MEMORANDUM

To: Sheila Abraham
Ohio EPA

Project No.: 933-6154
June 2, 2005

cc: Mary Logan, USEPA
Rainer Domalski, ROC

From: Steve Finn

RE: **SAMPLING RESULTS FROM STATE ROUTE 165 DRAINAGE DITCHES MIDDLE FORK LITTLE BEAVER CREEK, MAHONING COUNTY, OHIO**

On behalf of RÜTGERS Organics Corporation (ROC) this memorandum transmits the results of soil sampling conducted in connection with the drainage ditches alongside State Route 165 (SR 165) in the vicinity of its crossing of the Middle Fork of Little Beaver Creek near New Albany, Mahoning County, Ohio.

The sampling was conducted at the request of the Ohio Department of Transport (ODOT) and the approved scope of work was detailed in a memorandum from Golder Associates Inc. (Golder) to Ohio EPA dated December 7, 2004. Six composite samples of drainage ditch soil were collected by Golder on March 21, 2005 with field oversight from Ohio EPA. The locations and sample identifiers are shown on the attached map, and included three locations consisting of stockpiled material that had been excavated from the drainage ditch by ODOT. Each location was sampled as a vertical composite, representing the full thickness of removed soil in excavated areas, and a 1-foot thickness below the current ditch invert at other locations. Sampling methods, QA/QC protocols, and laboratory analytical methods followed the procedures previously approved by USEPA and Ohio EPA for the Nease Chemical Site Remedial Investigation.

Laboratory analytical data provided by Exygen Laboratories, including the results of QA samples (field duplicate and rinsate blank) were validated by Golder, and all data quality objectives were met. The validated data are presented in the attached table, including qualifiers applied by the data validator. Non-detect results are denoted by a "U" qualifier and the numerical result presented equals the laboratory reporting limit. A "J" qualifier indicates that the result is estimated, either due to interference, or because the analyte was detected at a concentration below the reporting limit.

In summary, four of the six primary sample results and the field duplicate indicate that mirex was not present. Mirex was detected at 38.4 ug/kg and at an estimated concentration of 6.38 ug/kg in the other two samples. Photomirex and kepone[1] were not detected in any samples. These results are consistent with expectations based on previously collected data, as summarized in the December 7, 2004 memorandum. Furthermore, the results confirm that there is no significant mirex human health risk associated with incidental contact with the materials in the drainage ditches alongside SR 165. While decisions as to the final disposition of drainage ditch materials will require the advice of the Health Department and the landfill disposal facility, these data confirm that the routine methods of soil disposal should be acceptable. Based upon the results, ROC does not believe there is any need for future sampling in connection with ODOT's routine maintenance activities in these drainage ditches.

[1] Kepone analysis was not included in the approved work scope, and this constituent would not be expected to be present based on previously collected data, but the analysis is routinely undertaken by the laboratory.

We trust that this memorandum provides all of the information required, but if you have any questions, please do not hesitate to contact Rainer Domalski of ROC in the first instance.

Encl.

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