

**From:** [Chet Myers](#)  
**To:** [Lederer, Dave](#)  
**Cc:** [Tisa, Kimberly](#); [Catri, Cindy](#); [Michael Bingham](#)  
**Subject:** RE: Geotechnically Unsuitable Soils SAP  
**Date:** Wednesday, July 31, 2013 4:52:30 PM  
**Attachments:** [image003.jpg](#)  
[image004.png](#)  
[image005.png](#)  
[Topsoil Figure 7-31-13.pdf](#)

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Hi Dave, Kim and Cindy,

Attached please find a diagram that indicates the areas that have been stripped of topsoil, and their relation (geographically) to the three hot-spot areas.

The southern two hot spots (in yellow) are the ones that had greater than 50 mg/kg PCBs, whereas the northern hot spot (in red) was impacted with petroleum hydrocarbons and the highest concentration of PCBs from that area is 1.7 mg/kg.

The southern two hot spots have already been excavated for offsite disposal and the confirmatory samples are out at the laboratory now.

The drawing also shows the results of historic PCB sampling on the site.

The boundary of the areas that have been (or are being) cleared of topsoil is colored white.

The subdivisions of the areas that are being cleared are in cyan, and are coded with the stockpile locations. (For example, area A1 is located on the northwest corner of the site. The topsoil from this area was stockpiled in the stockpile labeled A1 on the southwest area of the site.)

Please note that the stockpile area is actually paved (the aerial photo shown is old and does not show the currently paved area).

Thanks,



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**From:** Lederer, Dave [mailto:Lederer.Dave@epa.gov]  
**Sent:** Tuesday, July 30, 2013 4:26 PM  
**To:** Chet Myers  
**Cc:** Tisa, Kimberly; Catri, Cindy

**Subject:** FW: Geotechnically Unsuitable Soils SAP

Here are comments generated by Kim Tisa with regard to the Geotechnical unsuitable soil plan submitted by you on 7/22/2013

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**From:** Tisa, Kimberly  
**Sent:** Tuesday, July 30, 2013 10:01 AM  
**To:** Lederer, Dave  
**Cc:** Catri, Cindy  
**Subject:** RE: Geotechnically Unsuitable Soils SAP

Dave-

While I thought we may be able to consider this as a general plan, I now think we will need to consider it on a case-by-case basis. I understand that there are current stockpiles at this site.

There, I will need the following information to complete review of the plan I have:

1. Figure showing the location(s) where the stockpiles materials were generated from
2. # of stockpiles currently existing
3. A figure showing the in situ PCB concentrations at the site, including the newly generated data for the Excluded Shuster parcel.
4. The proposed disposition of the stockpiled materials
5. While the # of samples per cubic yards are provided, it is unclear how these samples would be collected. This needed to be in the plan.

In addition to the above, I provide the following comments on the plan I currently have:

1. Section 3.3 references "sediment" sampling.
2. Section 3.2. It is indicated that the volume of soil will be rounded to the nearest whole number. EPA would require it to be rounded up to the nearest whole #, not down. Thus for 443 cubic yards, the total samples would be 5, not 4.
3. Section 3.5. For the lab methods, please be aware that the appropriate sample extraction method is 3540C (soxhlet extraction). This should be included with the analytical method, 8082 with NT ECD peaks.

**Kimberly N. Tisa, PCB Coordinator (OSRR07-2)**

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**From:** Lederer, Dave  
**Sent:** Tuesday, July 23, 2013 1:53 PM  
**To:** Tisa, Kimberly  
**Cc:** Catri, Cindy  
**Subject:** RE: Geotechnically Unsuitable Soils SAP

Kim and Cindy:

Please route your comments through me. Thanks

Dave

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**From:** Chet Myers [<mailto:cmyers@apexc.com>]  
**Sent:** Monday, July 22, 2013 5:49 PM  
**To:** Tisa, Kimberly  
**Cc:** Lederer, Dave; Catri, Cindy  
**Subject:** Geotechnically Unsuitable Soils SAP

Hi Kim,

As we discussed on the phone, attached please find a Sampling and Analysis Plan for Geotechnically Unsuitable Soils, as required by Appendix J(1) of the EPA Final Determination For the South Terminal Project.

If you have a chance to review and quickly get back to us, we would sincerely appreciate it.

Thanks!



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