



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

December 4, 1995

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

SUBJECT: EPA Approval of the Sampling and Analysis Plan, Final Draft, Operable Unit 2 Remedial Investigation, Central Landfill, Johnston, RI, November 1995 as amended by GZA Response Summary Letter Dated November 28, 1995.

Dear Mr. aRusso:

The purpose of this letter is to approve the subject OU2 Sampling and Analysis Plan (SAP) as amended by GZA's November 28, 1995 response to EPA's comments to the subject SAP. EPA's approval is contingent upon RISWMC agreeing to incorporate our few remaining comments which are provided below. Only one of our remaining comments, comment number 3, impacts the December 1995 sampling event.

The comment numbers below correspond to those comments submitted during previous reviews of the SAP and GZA responses.

GENERAL COMMENTS

- 2) Table 2: The response indicates that detection limits of 5 ppb and 2 ppb for acetone and methylene chloride, respectively, will be provided by the laboratory, however the corresponding Target SQL's in Table 2 (attached to the responses) have **not** been revised to indicate these detection limits (they are still listed on the Table as 10 ppb). Also, footnote 8 of Table 2 appears in the text of the response, but has **not** been included on Table 2.

VOLUME I - SPECIFIC COMMENTS

- 3) The location of the "Phase II Groundwater Interceptor System" should be identified in figures prepared in the future.



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The sediment sample related to the Phase II Groundwater Interceptor System should not be collected from the culvert pipes, but from a location *immediately* downstream to the discharge of the pipes. (If an obvious sediment deposition area is noted at the outlet of the interceptor system which appears to be related to the discharge pipe, this location should be selected for sediment sample collection.)

- 22) ● The revision of footnote 5 in Table 3 is appropriate. However, footnote 5 should be used *within* the table itself, where appropriate. Please rectify. (NOTE: Footnote 5 in Table 3 appears to be equivalent to what would be footnote 8 in Table 2, which appears on page 1 of such table, but is not identified and explained on page 6. This should also be rectified).
- The complete references for the sediment ecological benchmarks for Aroclor 1242 and nickel are missing in Table 3.
- The correct complete reference for the sediment ecological benchmark for silver in Table 3 should be "4c".
- The *August 1993* edition of the document *Guidelines for the Protection and Management of Aquatic Sediment Quality in Ontario* should be used instead of the 1992 edition identified in footnotes 4, 4b and 4c of Table 3.

NEW COMMENT

Figure 2: The response is appropriate regarding the identification of the background sampling locations in the figures of the Draft OU2/RI report. However, the existence of the locations should also be properly acknowledged in the text of the document when discussing other background sampling locations.

It is not necessary to revise the November Final Draft SAP to incorporate our remaining comments. These comments can be addressed in the Final OU2 Remedial Investigation Report. Please call me if you have any questions.

Sincerely,



James M. Brown

cc: Dick Boynton, Chief RI/NH Superfund Section
Laurie Sclama, RIDEM
Becky Cleaver, HNUS
Ed Summerly, GZA GeoEnvironmental, Inc.