

M. K. Ketcher

131599



August 8, 1991

Allegheny County
Coraopolis Bridge Replacement
Project No. 0B02-0607
Hazardous Waste Investigation

MEMORANDUM OF RECORD

A meeting to review HDR's proposed environmental sampling plans for the structure boring program and, draft technical proposal to perform the additional hazardous waste investigation required by the EPA for a focused RI/FS was held in Harrisburg, PA, in Room 107 of the Transportation and Safety Building on July 25, 1991, from 1:00 p.m. until approximately 4:00 p.m. This meeting involved a discussion of the comments received from Pennsylvania DOT, the Allegheny County Health Department, ENSR Consulting and Engineering, and US EPA.

Representatives of the following organizations were present:

Allegheny County Department of Engineering & Construction
Pennsylvania Department of Transportation, District 11-0 and Central Office
United States Environmental Protection Agency
Maguire Group, Inc.
ENSR Consulting and Engineering, Inc.
FHWA
Neville Land Company
HDR Engineering, Inc.

See Attachment 1 for a listing for names and telephone numbers of all attendees.

In summary, the proceedings of the meeting were as follows:

1. Tom Stockhausen conducted introductions and stated that the purpose of the meeting was to discuss the structure boring sampling plan and draft technical proposal and to go through the comments received from reviewers.
2. Lisa Chisholm reviewed the comments received from PennDOT, the Allegheny County Health Department (no representative attended the meeting), ENSR and US EPA. HDR's response to these comments were outlined and discussion of the various issues took place comment by comment.

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HDR Engineering, Inc.

3 Gateway Center
Pittsburgh, Pennsylvania
15222-1074

Telephone
412 281-8470

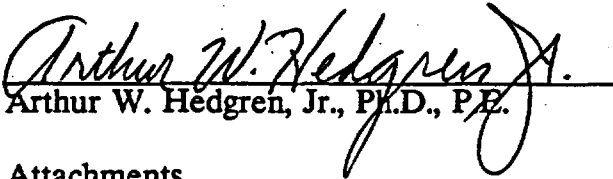
AR300595

3. The majority of time was spent addressing the PennDOT comments, which were primarily focused upon the Structure Boring Program and the environmental sampling to be conducted in association with it. The 32 comments from PennDOT and HDR's responses with meeting input make up a large part of Attachment 2. Two comments from the County Health Dept. were also addressed (see Attachment 2). The majority of the 24 comments received from ENSR were addressed during the discussion of the Penn. DOT comments, with EPA addressing several questions regarding the RI/FS procedures. The responses to these ENSR comments and to the six multiple comments from US EPA have also been compiled and are included in Attachment 2.
4. Martin Kotsch of the U.S. EPA stated that Allegheny County, PennDOT and FHWA would not incur liability as "operators" on the hazardous wastes site until construction was started.
5. It was agreed that HDR would revise the original technical proposal to reflect the results of these discussions. The Sampling and Analysis Plans that pertain to the Structural Boring Program and the Extended Soils Investigation on Neville Island will be written in accordance with agreements made during the Harrisburg meeting.
5. Finally, it was also agreed that the Structural Boring Program and associated river sediment and soils sampling could commence in accordance with the meeting results. The final Sampling Plan (dated 7/29/91), would be submitted to Allegheny County by August 5th through their agents, the Maguire Group. (The Sampling Plan is being distributed under cover letter from Allegheny County DEC dated August 13, 1991.)

Please refer to Attachment 2 for a compilation of comments and responses. Meeting results are noted where appropriate.

Memorandum of Record
August 8, 1991
Page 3

Should you have any questions regarding these matters, please call me at (412) 281-8470 or Charlie Lee at (704) 338-1800.


Arthur W. Hedgren, Jr., Ph.D., P.E.

Attachments

cc: Tom Stockhausen
C. Lee - HDR Charlotte

ATTACHMENT 1
 CORAOPOLIS BRIDGE REPLACEMENT
 MEETING
 1:30 P.M., 7/25/91

LIST OF ATTENDEES

Name	Phone No.	Organization
Arthur W. Hedgren, Jr.	(412) 281-8470	HDR Engineering
Lisa Chisholm	(704) 338-1800	HDR Engineering
Cathy Kleveter	(402) 399-1041	HDR Engineering
Martin Kotsch	(215) 597-3218	U.S. EPA
Dean Schreiber	(717) 783-5545	PennDOT Bureau of Design
Renee Sigel	(717) 782-3785	FHWA
Jose G. Ramirez	(717) 782-3940	FHWA AE
Jim Lukaszewski	(914) 681-0000	NLC
Terry Serie	(703) 243-4258	NLC
Robert Frank	(215) 665-3827	Buchanan Ingersoll for Neville Land Co.
Peter Barth	(412) 261-2910	ENSR For Neville Land Co.
Darlene Stringos	(717) 787-0459	PennDOT Env. Quality Div.
Tom Stockhausen	(412) 281-6393	Maguire Group, Inc.
Tom Donatelli	(412) 355-4430	Allegheny County
Patricia Remy	(412) 937-4638	PennDOT Env., District 11

