SulTRAC

US EPA RECORDS CENTER REGION 5
428092

March 19, 2010

Mr. Sam Chummar
Remedial Project Manager
U.S. Environmental Protection Agency
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604

Subject: **Technical Review Comments on "Mill Building, Area 3A and Area 3B Proposed Sampling and Analysis Plan" (Dated February 26, 2010) Former Plainwell, Inc. Mill Property, Plainwell, Michigan Contract No. EP-S5-06-02, Work Assignment No. 041-RSBD-059B**

Dear Mr. Chummar:

SulTRAC has reviewed the above-referenced document as part of its oversight activities for the former Plainwell Mill property in Plainwell, Michigan. The document is dated February 26, 2010, and was prepared by Conestoga-Rovers & Associates, Inc., for Weyerhaeuser Company, the responsible party for the site. The document contains the rationale for the proposed Mill Building, Area 3A and Area 3B investigation to be conducted at the site.

SulTRAC reviewed the document to assess its technical adequacy. SulTRAC's technical review comments on the document are enclosed.

If you have any questions about this submittal, please call me at (312) 201-7491.

Sincerely,

Jeffrey J. Lifka
Project Manager

Enclosure

cc: Norvelle Merrill-Crawford, EPA Contracting Officer (letter only)
Ron Riesing, SulTRAC Program Manager (letter only)
Ray Mastrolonardo, P.G., SulTRAC Hydrogeologist
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ENCLOSURE

TECHNICAL REVIEW COMMENTS ON
"MILL BUILDING, AREA 3A AND AREA 3B PROPOSED
SAMPLING AND ANALYSIS PLAN" (DATED FEBRUARY 26, 2010)
FORMER PLAINWELL INC. MILL PROPERTY
PLAINWELL, MICHIGAN

(Three Pages)

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SAMPLING AND ANALYSIS PLAN" (DATED FEBRUARY 26, 2010)
FORMER PLAINWELL, INC. MILL PROPERTY
PLAINWELL, MICHIGAN

SulTRAC has reviewed the above-referenced document as part of its oversight activities for the former Plainwell Mill property in Plainwell, Michigan. The document is dated February 26, 2010, and was prepared by Conestoga-Rovers & Associates, Inc., (CRA) for Weyerhaeuser Company (Weyerhaeuser), the responsible party for the site. The document contains the rationale for the proposed Mill Building, Area 3A and Area 3B investigation to be conducted at the site. SulTRAC reviewed the document to assess its technical adequacy. SulTRAC's general and specific technical review comments on the document are presented below.

GENERAL COMMENTS

1. The scope of the proposed investigation is related to evaluating soil quality from an environmental perspective (nature and extent of contamination) rather than assessing building materials for purposes of decommissioning and demolition. As such, additional sampling of building materials or waste materials potentially present in floor drains, pits, pipes, tanks, etc., would likely be necessary prior to decommissioning.

   In addition, given the physical constraints of sampling inside the buildings and limited access to some areas of the buildings, the proposed investigation is viewed as an initial assessment of environmental impacts, and additional investigation may be necessary based on the results of this investigation or at a later date if site conditions (such as future building demolition) allow for better access to potentially impacted areas.

2. Although this plan focuses primarily on sampling inside the Mill building, to more thoroughly investigate potential environmental impacts, consideration should be given to collecting samples outside and adjacent to the Mill building where outfalls, conveyances, drainage features, or process pipes are present. Following are some examples of areas outside of the building to be considered for this (unless Phase I or Phase II Remedial Investigation [RI] samples previously have been collected in these areas):

- Outside of Building 7 where the latex and hydrocarbon process lines are present
- Outside of Buildings 7 and 9 near the "ammonia," starch," and "clay titanium" tanks
- In the open area between Buildings 1 and 4 where concrete tank pads are present
- Outside of Building 1A near the areas marked "former underground conveyance" and "primary clarifier" on Figure 3A
- In close proximity to outfalls 001 through 004
- Outside near the corner of Buildings 28 and 3 where floor trenches appeared to be leading out of the buildings, as noted by SulTRAC during the November 2009 site building inspection
- Outside of Building 11A where a tank pad was observed and where a "sulfuric acid line" is located.

3. If evidence from visual observation, field screening, etc., indicates significant soil impacts, the sampling plan should include provisions for collecting "grab" groundwater samples from soil borings. In addition, the Phase II RI results should be reviewed to determine whether any significant data gaps exist with respect to groundwater flow patterns, and if so, temporary wells or piezometers should be installed as necessary to address these data gaps.

4. The proposed soil sampling program does not include analysis for cyanide. The Phase II RI results should be reviewed to determine whether the sampling plan should be revised to include cyanide in the list of laboratory analytical parameters.

5. Per previous Phase II RI protocol, drilling of "side-by-side" borings is anticipated at each location. As during the previous Phase II RI, soil will be obtained from both cores at each location, with one core to be used for field screening to determine the depth intervals for sample collection, and the other (undisturbed) core to be used for collection of the volatile organic compound (VOC) sample fraction. The plan should specify that the side-by-side borings will be performed at each location.

SPECIFIC COMMENT

1. **Table 4.** Table 4 provides the rationale for the proposed soil borings and test pits. Table 4 indicates that final sampling locations will be based on field observations, and thus the locations may be modified based on subsequent observations. Specific comments and considerations pertaining to the final selection of sampling locations identified in Table 4 are summarized below:

Building No./Area	Proposed Sample ID	Comment
Area 2 – Mill Building (Shown in Figures 3A and 3B)		
1A	SB205 - 207	SB206 should be located relative to floor drains, if possible
1	SB211	Location should be relative to open pipe and floor plates on slab
2	SB217, 218	Locations should be relative to floor drains or grates, if possible
3A	SB221	Location should be relative to floor drain, if possible
3	SB224, 225, 226	Add one more boring by exterior wall near corner of Buildings 3 and 28, where floor drains appeared to exit the building
6A	SB237, 238	During the November inspection, features that appeared to be sumps or pits were observed. Depending on knowledge of historical operations, consider sampling at or near these features
9C	SB248	Depending on knowledge of historical operations, consider a sampling location relative to the 18-inch diameter opening into the building observed from outside
11	SB270	Location should be relative to equipment pad with oil around base
15	SB287	Location is not shown as downgradient of elevator
9E	SB299, 2002, 2003	Locations should be relative to floor drains, if possible
Area 3A – Quality Products/Sludge Dewatering Buildings (Shown in Figure 5)		
Former QP	SB333	Consider another boring at south end of building for consistency with approximate spacing used in the Mill building
Sludge tank	SB325	Consider an additional location downgradient of tank
Vacant lands	Test pits	Consider additional test pits where public safety building and drive-through bays are proposed (see Figure 4) to assess conditions in area where intrusive construction work will be necessary
Area 3B – Specialty Minerals Building (Shown in Figure 6)		
AST	SB337	Consider another boring near drainage grate around western AST
Conveyance	TP336	Details regarding types of conveyance processes are unknown. Consider provisions for multiple test pits spaced along the downgradient side of the asphalt cut between the former Quality Products building and the Mill building