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### **SITE MONITORING REPORT GENERAL COMMENTS**

We have the following comments after reviewing a number of the Site Monitoring Reports (SMR):

**Monitoring Plan.** Please cross check the Tier 2 Monitoring Plan with the sampling conducted for the SMR. Unless a convincing reason is provided, we will reject SMRs that are not consistent with the Tier 2 Monitoring Plan. Variances from the Monitoring Plan may complicate future proposals for a No Further Action classification.

**Drinking Water Well and Plastic Water Line Sampling.** Please be sure to sample water wells and plastic water lines when they are a High Risk receptor of concern. We consider this to be a significant risk management activity for certified groundwater professionals to conduct.

**When to Rerun the Tier 2 Model Based on SMR Results.** If concentrations of chemicals of concern are increasing or it appears the groundwater plume is migrating, the following actions are required:

1. A new receptor ID plume must be generated to determine which additional receptors may need evaluation if either of the following conditions occur:
  - a. the source concentration(s) increase by more than 20% (above the concentration used during the Tier 2 evaluation) for two consecutive sampling events: **OR**
  - b. concentrations in any of the monitoring wells (included in the monitoring plan) have increased more than 20% **and** exceed the simulation value of that point.
2. Evaluate any new receptor, which is within the new receptor plume even if it was no further action required for the pathway at Tier 2. See the Site Monitoring Report (SMR) Guidance July 1999 for further information.

Either condition will automatically be indicated in the SMR, Groundwater / Soil Leaching Monitoring Plan Summary, Most Recent Sample column. The software will flag the Most Recent Sample column with a (\*\*) for the corresponding monitoring well. Further information is contained in the SMR Software User's Manual June 2000.

When the SMR sampling results indicate the Tier 2 model should be rerun the data from the SMR portion of the program should be moved to the Tier 2 portion of the program. The data

should be "cut" from the SMR portion of the program and "pasted" into the Tier 2 portion of the program. The file should be saved under a new name and the previous file saved as a back up.

After redoing the Tier 2, when you go to the SMR portion of the software it will reflect the new Tier 2 results. There will be no SMR results for the calendar year the Tier 2 was rerun.

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