ATTACHMENT 2

AR300599

Table 1A

River Sediments - Soils PLERR

Analytical Procedures

Parameter (All Non-CLP)	RCRA Metals	PCB/ Pesticides	SVOCs	VOCs	TPH	RCRA TCLPs
SW-846 Method Number	7000+	8080	8270	8240	418.1	Metals
Detection Limit (ppm)	0.01-0.2	1/Varies	Varies	Varies	30	SVOCs
Preservation	Cool, 4°C	Cool, 4°C	Cool, 4°C	Cool, 4°C	Cool, 4°C	Pest/Herbs
Holding Time	6 Mos.	6 Mos.	47 Days ^a	14 Days	14 Days	VOCs?
Regular Samples:						
River Sediments	4	4	4	0-4	4	2
Surface Soils (PLERR)	4-8	4-8	4-8	0-8	4-8	2-4
QA/QC Samples:						
Splits	2	2	2	-	2	1
Rinsate Blanks	(1)	(1)	-	-	(1)	-
Field Blanks	-	-	-	(1)		
Trip Blanks	-	-	-	(4)		-
Total Samples	10-14+(1)	10-14+(1)	10-14	0-12+(5)	10-14+(1)	5-7
Notes:						
() Indicates Water Samples						
a Seven days until extraction, 40 days after extraction						

Table 1B

Neville Island Soils

Analytical Procedures

Parameter (All CLP)	TAL/CN Metals	PCE/ Pesticides	SVOCs	VOCs	TPH	Herb/Pest. Dioxin	RCRA TCLPs
SW-846 Method Number	7000+	8080	8270	8240	418.1	8150/8140	Metals
Detection Limit (ppm)	0.01-0.2	1/Varies	Varies	Varies	30	Varies	SVOCs
Preservation Holding Time	Cool, 4°C 6 Mos.	Cool, 4°C 6 Mos.	Cool, 4°C 47 Days ^a	Cool, 4°C 10 Days	Cool, 4°C 14 Days	Cool, 4°C	Pest/Herbs VOCs?
Regular Samples:							
Surface Soils ^b	4	2	2	4	4	2	1
Deep Soils ^b	4	4	4	4	4	-	1
Surface Soils ^c	6	2	2	6	6	2	-
Deep Soils ^c	6	6	6	6	6	-	-
QA/QC Samples	4	2	2	4		2	1
Splits	1	1	1	1	1	-	-
Rinsate Blanks	(1)	(1)	-	-	(1)	-	-
Field Blanks	-	-	-	(1)	-	-	-
Trip Blanks	-	-	-	(2)	-	-	-
Total Samples	25+(1)	17+(1)	17	25+(3)	21+(1)	6	3
Notes:							
()	Indicates Water Samples						
a	Seven days until extraction, 40 days after extraction						
b	Surface and deep soil samples rolled into the structure boring program.						
c	Surface and deep soils part of Neville Island Sampling Plan (sensu stricto).						

AR300601

Pennsylvania DOT
REVIEW OF DRAFT PROPOSAL
EXTENDED SOILS INVESTIGATION &
RISK ASSESSMENT FOR
CORAOPLIS BRIDGE REPLACEMENT
HDR, May, 1991
RECEIVED 5/21/91

1.0 Task 1.10 Mod of HASP

1.1 The HASP must be prepared by or reviewed by a toxicologist or certified industrial hygienist.

1.2 It is 29 CFR not 20 CFR.

2.0 Task 1.13

2.1 2nd paragraph

Considering the regrading of this site in the past it is recommended that samples also be taken below the 12 inch depth.

2.2 6th paragraph

What about other QC/QA sampling and testing requirements (such as, rinseate blanks, trip blanks, spikes, lab blank, etc.)

2.3 Provisions must be included to containerize and store drill cuttings from this work and the geotechnical drilling.

2.4 No mention is made of preparing drilling contract and administering the contract.

2.5 It is recommended that at least one round of sampling and testing of the existing monitoring wells be conducted using all the test parameters being considered now. This should include obtaining information on ground water levels.

2.6 4th paragraph

Unless the EPA explicitly states the testing for herbicides and dioxins is not required, testing for these compounds should continue.

2.7 Samples and testing should also take place along areas of other underground activities (such as, removal, relocation, or addition of utility line, storm sewers, etc. or excavation for placement of subbase and pavement base drain)

2.8 Should continue to test for TPH.

2.9 This section is somewhat difficult to understand. It would be useful to develop a table identifying what tests are to be run at what depths at each location.

3.0 Task 1.15 Short-term Risk Assessment

Should reference that work will be done in compliance with

AR300602

"Risk Assessment Guidance for Superfund, Vol 1, Human Health Evaluation Manual (Part A).

4.0 Task 1.18 River Sediment Sampling

4.1 Should also be testing for phenols on a standard basis.

4.2 Sampling depths should be evaluated after associated structural borings are completed.

4.3 If appropriate, sampling locations should be away from areas of regular dredging

5.0 Task 1.19 Structure Boring Sampling/Monitoring

5.1 The full range of tests should be run on at least some of the samples from the eight boring.

5.2 Is OVA screening to control whether all testing to be conducted including test for metals?

6.0 A Site Operations Plan/Field Operations Plan must be prepared. The proposal should reflect this activity. The sampling plan would be a part of this plan.

