



Remedial Investigation and Feasibility Study Work Plan

Introduction

Northern Indiana Public Service Company (NIPSCO) and Brown Inc. (Brown) are conducting an investigation of the nature and occurrence of coal combustion by-products in the Area of Investigation, which is located in the vicinity of the Town of Pines, Indiana. This investigation is being conducted under a Consent Order these parties signed with the US Environmental Protection Agency (USEPA). Under the Order, NIPSCO and Brown are responsible for developing the project work plans and implementing the work, and USEPA is responsible for overseeing the work.

Recently, NIPSCO and Brown provided the USEPA a draft Work Plan for this investigation. This *Pines Update* identifies the steps of the investigation process, provides a summary of the results of the first step of the process, and provides an overview of the Work Plan.

What are the steps in the investigation process?

The steps in the investigation process (as required by the Administrative Order on Consent signed by USEPA, NIPSCO, and Brown) are:

Step 1 - Site Management Strategy – This document provides a summary of available historic and public information about the area that will be investigated, and describes some specific approaches

to evaluating the environmental conditions in the Area of Investigation.

Step 2 - Remedial Investigation/ Feasibility Study Work Plan and Field Sampling Plan – This Work Plan is the subject of this update.

Step 3 - Remedial Investigation – This is the phase of the investigation when samples are collected and analyzed.

Step 4 - Remedial Investigation Report – This report presents, analyzes, and interprets the data collected during the Remedial Investigation.

Step 5 - Human Health and Ecological Risk Assessment Reports– These reports present the analysis of potential risks to human health and the environment based on the information in the Remedial Investigation Report.

Step 6 - Feasibility Study Report – This report identifies and evaluates potential remedial actions for areas where risks above target risk levels may be identified in the Risk Assessment Reports.

What is the Site Management Strategy – what is the status of that step?

The Site Management Strategy was the subject of a previous update (*Pines Update* No. 2, available at www.pinesupdate.com). A draft of this document was submitted to USEPA in June 2004 and the final version was submitted in January 2005. Based on available information, the Site Management Strategy includes a description of:

- the geology of the area (what type of soil and rock is present in the area),
- the hydrogeology (where the groundwater is located and in what direction is it moving),
- the possible sources of coal combustion by-product related constituents (including boron and molybdenum) in the area (including natural sources),
- potential ecological receptors (what environments or animals are relevant to the investigation), and
- potential human receptor populations (what populations and activities may occur in the Area of Investigation).

The Site Management Strategy also discusses the approach for investigations and assessments of the area.

What is the Remedial Investigation and Feasibility Study Work Plan?

This Work Plan presents the approach and specific details for conducting the Remedial Investigation



and Feasibility Study for the Area of Investigation. The Work Plan specifies the data that will be collected and how the data will be evaluated.

The Work Plan consists of seven volumes, each of which addresses a different aspect of the work to be performed.

Volume 1 - Work Plan Overview.

This volume provides a general overview of the Work Plan and its contents. It also provides detailed information on the organization of the Work Plan; a summary of the Site Management Strategy; an overview of the approach to the investigation; a schedule for the investigation reports; and the project organization and management structure.

Volume 2 - Field Sampling Plan.

The Field Sampling Plan presents a detailed description of the field activities planned as a part of the Remedial Investigation, including samples to be collected and analyses to be performed.

Volume 3 - Quality Assurance

Project Plan. This plan describes the quality assurance methods that will be used for all sample collection, sample analyses, and data handling activities during the investigation. This plan also specifies the data quality criteria for the investigation (*see text box*). Only very high quality data will be

What are Data Quality Objectives?

Only very high quality data will be used for the Pines Area of Investigation.

Data quality objectives are qualitative and quantitative criteria that should be met. These criteria are established so that data of sufficient quality are obtained during an investigation. Data quality objectives are designed to ensure that the type, quantity, and quality of environmental data used in decision-making are appropriate.

used for the Remedial Investigation and Feasibility Study.

Volume 4 - Health and Safety Plan.

This plan specifies the procedures that people collecting samples will follow to ensure their and the community's health and safety. This plan meets Occupational Safety and Health Administration's (OSHA) regulations.

Volume 5 - Human Health Risk Assessment Work Plan. The Human Health Risk Assessment Work Plan establishes the methods that will be used to evaluate potential human health risks in the Area of Investigation. The work plan specifies how data collected during the

investigation will be used to complete this assessment.

Volume 6 - Ecological Risk Assessment Work Plan. The Ecological Risk Assessment Work Plan establishes the methods that will be used to evaluate environmental risks in the Area of Investigation. The Work Plan specifies how data collected during the investigation will be used to complete this assessment.

Volume 7 - Quality Management Plan. The Quality Management Plan details the quality management system that is maintained by the contractor who will perform the investigation.

What is the status of the Work Plan?

The Work Plan is currently a draft document undergoing review by USEPA, the Indiana Department of Environmental Management, the Agency for Toxic Substances and Disease Registry, and the National Park Service.

What is the next step – what happens to the Work Plan?

Upon review and approval of the Work Plan by the USEPA, the Field Sampling Plan will be implemented. The investigation will be conducted according to the schedule that is presented in the Work Plan. A future *Pines Update* will be issued before field activities begin and will describe the activities to take place.

Our Commitment....

NIPSCO and Brown are committed to keeping you informed on the progress of the municipal water service extension and the investigation of the Pines Area of Investigation. Look for future *Pines Updates* (such as this one) to update you to our progress. We have also created a website to provide continual updates on the project: www.pinesupdate.com

Please contact the Communications Coordinator at the address listed below to be placed on the mailing list.
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