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Subject: Arvin Industries, Site # 0000783, RTE # 2318-19-C  
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Initial Site Investigation Work Plan, dated April 16, 2019  
Arvin Industries  
Site # 0000783  
Franklin, Johnson County  
VFC # 82756917

### **Comments**

The requested review of the Initial Site Investigation Work Plan, prepared by Arcadis and received by Chemistry Services on April 17, 2019, has been completed. The following was noted.

The consultant has indicated that subsurface soil samples from eight locations will be collected via EPA Method 5035. The sampling depths will be based on field screenings. It is recommended that soil sampling be conducted in accordance with EPA Method 5035A which requires the sample to be placed in sample container immediately upon retrieval. Soil samples will be analyzed for VOCs by EPA Method 8260. The analytical method is acceptable.

The consultant has proposed to collect up to three groundwater VAP samples from each boring to assess shallow groundwater conditions. The VAP groundwater wells will be purged/developed with tubing and either a check valve assembly or peristaltic pump. The water quality parameters will be collected via a flow-through cell. The report is not clear if low-flow sampling techniques or grab sampling techniques will be utilized. Clarification should be provided. The groundwater samples will be analyzed for VOCs by EPA Method 8260, which is acceptable.

The Standard Operating Procedures (SOPs) and Technical Guidance Instructions were provided for Sample Chain-of-Custody, Groundwater and Soil Sampling Equipment Decontamination, Investigation-Derived Waste Handling and Storage, Soil Description, Low-Flow Groundwater Purging and Sampling Procedures for Monitoring Wells, and Technical Guidance Instructions – Vertical Aquifer Profiling (VAP) and were found to be acceptable. It should be noted that the SOPs for soil sampling were not provided and should be provided and/or clarification on how soil samples will be collected provided before conducting the sampling.

The consultant has also indicated that a preferential pathway assessment will be performed that will include the location of current and former utilities. The preferential pathway assessment appears acceptable and other technical staff should be consulted for concurrence.

*Peer Reviewed By: Jim Risch, April 23, 2019*

Kristy McIntire  
OLQ Chemistry Services Section

This document reflects the opinions of technical staff based on information presented in the report under review addressing the condition of the site, including other relevant information available at the time of the investigation. It is intended for use in agency decision making and does not contain final determinations regarding potential remedial actions. Information in subsequent tech memos may diverge from information contained in this document based on changing site conditions or the discovery of additional relevant information.