7.0 A site specific QA plan must be developed. The laboratory QA material should be returned for review.

8.0 In general description of task activities does not contain sufficient detail.

9.0 A library search should be done for all appropriate testing phases.

10.0 Should indicate that if contamination found there will be a need for a supplement to develop remedial designs.

11.0 Reference should be made to the use of the document "Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA-Interim Final" (SPA/540/G-89/044) when performing the RI/FS.

12.0 Will the piles for the abutment be driven or drilled?

13.0 Test to be performed should be listed explicitly.

14.0 How are river piers to be removed? If sediment and soil are to be removed, testing of this sediment and/or soil should be done.

15.0 Why is there not testing for all RCRA hazardous waste characteristics (particularly the TCLP portion).

16.0 Need to add task for preparation of special provisions for dealing with hazardous waste if encountered during construction regardless of the outcome of this investigation. This would

include provisions for sampling and testing at the very least.

17.0 Is there going to be earthwork activities (such as, regrading) at the location of the previous approach? I was told once no but plans seem to indicate otherwise. What exactly is to be done? Is there a need for testing at this location.

18.0 Monarch Basin inspectors should be health and safety trained as should the drillers.

19.0 HDR personnel used for geotechnical drilling should not be just health and safety trained but also qualified to be a site safety officer.

20.0 Manhour loading should be provided with next draft.

AR300604

RESPONSES TO PENNSYLVANIA DOT COMMENTS

- 1.1 The HASP was reviewed and approved by Paul Johnson, HDR's Corporate Health and Safety Officer; he is a CIH.
- 1.2 We concur; this was a typo.
- 2.1 Refer to paragraphs 5 and 6 where deep sampling is proposed.
- 2.2 EPA sampling and analytical protocol will be followed; 1 rinsate blank, 1 field blank, and 1 split sample will be taken for QA/QC purposes from each of the Structure Boring matrices (river sediments/railyard soils), along with 1 trip blank per week.
- 2.3 Cuttings will be contained in drums, covered, and stored at the driller's trailer on-site pending analytical results. This information is included in the driller's specifications. The specifications call for Penn Drilling Co. to be responsible for drumming, labeling, and storage of drummed cuttings, as well as disposal of non-contaminated materials. Disposal of other materials will be taken care of by Allegheny County as discussed by Allegheny County and Neville Island Land consultants, as has been done for the previous phases of work.
- 2.4 This has been taken care of under the provisions of the structure boring program.
- 2.5 This has been done in Phase I and II with no indication of contamination having been found. We do not favor this approach as we feel no new information will be gained and would incur considerable expense (~\$6,000). The water levels could be measured again to ensure that depth of excavation will not intersect water table. The EPA representative agreed with our reasoning and stated that additional water sampling at this point would only be of value if the entire NPL site was to be sampled. EPA also stated that they would not require the County to conduct such sampling in order to build the bridge. Therefore, no additional water sampling will be conducted at this time.
- 2.6 These parameters have been sampled along the approach (Phase 2), but, if they were tested for in the abutment area, it would complete the surface soils data set. The additional herbicides, pesticides, and 2,3,7,8-TCDD (dioxin) will be tested for in surface soils from the four locations in the abutment/wingwall area.
- 2.7 Pittsburgh HDR addressed this question. According to them, there will be a drain for water between the abutment area and the river. The County and Pittsburgh HDR will ensure that any other excavation will be within the sampled areas only.
- 2.8 It was agreed that TPH would be tested for in all 20 samples to be taken on Neville Island.

- 2.9 This information will be included in the two sampling plans. HDR will provide a table showing the analytical procedures and numbers of samples to be taken in the revised "Extended Soils Investigation and Risk Assessment," and in the Sampling Plans written for the Structure Boring Program and for the extended soils investigation on Neville Island.
- 3.0 We concur.
- 4.1 Phenols are a semi-volatile. We recommend that, instead of three samples from each boring being sampled for limited parameters, one composite sample per boring be tested for all the parameters except the volatile organics. Due to its proximity to borings 5S and 7S, 6S will not be sampled. Two of the composite samples will also be analyzed for TCLP RCRA metals, SVOCs, and pesticides and VOCs pending the results of OVA screening. The VOCs will be evaluated with an OVA. If OVA screening indicates the presence of VOCs, the samples showing the highest OVA readings (if any) will be submitted for VOC analysis. If no positive OVA readings are found, VOC analysis will be omitted. This approach would give more information on the sediments and keep the costs from becoming prohibitive.
- 4.2 It was agreed by Penn DOT that we would collect a composite sample from each of the river structure borings. The composite will be made up of a sample from the surface, the middle, and the bottom of the sediment to be excavated. (For example, if a boring extends 70' but excavation during construction is only to be 30', then the samples would be at the surface at ~15' and at ~30'.)
- 4.3 Since we are investigating materials associated with the piling locations, these locations are fixed.
- 5.1 Instead of partial testing of eight boring samples, we propose to do full analysis, except for VOCs unless they are indicated by screening, on four of these borings. The borings will be chosen based on site analysis. It costs \$1315/sample for full non-CLP analysis. It will save \$5260 to do four as opposed to eight. We also propose two TCLP analyses for RCRA metals, SVOCs, pesticides, and herbicides on composite samples from this area. VOCs will be included if their presence is indicated by screening (see Response 4.1 above).
- 5.2 No, only for VOCs.
- 6.0 Development of a sampling plan is proposed, see Task 1.11 and the Health and Safety Plan is Task 1.10. The HASP and SAP for the Structure Boring Program have been developed. The Neville Island SAP is currently being developed.
- 7.0 HDR has/will include a site-specific QA/QC plan within the Structure Boring and Neville Island Environmental Sampling Plans, as requested by Penn DOT.
- 8.0 This was a proposal not the sampling plan; the sampling plan contains/will contain detailed descriptions of task activities.

