

NDEP Comments on Interim Deliverables Provided by TRX on 7/6/7

1. Phase B sampling should consider historic data. While this data has not been validated, it cannot be ignored. For example, TPH issues in the vicinity of the tank farm. Has the extent of contamination been delineated in this area? No.
2. Phase B sampling cannot complete the phased RI because “nature and extent” have not been defined. TRX should seriously consider this as remedy selection may be faulty. This is a fundamental part of completing an RI and risk assessment cannot proceed based on statistics in a vacuum.
3. Table 5-16, the NDEP has the following comments:
 - a. Please explain the basis of the “MCL” reference in the footnote.
 - b. NDEP has not verified the values in this table or any others.
4. Figure 4-16, the NDEP has the following comments:
 - a. It would seem that soil gas samples should be biased towards the area of highest contamination (the western side of the property).
 - b. Regarding the depth of the sample, NDEP is reviewing. If TRX has guidance from USEPA on this it would be helpful.
 - c. Based upon a review of this Figure, TRX implies that GW is the primary source. Since the soil data is not presented it is difficult for the NDEP to concur.
5. Table – Soil Gas, the NDEP has the following comments:
 - a. TRX should complete the broad suite analysis for each suite selected. For example, VOCs should include analysis for all of the VOCs in the standard suite. This issue has also been raised for soils and groundwater. NDEP’s response is the same.
 - b. The rationale for this (for all media) is as follows:
 - i. Analytical services provide the full suite of analytes at the same cost as for a paired down suite.
 - ii. In the experience of the NDEP, when a lab reports a paired down suite the probability of errors in reporting is high.
 - iii. It is more cost effective to report the full suite of analytes than to provide detailed justification during future reporting (and risk assessment) to explain why this full suite was not completed.
 - iv. The added cost of data management for these analytes is “nominal” and in the opinion of the NDEP, does not warrant further discussion. If this price difference is not nominal it is likely that the lab or the project consultant is in error.
 - v. Since the level of investigation is somewhat preliminary it is conservative and judicious to error on the side of the broader suite. It will be cost prohibitive and ineffective to resample for a few problem analytes in the future.
6. Table 5-14, the NDEP has the following comments:
 - a. The issue of the selected DAF for the leaching pathway must be resolved before NDEP and TRX can move forward. **It would not be productive to meet until resolution is reached on this issue.**
 - b. NDEP will not review this table until the DAF issue is resolved.

- c. TRX must provide select portions of the references listed for this table. Specifically, the relevant portions of the 1st, 2nd and 4th references. If TRX chooses not to provide these the NDEP's review will be prolonged.
 - d. TRX must reference where the site-specific data was presented.
 - e. NDEP does not concur with the selection of the DAF 20 for comparison of the leaching pathway. Reasoning follows:
 - i. The soil to groundwater pathway has been shown to be complete for any number of contaminants that exist in groundwater.
 - ii. Examination of data collected during Phase II shows contamination through the soil column for several contaminants.
 - iii. The level of investigation for many of the contaminants is preliminary. Selection of the DAF 20 is not conservative.
 - iv. The DAF 1 specified in the USEPA technical background document is valid for the reasons provided by USEPA. TRX has not provided any reasons to validate the selection of DAF 20.
 - v. Selection of the DAF1 may not result in any additional suites being added to the evaluation. See additional reasons above re: use of complete suites during analyses.
 - vi. TRX should be able to complete adequate QC in-house without NDEP's line by line review of these tables. If this cannot be done perhaps the quality of services provided by ENSR should be evaluated.
7. Table 5-20A, the NDEP has the following comments:
- a. Note "(f)" states that comparison levels were not developed for the soil to groundwater leaching pathway for radionuclides. This is problematic in that elevated levels of uranium are noted in the groundwater. In addition, lack of a comparison level limits the ability of TRX to determine if these compounds have been adequately characterized. Kd values exist and should be used to developed comparison levels.
 - b. It is difficult for the NDEP to concur with some of the reasoning on this table in that it refers the reviewer to the text.
8. Materials requested for next meeting as follows:
- a. Table listing source areas and suites of contaminants associated with each source area.
 - b. Figure showing source areas and boring/well locations (including historic).
 - c. Any Figure showing soil or groundwater data should also show the sources.