DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

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Agency for Toxic Substances
and Disease Registry
Atlanta GA 30333

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Ms. Maria Malave
Site Investigation Officer
United States Environmental Protection Agency
Region III
Pre-remedial Section (3HW13)
841 Chestnut Building
Philadelphia, Pennsylvania 19107

Subject: NUS Sampling Plan, Shaffer Equipment Company, Minden, West Virginia

Dear Ms. Malave:

Enclosed are my comments on the NUS Sampling Plan proposed for the Shaffer Equipment Company in Minden, West Virginia. These have been discussed previously with you and Mr. Randy Patarcity, NUS, during various telephone conversations during the week of February 12-16 and February 21, 26, 1990.

Ben
This is a general statement
We added samples off-site
(as you will see) per ATSDR suggestion

1. The Sampling Plan proposed by NUS Corporation (February 7, 1990) is excellent for on-site sampling requirements, however, no off-site sampling was proposed in this document (other than Arbuckle Creek water and sediment samples). Because of the nature of our work, ATSDR has a deeper interest in off-site sampling, especially in areas where direct human exposure to contaminants may occur.

2. During the course of ATSDR's review of the files and correspondence, several items were found that ATSDR believes may be of interest to EPA or should be addressed during the next round of sampling. These items are:

   a. There were several items of correspondence from the Concerned Citizens to Save Fayette County (CCSFC) regarding the disposal of PCBs into a pit 12 feet deep, 40 feet wide, and 50 feet long in an area located at the drift mouth of the old Minden Mine by former Shaffer employees. These concerns were found in letters to J. D. Rockefeller IV from CCSFC dated July 10, 1986 and to EPA Region III from CCSFC (no date, believed to be o/a April 24, 1989). The exact location of this area is not known although EPA and NUS have a good idea as to the location and will try to sample accordingly. The EPA, in general, does not allow the general public to show them where to sample; this action may cause chaos when performing the sampling. The EPA may treat this location as a separate site, because it is believed to be off-site of the Shaffer site. Because sampling on this project is EPA's prerogative and responsibility, ATSDR will not concern itself with this item further.

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b. The NUS Sampling Plan dated February 7, 1989 basically addressed only on-site sampling requirements. The ATSDR suggested that off-site backyard samples of residences originally identified in the earlier Sampling and Measuring Plan (no date, 1985?) as having the highest levels of PCBs be resampled for PCBs/Dibenzo-dioxins/Dibenzo-furans to obtain current data. These residences were identified as House numbers 196 (15 ppm PCB) and 216 (15 ppm PCB). This suggestion was accepted by EPA and NUS.

c. The ATSDR suggested that an underground spring located on the western side of the site in the earlier Sampling and Measuring Plan (no date, 1985?) should be resampled. This spring had PCB concentration dissolved in the water of 16 ug/l. This suggestion was accepted by EPA and NUS.

d. The proposed Sampling Plan by NUS Corporation (February 7, 1990) indicated that "Sixteen samples of surface soils from properties adjacent to the site were collected by TAT personnel in late 1984. No evidence of off-site migration of PCBs was found in this sampling" (excluding PCB migration that occurred downstream in the flood-prone areas-ATSDR). However, in correspondence from IT Corporation to O.H. Materials, Inc., dated March 29, 1985, PCB soil samples from Houses 318 and 319 (which were adjacent to the site), indicated PCB concentrations of 4,500 mg/kg and 2.7 mg/kg, respectively. The ATSDR suggested that a composite soil sample be taken from these two houses for PCB/Dibenzo-dioxin/Dibenzo-furan analyses. The EPA and NUS accepted this suggestion.

e. The ATSDR suggested that the PCB "hot spot" found in the sediment of Arbuckle Creek at 190 ppm be resampled to obtain current conditions. The EPA and NUS accepted this suggestion, however, NUS indicated that the past records did not give an accurate location of exactly where this sample was taken. They will try their best to relocate and sample this "hot spot".

f. An EPA trip report from Theresa E. Bickel to E. Ann Cardinal dated May 12, 1989 regarding the Shaffer site indicated that "the residents would like other hot spots examined in the scope of the LSI, including:

-resampling 6 (six) transformers found on the "Mountain Laurel" property. Note: Area of transformer has been located on map. and if it's relocated, NUS will sample. MM 3/12/90

-sampling road material near Sam's Body Shop in Rocklick. Citizens suspect PCB-contaminated material was used as road material.

