From:	Taylor, Al (DEQ)
To:	Lucas, Steve (C) (CLucas2@dow.com); Crook, Marty (MD) (MDCrook@dow.com)
Cc:	Montgomery, Delores (DEQ); MacKenzie-Taylor, Deb (DEQ); Ostaszewski, Arthur (DEQ); Howe, Cheryl (DEQ); Artz Patton, Helen (helen.artz.patton@urs.com); Greg Rudloff (RUDLOFF.GREGORY@EPAMAIL.EPA.GOV); Himich, Virginia (DEQ)
Subject:	Revised 2013 Midland Area Soils Work Plan & Adaptive Management Report & QAPP
Date:	Wednesday, May 01, 2013 3:58:00 PM

Marty and Steve –

We have completed a review of the above-referenced documents that were on submitted April 26, 2013, and are providing the following comments/changes that are necessary for our approval without modifications. If these relatively minor issues can be addressed by Friday at noon, we should be able to issue a simple approval.

1) Please provide a copy of the revised property owner access agreement and questionnaire.

2) Please provide a copy of the revised individual sampling plans.

3) On further review, we are recommending that Parcel 14-23-30-404 (2504 Parsons Court and 310 Sam Street) be split into two DUs. I had previously indicated to Marty that it could be one decision unit based on size (1.05 acres), but in review of the plan we noted that it could easily be split into two parcels for development.

4) In the last paragraph of page 14, please strike **"(10 ppt less than action level)."**

5) In the first paragraph of page 16, please change the second to last sentence to read "**Additionally, the lower bound of the decision rule (220 ppt TEQ) is significantly higher than the TEQ background value."**

6) With respect to Section 5.0 of Attachment B (regarding the potential appropriateness of a 260 ppt TEQ lower bound), we think it is also important to note that if the 2013 early kickoff data is included in the evaluation and the fast analysis result is compared to the 1613b 95% UCL values, then there are four properties that were below 250 ppt via fast analysis but are over 250 ppt when the 1613b 95% UCL was calculated. We know that Dow is not proposing 260 ppt in this work plan for other reasons; however, we want to make sure you understand the Agency's position on this issue.

7) In Table 2-1 of the QAPP (page 7), Footnote C needs to be revised to indicate that the second column confirmation step is now optional.

If you should have any questions regarding these comments, please contact me.

Allan B. Taylor
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