



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
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NOV 24 2010

MEMORANDUM

SUBJECT: EPA Should Improve Oversight of Long-Term Monitoring at
PAB Oil and Chemical Services, Inc. Superfund Site in Louisiana
Report No. 10-P-0229

FROM: Al Armendariz
Regional Administrator

A handwritten signature in black ink, appearing to read "Al Armendariz", written over the printed name.

TO: Arthur A. Elkins, Jr.
Inspector General

On September 21, 2010, you provided me with the subject report which concludes the U.S. Environmental Protection Agency (EPA) should improve oversight of long-term monitoring at the PAB Oil and Chemical Services, Inc. (PAB) Superfund site in Abbeville, Louisiana.

EPA continues to seek ways to improve its oversight of remedial activities at all of its Superfund sites, and certainly our coordination and discussion over the past couple of years concerning the PAB Oil site has assisted us in this endeavor. While we respectfully disagree with the tone of the report, we appreciate your agreement with our conclusion that the monitoring data issues did not affect the protectiveness finding of the remedy.

We acknowledge the recommendations in your report and look forward to working with you to resolve these concerns regarding the long-term monitoring data issues at the site.

Attachment

Region 6 Response to the Office of Inspector General's (OIG) Final Report on the Long-Term Oversight Monitoring at the PAB Oil Superfund Site

This document transmits the Region 6 response and comments on the OIG's Final Evaluation Report on the EPA oversight of long-term monitoring at PAB Oil and Chemical Services, Inc. Superfund Site in Abbeville, Louisiana. The EPA notes the OIG determined the oversight issues it identified at the PAB site did not affect the EPA's remedy protectiveness determination.

Region 6 would like to offer comments on the recommendations that you raised in your evaluation.

Region 6 Response

Recommendation 2-1: Issue an addendum to the 2007 Five Year Review identifying the invalid data in the PAB site records, addressing how the invalid data affects the Region's protectiveness determination, and establishing the valid ground water level and ground water quality records for PAB.

Narrative Response: The EPA has initiated activities to address this recommendation. On May 5, 2010, the EPA transmitted comments to the PAB Group concerning the 2010 Annual Inspection Report and historical water level observations. On July 26, 2010, the EPA received responses to its comments from the PAB Group which included revised piezometric maps for all ground water monitoring events since 1991. All of the revised piezometric maps use only valid ground water elevation data and conform to the conceptual model of ground water conditions at the site (ground water flow is uniformly towards the north/northwest). This information will be incorporated into an addendum to the 2007 Five Year Review which is anticipated to be completed by March 30, 2011.

Recommendation 2-2: Modify the long-term monitoring plan for PAB to include procedures that ensure the Region and the responsible parties collect and report valid information on site ground water level and ground water quality conditions.

Narrative Response: The EPA has completed the necessary activities to resolve this recommendation. In early October 2010, the EPA contacted the PAB Group and discussed the issues of concern from the OIG Report. The EPA then sent comments on October 18, 2010, to the PAB Group concerning necessary revisions to the Operations and Maintenance Plan (O&M Plan). The PAB Group transmitted a Revised O&M Plan to the EPA on November 8, 2010, which addressed all of EPA's comments. The EPA approved the Revised O&M Plan on November 16, 2010.