



State of Ohio Environmental Protection Agency

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October 21, 2008

VOLUNTARY ACTION PROGRAM
TECHNICAL ASSISTANCE # 06GR054
AKRON AIRDOCK
AKRON, OHIO, SUMMIT CO.

Ms. Jennifer J. Krueger, PG
URS Corp.
36 East Seventh Street, Suite 2300
Cincinnati, Ohio 45202

Dear Ms. Krueger:

The Ohio Environmental Protection Agency (Ohio EPA), Division of Emergency and Remedial Response (DERR), Voluntary Action Program (VAP); and Division of Surface Water (DSW) have completed the review of the *Stormwater Sampling and Analysis Plan* (Stormwater SAP), dated October 1, 2008, for the Akron Airdock property. Please find below our comments on the Stormwater SAP.

- 1) Sections 4.0 and 4.3, Sampling Locations and Purpose of Sampling: The Stormwater SAP proposes sampling for PCBs in storm water at five locations, but does not include the location where the water discharges to Haley's Ditch. The Haley's Ditch discharge point (i.e., the existing general NPDES permit outfall 001 located just beyond Triplett Boulevard) needs to be added to the Stormwater SAP as another sampling location.

A number of reasons support the need for outfall sampling data. The storm sewer cleaning outlined in the June 24, 2008 *Storm Drain Debris Removal Plan* includes the Airport East West Storm Drain to the outlet at Haley's Ditch. Outfall 001 sampling will provide data of detections, if any, in water down gradient of the cleaned sewers. The data will support evaluation of the property's compliance with storm water and surface water requirements, including assessment data for an individual NPDES permit. The sampling data obtained from this location will also support the evaluation relative to the unrestricted TSCA decontamination standard for PCBs in water, as described in Section 3.0 of the SAP. Lastly, data obtained over time from sampling the outfall and other locations will support the evaluations necessary under Ohio Administrative Code (OAC) 3745-300-07 and 3745-300-15, to determine if the property achieves the applicable surface water quality standards for PCBs.

As discussed in your letter sent with the Stormwater SAP, incorporation of the Stormwater SAP as an element of the Operation & Maintenance (O&M) plan for the property's no further action (NFA) letter is appropriate. An NFA letter's reliance on an O&M plan allows additional time for the volunteer to perform needed monitoring and additional remedial activities, if needed, and provides the certified professional time to demonstrate that the voluntary action has resulted in the property complying with applicable standards.

- 2) Section 4.2.2, Typo: The last sentence of this section refers to sampling point CB1462 as one of the sampling points. However, Figure 2 shows sampling point CB1492. Please provide the correct numbering for this sampling point.
- 3) Section 5.0, Sampling Events: To follow DSW's standard storm water sampling requirements, a minimum of twelve (12) sampling events, each separated by approximately one month, are needed for representative sampling. Therefore, sampling should occur for at least one year. The four (4) proposed sampling events are not adequate to assess potential impacts from the property through storm water runoff to surface water, ensure the remedy is complete, and demonstrate applicable surface water standards have been met. For detections of PCBs above applicable standards, further sampling would be needed, in addition to other appropriate responses, depending on the detection. Section 9.0 of the SAP also acknowledges that recommended response actions will be developed as appropriate (e.g., which may involve collection of additional samples or an expanded program).
- 4) Section 5.0, Sampling Procedure: To follow DSW's standard storm water sampling requirements, the SAP's wording for collecting a grab sample should be revised as follows: "All samples shall be collected from the discharge resulting from a storm event that is greater than 0.1 inches and at least 72 hours from the previously measurable (greater than 0.1 inch rainfall) storm event. Where feasible, the variance in the duration of the event and the total rainfall of the event should not exceed 50 percent from the average or median rainfall event in that area. A grab sample shall be taken during the first 30 minutes of the discharge (or as soon thereafter as practicable)."
- 5) Sections 8.0 and 9.0, Sampling Analysis and Detection Limits: The reporting limit (RL) by TestAmerica, when it analyzes for PCBs including Aroclor1268, under EPA Method 8082 "low level" is 0.2 micrograms per liter (ug/L) or 200 ng/L. It is understood that TestAmerica is the only VAP certified lab with certification for Aroclor 1268 based upon Method 8082. The VAP agrees with your plan to obtain certified data through TestAmerica's analysis of the samples under its certification for PCBs by Method 8082.

In addition, please make sure that TestAmerica analyzes the samples down to the Method Detection Limit (MDL), which should be 0.1 ug/L or less. The analytical results need to be reported at the MDL because if PCBs are detected above the MDL, then there is a high probability that PCBs are present in the storm water. To report PCBs as present at or detected above the MDL is a more accurate representation of water quality than stating as not detected at the RL. Use of the MDL is needed for DSW storm water permitting requirements and will support the data comparison to applicable standards under VAP. It is important to note here that the applicable standards for PCBs are the Lake Erie drainage basin surface water quality criterion as described in Section 3.0. However, the current VAP certified lab's RL is only 0.2 ug/L, with an MDL of about 0.1 ug/L. Because of this discrepancy, the remedy and monitoring data needs to address this situation to the maximum extent practicable.

To allow for sampling to begin as soon as possible, Ohio EPA approves the Stormwater SAP with the revisions made to it that address these comments. Please submit the revised Stormwater SAP to the attention of Mr. Phil Rhodes and myself for our records.

If you have questions or need additional clarification, please contact me at (330) 963-1219.

Sincerely,

A handwritten signature in black ink that reads "Steven W. Love". To the right of the signature, there is a small handwritten mark that looks like "fa".

Vanessa Steigerwald Dick, Ph.D.
Site Coordinator
Division of Emergency and Remedial Response

VSD/kss

cc: Terry Finn, Roetzel and Andress
David Gunnarson, Lockheed Martin
Brad Heim, Lockheed Martin
Norma Fox Horwitz, Summit County Port Authority
Tony Martig, U.S. EPA, Region V, Waste Pesticides and Toxics Division
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