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North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary

January 24, 2008

Ms. Samantha Urquhart-Foster
Remedial Project Manager
Superfund Remedial & Site Evaluation Branch
Waste Management Division
U. S. Environmental Protection Agency, Region 4
Sam Nunn - Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303

RE: Draft Final Wastewater Treatment Solids Management Plan
LCP-HoltraChem Site
Riegelwood, Columbus County, NC

Dear Ms. Urquhart-Foster:

The North Carolina Department of Environment and Natural Resources (NC DENR) Superfund Section has received the *Draft Final Wastewater Treatment Solids Management Plan* for the LCP-HoltraChem Site. The NC DENR Superfund Section has reviewed this document and offers the following attached comments.

The NC DENR Superfund Section appreciates the opportunity to comment on this document. If you have any questions or comments, please feel free to contact me at (919) 508-8466.

Sincerely,

David B. Mattison/dg

David B. Mattison
Environmental Engineer
NC DENR Superfund Section

✓ cc: Geoff Little, NC DENR Solid Waste Section

Attachment

LCP-HoltraChem Site DRAFT FINAL WASTEWATER TREATMENT SOLIDS MANAGEMENT PLAN

Section 1.1 Background

1. Please revise the third paragraph of Section 1.1 to describe the discharge pipe subject to these actions and its history, including the dates of usage.
2. Please correct the last sentence of the fifth paragraph of Section 1.1 to state "... exceeding **background conditions** are considered part of the Holtrachem site..."
3. Please revise Section 1.1 to include greater detail regarding International Paper (IP) Landfill Cell No. 1 such as its design and construction, permit number and regulatory status, etc. This discussion should demonstrate the cells' suitability for disposal of wastewater treatment solids (WWTS) containing less than 50 milligrams per kilogram (mg/kg) polychlorinated biphenyls (PCBs) in accordance with Title 40 of the Code of Federal Regulations (40 CFR), Part 761.61(a)(5)(i)(B)(2)(ii) and Part 761.61(a)(5)(v)(A). Much of this information is scattered throughout the document and simply needs to be documented in its own section.

Section 1.2 Physical Setting

4. Please delete the phrase "technical narrative details concerning the fuel surcharge provided (dates surcharge appropriate, etc.)" from the third sentence of the second paragraph of Section 1.2.

Section 4.3 Confirmation Sampling

5. Please revise Section 4.3 to include provisions for: upon completion of excavation activities, re-establishing the pre-excavation sampling grid; collection of surface soil (0-12 inches) samples from all grid nodes using the same sampling techniques as used in July 2006; and, analysis for PCB content, specifically Aroclor 1268, to verify the adequacy of cleanup (≤ 25 ppm) as given in 40 CFR Part 761.61(a)(4)(i)(B)(I).
6. Please define the acronym "SAP" in the first sentence of the third paragraph of Section 4.3 and include a reference to Appendix E of this report.

7. Please correct the third sentence of the third paragraph of Section 4.3 to state "The bucket will be decontaminated in accordance with **Section 5.4** between sample locations to minimize the potential for cross-contamination."

Section 5.2.3 Confirmation Sampling

8. Please correct the confirmation sample identification for the sidewall samples given in the fifth paragraph of this section to indicate that they will be **grab** samples.

Section 5.3 Removal of Corrugated Pipe

9. Discussions during the January 10, 2008 site visit indicated that CH2M Hill preferred abandonment of the corrugated pipe using concrete. This is inadequate for source removal. Please proceed with the plans as stated in Section 5.3 to properly excavate the piping and all associated contaminated soils.

Section 5.4 Equipment Decontamination Procedures

10. Please revise Section 5.4 to include provisions for the decontamination of non-disposable sampling equipment.
11. Please define the acronyms "QCRs" and "CPRs" in the fourth sentence of the fifth paragraph of Section 5.4.

Section 6.3.1 Site Inspection/Preparation

12. Please delete the fifth sentence of Section 6.3.1 and include a description of how the WWTS are to be placed around the cell pit to utilize this structure as a sump.

