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west virginia department of environmental protection

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Office of Environmental Remediation  
601 57th Street SE  
Charleston, WV 25304  
Phone: 304-926-0455

Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
dep.wv.gov

August 18, 2015

Certified Mail #91 7199 9991 7034 3223 3489

Mr. Mark Welch, CRO  
Morris Anderson  
1788 Scarlett Drive  
Pittsburgh, PA 15241

RE: *Interim Site Assessment Work Plan*, VRP# 15017  
Freedom Industries, Charleston, Kanawha County

Dear Mr. Welch:

A review of the above referenced document dated August 13, 2015, and received by the Office of Environmental Remediation on 8/13/2015, has been completed. Our comments are provided as follow:

### **Geophysical Survey**

1. Will all geophysical survey work be completed before the test pits are excavated? When will the initial test profiles be complete and when will WVDEP know which methods will be used?

### **Test Pit Excavation**

2. Please provide detail on how perched groundwater will be removed and transferred to the on-site frac tank(s).
3. If saturated conditions are encountered in test pits prior to encountering native soil, please verify that groundwater will be removed to the extent practicable, and the excavation

continued to native soil where a sample will be obtained (subject to the conditions noted). WVDEP believes it is imperative to define the extent of cobble fill and sample native soil below the fill.

4. When collecting soil samples, please take care to preserve as much of the volatile portion of the sample as possible.
5. Limited data has been developed for the “cobble fill” slope, the lower bench, and the slope below the lower bench. For this reason, WVDEP would like for both samples from one test pit in each of these areas (preferably test pits 2, 3 & 4) to be analyzed for the full analytical suite that was recently run on water samples from the collection trench and newly installed sump. Please attach the list of analyses as an appendix.
6. P. 3, 2<sup>nd</sup> bullet: “One matrix spike and one matrix spike *duplicate* sample for every twenty samples...”.
7. The CORE Quality Assurance Plan referenced in the next to last paragraph on p. 3 was not included – please include as an attachment.

**Appendix A – Site Specific Health & Safety Plan – Appendix B**

8. Please verify that the site-specific Job Safety Analysis Forms (JSA’s) will be completed prior to initiation of the field work.

Please prepare a revised plan 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](mailto:David.W.Long@wv.gov).

Sincerely,



Dave Long  
Project Manager

cc: Matt Ford, LRS  
Charleston File # 15017  
ec: Patty Perrine, Interim Program Manager, WVDEP/OER