



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

October 1, 1992

Mr. Dennis aRusso
Rhode Island Solid Waste Management Corporation
Central Landfill
65 Shun Pike
Johnston, RI 02919

RE: EPA's comments to the draft Central Landfill RI/FS OU2 Task 1 Phase I Revised Upper Simmons Reservoir Sediment Sampling and Analyses Work Plan, July 1992.

Dear Mr. aRusso:

The EPA has reviewed the draft Sediment Sampling and Analyses Work Plan referenced above. If the comments below are satisfactory addressed in a revised version, the revised work plan may be considered final. A draft copy of these comments were FAXed to GZA GeoEnvironmental Inc. on October 1, 1992.

General Comments

1. The revised work plan does not include any information on a field work schedule. It is EPA's understanding that the field work will be completed in October, 1992. It is important that EPA be informed of any field work plans at least three weeks prior to implementation in order that arrangements for collection of split samples can be made.
2. Although EPA agrees with the approach of first targeting the locations for chemical analyses during the phase II investigation, we feel it would be prudent to collect surface water and sediment samples from at least two of the proposed ten phase I locations for chemical analysis. The analytical procedures during this initial phase do not need to follow CLP procedures. However, phase II data will need to be CLP. Also, the use of field screening tools during phase I should be considered.

Section 1.0

1. This study is not being conducted in accordance with the RCRA Administrative Order (Docket No. 84-1045). The study is being conducted under the authority of the CERCLA Administrative Order (Docket No. I-87-1016), April 1987.



2. On page one, paragraph three, GZA states two purposes for collecting the OU2 Task 1 information. EPA does not agree entirely with the two stated purposes. OU2 is an investigation into the nature and extent of off-site contaminant migration as required by the 1987 CERCLA Administrative Order By Consent. OU2 Task 1 is an investigation into the potential contamination of the inorganic and organic sediments within Upper Simmons Reservoir due to off-site contaminant migration. There is currently **no chemical data** on the organic sediments in Upper Simmons Reservoir. The information collected will be used by RISWMC/GZA as part of the data needs for the OU2 RI/FS and by EPA in part of our evaluation of the off-site risks and needs for remedial action.

EPA understands that RISWMC, under a Consent Agreement with the RIDEM, is required in part to remove the inorganic sediments deposited within the Upper Simmons Reservoir. Most of the data to be collected during the OU2 Task 1 CERCLA investigation is data that should have already been collected by RISWMC to properly develop their sediment removal plan and to address the potential environmental impacts of the removal. The OU2 Task 1 data, once available, can be used by RISWMC to plan their dredging project, however, this was not one of EPA's primary purposes for collecting the data.

Section 2.1

1. GZA's suggestions that the entire sample collection effort can be completed in one day may be overly optimistic. The characterization of the sediment distribution is contingent on the number of data points, therefore, all of the sampling proposed in the revised work plan must be completed regardless of the number of days required to complete this effort.

Section 2.2

1. The core tube/lexon liner decontamination procedure described in the June 1992 submittal has been modified to eliminate the decontamination of the new lexon liners prior to use. GZA should provide the rationale for this modification.

Section 2.4

1. Does GZA plan to purge the AVS/SEM sample containers with oxygen free nitrogen, as recommended by the procedure in Appendix C? Also, in order to ensure that sufficient sample

volume is available to accommodate split samples, use of 4-oz. wide mouth jars for TOC and AVS/SEM sample analyses may be preferable to the 250 cc containers proposed by GZA.

Section 3.1

1. GZA cites "modified ASTM D-422-63, reapproved 1972" for sieve analyses/grain size distribution; does the modification to the method consist solely of the addition of the No. 270 sieve to the procedure? In addition, there is a 1990 reapproved method.

Section 5.0

1. EPA will comment on the scope of Phase II after reviewing the Phase I data.

Figure 1

1. In evaluating the suitability of the proposed sediment core locations, it would be useful for GZA to include on the figure (next to the sample location symbols) the depth of inorganic sediments observed during Maguire group's April 1992 sampling effort.

Please call me at (617) 573-5779 if you have any questions.

Sincerely,



James M. Brown
Remedial Project Manager
Waste Management Division

cc: Dick Boynton, EPA
Susan Svirsky, EPA
Judy McCabe, RIDEM
Julie Jaglowski, RISWMC
Ed Summerly, GZA GeoEnvironmental, Inc.