Section 6.4.1 Equipment/Procedures

13. The first sentence of the second paragraph of Section 6.4.1 indicates that a pre-fabricated 40-mil high density polyethylene (HDPE) liner will be provided to cover the Old Cell Building pad, welded, folded and delivered to the site as a single piece. Discussions during the January 10, 2008 site visit indicated that CH2M Hill intended to weld the HDPE on-site. If this is the case, please revise Section 6.4.1 to include provisions for the placement of the 40 mil HDPE liner, seaming procedures, destructive/non-destructive HDPE liner and seam integrity testing, etc. Regardless, all information regarding the material specifications, manufacturing and quality assurance/quality control (QA/QC) should be submitted as an attachment as well.

Section 6.4.3 Stockpile Sampling

14. Two composite samples are inadequate. Please revise the first sentence of this section to include provisions for the collection of WWTS stockpile samples at a minimum frequency of one composite sample per 1,000 cubic yards of WWTS
15. Please correct the third sentence of Section 6.4.3 to state "The grab samples will be transferred to a clean stainless steel **bowl** for mixing prior to placement in the sample bottle."

Section 7.3 Sampling Equipment Decontamination

16. The decontamination procedures are specified in the Engineering Evaluation/Cost Analysis (EE/CA) Field Sampling Plan (FSP), not the Sampling and Analysis Plan (SAP) as stated in Section 7.3. Please correct this oversight.

Section 10.0 Schedule

17. Please update Section 10.0 and the proposed project schedule included as Appendix C to provide for the current schedule.

Table 2-3 Summary of PCB Sampling Results – July 2006 Investigation, Landfill Cell No. 2

18. Please correct Table 2-3 by highlighting with bold font the Aroclor 1268 result for soil boring H-4 at elevation interval 24-22 feet above mean sea level (ft amsl).

Figure 5-2 Engineered Stockpile Cross Section

19. Please revise Figure 5-2 to include a better visual representation of how the WWTS are to be placed around the cell pit to utilize this structure as a sump.

SAMPLING AND ANALYSIS PLAN

Sampling Program WWTS < 50 mg/kg

1. The decontamination procedures are specified in the Engineering Evaluation/Cost Analysis (EE/CA) Field Sampling Plan (FSP), not the Quality Assurance Project Plan (QAPP) as stated in the second sentence of the third paragraph of this section. Please correct this oversight.

WWTS ≥ 50 mg/kg

2. Please correct the confirmation sample identification for the sidewall samples given in the fifth paragraph of this section to indicate that they will be **grab** samples.
3. The decontamination procedures are specified in the EE/CA FSP, not the QAPP as stated in the second sentence of the sixth paragraph of this section. Please correct this oversight.

Pre-Treatment Discharge Water Samples

4. Please define the acronym "LOQ" given in Note *a* of Table 1 – Pre-Treatment Effluent Monitoring Sampling Schedule.

WWTS Stockpile Sampling

5. Two composite samples are inadequate. Please revise the first sentence of this section to include provisions for the collection of WWTS stockpile samples at a minimum frequency of one composite sample per 1,000 cubic yards of WWTS.
6. Please correct the third sentence of this section to state "The grab samples will be transferred to a clean stainless steel **bowl** for mixing prior to placement in the sample bottle."

Sample Management Sample Packaging

7. Please correct the first sentence of the second paragraph of this section to state "...and other equipment or sampling debris that has come into contact with WWTS, will be collected in plastic bags..."
8. Please revise the second paragraph of this section to describe how the disposable equipment and debris will be disposed.
9. Please revise the third paragraph of this section to describe how the decontamination rinsate will be disposed.

Quality Control Sample Procedures Field Quality Control Samples

10. Please correct the second sentence of this section to state "All sampling handling procedures will be in accordance to those specified in this SAP and in the QAPP."

Decontamination Procedures

11. Please correct the second sentence of this section to state "When equipment is reused, the contamination procedures presented in the EE/CA Field Sampling Plan (Geosyntec, 2004) **will be followed** for the HoltraChem Site."
12. Please revise the second paragraph of this section to describe how the residual samples, rinse water, and rinse solvents will be disposed.

