



west virginia department of environmental protection

Office of Environmental Remediation
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Earl Ray Tomblin, Governor
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October 9, 2015

Certified Mail #91 7199 9991 7035 6692 8282

Mr. Robert L. Johns
Freedom Industries Spill Claim Plan Administrator
Turner & Johns, PLLC
216 Brooks Street, Suite 200
Charleston, WV 25301

RE: Review of “Freedom Industries Interim Site Assessment Report”, VRP# 15017
Freedom Industries, Charleston, Kanawha County

Dear Mr. Johns:

A review has been completed of the *Freedom Industries Interim Site Assessment Report* prepared by Mr. Matt Ford, LRS, CORE Environmental Services, Inc., and dated September 30, 2015, and received by the Office of Environmental Remediation on 9/30/2015. Our comments are provided as follow:

1. Section 1.1: This section should note that the work was conducted in accordance with the “Interim Site Assessment Work Plan” dated August 25, 2015 and approved by WVDEP on August 27, 2015.
2. *Section 3.0, last ¶: This section discusses the backfilling of the excavation and sump installation in the former fire pump house area. The text should note that confirmation sampling was conducted prior to backfilling and sump installation. Both soil confirmation sampling and the initial sump water sampling results should be included in a separate appendix.
3. Section 4.1, last ¶: Text should be added to note that the geophysical survey report will also aid in development of the Interim Remedial Action Work Plan.

4. Section 4.2: Text should be added in this section to emphasize that test pits #14-17 were excavated to define the lateral and vertical extent of MCHM and PPH contaminated soils in the former tank and immediate spill area, based on initial results from test pit #9.
5. Section 4.3, Soil Sample Analyses: MTBE should be added to the last bullet in this section.
6. Section 4.3, P.5, last ¶: Did both types of sample jars (32-oz. & 4-oz.) contain Teflon-lined lids? It was WVDEP's understanding that the 4 oz. jars did. If this is the case, please confirm and include this information in the text as additional effort to preserve the volatile portion of the MCHM/PPH sample.
7. Section 4.3, P.5, last ¶: The text states, "Samples submitted for volatile organic compound (VOC) analysis were also placed in containers with zero headspace." Is this referring to samples for BTEX/MTBE analysis, or for the samples submitted for MCHM/PPH analysis in the 4 oz. jar? Please clarify. Also, please specify that samples submitted for BTEX/MTBE analysis were collected via EPA Method 5035.
8. Section 4.4: Test Pit TP-1 – This test pit contained an excavated component perpendicular to the original excavation, which was directed to the east/southeast back towards Barlow Drive. Construction and demolition (C&D) debris was present in the excavation to its furthest extent to the east/southeast, whereas, test pits 12 and 13 did not contain C&D debris. This is critical because it accounts for the "point" of the approximate C&D waste locations to the east/southeast depicted on Figure 5. Please revise text and figures as appropriate to make this point.
9. Sections 4.3 and 4.4: Language in these two sections regarding analysis of soils samples for MCHM and PPH is confusing. The text states samples were analyzed by gas chromatography/mass spectrometry methods and by USEPA SW846 Method 8270D. However, Method 8270D is a gas chromatography/mass spectrometry method. In reviewing the lab reports, it appears samples from both jars were prepared and analyzed for MCHM and PPH by the same methods (Prep-SW3541, Analysis-SW8270). It appears the only difference was in the bottles the samples were collected in. Please confirm and clarify the analyses for MCHM and PPH.
10. Table #1B – Please add Lead to the title.
11. Figure #4 – In the notes adjacent to the legend - the orange text - please add 32 to the jar description.

Please prepare a response to comments document and a revised report in response to the comments above and submit for final review. If you have any questions, please contact me at 304-926-0499, x-1265 or e-mail at David.W.Long@wv.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "DL", with a stylized flourish extending from the end.

Dave Long
Project Manager

cc: Matt Ford, LRS
Mark Welch, Morris Anderson
Charleston File # 15017
ec: Erin Brittain, Program Manager, WVDEP/OER