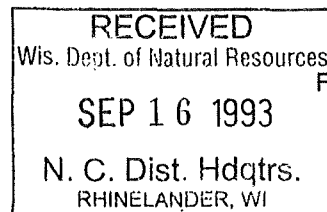


DATE: September 15, 1993
TO: Jim Kreitlow - NCD
FROM: Robin Schmidt *RS* SW/3



FILE REF: SE Unit

SUBJECT: Sampling of Military Creek Sediments

I received your memo regarding your concerns about the sediment sampling at Military Creek in Phelps, Wisconsin. I am sorry if there is a misunderstanding about how our programs can and are working together. The DNR, through the Site Evaluation Unit and several positions in District offices, is funded by the EPA to implement the Superfund Site Assessment program in Wisconsin, as compared with other States where EPA contractors implement the program. As such, we have the ability to look beyond the single program purpose of site sampling, and encourage other programs to work with us in obtaining environmental data that may be useful to their program as well. To that end, we have initiated a number of discussions with Water Resources regarding sites where sediment and surface water resources may be impacted. Linda Talbot has been assigned as our contact when issues arise regarding sediment sampling.

In addition, individual project managers within the Site Assessment program are encouraged to bring the expertise and insights of water resources staff into their sampling teams. At several sites throughout the state, water resources has provided valuable insights into our sampling strategies, as well as our staff being able to provide water resources with data not otherwise obtained through the Water Resources program. Please be aware, however, that all sampling we conduct is approved by and justified to the EPA in terms of the Site Assessment program needs. Therefore, we are not always able to obtain all the information other programs may desire or need.

In the implementation of the federal Site Assessment program, we utilize the EPA Contract Laboratory Program for sample analyses. The use of this National program is made available to us, without cost to us, and we cannot change their Contract Required Detection Limit to satisfy the DNR Water Resources program needs. I am sorry that you believe the contract required detection limit of 800 parts per billion (not 1700 ppb as initially thought) for pentachlorophenol is not adequate for your needs. Note that while 800 ppb is the contract required detection limit, our experience is that often the actual level of contaminants detected is well below that limit. We have made special arrangements with the CLP to analyze for dioxin, at your request. With respect to your concerns about TOC and particle size analyses, the purpose of our sampling, as justified to EPA, is to obtain legally defensible contaminant specific data to list the site on the Superfund National Priorities List. Since obtaining total organic carbon and particle size analyses does not contribute to this purpose (according to the EPA model established to score sites), the EPA is unwilling to pay the cost for this work.

While we are making every effort to coordinate with and work with other programs, and have worked successfully with the Water Resources program throughout the State, we are often not able to provide other programs with all information they may desire or need. Situations like this have been resolved in the past by working with the affected program (in this case, Water Resources) and collecting samples with them, but having the analyses split - that which we can justify to EPA is paid for through the use of the Contract Laboratory Program, those which are not justified and approved by EPA would then be paid by Water Resources. Both programs benefit in that we minimize duplication of effort for sampling the same water body and some of the analyses otherwise paid for by Water Resources can be obtained through our investigation. Also, we do

analyze for a broader range of hazardous substances than that which is typically analyzed for through the Water Resources program, which may provide additional data for your program to use.

The individual project manager is responsible for coordinating sampling efforts to the best of their abilities. The project manager's first priority, however, is to provide the information necessary for the Site Assessment program in a timeframe that ensures our commitments with EPA are met. We do not cancel our sampling events because another program is unable to use our data. Collecting samples in Military Creek is needed to document a release at the site, and will need to be collected during our site investigation in order to properly implement our program.

I will call you in the near future to discuss this further, and determine whether this clarifies our position on the Military Creek sampling. I look forward to further discussions, but note that in the future, simply calling and discussing initial concerns may prove to be a more efficient method of communication than preparing memos.

cc. → Connie Antonuk - NCD
Tom Jerow - NCD
Larry Maltbey - NCD
Gary Kulibert - NCD
Paul Didier - SW/3
Mark Giesfeldt - SW/3
Bob Strous - SW/3
Lee Liebenstein - WR/2
Tom Sheffy - WR/2
Bruce Baker - WR/2
Duane Schuettpeitz - WR/2
Tom Janisch - WR/2
Linda Talbot - WR/2