- 9.0 We have conducted a library search on contaminated sediments in industrial settings and have consulted with our own QA/QC personnel to assure that the analytical methods are proper (see Sampling Plans).
- 10.0 If contaminated sediments are found, there may be a need to determine whether or not they are hazardous via TCLP or other testing prior to and during excavation and construction. The results of such testing would then be used to set disposal criteria for the excavated sediments under Section 404 of the Clean Water Act (40 CFR part 230), if applicable. A design and plan for stock piling, testing, and disposal might be appropriate depending on the results of the currently proposed sediment sampling and analysis. Other available data on Ohio River sediments in the Pittsburgh area will be obtained from the US Army Corps of Engineers or the US EPA.
- 11.0 EPA RI/FS guidance is always consulted for NPL-related work and where soils/GW investigations are anticipated.
- 12.0 They will be driven.
- 13.0 A table will be provided in the revised proposal and in the Sampling Plans prepared for the Structure Boring Program and for the additional environmental sampling to be conducted on Neville Island.
- 14.0 This was discussed by Penn. DOT, the County, and HDR Pittsburgh. They determined that the piers will be cut down to the mud line, work will be done from a barge, and sediment will not be removed. Penn DOT stated that, because of this, sediment testing would not be necessary at these locations.
- 15.0 TCLP can be done, but it is not mandated under CERCLA and is very expensive. It will cost \$1,600/sample for full TCLP. The sampling plan will include running two TCLP tests in the river borings and two TCLP tests on soils from the eight structure boring locations in the railroad yard. VOC analysis would be requested pending the results of OVA screening. This is the only way that the sediments/soil can be characterized for disposal.
- 16.0 Allegheny County indicated that provisions dealing with hazardous waste would be included if we made it to the construction phase.
- 17.0 If doing earthwork by removing the previous approach would require additional testing, Allegheny County indicated it would leave the previous approach alone.
- 18.0 This is indicated in the HASP; all on-site personnel (drillers, sub-contract geotech. engineers, HDR samplers, etc.) will be OSHA 40-hour trained. Art Hedgren addressed this question in the meeting at Harrisburg.
- 19.0 They will be.

20.0 Allegheny County addressed this question. The technical proposal, revised in accordance with the July 25th meeting, will be resubmitted to EPA for final approval. With that approval, the full proposal will be submitted to PennDOT with a draft supplemental agreement for the purpose of and in accordance with procedures for pre-award audit and draft agreement review. It is not intended to solicit comments from the technical review group on the fee proposal or manhours.

Allegheny County Health Department

COUNTY COMMISSIONERS

TOM FOERSTER
chairman

PETE FLAHERTY

LAWRENCE W. DUNN

ALBERT H. BRUNWASSER, M.P.H., M.B.A.
director



Frank B. Clack Health Center
Building #5, 3901 Penn Avenue
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BOARD OF HEALTH

ROY L. TITCHWORTH, M.D.
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June 5, 1991

Herbert C. Higginbotham II, Director
Department of Engineering & Construction
County of Allegheny
501 County Office Building
Pittsburgh, PA 15219

ATTENTION: Thomas Stockhausen

RE: CORAOPOLIS BRIDGE REPLACEMENT
SUPPLEMENTAL HAZARDOUS WASTE
INVESTIGATION SCOPE OF SERVICES
SUPPLEMENT SOILS AND RISK
ASSESSMENT WORK

Dear Sir:

The Division of Public Drinking Water & Waste Management has reviewed the draft proposal from HDR Engineering, Inc., entitled "Extended Soils Investigation and Risk Assessment", dated May 1991. This document has been reviewed for possible impacts that such site investigative efforts may incur on area drinking water facilities and for general comments related to our knowledge of environmental health-related issues, including issues specific to this site.

This office concludes that the proposal for the scope of services to be provided by HDR Engineering, Inc. will be beneficial in further characterizing the possibility of impacts of the bridge project and will provide the EPA with a basis for further decisions on the project. The approaches and tasks outlined in the proposal are of sound approach and method. This proposal is acceptable to this office as a scope of services and appears to address the concerns raised in the letters from the EPA concerning soils at the site.

As a brief comment, HDR Engineering, Inc. should consult with the EPA on the herbicides previously determined to be present at the park disposal area, that are to be excluded from further sampling, to ensure that additional gaps in the data required by the EPA are not created that may impair their ability to exclude an area from the listed site boundaries and consider a health assessment as complete. This may be especially relevant to the previously unexplored river sediments.

