin's operations. Although the buildings have been expanded over the years, the site only contains 8 buildings some of which were constructed for Rueter Inc. (the original Dolphin I building) and George and Sons Steel (Dolphin III buildings).
4. The facility operating hours, shifts, and number of employees have varied over the years depending on production requirements. The facility is currently operating 2 shifts, 4 days per week and has approximately 160 employees.
5. The first complete sentence at the top of page 1-8 states that several historical releases of hazardous waste occurred at the site but specific documentation regarding

the releases had not been identified. Between 1992 and 2002, several investigations were conducted at the Dolphin facility to identify and characterize historical releases of hazardous substances. Those investigations identified 4 releases/source areas of hazardous substances - former drum storage areas at Dolphin I, former vapor degreaser at Dolphin I, former sewer interceptor at Dolphin III, and a liquid and sludge release at Dolphin III. Those investigations were conducted under the oversight of the hazardous waste unit at ADEQ. Reports describing the results of the investigations can be found in ADEQ's files. Please revise the sentence to more accurately describe the hazardous substance releases identified at Dolphin's facility.

Section 1.3.2.6, Page 1-14

6. This section of the draft RI report does not mention the work conducted by Dolphin at its facility under the WQARF program and the RCRA Consent Decree. The work included installation and testing of monitor wells, site investigations to identify and characterize potential releases of hazardous substances, and SVE and air sparging to remediate soil and groundwater. Descriptions provided under other facilities in this section include this type of information.

Table 2-3

7. What is the purpose of Table 2-3? The data presented is not complete even though the title of the table states that it is a summary of soil gas and soil samples collected at select facilities. Are you presenting only the highest concentrations of COCs detected at each facility? What is the purpose of the "bold" on some of the results? The table should be revised for clarity. In addition, the residential SRL (post 5/5/2007) should show the 10-5 risk value since the 10-6 risk value only applies to schools and day care centers and all of the facilities listed in the table are non-residential properties.

Sections 2.3 and 2.4

8. When comparing soil concentrations to the GPL in the text of the report, the work "minimum" should be added in front of "GPL" to avoid confusion with alternative depth-specific GPLs. The acronym "GPL" is first defined on page 2-13.

9. Reported concentrations of COCs in the draft RI are not consistently compared to the same regulatory standards. In some cases, they are compared to HBGLs (see page 2-20), minimum GPLs or pre-determined SRLs (residential or non-residential is not specified). Text should be added at the beginning of Section 2.0 describing the different regulatory standards, their significance in conducting characterization activities and establishing remediation goals, and how they are used. This could be accomplished by

moving the discussion of regulatory standards at the beginning of Section 4.0 to Section 2.0. Detected concentrations should be compared to predetermined, non-residential SRLs and minimum GPLs, not HBGLs. HBGLs should only be used if SRLs have not been established for a specific COC.

10. The draft RI reports the maximum concentration of COCs detected in soil gas, soil and groundwater sampling. The information would be more useful if the range of detected concentrations were reported for each COC in each media. Table 2-3 could be revised to include this information.

11. The text on page 2-21 and 2-22 and in Section 2.4.1.4, page 2-31 should include information on the significant reduction of VOC concentrations in groundwater at Dolphin as a result of the air sparging and soil vapor extraction activities. As a result of SVE/AS activities, PCE concentrations in UAU₁ have decreased from 95,000 ug/L to less than 15 ug/L within and downgradient from the VOC source areas. In addition, VOC concentrations in upgradient wells are equal to or higher than the concentrations detected in source area and on-site downgradient wells indicating that the SVE/AS has reduced VOC concentrations in UAU₁ to below background concentrations migrating onto Dolphin's facility from upgradient sources. Similar information is provided for the ALSCO facility in both Sections 2.3 and 2.4.

12. Air sparging should be added to the bullet list on page 2-22 of corrective actions taken at Dolphin for the following source areas: Former Drum Storage Areas; Former PCE Degreaser; and Drywell #1.

Figures 3-18, 3-27, 3-36

13. Groundwater elevation data for Dolphin's wells from the 1st quarter of 2008 should be added to Figures 3-18, 3-27, and 3-36 for the Final RI. These data were submitted to ADEQ in September 2008.

Section 4.1; page 4-2

14. Why are HBGLs used as standards for evaluating COCs? All of the COCs in the WVB area have SRLs which are established by rule.

15. As mentioned in the comments above, discussion regarding the identification of COCs and associated regulatory standards should be presented prior to the detailed discussion of facility investigations presented in Section 2.0.

16. The residential SRLs for the 10-5 and 10-6 risk levels should be presented in the

table of revised SRLs on page 4-2. Except for Cr+6, the 10⁻⁶ risk level values only apply to schools and day care centers. None of the facilities under investigation in the WVBA are schools or day care centers.

17. The information regarding maximum COC concentrations in soil gas, soil, and groundwater presented in Section 4.1 is repetitious with the information presented in Section 2.0 and should be deleted. It also does not acknowledge the remediation performed by several facilities which have significantly reduced the COC concentrations. A more balanced and complete presentation of the information is presented in Section 2.0.

Section 4.2

18. At the beginning of Section 4.2, the report should indicate that ADEQ is continuing to conduct a PRP search for the WVBA and may identify other sources of soil and groundwater contamination. As stated in Section 1.0, 145 facilities are currently under investigation and the final complete list of PRPs will not be finalized until the PRAP is issued by ADEQ. Otherwise, a reader could incorrectly conclude that the facilities discussed repeatedly in various sections of the report are the final list of PRPs for the WVBA.

Section 4.2.3.1

19. References to Figures 4-1 and 4-2 on pages 4-14 and 4-15 should be deleted because groundwater quality data for Dolphin's facility was not available until after 1993.

20. Groundwater quality data for Dolphin's wells for the first quarter of 2008 should be added to figures 4-11, 4-12, and 4-13 for the Final RI.

21. Dolphin has no records indicating that it used TCE, 1,1-DCE, or cis-1,2-DCE in its manufacturing processes. Although these compounds may have been present in small quantities in the PCE purchased by Dolphin for use at the facility, the presence of these compounds in soil and groundwater is probably the result of degradation of PCE.

Figures 4-11 through 4-13, 4-22 through 4-24, and 4-33 through 4-35

22. Groundwater quality data for Dolphin's wells from the 1st quarter of 2008 should be added to the figures listed above for the Final RI.

Appendix D - Dolphin Inc.

23. The maps and laboratory reports presented in Appendix D for Dolphin are very limited, both in scope and time. Much more information is readily available in the reports submitted to ADEQ over the last 15 years. What is the purpose of providing this limited information in an Appendix to the RI? What criteria were used to determine which information should be included in the Appendix? Similar to all the other data available for the site, it seems more appropriate to reference the information in the reference list and indicate that the reports and data are available in ADEQ's files. I did not review the information in Appendices A through C and E through I but I suspect this comment would apply to those appendices as well. If the purpose is to provide a quick reference list of facility specific information, then a complete list of facility specific records and reports could be included for each facility instead of limited, random data pulled from the files or reports.

Give me a call if you have any questions or need clarification on any of my comments.

Thanks
Phil

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