

From: [Tisa, Kimberly](#)
To: [Catri, Cindy](#); [Stanley, Elaine](#)
Subject: FW: Geotech Unsuitable Soil SAP
Date: Thursday, August 08, 2013 4:37:30 PM
Attachments: [Example of Stockpile Sampling Grids.pdf](#)

Here's my response to the Stockpile SAP.

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From: Tisa, Kimberly
Sent: Thursday, August 08, 2013 4:36 PM
To: 'Chet Myers'; Michael Bingham
Subject:

Chet/Mike-

EPA has reviewed the SAP for the stockpiled Geotechnically Unsuitable Soils dated August 5, 2013. Mike verbally provided to me today the current site conditions, which include 11 stockpiles of varying sizes and dimensions. The SAP indicates that a composite sample will be collected per every 100 cubic yards of soils.

Conceptually, the stockpile SAP currently being discussed would appear to be sufficient to determine whether a stockpile is < 50 ppm or > 50 ppm for off-site disposal purposes. However, as I discussed with Mike today, I believe that a more systematic approach to grid sampling of piles is more defensible than just using a volume estimate. Attached are examples of a sampling protocols for several different stockpiles varying in both size and dimension. The approximate # cubic yards per sample shown in these examples is smaller than 1 sample per 100 cubic yards, so I am willing to discuss once you have an opportunity to review. (Please no comments on my artistic ability.....)

I did go back and look at all our previous correspondence regarding how the geotechnically unsuitable soils would be managed. By email dated July 3, 2012, APEX provided comments to EPA 6/23/2012 comments. Response 4 opined that the data from the test pits and soil borings indicated that more "materials" would be reused at the facility, but that if it was geotechnically unsuitable, it would be disposed off-site (i.e., not used as clean fill). In fact, the test pit sampling did identify PCB concentrations in other locations (e.g., 4.6 ppm in TP-9.) which is located in one of the stockpile area. EPA concurred with this, but required the SAP as part of the Determination.

If the Commonwealth is considering a different disposition of these geotechnically unsuitable soils (i.e., clean fill), EPA would require a much more stringent sampling protocol than what we

indicated above.

At this point I would recommend developing the plan for off-site disposal incorporating the suggested sampling protocols that is attached, and see what the data results are. We can discuss the final sampling protocol once you have an opportunity to review the examples I've provided.

Of other consideration, of course, will be any other cocs that are present in these stockpiles. Will any samples be analyzed for other [non-PCB] cocs?

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