NCH, GF, Connors, Maguire, Tom D, McHugh

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ALLEGHENY COUNTY
DEPT. OF ENGINEERING
DIVISION

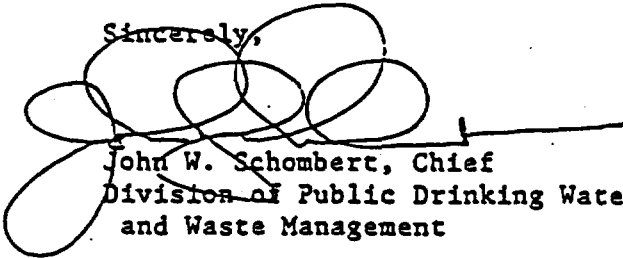
Herbert C. Higginbotham II, Director
June 5, 1991
Page Two

Also, the EPA should be consulted to determine if the intended short-term risk assessment in Task 1.15 for on-site workers is consistent with the NEPA requirements regarding exposed populations. The assessment might be extended to river water users with the advent of sediment sampling results for the back channel.

This office would like to thank you for the opportunity to review and comment on this document.

If you should have any questions, please contact me at 578-8047.

Sincerely,



John W. Schombert, Chief
Division of Public Drinking Water
and Waste Management

KSW/st

cc: Gerald M. Barron, ACHD

AR300610

2

Answers to comments from Allegheny County Health Department

A representative was not present at the meeting.

As indicated in the Harrisburg meeting, HDR will test for TCL PCB/Pesticides in River Sediments and the PLE Railroad Yard, but not for the extended list of pesticides. We propose to test for these parameters (2,4-D, 2,4,5-T, Silvex, Malathion, and 2,3,7,8-TCDD) on samples taken from the four structure borings in the abutment area as this is an area where we do not yet have data; this would complete the data set. Even if extended pesticides and herbicides were discovered in the river sediments, they would have originated from somewhere upstream, as the sediment and groundwater from the NPL site would be transported toward the north/northwest in the direction of river and TCL groundwater flow. This testing would add ~\$1,500-\$2,000/sample to the total cost.

With regard to extending the risk assessment to the river water users, we feel that the industrialized nature of the areas upstream makes it very difficult to determine the point sources of contamination if found. Such an extension goes beyond the reach of the area regulated by CERCLA.



ALLEGHENY COUNTY
DEPARTMENT OF ENGINEERING
AND CONSTRUCTION

JUN 10 10 40 AM '91

ENSR Consulting
and Engineering
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Pittsburgh, PA 15222
(412) 261-2910
(412) 765-1421/FAX

June 7, 1991

Mr. Herbert C. Higginbotham, II, P.E.
Director
Department of Engineering and Construction
County of Allegheny
501 County Office Building
Pittsburgh, PA 15219

Attention: Thomas Stockhausen

RE: COMMENTS ON THE HDR SCOPE OF SERVICES FOR RI/FS ACTIVITIES
AT THE CORAOPOLIS BRIDGE SITE
NEVILLE TOWNSHIP, PA.

Dear Mr. Higginbotham:

Thank you for the opportunity to comment on the document "Extended Soils Investigation and Risk Assessment" by HDR Engineers, dated May 1991. ENSR has reviewed this document and divided our comments into general and specific categories.

GENERAL COMMENTS

1. Your cover letter indicates that Allegheny County would undertake a focused RI/FS. However, HDR's scope of work states that the "overall purpose of the proposed work would be to fill data gaps". What is the objective of the proposed scope of services?
2. The proposed scope of services indicates that "Allegheny County will request a Record of Decision (ROD) in order to proceed with construction of the bridge". In a discussion with Martin Kotsch (EPA), we understand that in order to obtain a ROD, Allegheny County would have to follow more formal RI/FS protocol.
3. The aforementioned document is simply a response to your request for proposal for the additional work required by EPA prior to construction activities at the site, and, as such, lacks the level of detail that is necessary for RI/FS activities at NPL sites. ENSR assumes that HDR will prepare a Site-Specific Sampling Plan (SSSP) as described in Task 1.11, a Quality Assurance Protection Plan (QAPP), and a site-specific Health and Safety Plan (HASP) for activities to take place on site.

HCH, GF, Connors, Tom D, Maguire, McHugh

AR300612

June 7, 1991

Mr. Herbert C. Higginbotham, II, P.E.

Page 2

4. The proposed scope of services includes investigations on three distinct properties; the Ohio River Site (a property listed on the NPL), Pittsburgh and Lake Erie Railroad Yard, and Back Channel of the Ohio River. The existing scope of services does not distinguish the differences in those areas with respect to CERCLA RI/FS activities. Since the scope of work required in each of these areas are different, the scope of services for each area should be discussed separately.
5. The proposed scope of work does not reference the EPA report entitled 'Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA' (EPA/540/6-89/004). Unless specific portions of the guidance procedure are not required by EPA, the focused RI/FS will need to comply with this guidance. Risk assessment activities will be performed by the U.S. EPA
6. Feasibility study activities are not discussed in the proposed scope of work.
7. How will community relations be handled during this program?
8. The proposed soil characterization activities appear to be limited to the proposed right-of-way for the new bridge and approach, rather than the entire parcel south and east of Grand Avenue. It appears that EPA is requiring that only the right-of-way be characterized (Page 3, item No. 1). Has EPA explicitly approved the limits of the proposed area for soil characterization? Allegheny County should describe the proposed study area prior to preparing formal work plans.
9. No task is identified for developing a work plan for the RI/FS within the scope of services. Will HDR have an initial scoping meeting with U.S. EPA to define the scope of work, data objectives, and program requirements?
10. This site should be identified as the Ohio River Site, not the Ohio River Park Site.
11. It is not clear what the appropriate boundary is for the area of investigation. Is the boundary the limits of the right of way, the limits of the excavation, or the entire southeast corner of the property?

