

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

SUBJECT: Review of ICIAP Draft Work Plan **DATE: 05/15/2014**
Cooper Industries, LLC. Earlysville, VA –
VAD 023717853

FROM: Michael P. Cramer
Environmental Scientist (3LC10)

TO: Donna Weiss
Associate Director (3LC10)
LCD OTAS

As requested, I have reviewed the subject work plan using the language provided in the email from Luis Pizarro dated 05/08/14 regarding Cooper LTS evaluation: The goal is to determine if based on your last visit and recent information request we can conduct and document an LTS evaluation that: (1) ensure that the engineering controls selected and implemented remain intact and undamaged; (2) verify that the use of the property has conformed to any applicable use restrictions; and (3) determine whether any potential IC or EC deficiencies have been identified and are being addressed in a timely manner. Luis wants me to review the Cooper response to EPA's request for a draft ICIAP work plan to determine if EPA can count the field events of November 2011, and the Cooper response, as an initial inspection under the LTS program.

1. The engineering controls at the facility include: recovery of groundwater and onsite treatment of plume constituents using ART wells and GAC canisters to reduce contaminants to cleanup levels required in the Consent Order. At the time of the inspection the engineering controls were operating as designed. The monitoring wells were photographed and issues such as faulty well casing locking mechanisms were noted at that time. There are currently six ART wells in place, and groundwater recovery from shallow and deep groundwater is ongoing.
2. Documentation provided in the draft ICIAP work plan indicates that the property has conformed to any applicable use restrictions.
3. As of this date, I have not identified IC or EC deficiencies, and the available information indicates that the remediation continues to adequately capture the plume and treat it to levels approaching the cleanup numbers provided in the Consent Order.

I have comments on the contents of the ICIAP draft workplan which I will address in a separate response to Cooper.

cc: Luis Pizarro (3LC20)



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