

Pohl, David H.

From: Pohl, David H.
Sent: Thursday, November 19, 1998 7:23 PM
To: 'Kent.Johnson'
Cc: 'Justina.T.Wesley'; Popp, Stacie A.
Subject: RE: LOOW Remedial Design - Areas A & B

Kent,

WESTON is preparing the supplement to the 60% Remedial Design for Areas A & B (Component 1, Phases 2 and 3) under the new phasing of the Interim Removal Action for LOOW. In reviewing the past submittals and the comments received on those submittals, the issue has arisen of what parameters and screening criteria should be used for the confirmation sampling to be performed once the limits of the excavation are reached. Based on the project meeting held on 4 December 1997 and the follow-up responses to your comments, the following was proposed for analysis of confirmation and verification (10% of confirmation samples) samples:

Area A:

Confirmation Samples - Target VOCs (detected in subsurface soils based on RI) - acetone, benzene, toluene, 1,2-Dichloroethene, ethylbenzene, styrene and xylene (total) *NO CLEAN UP CRITERIA*
Verification Samples - full suite VOCs and Semi-VOCs

Area B:

Confirmation Samples - Zone 1: Target VOCs -methylene chloride, benzene, chlorobenzene, ethylbenzene, styrene and xylene (total) - Target Semi-VOCs - 1,2,4- trichlorobenzene, 1,4-dichlorobenzene and 2-methylnaphthalene - Target Pesticides - Aldrin, alpha-BHC, Dieldrin, Heptachlor Epoxide

Confirmation Samples- Zone 2: Target List VOCs - acetone, carbon tetrachloride, tetrachloroethene, carbon disulfide and chloroform. Target Semi-VOCs - hexachloroethane, naphthalene, 2-methylnaphthalene, and phenanthrene.

Verification Samples: full suite VOCs, Semi-VOCs, Pesticides

This list of target parameters for the confirmation samples has been expanded from that listed in the response to comments based on a review of the data presented in the EE/CA, and includes all the reported compounds detected in subsurface and surface soils.

The issues we need your input on are the following:

1. The VOCs and semi-VOCs that are highlighted do not have a NYSDEC clean-up criteria. Is there an alternate clean-up criteria for these compounds? What clean-up criteria should be listed for these compounds?
2. Have new clean-up criteria been established since the Jan. 24, 1994 memorandum that we should be using for the LOOW site?
3. A number of metals were also detected in surface and subsurface soils in Areas A & B that are above the clean-up criteria. However, the clean-up criteria also states for these metals "or background". Should analysis for metals be included in the confirmation and verification samples and what should be used for the clean-up criteria? Do you have any guidance on background metal concentrations that could be used for the clean-up guidelines for LOOW? The metals that exceed the criteria include arsenic, chromium, copper, mercury, nickel, and zinc.
4. Lithium and Boron were detected at high concentration in the soils in Area B and to a lesser extent in Area A. Are there any established clean-up criteria for these metals in soil? Should these metals be added to the verification analysis list, and what clean guidelines should be used?

We are scheduled to submit the supplement to the 60% design for Area A on 4 December. We would appreciate your input on these issues as soon as possible. Please call me at 610-701-7550 with questions. Thank you for your help on this matter.

Dave Pohl