AR300613

June 7, 1991

Mr. Herbert C. Higginbotham, II, P.E.

Page 3

12. What will be the data quality objectives for the analytical data? It would be beneficial if analytical data generated could be used for future risk assessment evaluations.

SPECIFIC COMMENTS

1. Page 1 - Background

The second sentence should read: On the Neville Island end of the bridge, the selected approach alternative is on a former hazardous waste disposal site known as the Ohio River site, which is currently listed on the National Priority List.

2. Page 2 - Previous Studies

- a. Second Paragraph, 6th sentence

This sentence should be revised to explain that dissolved metals were detected at levels below the primary drinking water standards.

- b. Second Paragraph, 1st Sentence

2,3,7,8 Dibenzodioxin is misspelled and should be 2,3,7,8 tetrachlorodibenzo-p-dioxin.

3. Page 3 - Objectives

- a. First Paragraph

See general comment 1.

- b. First paragraph, last sentence

The structure boring program is off-site and characterization of off-site areas should be addressed separately.

- c. Item No. 1:

The term "vicinity" should be more specific to define the study area requiring further characterization. A map of the proposed study area would be helpful.

AR300614

June 7, 1991
Mr. Herbert C. Higginbotham, II, P.E.
Page 4

d. Item No. 2:

The risk assessment will require an assessment of the potential threat to human health and the environment in the absence of any remedial action. If remediation is undertaken, impacts during remediation will need to be addressed. Worker exposure is part of the health and safety plan.

e. Page 4 - First Paragraph

As previously discussed, the on-site (characterization) work should be managed separately from the off-site (structure boring) work because of the more stringent requirements for the characterization work.

4. Task 1.10:

It is unclear whether one or two HASPs will be prepared. As previously suggested, on and off-site work should be managed separately. Also, it should be noted that any personnel on site during intrusive activities must meet the requirements of 20 CFR 1910.120.

5. Task 1.11:

The property owner is the Neville Land Company, not Hillman Land Company as stated in the third sentence.

6. Task 1.11:

It is unclear to ENSR what will be produced through this task. Allegheny County should receive a general outline listing all components to be included in the SSSP. A typical SSSP includes (but is not limited to) a site history, description of previous environmental studies and results, sample locations and rationale, sampling methodology, field documentation and quality assurance/quality control, analytical parameters, methods, detection limits, and handling of investigation-derived materials (e.g., soil cuttings from drilling). It appears that Task 1.13 is a general sampling plan, but this is not explicitly stated. A typical SSSP is much more detailed than that provided in this document.

7. Task 1.12:

A drilling subcontractor will also be required based on the work identified.

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8. Page 5, Task 1.13:

a. General:

Task 1.13 is not consistent with the remainder of the proposal format for defining the nature of the services to be provided. Much of the thought process presented should be part of the investigation work plan.

b. First Paragraph:

Soil sampling should extend to the groundwater interface.

c. Second Paragraph:

TAL metals should be analyzed in place of the eight RCRA metals.

d. Third Paragraph:

Semi-volatile organic compounds (SVOC) and PCB/pesticide analyses are proposed only for surface samples. All soil samples should also be analyzed for SVOC, pesticide, and PCB content.

e. Fifth Paragraph:

An undue amount of judgement is required of the Field Manager with respect to choosing samples for chemical analysis based on OVA readings or physical appearance of soils. The criteria for choosing samples for analysis should be explicitly defined by the SSSP, with a set interval or number of samples per boring being pre-determined as required samples. Other sampling intervals could then be added at the discretion of the Field Manager, based on OVA readings or appearance. As written, borings SS-7 through SS-10 could generate between eight and 44 samples, and borings SS-11 through SS-16 could generate between 12 and 36 samples.

f. Sixth Paragraph:

HDR should verify that the proposed suite of analyses can be performed on the volume of soil generated from a six-inch interval.

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g. Sixth Paragraph:

RCRA metals analysis should be replaced by TAL metals analysis.

h. Sixth Paragraph; last sentence:

The remedial investigation will require that field, trip, and duplicate samples be collected as part of the QA/QC program. See the EPA Guidance Document EPA 540/6-89/004.

i. Page 6 - First Complete Paragraph

ENSR suggests that groundwater level measurements should be made prior to excavation activities to document that groundwater is below the anticipated excavation depth.

9. Task 1.15:

See general comment 2.

10. Task 1.16:

See general comments 4 and 5.

11. Task 1.17:

No Comment

12. Task 1.18 and Task 1.19

Remedial investigation activities undertaken at these locations should be considered separately from the work on the Ohio River Site.

