

Baran, Cynthia (DEP)

From: Baran, Cynthia (DEP)
Sent: Thursday, July 01, 2004 4:28 PM
To: 'James J. Decoulos'
Cc: Hobill, Jonathan (DEP)
Subject: Eagle Gas Station, Carver RTN: 4-17582 IRA Plan Modification Denial

The purpose of this e-mail is to document our discussions on June 21, 2004 and on June 29 and 30, 2004 regarding the proposed IRA Plan Modification for Eagle Gas Station in Carver. The IRA Plan Modification for RTN: 4-17582 prepared by Decoulos & Company dated June 15, 2004 and received at DEP on June 17, 2004 is denied for the following reasons:

1. The IRA Plan Modification does not contain sufficient supporting documentation to demonstrate the efficacy of contaminant removal capabilities of the proposed passive recovery system.
2. The extent of NAPL is not fully delineated and the IRA Plan Modification does not provide sufficient information to demonstrate that the proposed passive collection system with a one-half gallon storage capacity that must be emptied manually provides sufficient NAPL recovery or storage capacity for the NAPL present at the site.
3. The proposed gravel interceptor trench does not include an impervious barrier on the downgradient end of the trench to prevent migration to the storm water drainage system nor does it include an active recovery/pumping component that could provide hydraulic control. The gravel trench as proposed has the potential to create a preferential migration pathway for contaminant flow off site toward/along the storm water drainage system and may exacerbate existing site conditions.
4. Past history of NAPL recovery via hand bailing monitoring well BP-5RR, as documented in the IRA Status Report, was not performed on a routine basis and did not control the migration of NAPL as evidenced by the recent detection of NAPL at monitoring well DCW-1.
5. The proposed operator of the passive recovery system does not have the appropriate health and safety training.
6. The proposed IRA Plan Modification does not include a monitoring plan to monitor and verify the effectiveness of the NAPL recovery system in controlling the off-site migration of NAPL.
7. An active NAPL recovery system was required in the field Notice of Responsibility dated 5/16/03 and has yet to be implemented.