1167279 - R8 SDMS

**{In Archive} Comments , OU4 RI**

**Sloan, Richard** to: Nicole Bein

Cc: "LeCours, Catherine", "Scusa, Larry", Victor Ketellapper

02/17/2010 02:49 PM

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Nicole,
Attached are our comments on the Draft Remedial Investigation for OU4.
Please contact me if you have any questions or comments.
Thank you.
Dick Sloan

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February 17, 2010

To: Nicole Bein, USEPA, Region 8
From: Dick Sloan, Montana DEQ

Subject: Comments on the OU4 Draft Remedial Investigation Report, issued for comment by CDM on January 19, 2010

The Montana DEQ appreciates the opportunity to review the draft OU4 RI report. Catherine LeCours and Richard Sloan have reviewed the subject report in detail, and the following comments are presented:

1. This report is an excellent compilation of the extensive sampling and testing that has been done on OU4 over the last 10 years of so. It is very valuable to compile all the significant data and issues in a single report, which will form the basis for proceeding with the final remediation of OU4.
2. The report documents the surface soil, the subsurface soil, the air, and the surface water data that was used to design and confirm the numerous response actions that have been completed in OU4.
3. The hundreds of response actions over the last 10 years of so have been very effective in reducing the public exposure to LA.
4. In OU4, the distribution of LA is generally random and associated with human activity - residences, businesses, construction, recreational activities, etc. Thus the practice of sampling and testing in such areas is necessary.
5. Except for a few minor data gaps, the nature and extent of the LA in OU4 have been well defined.
6. The detailed and comprehensive evaluation of analytical methods for LA in soil and air samples has been presented. Section 2.1 summarizes the analytical methods. There appears to be some confusion as to the "best" analytical method for specific samples – soil, air, water. It is suggested that the EPA and CDM develop a recommended analytical method for each type of sample and potential exposure.
7. The table on Page 2-89 suggests that clean-up action is triggered by visible vermiculite. Visible vermiculite may indicate a possible asbestos exposure, but the LA content of the suspect media is what really drives the need for response action or remedial action.
8. This report confirms that the QA/QC, that has been applied, was continuous, credible and consistent with the various Quality Assurance Project Plans. Field sampling, sample handling, chain-of-custody, field blanks, laboratory blanks, laboratory selection, laboratory audits, etc. indicated no issues with data quality.

Please contact Dick Sloan (rsloan@mt.gov) if you have any questions or comments.

Thank you.