-include East Oak Hill in LSI. (Green Hill)

-sample slate pile on Minden Ave."

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These citizen concerns may not have been addressed, and the proposed Sampling Plan may not be the most suitable forum for these concerns to be addressed. These concerns are solely within the purview and responsibility of EPA. The ATSDR highlighted these concerns for EPA consideration and will not pursue these further.

g. During ATSDR's site visit of April 25, 1989 to the Shaffer site, it was noticed that something was volatilizing in the air that caused congestion and watery eyes. Because of this, ATSDR suggested that at least one long-term air sample be collected downwind on the periphery of the site to attempt identification of the contaminant. PCBs may be volatilizing from the site. The opinion of EPA's toxicologist was that PCBs exhibit low volatility from soils, therefore air monitoring for PCBs would not be warranted. PCB volatilization from water is much higher. The primary concern for this site is PCB soil contamination, because very little PCBs were found in the water. Therefore, ATSDR agrees with this assessment. However, an attempt will be made by NUS and EPA using field instruments to determine if other types of volatile organics are present on-site. The ATSDR suggested that a long-term (8 hour) sample be taken using a Gilliam Pump and charcoal cannister to investigate the presence of other organics. This method would be more sensitive than the usual field scan by HNu and OVA instruments. The EPA is going to check with their contractor to see if this equipment is available and may implement as a screening method. The HNu and OVA will screen for acute exposure to organics. The Proposed Sampling Plan (February 7, 1990) will analyze soil and sediment samples for routine CLP organic and inorganic parameters. This will screen for low level organics and possible chronic exposure to low level organics.

h. The NUS Sampling Plan dated February 7, 1990 indicated that approximately 21 persons within one mile of the site use private home wells, and that the nearest home well was located approximately 1,750 feet south of the site. The ATSDR suggested that the nearest well be sampled for PCB contamination. However, it was not known if the nearest home well 1,750 south of the site was hydraulically downgradient of the site. NUS indicated that there may not be a private home well at that site or at any of the other 21 sites; they assumed that a well was located at a residence if the municipal water supply map did not indicate a tap onto the municipal water supply system. Actual confirmation of private wells was not accomplished. NUS indicated that they will try to locate the nearest downgradient private well and sample for PCBs using the same PCB detection limit (0.005 ug/l) as for the municipal well sampling.

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i. The ATSDR suggested that PCB tissue analyses be obtained for fish and snapping turtles from Arbuckle Creek. The CCSFC noted in their correspondence that people were eating snapping turtles from the site vicinity. It is not known if fish are present in Arbuckle Creek. NUS indicated that if any game fish large enough for human consumption are found, they will be analyzed for PCB (fillets). Any edible fish or snapping turtle found above the FDA PCB limit will also be analyzed for polychlorinated dibenzo-dioxins and dibenzo-furans.

3. In an effort to contain costs, several on-site samples proposed in the NUS Sampling Plan of February 7, 1990 were deleted in favor of the off-site samples. The ATSDR agrees with this action in the belief that the off-site sampling data will constitute more valuable information for Health Assessment purposes.

This letter represents ATSDR's understanding of the current status of the NUS Sampling Plan. Please contact Donald Joe at 404-639-0628, ATSDR, if this information is not correct or is not your understanding by March 23, 1990. Otherwise, ATSDR will assume the above information is correct. We deeply appreciate working with you on the Shaffer site.

Sincerely yours,

Donald Y. Joe

Donald Y. Joe, P.E.