TO: BRUCE EHLERINGER
McLAREN HART
FAX #: 810-358-5321

FLASH-FAX™ NOTE
NO. OF PAGES INCLUDING THIS FLASH-FAX™: 9

FROM: DIANA L. NEWMAN
U.S. EPA
SUPERFUND BRANCH
FAX #: (913) 551-7063
PHONE #: (913) 551-7887

SUBJECT: RI/FS WORK PLAN Comments on 2/28/94 Submittal

MESSAGE

DATE 6/30/94

I AM SENDING OUR COMMENTS ON THE 2/28/94 RI/FS WORK PLAN. WE CAN DISCUSS THESE COMMENTS/ISSUES IN THE MEETING SCHEDULED ON JULY 13, 1994 AT EPA REGION 7. OTHERS THAT WILL BE ATTENDING THE MEETING WILL BE REPRESENTATIVES FROM MDOH, MDNR, EPA'S OVERSIGHT CONTRACTORS & STEVE KINSER — NEW EPA PROJECT MANAGER. IF YOU HAVE ANY QUESTIONS GIVE ME A CALL. SEE YOU ON 7/13/94 in K.C., KS.

☐ PLEASE REPLY ☐ NO REPLY NECESSARY SIGNED Diana L. Newman

PLEASE INFORM US IMMEDIATELY IF YOU DO NOT RECEIVE FACSIMILE IN FULL

TOPS FORM 14400 LITHO IN U.S.A.

TRANSMISSION REPORT

THIS DOCUMENT (REDUCED SAMPLE ABOVE)
WAS SENT

** COUNT **
# 10

Site: West Lake Landfill
Id#: MOD079900932
Break: 10.9
Other: Wkpl Comments
6-30-94
0714

*** SEND ***

NO	REMOTE STATION I. D.	START TIME	DURATION	#PAGES	COMMENT
1	313 358 5321	7-1-94 12:16	6'03"	10	
		TOTAL	0:06'03"	10	

XEROX TELECOPIER 7020

40045805
SUPERFUND RECORDS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

JUN 30 1994

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Senior Hydrogeologist
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1000 Town Center, Suite 600
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Project Manager
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Enclosure

cc: Charles Arnold, MDOH
Mike Hockley, Spencer Fane
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RECYCLE
PAPER CONTAINS RECYCLED FIBERS

WEST LAKE LANDFILL
EPA REVIEW COMMENTS FOR THE
RI/FS WORK PLAN DATED FEBRUARY 28, 1994

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35. Page 6-32. Please clarify if surface water/leachate/rainwater run-off samples will be filtered or unfiltered for analysis. We recommend unfiltered analyses.

36. Figure 6-6. The surface water sampling locations do not fully characterize the potential impact from the site. One sampling location is not sufficient to characterize the northwest face of Area 2. Please rationalize why no samples are necessary north of Area 1 prior to entering surface water at Area 2. Please re-evaluate surface water sampling.

37. Page 6-34. Please provide the rationale for not analyzing priority pollutant metals in rainwater run-off samples.

38. Page 6-34. The text should reference Figure 6-3 where staff gage/surface water sampling locations are initially shown.

39. Page 7-28. This table shows cobalt as having an MCL of 5 ug/L. What is the source of this MCL?

40. Page 7-39. This paragraph states that non-promulgated criteria, advisories or guidance issued by Federal or State agencies may be considered as To Be Considered (TBCs) in determining clean up levels for the protection of public health or the environment. The State of Missouri has proposed Any-Use Soil Levels (ASLs) documenting maximum soil concentrations which are acceptable to human health in a residential setting. While the proposal was withdrawn in November of 1992, the state plans on re-proposing these ASLs in the near future; therefore Missouri's ASLs should be retained as TBCs.

41. Page 7-52. The preliminary list of remedial alternatives provided in the text is too limited. Please refer to EPA's

guidance "Conducting Remedial Investigations/Feasibility Studies for CERCLA Municipal Landfill Sites". The text should be expanded to include other remedial alternatives.

42. Page 1-1. Please refer to comment 15.

APPENDIX A
SAMPLING AND ANALYSIS PLAN

43. Page 1-4. The environmental media which will be evaluated should not consider landfill gas as a contingency. The landfill gas has been evaluated in the EI and HI Assessment performed by Laidlaw which indicates elevated levels of methane. The Work Plan and Sampling and Analysis Plan should provide the procedures that will be utilized for evaluating the landfill gas as well as drilling in the landfill with high levels of methane. The data to be obtained for evaluating the landfill gas should be of quality (i.e., Level III) to be used in the baseline risk assessment. The EI and HI Assessment report indicates elevated levels of Ra_{222} within the landfill gas. The landfill gas should be fully characterized for all COPCs to determine the risk associated with the air pathway.

44. Page 3-11. Duplicate samples to be collected should be at least 10% of the total number of samples to be analyzed.

45. Page 3-13. Please clarify how the data of the overland radiological survey will form the basis for selecting boring locations (i.e., Will borings be collected at the 5 "hottest" locations irregardless of the areal extent of "hot" readings? Will the borings be completed at locations centered within the 5 largest zones of "hot" readings?).

46. Page 3-16. Additional information should be provided as to how all the soil piles will be managed (i.e., pile stabilization, dust releases, etc.).

47. Page 3-18. Radiological contamination has been detected in well south of Areas 1 and 2. Specific instances where radiological detections have been identified are from 1990-1991 water samples collected from monitoring wells D-89, S-75, MW-F2 and in 1986 water samples from D-81, S-54, I-56, and S-88. Please explain the rationale for not including these wells into the sampling program. Previous data should be considered.

48. Page 3-29. A dedicated bailer for each well should be used for sampling or purging.

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50. Page 3-30. Refer to comment 21.

