



Memorandum

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RE: 2006 Dewatered Sediment PCB Sampling Plan

Overview

This memorandum outlines the sampling protocol for sampling OU1 2006 RA dewatered sediment for PCB analysis. Samples will be collected from the thickener slurry and from the material (> 1/8 inch) removed by the trammel screens preceding the thickeners. Because the data gathered in 2004 and 2005 demonstrate a reliable correlation between *in situ* and dewatered sediment PCB values whereby dewatered sediment PCB values are lower than *in situ* values, GW Partners will decrease the frequency of dewatered sediment PCB sampling in 2006.

Thickener Slurry

A composite sample of the thickener slurry will be collected for PCB analysis over the course of each week during the 2006 RA activities.¹ This will be accomplished when, every two hours during thickener operation, the thickener operators will take an approximate 200 ml sample as they make their routine rounds. Sample times will be recorded on a thickener slurry sampling log, along with the sampler's initials and the geotextile tube(s) being filled at the time of sample

¹ Assuming 150,000 cy of sediment are planned for removal over an approximate 27-week period, 6,000 cy will be the approximate volume of sediment removed weekly. One PCB analysis will be performed for approximately every 6,000 cy of dewatered sediment generated. Due to this production rate, one composite sample will be analyzed each week to achieve the approximate one sample per 6,000 cy frequency.

collection. These samples will be placed in a covered 5-gallon pail and stored in a cooler containing ice, which will keep the samples at approximately 4^o Celsius. At the end of each week, the Engineer will homogenize the composite of the week's samples and then collect three aliquots from this composite. The Engineer will send the samples to Pace Analytical for PCB analysis (Fox River Method) within the maximum 14-day holding time for PCBs. The PCB result for that week will be recorded as the arithmetic average of the three aliquots (e.g. (51 ppm + 10 ppm + 2 ppm)/3 = 21 ppm).

If the average PCB concentration of the three aliquots analyzed each week is ≥ 50 ppm, the Engineer will perform additional sampling to collect a representative composite sample from each of the individual geotextile tubes that were being filled during this sample collection period. These samples shall be collected from the same locations as the percent solids samples collected as part of the routine dewatered sediment QA sampling. In addition to forming the composite, discrete full depth samples from each of the geotextile tube sample locations will be retained and archived. If a composite sample from any individual geotextile tube reveals the presence of PCBs at concentrations ≥ 50 ppm, the archived discrete samples will be analyzed to determine the segment(s) of the geotextile tube with potential for PCB concentrations ≥ 50 ppm. The Engineer will then perform grid sampling on the identified geotextile tube segment(s) to determine the extent of the dewatered sediment with PCB concentrations ≥ 50 ppm. This sampling would be performed when the suspect geotextile tube(s) is exposed as a result of load-out of the adjacent non-TSCA geotextile tubes. The impacted material shall be segregated for disposal at an approved TSCA facility.

Screen Material

Material removed by the trammel screens ($> 1/8$ inch) will be collected for PCB analysis once per month for the first two months, and at a reduced frequency of once every two months if the first two months indicate no PCB values ≥ 50 ppm. The Engineer will collect 10 samples from various representative locations in the stockpile and form a single homogenized composite sample. Three aliquots will be formed from the composite. The Engineer will send the three aliquots to Pace Analytical for PCB analysis (Fox River Method) within the maximum 14-day holding time for PCBs. The resulting PCB value for the month will be the arithmetic average of the three samples as described above for the thickener slurry.

In the event that the average PCB concentration of the three composite screen material samples analyzed each month is ≥ 50 ppm, the Engineer will perform grid sampling in the screen material stockpile to determine the extent of the screen material with PCB concentrations ≥ 50 ppm, and the impacted material shall be segregated for disposal at an approved TSCA facility.

Once the sampling of a pile has been completed, the pile of screened material will be moved to allow another pile to begin being formed. As soon as the results are received, the material from the appropriate pile will be loaded, transported and disposed.