ENSR

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Please contact me if you need further clarification of any of these comments.

Sincerely,



Peter J. Barth
Senior Program Manager

PJB:mah\4920201h.pjb

cc: R. W. Rittmeyer
H. V. Blaxter, III, Neville Land Company
T. C. Reed, Buchanan Ingersoll

AR300618

Responses to comments by ENSR CONSULTANTS AND ENGINEERS

(ENSR went through comments quickly. Most of their concerns had been answered in discussions of other comments.)

EPA answered their questions about the RI/FS.

GENERAL COMMENTS

1. The objective of the proposed scope of services is to provide complete soil characterization data for those areas to be impacted upon/disturbed by excavation during bridge construction. This needs to be accomplished in order that a focused RI/FS can be completed.
2. This has been addressed in letters to Allegheny County from the EPA.
3. The reviewed document was an informal proposal requested by the County. A formal HASP has already been completed and the sampling plan, proposed in Task 1.11, normally addresses QA/QC. Addressed previously under Penn. DOT comments.
4. The scope of services is the same for all three sites in that they are designed to provide soils characterization on areas to be impacted/disturbed by excavation during bridge construction. The only difference will be in the actual analytical protocol used for the different areas. The samples taken from the NPL site on Neville Island will be analyzed under CLP protocol. CLP will not be used on the samples from the non NPL areas due to the increased expense and the lack of CERCLA jurisdiction.
5. As stated previously, this has been addressed in letters to Allegheny County from the EPA and was addressed by the EPA.
6. This is beyond the scope of the current proposal.
7. Allegheny County keeps the public in the area informed about the work being done with meetings and newsletters and is not concerned about problems in this regard.
8. The area of investigation is shown in Figure 1 of the proposal and is also in Figure 2 of the HASP.
9. HDR is not proposing to complete a full RI/FS, currently only a focused RI/FS has been requested. EPA addressed this issue.
10. This is the name that the EPA has used in correspondence with Allegheny County.
11. The limits of the proposed excavation will be the focus of the Neville Island

investigation.

12. HDR will follow RI/FS/CLP protocol on Neville Island, but not on the samples from the non-NPL areas.

SPECIFIC COMMENTS

1. We concur.
2. We concur.
- 3a. Addressed above.
- 3b. See Sections 1.18 and 1.19 of the draft proposal.
- 3c. See Figure 1 in proposal and Figure 2 in HASP.
- 3d. It is a focused RA not a baseline RA. Worker exposure needs to be addressed in the risk assessment, so that an appropriate HASP can be written for the construction phase of the bridge project.
- 3e. We have addressed this above, see general comments #4.
4. The HASP has been prepared and covers all areas of activity. This HASP was written in accordance with 29 CFR 1910.120. The Neville Island and non-NPL area will be managed separately, but the same HASP will apply to both.
5. An oversight, which will be corrected.
6. Task 1.13 is a general sampling plan. The items listed under the SSSP are/will be included in the proposed sampling plans.
7. HDR is aware of this.
- 8a. The County wanted a general outline of the proposed sampling effort. The narrative in 1.13 provides for an estimate of the numbers and types of samples to be taken, and by extension, the cost of analysis.
- 8b. The depth of excavation does not approach the water table which has been measured on the site (by HDR and others) to be >20 feet below the surface.
- 8c. TAL is \$250/sample more than analyzing the 8 RCRA metals; HDR will test soils on Neville Island for TAL metals and CN.
- 8d. Addressed in previous comments.

- 8e. On Neville Island, we will take 10 surface soil TAL metals + CN, surface soil VOCs and TPHs, 4 surface soil SVOC/PCBs/pesticides, 10 deep soil TAL metals + CN, TCL VOC, SVOC, PCBs/pesticides, and TPH samples. In addition, the 4 surface soils to be taken from the wingwall/abutment will be analyzed for the extended herbicide/pesticide list and dioxin as indicated above.
- 8f. HDR proposes using a drill rig and a 2.0" OD split spoon will be used to collect the samples. The SAPs will be modified accordingly.
- 8g. This was addressed in response 8c.
- 8h. Rinsate/field/trip blanks and duplicate samples will be taken in accordance with the guidance document and as outlined in the SAPs under site specific QA/QC sampling.
- 8i. It will not be a problem to measure the wells before excavation. Based on previous HDR measurements 3/8/90 (HDR Field Notebook) MW-1 WL=23.6' TOC; MW-2 WL=24.6' TOC; MW-3 WL=23.15' TOC; MW-4 WL=24.8' TOC; MW-5 WL=23.8' TOC. These measurements are also supported by information found in ERT documents.
12. We are not conducting a remedial investigation on these areas but wish to characterize the nature of contamination, if any, found in the Ohio River sediments and the railyard soil. This is being done as a precaution designed to protect on-site workers from potential exposure to hazardous materials.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

ALLEGHENY COUNTY
DEPT OF ENGINEERING
& CONSTRUCTION
JUN 7 2 08 PM '91

Mr. Herbert C. Higginbotham, II, P.E.
Director
Department of Engineering and Construction
Allegheny County
501 County Office Building
Forbes Avenue & Ross Street
Pittsburgh, PA 15219

Dear Mr. Higginbotham:

This is being sent to you to formally transmit our comments on the draft proposed scope of work for the soils investigation of the Coraopolis Bridge Replacement Project right-of-way area as prepared by your consultant HDR.