QUALITY ASSURANCE PROJECT PLAN Table of Contents

1. Please move the heading to the following page and correct the Table of Contents for the following sections, *Instrument Calibration*, *Cleanup Procedures to Minimize Matrix Effects*, and *Laboratory Quality Assurance Program*.
2. Please revise the Table of Contents such that the page numbers for the tables are only given once.

3. Please move the heading to the following page and correct the Table of Contents for Table 3-1.
4. Table 4-8 was inadvertently omitted. Please correct this oversight.
5. Please delete the parenthesis “)” at the end of the title for Table 4-13 in the Table of Contents.

Acronyms and Abbreviations

6. Please delete the question mark in the third row of this section.
7. Please delete the “s” at the end of the definition of the acronym “PCB”.

Section 1 Introduction

8. Please correct the first sentence of Section 1 to state “...requirements for excavation, segregation, transportation, and storage of wastewater treatment solids (WWTS) located in Cell No. 2...”
9. Please correct the second sentence of the fifth paragraph of this section to state “The SAP discusses the specific protocols for sampling, sample handling and storage, and field quality control.” Note that this is the first of several references to the FSP. Should these references include both the SAP and FSP, please revise the given sentences and references accordingly.
10. Please correct the first sentence of the last paragraph of this section to state “This QAPP supplements the SAP and other project-specific documents.”

Section 2 Sampling Procedures **Sampling Design**

11. Equipment decontamination is discussed in the EE/CA FSP, not the Sampling and Analysis Plan (SAP) as is stated in the second sentence of this section. Please correct this oversight.

Field Duplicate Samples

12. Please define the frequency of field duplicate sample collection in the second sentence of this section.

13. Please delete the third sentence of this section as this phase of the project should not last long enough to warrant semi-annual sample collection.

Trip Blanks

14. The third sentence of this section indicates that samples are to be collected for methyl mercury analysis. Please provide additional detail regarding these samples for methyl mercury analysis.

Matrix Spike / Matrix Spike Duplicate

15. Please define the frequency of matrix spike/matrix spike duplicate (MS/MSD) sample collection in the first sentence of the third paragraph of this section.
16. Please delete the second sentence of the third paragraph of this section as this phase of the project should not last long enough to warrant annual sample collection.

Sample Documentation and Tracking

17. Please correct the last sentence of the second paragraph of this section to state, "The types of information to be recorded during collection are specified in the SAP."

Section 3 Sample Handling and Custody Sample Packaging and Transport

18. Please revise this section such that it agrees with the information given in the SAP.

Section 4 Data Quality Objectives and Quality Assurance Program

19. Please correct the reference given for the EPA document *Guidance for the Data Quality Objectives Process* in the first sentence of Section 3.

Table 4-1 Data Quality Objectives

20. Please correct the last sentence of the description for Step 2 – Identify *the Decision* to state "Pre-treatment effluent samples will confirm water containing Aroclor 1268 is not **discharged** to the IP waste water treatment system above specified limits."

Reporting Limits

21. Please delete the unnecessary phrase at the end of the second sentence of this section.

Elements of Quality Control

22. Please correct the third sentence of the second paragraph of this section to state "is defined by the remaining time in the method-prescribed 12-hour time period divided by the analytical run time."

Laboratory Quality Assurance Program Laboratory SOPs

23. Please correct the references given for the EPA documents in this section.

Reporting Limits and Analytical Requirements

24. Please correct the first sentence of this section to state "Tables 4-2 through 4-9 contain lists..."
25. Please correct the second paragraph of this section to state "The accuracy and precision limits are listed in Table 4-10 through 4-15. Calibration and quality control requirements are specified in Tables 4-16 through 4-20."

Section 5 Calibration Procedures and Frequency

26. Please correct the page numbering in Section 5 as well as in the Table of Contents.

Field Calibration Procedures

27. Please correct the last sentence of the first paragraph of this section to state "...and the information included within the SAP."

