



---

west virginia department of environmental protection

---

Office of Environmental Remediation  
601 57th Street SE  
Charleston, WV 25304  
Phone: 304-926-0455

Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
dep.wv.gov

November 19, 2015

Certified Mail #91 7199 9991 7035 6612 7050

Mr. Robert L. Johns  
Freedom Industries Spill Claim Plan Administrator  
Turner & Johns, PLLC  
216 Brooks Street, Suite 200  
Charleston, WV 25301

RE: Review of “VRRP Interim Remedial Action Work Plan”, VRP# 15017  
Freedom Industries, Charleston, Kanawha County

Dear Mr. Johns:

A review has been completed of the Freedom Industries “VRRP Interim Remedial Action Work Plan” prepared by Mr. Matt Ford, LRS, CORE Environmental Services, Inc., dated November 12, 2015, and received by the Office of Environmental Remediation on 11/12/2015. Our comments are provided as follow:

1. Section 1.1 - Purpose: WVDEP suggests adding an additional bullet (#5) in this section to include the excavation, reinstallation and sampling of the collection trench; this will provide a segue to current bullet #5.
2. Section 4.1 – Site Preparation and Erosion Control, p.4, 2<sup>nd</sup> ¶: In addition to the proposed security fencing, WVDEP recommends the use of signage (No Trespassing, Danger – Construction Area, etc.) to assist in securing the site.
3. Section 4.1 – Site Preparation and Erosion Control, p.4, 3<sup>rd</sup> ¶: In the unlikely event that an excavation had to be left open overnight and a significant precipitation event occurred, WVDEP needs assurance that appropriate equipment and capacity is available for dewatering the excavation before additional excavation takes place.

4. Section 4.2 Target Excavation Areas, p.6, last ¶: The text states, “Field screening will be performed on site soil using the headspace method and a photoionization detector (PID) calibrated to isobutylene, since previous site data indicates PID response to MCHM and PPH.” WVDEP recommends that olfactory senses be used in conjunction with the PID to segregate contaminated soil. The goal is to remove soil above laboratory reporting (quantitation) limits; previous studies have shown that MCHM odor threshold concentrations are extremely low, even below laboratory quantitation limits.
5. Section 4.2 Target Excavation Areas, p.7, 1st ¶: The text states, “A representative number of soil samples will be used to characterize the presumed clean soil stockpile (e.g., one per 500 cubic yards).” DEP prefers the frequency of sampling to be 1/300 yds<sup>3</sup>, similar to landfill characterization sampling.
6. Section 4.2 Target Excavation Areas, p.8, Area 1A and Figure #4: Note that Test Pit #17 is actually located in Area 1B
7. Section 4.2 Target Excavation Areas, p.9, (Area 4) 2nd ¶: Due to a concern for potential surface water impacts, WVDEP will require that a surface water sample be obtained from the Elk River after the first day of excavation on the slope (Area 4).
8. Section 4.2 Target Excavation Areas, p.10, (Area 5) 1st ¶: The first sentence in this paragraph is confusing – is there another way to describe the area where the dewatering will take place?
9. Section 4.2 Target Excavation Areas, p.10, (Area 5) 2nd ¶: Due to a concern for potential surface water impacts, WVDEP will require that a surface water sample be obtained from the Elk River after the first day of excavation of the collection trench (Area 5).
10. Section 4.3 Backfill and Site Grading, p.10, 1<sup>st</sup> ¶: Text states “Each area that is excavated as specified in Section 4.2 of this IRA Work Plan will be backfilled before moving on to the next excavation area.” Will confirmatory sample results be reviewed for potential additional excavation prior to backfilling?
11. Section 4.4 Collection Trench Reconstruction p.11, 1<sup>st</sup> ¶: Text states, “The sumps will be removed after two consecutive sampling events (minimum of four weeks apart) indicating no detectable MCHM and/or PPH above laboratory reporting limits, and WVDEP notification.” WVDEP believes additional sampling events are needed to confirm post-excavation water quality. Additional guidance will be provided.

