



west virginia department of environmental protection

Office of Environmental Remediation
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Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
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May 8, 2015

Certified Mail #91 7199 9991 7033 6612 3007

Mr. Mark Welch, CRO
Freedom Industries
1015 Barlow Drive
Charleston, WV 25311

RE: *Addendum to VRRP Interim Measures Work Plan* Comments, VRP# 15017
Freedom Industries, Charleston, Kanawha County

Dear Mr. Welch:

A review of the above referenced document dated May 1, 2015, and received by the Office of Environmental Remediation on 5/1/2015, has been completed. Our comments are provided as follow:

P. 1, 2nd Paragraph: During the on-site meeting on April 6, 2015, the WVDEP agreed that potential residual MCHM and PPH soil contamination in the interceptor trench may be impacting water collecting in the trench, so that water in the trench is not representative of surface runoff. WVDEP agreed to review a plan for a separate trench installation. Based on a site visit on May 30, 2015 and conditions observed, WVDEP is still of the opinion that it would be difficult to collect a stormwater sample with no MCHM/PPH detections in the area of the MCHM/PPH release, migration route to the river, or collection trench without further excavation of contaminated soil.

P. 2, 2nd Paragraph: The interim work plan submitted April 22, 2015 contained plans for a trench installation, however, the location and details of the trench installation differed significantly from what was discussed on-site during the April 6, 2015 site visit.

P. 2, Item #1 – Former Pump House Excavation – Will a temporary cap be placed in this area to prevent infiltration?

P. 2, Item #2 – New and Existing Collection Trench - As noted previously, WVDEP cannot approve a proposal for a new trench without assurance that the trench will not collapse or be inundated/breached by the river.

P. 3, Item #3 – Sampling Plan - WVDEP requests additional detail concerning sampling of the various media. At what depth will the surface water be sampled? How far from shore will the surface water samples be obtained? Will sediment be sampled? Will the river bank soils be sampled? Note that these media will require sampling to ensure a complete VRP site investigation. Details should be included in the "VRP Supplemental Site Investigation Work Plan", due May 30, 2015 per the Voluntary Remediation Agreement

P. 3, Item #4 – Monitoring Plan – WVDEP believes daily monitoring is required initially for the first five precipitation events following collection of a water sample with no MCHM/PPH detections. Should there be no detections during the initial monitoring, a less stringent monitoring schedule may be appropriate.

P. 3, Item #5 – Excavation and Confirmatory Sampling – As noted previously, WVDEP believes additional excavation of MCHM/PPH impacted soil is needed to ensure no impacts to surface water runoff and the Elk River.

For the reasons noted herein, WVDEP/OER cannot approve the *Addendum to VRRP Interim Measures Work Plan* at this time. A Response to Comments document as well as a revised or alternate VRRP Interim Measures Work Plan should be submitted by May 15, 2015.

WVDEP/OER personnel are available to discuss proposed revisions and/or alternate plans. I can be contacted by phone at 304-926-0499, ext. 1265 or email at David.W.Long@wv.gov.

Sincerely,



Dave Long
Project Manager

cc: Ira Buchanan, LRS
Charleston File # 15017

ec: Patty Perrine, Interim Program Manager, WVDEP/OER