

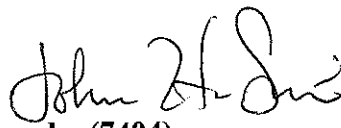
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TELEFACSIMILE

April 12, 1999

TO: **Linda Wilson**

FROM: **John H. Smith, Ph.D.** 
Fibers and Organics Branch (7404)
(202) 260-3964 (DESK), (202) 260-1724 (FAX)
E-Mail: smith.johnh@epa.gov

MESSAGE: Please see the attached answers to your questions.

Office of Prevention, Pesticides and Toxic Substances
Office of Pollution Prevention and Toxics
National Program Chemicals Division
Fibers and Organics Branch

3 Pages (including cover)

Question 1. If previous characterization of PCBs (i.e. before June 29, 1998) was performed using Immunoassay test kits (USEPA Method 4020) with laboratory confirmation of greater than 10 percent of the results, is it necessary to collect additional characterization samples prior to initiating a self-implementing cleanup?

Answer 1: When submitting the notification required in §761.61(a)(3), you may submit sampling data collected at a time period more than thirty days prior to the intended date site cleanup is scheduled to begin. However, during the 30 day review period provided by §761.61(a)(3), the EPA Regional Administrator (EPA RA) will on a case-by-case, site-by-site basis determine the applicability of all site characterization data submitted in the notification to the condition of the site at the time site cleanup is scheduled to occur. At the conclusion of the review, the EPA RA may require additional sampling and analysis using another analytical method or require confirmation of your method in accordance with subpart Q.

Question 2. Is it acceptable to use the immunoassay test kits for verification sampling with confirmation samples analyzed using USEPA Method 8082?

Answer 2. For §761.61(a), if you choose to use another chemical analysis method other than that provided in subpart O, you must validate the method(s) in accordance with subpart Q and submit the method(s) in the §761.61(a)(3) notification .

Question 3. Subpart O uses a two dimensional sampling grid. Do the sidewalls of the excavation require sampling.

Answer 3. Subpart O requires a core sample for non-liquids. This core provides the third dimension. Cleanup verification only applies to the areas cleaned up and sampled. The walls of an excavation are not considered cleaned up unless they are sampled. Contamination from a spill to the surface may not be best evaluated in the same way in the floor of an excavation. EPA designed the confirmation sampling for excavation which occurs in layers roughly parallel to the surface of the ground. EPA assumed that each layer of an excavation would be extended outward as far as contamination is found. Any proposal to verify that walls are clean, must be submitted in the notification and approved by the EPA RA prior to cleanup and verification.

Question 4. When sampling gravel, what analytical method is used? Is the gravel crushed?

For confirmation sampling, gravel is analyzed in the same manner as soil. It is not necessary to crush the gravel, so long as the analytical equipment as required in subpart O (or alternative method validated in accordance with subpart Q) can accommodate the amount of gravel in a representative sample. The method in subpart O does not prevent the crushing of gravel in a

representative sample, so long as the crushing does not generate sufficient heat and or pressure to change the PCB concentration in the gravel.

Question 4:

If adequate characterization, can fewer verification samples be collected?

Answer 4:

The Regional Administrator will determine the adequacy of characterization and verification sampling from the information submitted in the notification (see Answer 1). Usually additional pre-cleanup characterization sampling would not have any bearing on verification of cleanup.

Question 5: Is a deed restriction required of cleanup less than 25 ppm?

Answer 5:

Yes. The only cleanup which does not require a deed restriction is a cleanup to less than 1 ppm. All cleanups in low occupancy areas and any cleanup requiring a cap or fence require deed restrictions.

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FACSIMILE TRANSMITTAL SHEET

To: John H. Smith, Ph.D Fax No. 202-260-1724
USEPA - OPPTS Phone No. _____
 _____ Project No. _____

Sent by: Linda Wilson Date: 4-1-99 Time: _____
~~3-25-99~~

Message: I am resending this fax to verify that it has been
received. I have also added two additional questions.

TOTAL NUMBER OF PAGES SENT INCLUDING TRANSMITTAL SHEET 2

IF ALL PAGES ARE NOT RECEIVED, PLEASE CALL US AS SOON AS POSSIBLE

PHONE: (516) 232-2600

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- Natural Attenuation/Intrinsic Remediation
- Bioremediation
- Risk Based Corrective Action (RBCA)
- Voluntary Cleanup Programs
- Site Redevelopment/Brownfields

Ground-Water and Soil Investigations

- Phase I/Phase II Investigations
- CERCLA RI & RCRA RFI
- Ground-Water Modeling
- Geophysical Investigations

Litigation Support

- Expert Testimony/Technical Presentations
- Contaminant Source Identification
- Remedial Action Assessments
- Cost Allocation Studies

Remedial Engineering & Design

- CERCLA FS & RCRA CMS
- Conceptual Design/Engineering Design
- Construction Management

Human Health & Environmental Risk Assessments

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- Property Transfer Assessments
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Thank you.

1. If previous characterization of PCBs (i.e., before June 29, 1998) was performed using Immunoassay test kits (USEPA Method 4020) with laboratory confirmation of greater than 10 percent of the results, is it necessary to collect additional characterization samples prior to initiating a self-implementing cleanup? Is it acceptable to use the immunoassay test kits for verification sampling with confirmation samples analyzed using USEPA Method 8082?

2. Subpart O uses a two dimensional sampling grid. Do the sidewalls of the excavation require sampling?

3. When sampling gravel, what analytical method is used? Is the gravel crushed?

4. *If adequate characterization, can fewer post verification samples be collected?*

5. *~~If a restricted area is required~~
Is a restricted area required for cleanup less than 25 ppm?*