A MEMBER OF THE ENVIRONMENTAL RESOURCES MANAGEMENT GROUP

SCOPE OF WORK FOR ADDITIONAL RI SAMPLING

MALTA ROCKET FUEL AREA SITE

18 October 1993

ERM-Northeast, Inc.
501 New Karner Road
Suite 7
Albany, New York 12205

ERM

15 (12-75)

New York State Department of Environmental Conservation

MEMORANDUM

OCT 2 2 '93

TO: Daniel Steenberge, RHWRE, Region 5 - Ray Brook
FROM: Marsden Chen, Bureau of Eastern Remedial Action, DHWR
SUBJECT: Malta Rocket Fuel Area Site ID No. 546022

DATE: October 20, 1993

Marsden Chen

Attached is a copy of the final Scope of Work for Additional RI Sampling for the above-referenced site for your records.

If you have any questions, Victor Cardona, project manager, can be reached at (518) 457-3976.

Attachment

printed on recycled paper

file
MALTA
#546022

Kristen F. Begor
Remedial Project Manager

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18 October 1993

Alison Hess, Project Manager
c/o Mel Hauptman
U.S. Environmental Protection Agency
26 Federal Plaza - Room 737
New York, New York 10278

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Virginia Capon, Esquire
U.S. Environmental Protection Agency
26 Federal Plaza - Room 437
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Victor Cardona, Project Manager
Bureau of Eastern Remedial Action
Division of Hazardous Waste Remediation
NYS Department of Environmental Conservation
50 Wolf Road - Room 222
Albany, New York

Re: Malta Rocket Fuel Area Site - Scope of Work for Additional RI Sampling

Dear Ms. Hess et al.:

Enclosed, pursuant to the October 8, 1993 letter of Ms. Peterson of USEPA, is the 'Scope of Work for Additional RI Sampling' at the Malta Rocket Fuel Area Site. This document responds to and addresses the comments provided by EPA on the proposed approach previously forwarded by the Respondents on August 13 and September 17, 1993.

Please call if you have questions.

Very truly yours,

Kristen F. Begor

Kristen F. Begor
Facility Coordinator

cc: Kirk Macfarlane, Esq., GE
Angus Macbeth, Esq./Steve Meyers, Esq., Sidley & Austin
Hal Brodie, Esq., NYS Energy Research and Development Authority
Phil Gitlen, Esq., Whiteman, Osterman & Hanna
Don Hooker, US Army Corps of Engineers
Cathy Sanders, Esq., US Army Corps of Engineers
William Miller, ERM - Northeast

SCOPE OF WORK FOR ADDITIONAL RI SAMPLING

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1.0 *INTRODUCTION*

In September 1989, the United States Environmental Protection Agency (USEPA) issued Administrative Order (AO) Index No. II CERCLA-90219 to Advanced Nuclear Fuels, Inc., Curtiss-Wright Corporation, General Electric Company (GE), Mechanical Technology, Inc. (MTI), New York State Energy Research and Development Authority (NYSERDA), Olin Corporation, Power Technologies, Inc. (PTI), and Wright-Malta Corporation as potentially responsible parties (Respondents). The AO required the PRPs to conduct a Remedial Investigation (RI) and Feasibility Study (FS) at the Malta Rocket Fuel Area (MRFA) Superfund Site. In March 1990, GE, NYSERDA, and the U.S. Department of Defense (DOD) entered into a participation agreement to carry out the RI and FS and established themselves as the Malta Site Group. On April 29, 1991 Geraghty & Miller, Inc. was authorized to prepare a Work Plan, Project Operations Plan, and a Literature Search on behalf of the Malta Site Group. On August 9, 1991 ERM-Northeast, Inc. (ERM) was authorized to carry out the RI on behalf of the Malta Site Group.

The information collected during the RI was compiled into a Draft RI Report that was submitted to the USEPA and New York State Department of Environmental Conservation (NYSDEC) on 25 February 1993. On 9 July 1993, the Respondents received comments from the USEPA dated 8 July 1993 on the Draft RI Report. In response, the Respondents submitted a proposed background sampling approach for surface and subsurface soil to the USEPA and NYSDEC on 30 July 1993. On 9 September 1993, the Respondents received final approval on their background soil sampling program from the USEPA in a letter dated 3 September 1993. Following the completion of the background soil sampling and analysis program, the previous RI results will be re-evaluated in light of the background data and a determination will then be made regarding further soil investigations. Respondents will then (as set forth in their July 30th proposal) submit a

sampling program for any additional soil investigations. Additionally, the Respondents have prepared a scope of work (SOW) for additional RI sampling as described herein.

