

From: [Chet Myers](#)
To: [Tisa, Kimberly](#)
Cc: [Michael Bingham](#); [Gregory Dolan](#); [Catri, Cindy](#); [Stanley, Elaine](#); [Cote, Molly \(DEP\)](#)
Subject: Re: Revised Sampling Plan - Geotechnically unsuitable material
Date: Thursday, August 15, 2013 7:10:54 PM
Attachments: [image001.png](#)
[image002.png](#)

Hi Kim,

I will confer with Mike, but this appears consistent with our conversations, the submitted SAP, and our actions and plans to date.

Thanks!

Chet

Sent from my iPhone

On Aug 15, 2013, at 6:17 PM, "Tisa, Kimberly" <Tisa.Kimberly@epa.gov> wrote:

Chet and Mike:

This is to confirm our conversations this week regarding next steps for the 11 stockpiles currently existing on the South Terminal project area. These stockpiles contain geotechnically unsuitable material which were removed from the upper 2-feet or less from the main terminal area. My understanding of the next steps follows. Please let me know if you concur or if I have missed anything.

- <!--[if !supportLists]-->1. <!--[endif]-->The SAP provided to me via email on August 12, 2013 is consistent with our prior conversations and with the examples I provided to you. Accordingly, the SAP is to be considered approved for the stockpiles currently existing and described in the SAP.
- <!--[if !supportLists]-->2. <!--[endif]-->Stockpiles that have discrete samples with PCB concentrations at ≥ 50 ppm will be removed and disposed of as a ≥ 50 ppm PCB waste. Currently, the data you provided verbally to EPA indicates that Stockpiles D2 and I2 meet this requirement.
- <!--[if !supportLists]-->3. <!--[endif]-->Stockpiles that either have no data or a discrete sample with a PCB concentration of < 50 ppm will be sampled in accordance with the SAP. Data from this sampling will be evaluated to determine appropriate disposal of these piles and/or to determine if additional sampling/analysis is required.
- <!--[if !supportLists]-->4. <!--[endif]-->The areas where the D2 and I2 stockpiles were generated from will undergo sampling to delineate PCB concentrations in these areas. Sampling will be conducted initially on a 25x25-foot grid.

Review of the data will determine next steps for sampling and/or excavation/disposal of PCB-contaminated soils.

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
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From: Michael Bingham [<mailto:MBingham@apexcos.com>]
Sent: Monday, August 12, 2013 11:06 AM
To: Tisa, Kimberly
Cc: Chet Myers; Gregory Dolan
Subject: RE: Revised Sampling Plan - Geotechnically unsuitable material

Kim:

Attached, please find a revised sampling plan for the New Bedford project. I have included a table summarizing each stockpile and the proposed number of samples from each (per your email dated 8/8/13. Which I also included as an Appendix).

Please let me know if you have any questions.

Sincerely,

Mike

<p>Michael Bingham, LSP, LEP, CPG Senior Project Manager</p> <p>Apex Companies, LLC 125 Broad Street, 5th Floor Boston, MA 02210 O) 617-728-0070 x127 M) 508-713-1990</p>

Follow Apex on [<image001.png>](#) and Like us on [<image002.png>](#)

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From: Tisa, Kimberly [<mailto:Tisa.Kimberly@epa.gov>]
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?

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

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