

August 11, 2006

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RE: OU 1 POG3 South DMU- 22 (TSCA Area) Post Dredge Sampling and Closure Status

Dredging was completed in DMU-22 (the TSCA area) in July 2006. During dredging, areas of high subgrade were encountered. The TSCA area was poled and cored to confirm areas of high subgrade on July 25, 2006. Twenty seven mini-cores were collected to confirm the presence of high sub-grade. During logging of the minicores, a majority of the minicores revealed very-fine to fine sand and 11 locations were determined to contain 4 inches or greater of predominantly very-fine to fine **loose** sand with little or no organic material. Based on the definition of high subgrade (dense sand, clay, or rock) these areas (about 40% of the total DMU 22 area) could not be classified as confirmed high subgrade. Due to the nature of the soft material (predominantly sand) in this area, the decision was made to complete post-dredge coring and core analysis within DMU-22 to determine the residual levels of polychlorinated biphenyls (PCBs). The attached Figure 1 illustrates the mini core locations, 2" post-dredge locations, and the approximate extent of DMU- 22 not meeting the typical "confirmed high subgrade" definition (areas outlined in blue).

DMU-22 was cored on July 31, 2006 (post -dredge sampling) and cores were sent to Pace Labs for analysis of PCBs on August 1, 2006. Two primary samples were collected from sample areas 62P and 69P as well four secondary samples collected at locations 69A, 69B, 69C, and 69D.

The 0 – 4 inch interval from each primary sample was processed and sent in for analyses. These cores primarily consisted of dark gray loose to dense fine sand with some silt, root fibers, and woodchips. The secondary samples primarily consisted of dark gray loose silt and fine to medium loose to dense sand with organic fibers and woodchips. The 0 – 4 inch interval from the secondary samples were homogenized and sent in as a composite sample. All cores were collected, processed and analyzed as outlined in the Sediment Removal Verification Plan (Appendix D, LFR OU1 RA 2006 RAWP).

The results from these samples are as follows:

<b>Sample ID</b>	<b>PCB Concentration Percent Solids</b>	
	<b>(mg/Kg)</b>	<b>(%)</b>
1-RA-06-POG3-PS-62P(0-3 ¼)	0.120	67.5
1-RA-06-POG3-PS-69P(0-4)	0.120	76.8
1-RA-06-POG3-PS-69AB (0-3 ¾)69CD (0-4)	0.190	70.6

mg/Kg = milligrams per kilogram

Post dredge samples 62A, 62B, 69D, and 70A were collected within the areas defined as having greater than 4 inches of soft sediment remaining. The levels of PCBs detected in the primary samples 62P and 69P, and composite sample 69A-D are well below the remedial action level (RAL) of 1 part per million (ppm). In looking at the post dredge 2" core logs, the primary difference between the cores collected in the confirmed high subgrade areas and cores in the areas with 4" or more of remaining material not meeting the "high subgrade" definition, is the physical property of being "dense" rather than "loose".

The secondary samples for triangles 62, 68 and 70 have not been analyzed because adjacent DMU's need to be sampled prior to making the composite sample for these triangles.

Based on the information collected and summarized above, including the low post-dredge residual PCB values, we believe it is reasonable that GW Partners request that the Agencies/Oversite Team review this information and concur with a "closed" status for this DMU.