Our comments are attached to this letter. Upon review of our comments, if you have any questions, please contact me to further discuss them. Upon revision of the scope of work, EPA will be willing to give the proposal a final review if you so desire.

Sincerely,

Martin T. Kotsch, P.E.
Remedial Project Manager

Attachment

AH, GF, Connors, Tom D, Maguire, McHugh

AR300622

EPA COMMENTS ON HDR PROPOSED SCOPE OF WORK

1. According to page 5 of the proposal, surface soil samples will be analyzed for RCRA toxic metals (arsenic, barium cadmium, chromium, lead mercury, selenium, and silver). It is unclear from this statement, however, whether each soil sample will actually be analyzed for metal content or if TCLP analyses (for characterizing hazardous solid waste) will be performed. Please note that for the basis of quantifying risk, it is imperative that contaminant concentrations in soil be provided (in terms of mg/kg), since TCLP results cannot be applied to human health risk calculations.

2. In determining the risks, if any, associated with excavation of the site, the following sources of guidance should be relied upon:

A. Risk Assessment Guidance for Superfund, Volume I : Human Health Evaluation Manual (Part A), December 1989.

B. Integrated Risk Information System database (IRIS).

C. Health Effects Assessment Summary Tables, Fourth Quarter.

3. Objectives (p. 3)

Although a primary objective of the soil characterization effort is to acquire data suitable for performing a quantitative risk assessment, another important consideration is to determine whether any waste materials or contaminants remaining in the soil could be mobilized or destabilized during bridge construction activities. The effect of disturbing the soils or waste materials should be evaluated in the final report.

4. Task 1.13 - Surface and Deep Soil Sampling (p. 5)

A. The Superfund Program requires that chemical analysis for metals appearing on the Target Analyte List (TAL) be performed. All references to RCRA toxic metals should be replaced with TAL metals.

B. Depths of either 5.5 ft. or 10.5 ft. have been chosen for the soil borings. However it is not clearly stated that the bridge construction activities will be limited to these depths. The rationale for selecting the soil boring depths should be explained in greater detail.

5. Task 1.18 - River Sediment Sampling (p. 7)

A. The location of the structure boring samples should be included on a site map.

B. The rationale for excluding semi-volatiles in the lab

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analysis for the sediment samples is not clear. Furthermore, the last sentence in this section seems to indicate that TCL organic analysis will only be performed if the OVA screening results are positive. Additional clarification is needed on both of these points. The lack of full TAL analysis on the river sediments does not seem to be justified.

6. Task 1.19 - Structure Boring Sampling/Monitoring (p. 7)

- A. A map indicating the locations of the eight borings to be advanced of the south side of the back channel should be included.
- B. The purpose and scope of the task is not clear. Further information of the depth of these borings, method of drilling and sampling, the rationale behind obtaining only surface samples, and why only the samples exhibiting OVA readings above background would be submitted for chemical analysis (as opposed to obtaining at least two samples per boring as in SS-7 thru SS-16 should be provided.

Response to EPA Comments

1. HDR proposes to sample soils from Neville Island and will request TAL metal content analysis plus CN.
2. These sources of guidance will be utilized.
3. The effects of whether any waste material or contamination in the soil could be mobilized during bridge construction will be evaluated in the final report.
- 4a. HDR will comply; it will cost \$250 more per sample.
- 4b. These depths were chosen because they exceed the anticipated excavation depths by a foot or two in all locations. In the meeting at Harrisburg, it was agreed to obtain the deepest samples from a level at and just above the base of any anticipated excavation.
- 5a. See Figure 2 from the HASP; Figure 3-1 from the Structure Boring SAP.
- 5b. HDR proposes to change the sampling of the river sediments to one composite sample from each boring and will request analysis for 8 RCRA metals, TAL inorganics, TCL semivolatiles, and TCL PCB/pesticides. Since the river sediments are not part of the NPL site, HDR questions the necessity of the extra expense of the full TAL analysis. All sediments and soil samples would be screened for VOCs with an OVA. The sample from each of the 4 river borings with the highest OVA reading, if any, will also be submitted for VOC analysis.
- 6a. See Figure 2 from the HASP and Figure 3-1 from the Structure Boring SAP.
- 6b. These samples are being taken because of the industrial nature of the location where construction will be occurring. We are proposing analysis that will target the waste that can potentially be found at railroad yards. We do not anticipate contamination other than these parameters. For these relatively immobile compounds, the highest concentrations would be expected to be found at the surface, therefore, HDR did not propose deep sampling. If VOCs are automatically run, it will cost an extra \$358/sample. If it is necessary to test for all parameters, then we suggest that this can be done, but that the number of samples taken should be cut to four. We would also propose to screen the split spoon samples with an OVA and would run 4 samples for VOCs only if OVA results are positive. Four surface soil samples will be analyzed for RCRA metals, SVOCs, PCBs/pesticides, and TPH. Two samples will also be run for TCLP.