

Mary Siders

From: Randy L. Jackson [rljackson@dcimg.com]
Sent: Thursday, November 02, 2006 6:24 AM
To: Mary Siders; Scott_Ball@URSCorp.com
Cc: Dennis_Connair@URSCorp.com; Greg Lovato
Subject: RE: Source Removal CAP

Mary,

We did have a call yesterday to try and address the confusion around the soil disposal limits and to determine how to move forward with the CAP in light of the possibility for excavation being feasible. I had intended for Scott to call you today to discuss but his email and your response is helpful in that regard.

You had also asked about our obligation to a former owner at this site. The owner who sold the property to the school district (a trust) discovered the contamination. We went through a lengthy legal process to work out a settlement with them. That agreement requires us to allow them to review and comment on our proposed remedial plans. They have ten days to do so from the time we provide the plans and have been pretty cooperative in the past.

As for the Commercial Development deal, we have heard nothing. That is what we were waiting on this year in case a deal would be struck where they potentially take over the remedial effort. It doesn't look like that is going anywhere, although the building was removed as discussed in our original meeting.

I appreciate your assistance at this site and we will be in contact as we move forward.

Regards,

Randall L. Jackson, R.G, CHMM (Randy)
Health, Safety & Environmental Director
DCI Management Group, Ltd.
Phone/Fax (913) 671-8405

-----Original Message-----

From: Mary Siders [mailto:msiders@ndep.nv.gov]
Sent: Wednesday, November 01, 2006 6:45 PM
To: Scott_Ball@URSCorp.com
Cc: Randy L. Jackson; Dennis_Connair@URSCorp.com; Greg Lovato
Subject: RE: Source Removal CAP

Scott,

It seems that your e-mail below was intended for Randy and Dennis, but it was sent only to me. My expectation is that the CAP will delineate the excavation (or treatment) area based on existing data, with proposed additional sampling required to fill data gaps. There is also an expectation that the CAP will include some provision for confirmation sampling or monitoring. I realize that costs and designs can only be approximate at this point, and that the extent of the excavation will only be known exactly by confirmation samples collected during the actual excavation. Please note that the NDEP did specify that the 100 ug/kg was an interim cleanup goal that may be adjusted based on a cost/benefit analysis.

Because DCI does not have unlimited funds for remediation, I feel it is important that the CAP have at least an approximation of the costs for alternative remedies. DCI seems to have been given some misinformation about land disposal restrictions and the universal treatment standard

(UTS) for PCE-contaminated soils. Section 268.48 provides 6,000 ppb (6 ng/kg) as the UTS for PCE waste (F002), with Section 268.49 providing a basis for alternative LDR treatment standards of as much as 10 times the UTS (i.e., 60 mg/kg or 60,000 ppb). Please take another look at these sections in the regulations.

Finally, if you again read my letter of October 9, you will see that the second bullet at

the bottom of the first page calls for figures and cross sections depicting "additional proposed borings" (these are needed to fill data gaps) and "the areal extent and depth of proposed cleanup activities" (that is, the approximate extent of the excavation or treatment area).

Mary

-----Original Message-----

From: Scott_Ball@URSCorp.com [mailto:Scott_Ball@URSCorp.com]
Sent: Wednesday, November 01, 2006 4:04 PM
To: Mary Siders
Subject: Re: Source Removal CAP

Randy and Dennis -

NDEP's letter for MS dated October 9, 2006 indicated that the additional soil evaluation at the former building location should be included in the CAP for the site. This is how we had agreed that it would be done.

Mary's email below from today seems to indicate that she is still expecting that the CAP has the additional soil sampling included in it and that it will contain info on excavation limits and remedial alternative cost (ie. excavation vs AS/SVE).

We had talked on the phone that I should email her regarding performing the soil testing first then preparing the CAP after completion of the additional assessment. I think that Dennis said that he thought her email seemed to indicate that she thought that we should do the soil assessment first but, that's not how I read what she sent. Please take another look at it again and tell me how you read her email. Then I'll send her a note tomorrow. Thanks!

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"Mary Siders"

<msiders@ndep.nv.

gov>

To

"Randy L. Jackson"

11/01/2006 12:37

<rljackson@dcimg.com>

PM

<Scott_Ball@URSCorp.com>,

<Dennis_Connair@URSCorp.com>, "Greg
Lovato" <glovato@ndep.nv.gov>

Subject

CAP

Randy,

I also meant to ask about progress on the work plan for soil gas sampling.
You'll need to evaluate the merits of active versus passive soil gas sampling, based on attributes of the site.

The objectives of a Corrective Action Plan (CAP) are to clearly communicate the basis and details of a proposed cleanup strategy such that the NDEP can evaluate the technical feasibility of the plan, effectiveness of the engineering design, reasonable cost, and above all, protection of human health and the environment. The CAP must be specific, not just a general overview of technologies (as was the case for the 12-27-05 URS letter to the NDEP). A "plan" such as the December 27, 2005 letter is not acceptable. The NDEP expects the CAP to contain site-specific calculations, scaled maps, and cross sections. Scaled maps and cross sections should post the concentrations of PCE and show the locations (or proposed locations) of borings, wells, and excavation limits. Estimated costs for the remedial alternatives (e.g., excavation versus AS/SVE), along with a schedule of implementation and reporting, should be provided in the CAP. The CAP should also indicate how performance of the remedy will be assessed to assure that target remediation goals are met (e.g., monitoring, confirmation sampling, etc.).

Mary

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