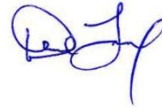
12. Section 6.0 Post-Excavation Soil Sampling Plan, p.13, 1st ¶: The text states, “Also, a minimum of four side wall and two base samples will be collected at the collector (collection) trench excavation.” Since the trench is divided into three sections by the two collection sumps, WVDEP would like to see a minimum of three samples from the excavated trench floor.
13. Section 6.0 Post-Excavation Soil Sampling Plan: WVDEP intends to split one soil sample per target excavation area for a total of six soil samples to be analyzed at a separate laboratory (likely Research Environmental and Industrial Consultants – REIC, located in Beaver, WV). Split samples are used as a measure of inter-laboratory precision.
14. Section 7.0 Report Preparation, p.13: Please note that an appropriate number of tables and figures should be included in the report to properly document site activities and results.
15. Section 8.0 Remedial Action Schedule, p.14: WVDEP requests that the schedule be reviewed and shortened wherever possible.
16. Appendix A - Site-Specific Health and Safety Plan (HASP), Section E – Entry Objectives, pp.4-5: The last sentence on p.4 is incomplete – please review and revise.
17. Appendix A - Site-Specific HASP, Section F – Safety Hazards Table, p.5: Consider adding slips, trips and falls – current site topography is very uneven; slope work could be especially difficult.
18. Appendix A - Site-Specific HASP, Section G – Personal Protective Equipment (PPE), p.6: Consider adding hearing protection to levels C and D, especially when working around heavy equipment.
19. Appendix A - Site-Specific HASP, Section G – Personal Protective Equipment (PPE), p.6, last ¶ (in bold): Fourth sentence states, “... the CORE Project Manager will notify on-site personnel whether PPE should be *ungraded* to Level B or downgraded to Level D based on air monitoring results.” *Ungraded* should be changed to upgraded.
20. Appendix A - Site-Specific HASP, Section G – Personal Protective Equipment (PPE), p.6, last ¶ (in bold) and Appendix C of HASP – Air Monitoring Plan, p. 6, Section 7.0 - Table: CORE has previously conducted hot-spot soil vapor sampling and ambient air monitoring/sampling for MCHM, PPH and benzene at the site. Results of this sampling were all ND (non-detect) at 2 ug/sample reporting limit or below. WVDEP requests that CORE reconsider whether it is necessary to begin work in Level C PPE.

21. Appendix A - Site-Specific HASP, Section K – Site Map, Item #2: Consider adding Equipment Decontamination Area
22. Appendix A - Site-Specific HASP, Appendix C – Air Monitoring Plan: WVDEP advises CORE to be cognizant of potential diesel exhaust interferences during air monitoring, both ambient and personal.
23. Appendix A - Site-Specific HASP, Appendix C – Air Monitoring Plan, Section 3.0 - Monitoring Locations and Data Tracking: WVDEP is somewhat concerned with the potential number of air samples to be analyzed during the duration of the excavation. Will samples be collected every day regardless of the previous day's results in the same target excavation area? Or will decisions on sampling be made during the excavation activities based on results? Please clarify the basis for the frequency of air sample collection, both ambient and personal.
24. Appendix A - Site-Specific HASP, Figures – Figure #2 – There is a text box at the far right of the figure with no text - please include the text or remove the box.
25. Appendix B – Sediment & Erosion Control Plans – Sheet 1 – Phase 1A & 1B Plan: On the far right side of the figure (north end of site), there is a direction to “Install Safety Construction Fence”, but the arrow appears to be pointing to the middle of the slope and not the fence. Please re-direct the arrow or explain.
26. Appendix B – Sediment & Erosion Control Plans – Sheet 3 – Phase 3 Plan: Water from the temporary diversion ditches appears to flow to a temporary 8” steel pipe and then to test pit #9 (TP-9) – is this correct? Or should the water be going to the sump within the excavation area? Please explain and revise as necessary.
27. Appendix B – Sediment & Erosion Control Plans – Sheet 5 – Phase 5 Plan: Is excavation/construction equipment access to the collection trench via the slope or the lower bench where the trench is located? What is the purpose of the HDPE liner? Will this work be conducted when there is virtually no chance of precipitation?
28. Appendix D – Quality Assurance Project Plan, p. 14, Section 8.2.3 – Accuracy: In the equation for Matrix spike percent recovery, is the denominator KC or SC, or does it matter [both appear to be “Known analyte or compound (i.e., spike) concentration”]?
29. Appendix D – Quality Assurance Project Plan, Table 2. Maximum Allowed PQLs: Units for soil are listed as mg/kg – should these be ug/kg?
30. Appendix D – Quality Assurance Project Plan, Table 3 – QC Samples Per Matrix: Field duplicate air samples for MCHM/PPH/Benzene - since PPH is analyzed separately from

MCHM/Benzene, shouldn't there be 2 samples? If so, do the number of air samples for background and field blank samples need to be adjusted also?

Please prepare a response to comments document and revise the work plan accordingly in response to the comments above and submit for final review. If you have any questions, please contact me at 304-926-0499, x-1265 or e-mail at [David.W.Long@wv.gov](mailto:David.W.Long@wv.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Dave Long".

Dave Long  
Project Manager

cc: Matt Ford, LRS  
Charleston File # 15017  
ec: Erin Brittain, Program Manager, WVDEP/OER