

Lilly

Eli Lilly and Company

Lilly Corporate Center
Indianapolis, Indiana 46285
(317) 276-2000

July 9, 1987

Mr. Joseph Dufficy
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Ms. Mary Tyson
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Mr. Timothy M. Conway
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Dear Messrs. Conway, Dufficy, and Ms. Tyson:

Pristine, Inc. Superfund Site
June 10, 1987 Meeting

Thank you for the opportunity for members of the Pristine generator/transporter group to meet with you and the other EPA Region V staff in Chicago on June 10th. The exchange of views is something we believe to be very beneficial to everyone and is something we hope can be continued in the future.

We appreciated having your views on the timetable for future activities at this site. We understand that you expect the Feasibility Study (FS) to be completed this fall, with special notice under Section 122 of CERCLA going out to known PRPs about the time the FS is released for public comment. We respectfully urge the EPA to issue the 122 Notice to PRPs 60 days after the final FS is issued. We believe that this period is absolutely essential in order for our Group to completely and efficiently resolve this matter. *

You also anticipate that a Record of Decision may be signed before the end of calendar year 1987. This means that our activities as a group must be focused quickly and that a viable working relationship with Region V must be established whereby pertinent and current information can be shared with each other.

EPA Region 5 Records Ctr.



223897

Pristine, Inc. Superfund Site
July 9, 1987

You indicated that you would be willing to consider any comments we might have concerning the technical data prepared by your consultant. We may well decide to take advantage of this opportunity to share our views with you on these matters, and we appreciate your willingness to consider them. In terms of receiving current status reports from your consultant as the consultant's work continues, it would be our preference that your consultant communicate directly with ours. Although you indicated that such an approach might not be feasible, we believe such an arrangement is necessary and ask that it be implemented if at all possible.

An acceptable alternative would be the approach suggested at our meeting by Bruce Jernigan, which has been implemented in other Regions. This approach involves the preparation by EPA and/or its consultant of periodic status reports or "Field Activities Memoranda" which would set forth pertinent technical data. (Attached are some examples.) Such documents would then be distributed to public repositories where they could be reviewed by the PRPs and other interested parties. Additional components of the process would consist of periodic meetings as milestones are achieved.

We believe that a process such as that described herein would be efficient and beneficial to the EPA, the Pristine Group, and other interested parties. A combination of timely memoranda, verbal communications and periodic meetings could achieve the goal of providing meaningful communication to the Group concerning the status and development of the RI/FS. Such communication would also be fully consistent with the policy most recently expressed in the February 12, 1987, memoranda by Messrs. Porter and Adams to Regional Administrators concerning the desirability of providing current and substantial information and data to the affected PRPs in order to facilitate successful settlement efforts.

It was also agreed that representatives of our group and/or our contractor could be present when future sampling is undertaken at the Pristine site and that we could receive split samples. This was conditioned on our agreement to furnish the EPA with the results of any analysis of our split samples and on proper health and safety training for our representatives who will visit the site. It was also agreed that when on-site activities are planned, Mary Tyson will provide advance notice to our technical representative, Gloria McKinley, in order that we may make arrangements to visit the site, so that we can have the opportunity to observe and split samples. Ms. McKinley can be reached at (513) 243-5194. If she is not available, would Ms. Tyson please telephone me at (317) 276-3095. If time permits Ms. Tyson to write Ms. McKinley, her address is:

General Electric Company
Mail Drop N123
Cincinnati, Ohio 45215

Pristine, Inc. Superfund Site
July 9, 1987

We also expressed our interest in ensuring that all potentially responsible parties are located and notified. A comparison of Pristine cash flow with the value of the equipment Pristine owned and the number of employees known to have been on Pristine's payroll indicates that substantial waste volume may be unaccounted for. If necessary, our group is willing to spend time and resources to find additional transporters and generators. You agreed to cooperate with us by explaining how you developed your present lists of PRPs. I appreciate very much Mr. Dufficy's taking the time to meet with me on this subject on June 18.

You also agreed that we could inspect and copy files listing PRPs if we present an appropriate Freedom of Information Act request. We will make that formal request this week. If we present sufficient reason to believe that a party was a generator or transporter, you agreed to consider sending the PRP a §104(e) notice or request for information under CERCLA. However, we should identify any such new PRPs to you prior to your sending the special notice under Section 122 as discussed above. You also indicated that you might try to obtain Dr. Kinman's tax returns. We would ask that you do so if possible.

* info request.

It was also agreed that an informational meeting as proposed in your letter of March 26 to Mr. Kim Burke would be a good idea. Such a meeting will probably be held in late July or early August. You would conduct a morning briefing session on the history and current status of the Pristine, Inc. site, and our group could then conduct an afternoon session on group activities. You suggested the meeting be in Chicago unless we felt there would be more participation in Cincinnati. We will get back to you again soon on this point.

