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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

July 7, 1992

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

RE: EPAs comments to the draft Central Landfill RI/FS OU2 Task 1 Upper Simmons Reservoir Sediment Sampling and Analyses Work Plan, June 1992.

Dear Mr. aRusso:

The Agency 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 July 6, 1992.

General Comments

1. Obtain all necessary approvals from the RIDEM.

2. The work plan does not address surface water sampling and analysis. Surface water samples must be collected from at least five of the sediment sampling locations. Locations 1, 5, 9, 12, and 19 are suggested. Analyses must include VOAs, SVOAs, Metals, hardness and other conventional water quality parameters including pH, DO, temperature, conductivity, and turbidity. These samples should be collected in the water column near the sediment interface prior to the disturbance of the sediment.

Section Specific Comments

2.10 Relocate four of the sampling locations shown of Figure 1 as follows:

- o move location 11 to a point a little above U5.
- o move 12 to where 11 was.
- o move 13 to where 12 was.
- o move 14 a little below the current location midway to the current 13.

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2.20 The methods specified in Table 1, are appropriate, however, the Lloyd Kahn Method for TOC analysis of sediments may be more appropriate than the SW-846 Method 9060. The Lloyd Kahn Method for TOC analysis of sediments is an approved Region I SAS Request. The Lloyd Kahn Method is attached.

Indicate which revision of ASTM D-222 will be utilized.

2.21 What type of bottle will be used for the TAL metal equipment blank collection? On page 6 under Equipment Blank section, only VOA vials and one liter amber bottles are listed for equipment blank collection. Will polyethylene bottles be used for TAL metal collection?

The blind duplicate samples would be more representative if the sample is mixed prior to filling the sample containers rather than repeat sampling at the same location, provided their is an adequate amount of sediment for both.

In the proposed Laboratory Quality Assurance Project Plan (QAPP) submitted by Ceimic Corporation to GZA GeoEnvironmental, Inc., the standard CLP protocols were referred to for various procedures (e.g., organic and inorganic calibrations). Clarify that the same revisions of the CLP Methods stated in the Sediment Sampling and Analyses Work Plan will be used by the laboratory.

Clarify that the laboratory is able to perform the following analyses: total organic carbon, acid volatile sulfides, sieve and hydrometer analyses, and percent volatile solids by the methods indicated in Table 1 of the Sediment Sampling and Analyses Work Plan. The laboratory's QAPP does not indicate that the above analyses can be performed.

Typographical error on page 5 Table 2 (regie vs regime)?

2.22 Add a discussion in this section concerning MRLs vs. CRQLs.

Typographical error on page 8 under Section 2.22 (weather vs whether)?

2.23 Typographical error on page 8 under Section 2.23 (regie vs regime)?

Appendix B

1. There is a subsequent release (August 1991) of a method for Acid Volatile Sulfide determination in sediments. A copy of this method is attached. This method may or may not be substantially different than Appendix B.

Please call me if you have any questions on the above comments.

Sincerely,

James M. Brown

James M. Brown
Remedial Project Manager

Attachments

cc: without attachments

Dick Boynton, Chief RI Superfund Section
Susan Svirsky, EPA
Dave Hill, CDM FPC
Judy McCabe, RIDEM
Ed Summerly, GZA GeoEnvironmental