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BUREAU OF SOLID-HAZARDOUS
WASTE MANAGEMENT

January 15, 1993

Mr. Robert Smith
USEPA
77 West Jackson Blvd.
Chicago, IL 60604

RE: CCP - Proposed Investigations at Off-Site Locations

Dear Bob:

This letter is to confirm the sampling and analysis objectives and approach for off-site investigations at the Churchyard and Logeman Properties.

The objectives of the data collection include the following:

- To characterize the nature and extent of impacts to soil to determine whether the area is impacting groundwater quality
- To assess the risk posed by direct contact with soil under current conditions
- To assess the risk posed by potential soil pore gas migration into basements at the Churchyard under future land use conditions

The investigations were developed to achieve these objectives and are described below.

Churchyard Property

Churchyard soils may potentially be impacted as a result of the following:

- Past overland flow of spent solvents may have migrated onto a small section of ball field in the Churchyard from CCP's former urethane laboratory area.
- The Churchyard ball field, as a whole, is located downgradient of impacted groundwater at the site. Groundwater vapors of VOCs may impact vadose zone soils in the ball field.

Potential Spilled Solvent Area

Five borings will be installed to the water table to delineate the nature, depth, and lateral extent of VOCs beyond CCP's eastern property line in the Churchyard ball field. One boring will be located within the suspected area of impact from overload flow based on plant staff recollection. Four borings will be located outside this area. Borings will be sampled continuously at 2-foot intervals.

Portable GC analyses of VOCs in soil headspace will be conducted for samples recovered from the borings. GC results will be considered level 2 data quality for delineating the extent of VOC impacts. GC results at the 2- and 6-foot depths will be considered level 4 data quality for assessing the future risk of potential soil pore gas migration into basements. Measuring gas concentrations directly is appropriate for this type of assessment.

Appendix IX VOCs and SVOCs will be analyzed for samples collected at 2-foot depths that appear to be impacted based on the portable GC results. These results will be used to 1) characterize the nature of contamination; and 2) to assess the risk of direct contact at this location. Appendix IX VOC results will be considered level 4 data for characterizing the VOC contamination and for assessing the risk of direct contact with soil.

Ball Field

Ten grid locations will be sampled at surface to 2-foot and 4- to 6-foot-depth intervals throughout the remainder of the Churchyard ball field.

Portable GC analyses of VOCs in the soil headspace will be conducted for all of the samples. GC results will be considered level 4 data quality for assessing the risk of potential soil pore gas migration into basements.

Appendix IX VOCs will be analyzed in all of the near-surface samples. Approximately the top 6 to 8 inches of soil have been replaced in the past. Therefore, samples will be obtained from the 1- to 2-foot increment of the recovered samples which is more representative of near-surface conditions. Appendix IX VOC results will be considered level 4 data quality for assessing the risk of direct contact with soil.

Logeman Property

The investigation proposed for determining the nature and extent of contamination at the Logeman property remains unchanged, except for the addition of Appendix IX VOCs for samples collected at the ash pile.

The risk assessment for direct contact will consider soil results from the surface to a 2-foot depth. Appendix IX VOC and metal results will be considered level 4 data quality for this evaluation.

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Future land use scenarios will not be considered at the Logeman property at this time. The presence of buried containers of solidified resin may present an unacceptable risk for direct contact.

Agreement on these fundamental sampling objectives and approach is required to complete the Workplan and QAPjP. Therefore, we request your timely response by January 19, 1993.

Thank you for your assistance.

Sincerely,



Stacy McNulty, P.E.
Technical Coordinator

nsr

cc: Jill Fermanich
Craig Bostwick
Jim Rickun