51. Page 3-32. When obtaining surface soils to be sampled for VOCs, the sampling depth should be 18"-24".

QUALITY ASSURANCE PROJECT PLAN

52. Page 3-3. This paragraph states that surface water sampling will be performed at the North Water Body, adjacent to Area 2. Section 6.8, page 6-34, third paragraph of the work plan states that surface water sampling will be performed at other low-lying water drainage retention ponds as well. Please clarify the discrepancy.

SITE SAFETY and HEALTH PLAN

53. Table 3-3. It should be noted that the Permissible Exposure Limit (PEL) of 1.25 rem/quarter for radioactive material only applies to individuals who have received radiological training to minimize their exposure and includes both external and internal exposures.

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ID #: MOD079900932
Break: 10.9
Other: WKpl-Comments
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WSTM/SPFD/FFRS/NEWMAN/G:\user\share\dnewman\wlltrans.ltr/063094

FFRS	REML	FFRS	REML
NEWMAN	KINSER	FLOURNOY	KING
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locations may change based on the overland gamma survey. Please explain.

33. Page 6-28. The text states that development will continue until the physical parameters have stabilized and the water is non-turbid (<100 NTU). The turbidity should be less than 30 NTU unless determined in the field and agreed to by EPA that this level is not achievable.

34. Page 6-30. The text states that priority pollutant metals and radionuclide analyses will be performed on both filtered and unfiltered samples during the initial sampling round, and only on filtered samples during the second round. The analytical results for all samples should at least have total analyses. If filtered samples are to be obtained then they may be performed in addition to the total analyses. The data to be used for risk assessment will be total analyses only.

35. Page 6-32. Please clarify if surface water/leachate/rainwater run-off samples will be filtered or unfiltered for analysis. We recommend unfiltered analyses.

36. Figure 6-6. The surface water sampling locations do not fully characterize the potential impact from the site. One sampling location is not sufficient to characterize the northwest face of Area 2. Please rationalize why no samples are necessary north of Area 1 prior to entering surface water at Area 2. Please re-evaluate surface water sampling.

37. Page 6-34. Please provide the rationale for not analyzing priority pollutant metals in rainwater run-off samples.

38. Page 6-34. The text should reference Figure 6-3 where staff gage/surface water sampling locations are initially shown.

39. Page 7-28. This table shows cobalt as having an MCL of 5 ug/L. What is the source of this MCL?

40. Page 7-39. This paragraph states that non-promulgated criteria, advisories or guidance issued by Federal or State agencies may be considered as To Be Considered (TBCs) in determining clean up levels for the protection of public health or the environment. The State of Missouri has proposed Any-Use Soil Levels (ASLs) documenting maximum soil concentrations which are acceptable to human health in a residential setting. While the proposal was withdrawn in November of 1992, the state plans on re-proposing these ASLs in the near future; therefore Missouri's ASLs should be retained as TBCs.

41. Page 7-52. The preliminary list of remedial alternatives provided in the text is too limited. Please refer to EPA's

guidance "Conducting Remedial Investigations/Feasibility Studies for CERCLA Municipal Landfill Sites". The text should be expanded to include other remedial alternatives.

42. Page 1-1. Please refer to comment 15.

APPENDIX A
SAMPLING AND ANALYSIS PLAN

43. Page 1-4. The environmental media which will be evaluated should not consider landfill gas as a contingency. The landfill gas has been evaluated in the EI and HI Assessment performed by Laidlaw which indicates elevated levels of methane. The Work Plan and Sampling and Analysis Plan should provide the procedures that will be utilized for evaluating the landfill gas as well as drilling in the landfill with high levels of methane. The data to be obtained for evaluating the landfill gas should be of quality (i.e., Level III) to be used in the baseline risk assessment. The EI and HI Assessment report indicates elevated levels of Ra_{222} within the landfill gas. The landfill gas should be fully characterized for all COPCs to determine the risk associated with the air pathway.

44. Page 3-11. Duplicate samples to be collected should be at least 10% of the total number of samples to be analyzed.

45. Page 3-13. Please clarify how the data of the overland radiological survey will form the basis for selecting boring locations (i.e., Will borings be collected at the 5 "hottest" locations irregardless of the areal extent of "hot" readings? Will the borings be completed at locations centered within the 5 largest zones of "hot" readings?).

46. Page 3-16. Additional information should be provided as to how all the soil piles will be managed (i.e., pile stabilization, dust releases, etc.).

47. Page 3-18. Radiological contamination has been detected in well south of Areas 1 and 2. Specific instances where radiological detections have been identified are from 1990-1991 water samples collected from monitoring wells D-89, S-75, MW-F2 and in 1986 water samples from D-81, S-54, I-56, and S-88. Please explain the rationale for not including these wells into the sampling program. Previous data should be considered.

48. Page 3-29. A dedicated bailer for each well should be used for sampling or purging.

49. Page 3-29. Duplicate samples to be collected should be at least 10% of the total number of wells sampled.

50. Page 3-30. Refer to comment 21.

51. Page 3-32. When obtaining surface soils to be sampled for VOCs, the sampling depth should be 18"-24".

QUALITY ASSURANCE PROJECT PLAN

52. Page 3-3. This paragraph states that surface water sampling will be performed at the North Water Body, adjacent to Area 2. Section 6.8, page 6-34, third paragraph of the work plan states that surface water sampling will be performed at other low-lying water drainage retention ponds as well. Please clarify the discrepancy.

SITE SAFETY and HEALTH PLAN

53. Table 3-3. It should be noted that the Permissible Exposure Limit (PEL) of 1.25 rem/quarter for radioactive material only applies to individuals who have received radiological training to minimize their exposure and includes both external and internal exposures.