From: Beard, Scott
To: Jeff Woelfer

Cc: GUERRETTAZ, JOHN; WORKMAN, JEFF; McCormick, Debra J

Subject: USS Lead//IND047030226//USS Lead - IDEM Comment Letter - Second Biannual 2023

Date: Tuesday, June 25, 2024 8:51:34 AM

Attachments: image001.pnq

image002.png

USS Lead - IDEM Comment Letter - Second Biannual 2023 – June 24, 2024 Document VFC # Pending

USS Lead

East Chicago, Lake County HW Program ID: IND047030226

Good morning Mr. Woelfer,

I reviewed the *USS Lead - IDEM Comment Letter - Second Biannual 2023* (email) dated June 24, 2024. You submitted the email on behalf of the facility on June 24, 2024. The email documents two questions regarding our letter dated June 19, 2024 (VFC # 83655535). I have included your questions in italics followed by my response.

1. Regarding the Arsenic issue at MW-7, you mentioned at end of the second paragraph of the second bullet that, "an additional source investigation appears warranted". The USEPA, as part of the Superfund work at the site, conducted a soil investigation a couple of years ago around MW-7 and did find evidence of elevated Arsenic in the soils in this area. I believe they are planning to do additional work in this area. Is your statement asking us to conduct a further source investigation in addition to what the USEPA has done or is planning to do?

At this time, since it appears the U.S. Environmental Protection Agency (U.S. EPA) is planning to conduct further work in the area near MW-7, the facility does not need to conduct an additional source investigation in addition to the U.S. EPA's work. However, the facility should include status updates on the U.S. EPA's work around MW-7 in future semiannual reports.

2. (...). We are planning to do the next biannual sampling event soon, so I don't mind sampling both wells (MW-9 and MW-10) for volatiles. I had planned to conduct the biannual sampling at the end of this week, but I have run into a scheduling problem. I would like to conduct the sampling the week of July 15. This a bit later than usual, so I wanted to let you know and make sure you have no concerns with this. I will make sure the following report will not be delayed.

At this time, we do not have any concerns regarding the facility conducting the semiannual groundwater sampling event the week of July 15, 2024. Of note, Condition IV.D of the Post-Closure Permit (Permit) dated April 12, 2024 (VFC # 83623777), states, "Semiannual groundwater monitoring must occur during the

Spring and Fall of each year with scheduled semiannual sampling events occurring no less than five or no more than seven months apart." Therefore, since the previous semiannual groundwater sampling event took place in December 2023, the July 2024 proposed groundwater sampling event follows the Permit as it is within seven (7) months of the last semiannual groundwater sampling event.

Additionally, we agree with the proposal to sample both MW-9 and MW-10 for the volatile organic compounds during the July 2024 sampling event.

If you would like to discuss further, please feel free to contact me.

Thank you for your continued compliance.

Sincerely,



Scott Beard Geologist 2 Geology Section - Permits Branch Office of Land Quality

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https://www.in.gov/idem/waste/

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Geology Task ID # 47244