



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
61 Forsyth Street
Atlanta, Georgia 30303-3104**

January 18, 2018
Mr. James Erickson, P.G.
Vice President
Principal Hydrogeologist
Tetra Tech
1100 S. McCaslin Blvd, Suite 150
Superior, CO 80027

Re: October 18, 2017, Phase II Results for the Former South Lagoon
Preliminary Design and Design Investigation Workplan Implementation
Document

Dear Mr. Erickson:

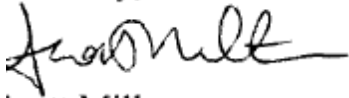
Thank you for the "Phase II Results for the Former South Lagoon
Preliminary Design and Design Investigation Workplan Implementation" dated October
18, 2017.

EPA's comments on the document are as follows:

1. We request that Tetra Tech produce maps for the Surficial and for the UHG illustrating the extent of Category 3 (residual DNAPL impacts) for both the Former Process Area and for the Former South Lagoon. Maps in the documents relating to these source areas show impacts above Category 3.6. The extent of residual impacts is general information that should be known.
2. Tetra Tech should include a table and histogram of DNAPL recovery data for the Former South Lagoon, and ongoing future South Lagoon DNAPL recovery reporting should be included in the monthly status reports.
3. We believe it would be prudent to treat all of the area within the 240N 189E / 340N 100E area within the red circle in the attached figure. The three areas interpreted by the EVS model as isolated DNAPL bodies – may actually be one continuous DNAPL mass. EPA specifically proposes one or more injection points between SL- 139, SL- 140, and SL- 155, between SL- 126 and SL- 127, and between SL- 175 and SL- 176.
4. We would appreciate your thorough consideration of the January 17th request to expand injections that was received from the GRU groundwater consultants.

We look forward to working with you on Workplan implementation.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Miller". The signature is fluid and cursive, with a long horizontal stroke at the end.

Scott Miller

Remedial Project Manager

U.S. Environmental Protection Agency