

DW-8J

January 21, 2004

Douglas L. Fisher  
Environmental Affairs and Safety Manager  
Vernay Laboratories, Inc.  
120 E. South College  
Yellow Springs, Ohio 45387-1623

Re: Historical Data Usage  
Vernay Laboratories, Inc.  
Yellow Springs, Ohio  
OHD 004 243 002

Dear Mr. Fisher:

This is in response to the December 12, 2003, submittal titled *Technical Memorandum No.2, Historical Data Usage in the RCRA Corrective Action* and it discussed the historical data usage in the RCRA Facility Investigation (RFI) as outlined in the Section 3008(h) Order on Consent. Vernay Laboratories, Inc.(Vernay) requested that the United States Environmental Protection Agency (U. S. EPA) complete a Quality Assurance Project Plan (QAPP) review of past site investigation data collected by The Payne Firm, Inc. (Payne Firm). The data was collected from 1998 to 2001 during a voluntary investigation conducted by Vernay following the Ohio Environmental Protection Agency (OEPA) Voluntary Action Program (VAP) rules. This data was submitted in a report following the guidelines in the U.S. EPA's, May 8, 1998, *Region 5 Policy and Guidance Regarding Historical Data Usage in the RCRA Facility Investigation*.

In general, Vernay has made a good faith effort reviewing the relevancy of their VAP groundwater, surface water, and sediment data to the RFI and relying on the guidance supplied by the Region's 1998 RCRA QA Policy. The review centered on determining whether or not Vernay had sufficiently demonstrated they had vouched for their VAP data. At this time, there was no attempt to re-validate the VAP data. We can accept the use of historical data to establish

trend analyses in groundwater, sediments, and surface water. We can not accept the use of historical data to establish trend analyses for soil until the soil data collection is complete and confirmation is demonstrated . We can not accept using the VAP historical data as replacement data for what Vernay must collect to complete the RFI or for information to be collected as outlined in the Order on Consent.

I am enclosing more detailed comments to the Technical Memorandum No. 2, Historical Data Usage in the RCRA Corrective Action Report dated December 12, 2003. If you have any questions, please do not hesitate to contact me at 312-886-8093. We could also set up a conference call to discuss any outstanding issues.

Sincerely,

Patricia J. Polston  
Project Manager  
Corrective Action Section  
Waste, Pesticides and Toxics Division

Enclosure

cc: A. Debus, (w/enclosure)  
J. Morris, ORC (w/enclosure)  
D. Contant, The Payne Firm (w/enclosure)

## ENCLOSURE

U.S. EPA Response to  
 Technical Memorandum No. 2  
 Historical Data Usage in the RCRA Corrective Action  
 Dated December 12, 2003  
 Vernay Laboratories, Inc.  
 OHD 004 243 002

General:

1. *Page 5:* The 2<sup>nd</sup> bullet from end of page references Tables 5 and 6 of the Project QAPP, although I couldn't find this data in Appendix II.
2. *Section 4.4:* On page 6, end of 2<sup>nd</sup> par. in this section, note that "CLP-like data" generated during future RFI phases should be Level 4, not Level 3.
3. *Section 4.6:* In the last par. on page 7, as well as on page 2 of Table 2, Vernay mentions that they will confirm 10% of their soil data during the RFI. It is anticipated then, and should be confirmed in writing, that Vernay will submit another "Technical Memorandum," analogous to this document, although next time focusing on their VAP soil data. It would also be advisable to 'confirm' as many VAP background soil locations as possible.
4. *Table 2:* This Table impressively underscores how heavily the VAP data will be relied upon to meet a number of important RFI objectives. It isn't clear however, that much additional (new) RFI data will also be collected, supplementing VAP data. Furthermore, and although this report isn't intended to be a QAPP for future work, all new data should be reported as CLP-Level 4 data, not "Analytical Level III."
5. *Table 4:* Finally, just a 'planning' advisory that analytical reporting limits (e.g. 'PQLs) for all constituents to be reported should be consistent with the scope of RFI-prescribed environmental indicator, human health and ecological objectives.

Appendix V:

1. While it wasn't the focus to revalidate VAP data, case narratives summaries of VAP data in this Appendix were read. QC problems were noted in a number of cases which were flagged using post-it notes in one copy of the report. In some

cases surrogate recoveries for PAHs by method 8310 were poor, even though the data was considered acceptable for use in an 8/16/00 summary. PAH matrix spike recovery data was 'off' as well. Further explanation as to why the PAH QC data was inaccurate in several cases should be provided prior to accepting this data for future use.

#### Appendix VII:

1. Vernay has conservatively adapted the equation appearing in Appendix A of Region 5's QA Policy for non-soil media as well as situations where data is reported at detection limits. I concur with Vernay's approaches. In fact, after re-reading our Appendix A and applying the equation for the first time (& for the record, Vernay's is the first such demonstration provided to U.S. EPA in this format), I realized that there is a typo in our Appendix A interpretation of what results will mean. Vernay has correctly interpreted their indexed results, however.

#### Conclusions:

1. In the case of wells MW02-01, MW01-06, MW01-07, MW01-08, MW01-11, MW01-12, and MW02-02, method reporting limits achieved by STL for the VAP study are comparable to those attained during a recent 2003 groundwater monitoring event for all reported VOCs constituents.
2. In cases of select SVOCs, (including several PAHs), presumably measured by STL-North Canton using Method 8270, and chromium, respective reporting limits achieved during the VAP study are comparable to those attained during a recent 2003 groundwater sampling event.
3. With a solitary exception for wells indicated in Table 3 of Appendix VII, wherever it was possible to make valid comparisons, historical VAP VOCs data appears comparable to more recent 2003 data at respective well locations - the exception is toluene measured in MW01-02CD.
4. With one exception, wherever it was possible to make valid comparisons, historical VAP data collected in the year 2000 appears comparable to the 2003 data set at respective well locations. The exception is chromium measured at MW01-03.
5. In Appendix VIII, there would appear to be good agreement between February 2003 'confirmation' and 'pre-2003' data for surface water and sediment VOCs samples. (For most data points, the level of detection was used.) Analytical reporting limits also seemed reasonably in agreement between the two data sets. These have not been compared to Region 5's Ecological Screening Levels.