Section 6 Data Reduction, Validation, and Reporting Hardcopy Deliverables

28. Please correct the reference given in the first sentence of this section.

Section 10 Corrective Action

29. Please correct the second sentence of the second paragraph of this section to state "Field and laboratory staff may encounter conditions requiring immediate corrective action that are not covered in the SAP or QAPP."

Section 12 Data Management Archiving

30. Please revise this section to include provisions for document retention for a period of five years upon completion of the project or as is stated in the Administrative Order on Consent (AOC).

QUALITY CONTROL PLAN

Table of Contents

1. Please correct the Table of Contents to indicate that the title of Section 2.1.3 is Construction Manager – Marshal Linton/**Robert Custance**".
2. Please correct the Table of Contents to indicate that Table 3-1 is located on page 3-2.
3. Please correct the Table of Contents to indicate that the sixth item in Appendix A is the "Waste Tracking Log **Template**".

Acronyms and Abbreviations

4. Please delete the acronym for AFCEE – Air Force Center for Environmental Excellence.
5. Please delete the question mark following the definition of the acronym NVLAP.
6. Please delete the "(TO)" following the definition of the acronym TO.

Section 2.1.2 Project Manager – Denis Ewing

7. Please correct the thirteenth bullet item of Section 2.1.2 to state "Investigates of nonconformance and implementations of corrective actions".

**Section 2.1.5 Subcontractors
Engineered Stockpile Construction, WWTS removal, segregation, and
transportation – Shamrock Environmental**

8. The last sentence of the second paragraph of this section references the Materials and Performance Specifications. This document was inadvertently omitted. Please correct this oversight.

Section 3.1 Inspections

9. The second sentence of this section indicates that a Site Superintendent will assist in performing inspections. Please identify the Site Superintendent and the roles and responsibilities of the Site Superintendent.

**Table 3-1 Project Inspection Activities by Task
Task – Dewater Cell No. 2 and Remove WWTS**

10. Please delete the question mark in the first bullet item of this task.

HEALTH AND SAFETY PLAN

Emergency Contacts

1. Please correct and complete the Site Contact information.
2. Please revise the Emergency Contact List to include the International Paper (IP) emergency response number and appropriate contact information.

Directions to Hospital

3. The map to the hospital was inadvertently omitted. Please correct this oversight.

Site Map

4. The Site Map was inadvertently omitted. Please correct this oversight.

Table 1-1 Task Hazard Analysis Table

5. Please revise Table 1-1 to include potential hazards from excavations, heavy equipment exposure, noise and vehicle backing exposure from each of the four tasks.

Section 2.1.3 Safety Meetings

6. Please correct the fourth sentence of Section 2.1.3 to state "...and actively **participate** in the discussions."

Section 2.2 Project-Specific Hazards and Controls

7. Please correct the project date in the second sentence of Section 2.2.

Section 2.2.1 Earthmoving Equipment

8. Please delete the last bullet item of Section 2.2.1.

Section 2.2.4 Exposure to Public Vehicular Traffic

9. Please correct the project date in the first sentence of Section 2.2.4

Section 2.3.11 Procedures for Locating Buried Utilities

10. Please correct the sixth bullet item to state "... (e.g., sudden change **in** advancement of auger or split spoon)."

Section 2.5 Chemicals of Potential Concern

Table 2-4 Chemicals of Potential Concern

11. Please correct the Aroclor 1268 concentrations to reflect actual site conditions of the wastewater treatment solids.

Section 3.3 CH2M Hill Subcontractors

12. Please delete the second sentence of Section 3.3.

Ms. Samantha Urquhart-Foster
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Attachment 5 Project Activity Self-Assessment Checklists
HS&E Self-Assessment Checklist – PCB Waste Management

13. Please correct the second sentence this checklist to state "... 2) CH2M HILL provides oversight of subcontractor personnel who are engaged in PCB operations."

Attachment 11 Drug Testing Hospital Kit Notice

14. Please correct the project date in the first sentence of Attachment 11.