

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

MEMORANDUM

DATE: June 23, 1997

SUBJ: Boliden Metech Soil Management Work Plan, June 1997

FROM: Kimberly Tisa, PCB Coordinator
Office of Ecosystem Protection *kt*

TO: File

Boliden has completed the site characterization portion required under its Consent Decree and has entered into its next phase, site remediation. As part of its order, Boliden was required to submit a remediation plan for this work and receive EPA approval prior to beginning work.

VHB was hired by Boliden to develop this phase and submitted its work plan "Boliden Metech Allens Avenue Facility Soil Management Work Plan, June 1997" on June 16, 1997.

To expedite the approval, I called David Carlson, VHB's project manager for this scope, on June 19 to give him verbal comments on the submittal. These comments follow:

1. *Introduction Section, page 2*

- 1) Figure 1 is incorrectly referred to as Figure 2

2. *Introduction Section, subsection Remedial Action Overview, page 2*

- 1) Paragraph 2 indicates that stockpiled soils will be recharacterized for PCBs after excavation. I asked D. Carlson why this was since the soils have already been characterized as TSCA. D. Carlson indicated that the TSCA landfill wanted the stockpiled soils characterized again. I said okay, as long as the soils are disposed of as TSCA.



- 2) Paragraph 2 indicates that the stockpile characterization samples will be used to verify remediation cleanup goals. D. Carlson indicated that this statement was incorrect and should have been removed from the submittal.
3. *Remedial Action Evaluation Criteria, subsection Site Soil and GW Cleanup Objectives page 3*
 - 1) GW cleanup objective is not 4 µg/L as indicated. The SOW clearly indicates that GW remediation level will be determined once monitoring wells are installed and analytical results have been obtained.
4. *Soil Remediation, Subsection Pre-Excavation Activities, page 6*
 - 1) Figure 1 incorrectly referred to as Figure 2
5. *Soil Remediation, Subsection Dust Control, page 7*
 - 1) How are off-site dust emissions to be monitored? D. Carlson said visual techniques would be used.
6. *Soil Remediation, Subsection Soil Stockpile Management, page 8*
 - 1) The submittal indicates that identified PCB-contaminated soil in the bermed-area will be disposed of according to Work Plan provisions. I asked D. Carlson what this meant. D. Carlson indicated that the wash water would be allowed to collect in a soil-lined berm area. After the water filters through the soil, the soil will be tested for PCBs and disposed of if greater than 10ppm. I indicated to D. Carlson that all decon and rinse waters must be collected and disposed of as TSCA-regulated waste if these waters are used to decontaminated equipment which has been in contact with PCBs.
7. *Soil Remediation, Subsection Verification of Soil Remediation, page 8*
 - 1) Second complete paragraph indicates that following cleaning of residual soil from asphalt and concrete pads, "identified PCB-contaminated soil will be removed and disposed of in accordance with Work Plan provisions." What does this mean?

According to D. Carlson, the asphalt and concrete pads would be pressure washed and the decon fluid allows to collect into a bermed soil-lined area. After filtration into the soil, the soil would be sampled to determine if PCBs exceeded 10 ppm. I told D. Carlson that all decon waters must be collected and disposed of. If the water was collected,

analyzed for PCBs and the PCB level was less than 0.50 $\mu\text{g/L}$ (this is less than RI SDWA regulations), then they could dispose of it on-site. D. Carlson is making appropriate changes to submittal.

8. *Post-Remediation Groundwater Monitoring, Chapter 4, p. 9*

1. The groundwater monitoring locations are different from those given in the SOW. D. Carlson indicated that the locations were selected based on groundwater flow and PCB concentration determined after Phase I. He will update Work Plan explaining why GW locations were moved.

9. *Post-Remediation Groundwater Monitoring, Chapter 4, p. 9, GW Sampling*

1. D. Carlson asked if filterable portion of GW PCB analytical could be eliminated since any risk would be based on total PCBs and since a low-flow sampler would be used.

When original SOW was written, I believe that the analytical for PCBs for the filterable fraction and the non-filterable fraction were being performed to eliminate contribution from suspended soil particles. Since a low-flow sampling device is being used, the contribution from soil particulates should be minimal, therefore, total PCBs are sufficient to address PCBs in the GW.

D. Carlson indicates that the Work Plan would be updated and to EPA ASAP.

Comments were provided to D. Carlson via telephone on 6/19/97.

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