As we stated at the meeting, we think it is very important for our group and EPA Region V to work closely together in the future and to have full and free exchange of views and information. Such a cooperative atmosphere is in keeping with guidance from EPA Headquarters and is the only way this matter can be resolved quickly and effectively.

Sincerely,

Donald L. Sullivan
Donald L. Sullivan
Chairman
Pristine Group Steering Committee

/bt

Enclosures

PHASE I FIELD
ACTIVITIES MEMORANDUM

VOLUME II
APPENDICES B, C, D, AND E

Sand Creek Industrial Site RI/FS

EPA Project No. 68-01-6939

Document No: 203-RI1-RT-CYGE-1

RECEIVED

JUL 30 1996

ENVIRONMENTAL REMEDIATION



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
ONE DENVER PLACE — 999 18TH STREET — SUITE 1300
DENVER, COLORADO 80202-2413

AUG 1 1986

MEMORANDUM

Addressees

TO: Elisabeth Evans *liz*
Remedial Project Manager

→ EPA RPA

SUBJECT: Phase II Well Drilling Program
Sand Creek Industrial Site

The purpose of this memo is to transmit Phase I correction sheets to you, propose well locations for the Phase II drilling program, and set up meeting time to discuss these proposed locations.

The two correction sheets were left out of your copies of the Phase I report. Please let me know if any other pages are missing.

The attached map shows the proposed locations for the Phase II well drilling program. The map indicates the number of wells at each location and the rationale for each well. We have put it together based on the Phase I data and the sample results we have received for ground water.

I would like to meet on August 15, 1986 to discuss your input to these proposed well locations. I have reserved the EPA 14th floor conference room on August 15, 1986, starting at 9 a.m. Please let me know if you will be able to attend this meeting.

Addressees: Chet Culley
Bruce Jernigan
Jack La Follette
Randy Matsushima
Ned Noack
Ken Conright
Chris Renda

PAP REPRESENTATIVES

RECEIVED

AUG 7 - 1986

→ STATE REP.

ENVIRONMENTAL REMEDIATION

→ PAP CONSULTANT

Closures

MEMORANDUM

TO: Elisabeth Evans

FROM: Roy Evans

DATE: July 30, 1986

PROJECT: EPA CONTRACT NO.: 68-01-6939

DOCUMENT NO.: 203-RI1-WM-DBLK-1

SUBJECT: Proposed Locations of Monitoring Wells for Phase 2 of the Remedial Investigation, Sand Creek (Colorado)

ACTION: Review and Forward to Potential Responsible Parties

The Phase 1 field work has been summarized in the Phase 1 Field Activities Memorandum, July 1985 (Document No. 203-RI1-RT-CYGE-1). After reviewing the available data from monitoring wells, borings, and surface soil samples, it was determined that additional monitoring wells are necessary. This additional data is necessary in order to more clearly define the ground-water flow systems, to delineate the horizontal and vertical extent of contamination, and to aid in determining the source of contamination.

The proposed locations for 13 additional ground-water monitoring wells are shown in Figure 1. The base map for this figure is Plate A-7 of the Phase 1 Field Activities Memorandum mentioned above. Four of the wells are nested (with two completions), while the remainder are single completions. Water chemistry data from Phase 1 sampling has not yet been validated and bedrock well data is not yet available from the laboratory. Consequently, the number and locations of proposed wells may be modified if warranted by additional chemical data. Also, wells #18A and #20A are optional at present. The EPA Region VIII Field Investigation Team may drill well #18A, and Well #20A may not be necessary (depending on chemical data from nearby wells, which is not currently available).

Table 1 lists the proposed wells, their estimated depths, and the corresponding water-bearing unit. As described in the Field Activities Memorandum, it was possible to establish the following distinct water-bearing units: the Piney Creek Alluvium, the Older Alluvium (Upper Section), the Older Alluvium (Lower Section), and the the Bedrock aquifer.

The rationale for drilling the wells listed in Table 1 is given below.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
ONE DENVER PLACE — 999 18TH STREET — SUITE 1300
DENVER, COLORADO 80202-2413

AGENDA

SAND CREEK PHASE II DRILLING PROGRAM August 15, 1986

Introduction

Phase I presentation

- report summary
- piezometric maps
- quality maps

Phase II proposed well locations

Discussion

AGENDA FOR MEETING BETWEEN PRPS
EPA AND CONSULTANTS TO PRESENT PHAS
RI RESULTS AND DEVELOPE PHASE II
RI SCOPE OF WORK.

PRP
CONSULTANTS

MEMORANDUM

TO: EPA, ERT, and HydroSearch

FROM: Roy Evans, CDM — EPA CONSULTANTS

DATE: August 6, 1986

SUBJECT: 8-5-86 Water Level Results

Enclosed are the results of the 8-5-86 Sand Creek water level sampling effort. If there are any errors in comparing these tables with your records, please let us know.