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NBH - SER

Ira, Stephen, Carl
Ken Kimmel Jay + Greg Dolan (Apex)

10/20/10 Call w/ State, Apex, etc. re sampling

- Ken - State wants to understand what we need + why. Concerns about timing + costs

SDMS DocID 517952

- Ken - on water side
  certain types + numbers of samples prior to issuance of draft permit
  concerned about costs for 100' grid
  Jay has suggestions for less sampling but hopefully sufficient
- Jay - we discussed 100x100' grid → 70 sampling locations in looking at sediment, average of 2 feet depth. Wd be sampling close to 1 sample per every 1000 cu yds. This is higher than what wd even be required by landfill. They'd like to do 200x200' grid, or every 2000 cu yds - ~35 locations. Still stick w/ 1' intervals + going to depth
- Kim - nothing in TSCA is based on volumetric analysis. She needs to be persuaded that their idea will → "representative" sampling. She's landfill sampling being required at every 500 cu yds. They need to show w/ confidence that nothing that wd go into CDF wd be missed. We tried to come up w/ sampling scheme that wd give confidence that all but maybe de minimis amts wd be < 50ppm. Not a lot of data she can rely on in that area. Our regs talk about 1x/100 sq feet (for land sampling) so she's tried to make reasonable accommodation to the facts here + went to 1x/10,000 sq ft
- They'd like to suggest doing research + seeing what's been done in some other similar contexts
- Kim - She's said she's open to something else being justified but what she's heard so far isn't sufficient
- draft determination - wd be based on assumption that data wd confirm wd be < 50. Wd be a conditional kind of determination

potential of a predictive approach?
Kim - the question is whether it can be justified

Matt - we do still need ahead of draft decision data for WQ purposes
Ken - approx 10 samples - 401 WQ type parameters. They're OK w/ that

On the land side -
Where do we want 21E type assessment done? The parcels aren't all contiguous, & they're under different ownership
The State owns the parcel w/ the AUL.
Cindy - since there was prior mill building there, concern there may be haz. waste there
Ken - coming late in the process. Do we need before draft
Cindy - they'd need to identify what's there to be sure no RCRA viols
Kim - capacitor was found there - our draft decision would say they'd do site charac & make whatever decisions are needed
northern most 9 acres are in private property & they're in negotiations w/ landowner
They wouldn't be able to get access to do sampling right

Dave - need baseline groundwater data

Ken - can't they rely on 21E assessment done for the 3.4 acres already?
Kim - she looked at the RAO - didn't examine PCBs but capacitor was found
Jay - they've asked the LSP to look at this again & he's pretty confident there's not PCBs - lead triggered the need for the AUL
Kim - one way to say GW isn't impacted is to do the GW monitoring wells we talked about

Dave - we discussed computer flux modeling - that shd give us some GW info before final permit decision

Jay - assumption that modeling wd happen after the sampling + analysis

Cindy - we need more clarity on dewatering operations. The pathway of the water + where its discharged

Jay - yes, passive dewatering on site. Haven't had the chance to think more about how to do the dewatering + where the supernatant would

Ken complains about issues being raised late, etc.

Matt clarifies that we're doing our best to review what they give us as soon as possible and raise things as soon as we can. We also "self-censor" + try to evaluate what's needed before vs. after draft decision.

Dave - need to solidify the basic methods for dredging + dewatering

Ken - as other things come up send them emails as they come up so we can keep this moving

Dave - Stockpiled dredged material can also have air quality effects.

Post call discussion → Cindy, Ann, Matt, Ellen

Matt + Ellen recommend we place as a condition that they hire an independent overseer who reports to us -