In response to the USEPA 8 July 1993 Comment #4 and 3 September 1993 Comment #12, the revised Draft RI report will contain a refined conceptual model consistent with USEPA's "Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA."

2.0 *OBJECTIVES*

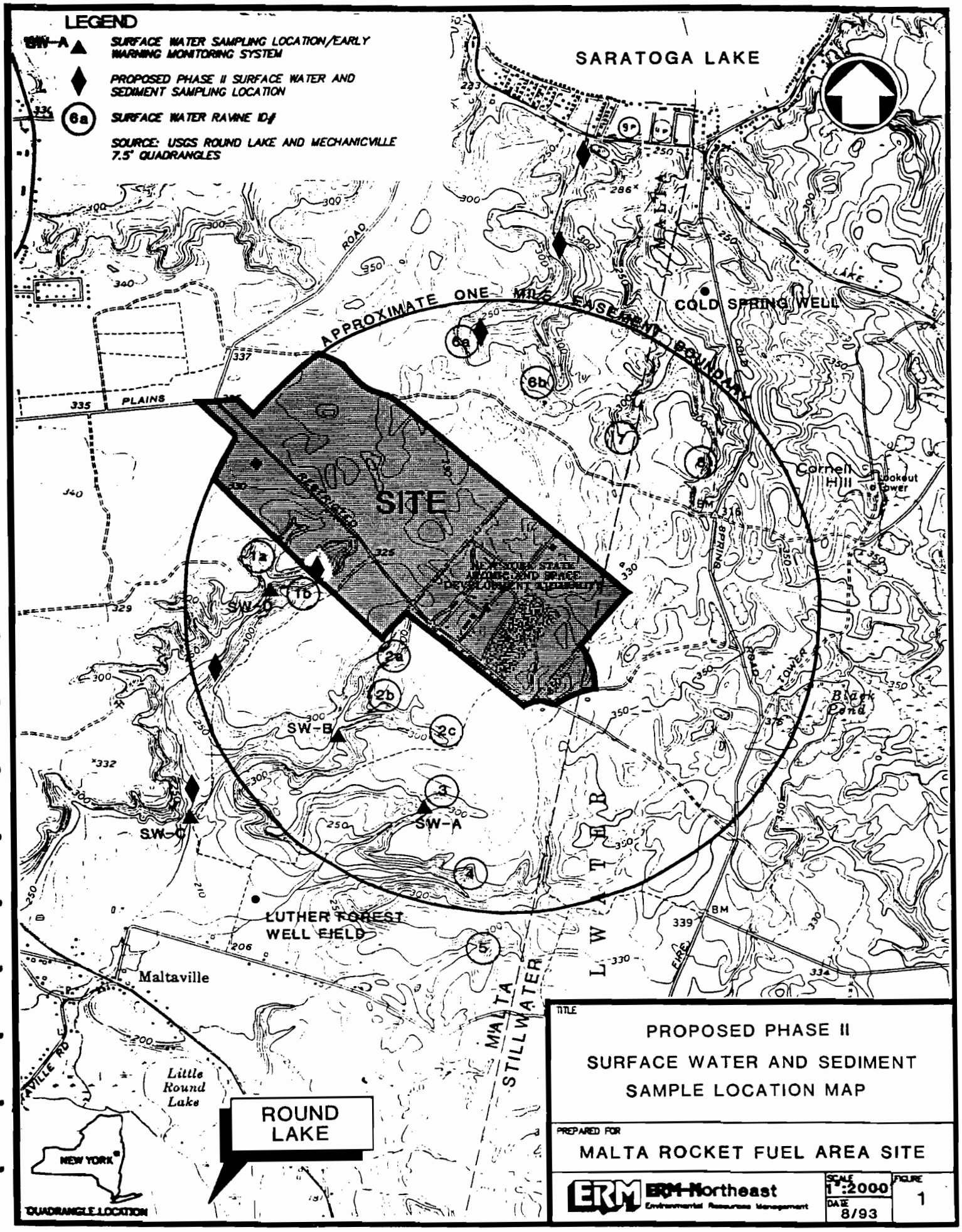
The Respondents have reviewed the comments in the USEPA letters dated 8 July 1993 and 3 September 1993, the data generated during the RI, and the site history. Based on the proposed background soil sampling and the TRC Pathway Analysis Report, a SOW for additional investigation has been prepared, which is described in the following text. The objectives of this additional investigation are to further delineate the extent of organic and inorganic constituents detected during the initial investigation as well as to evaluate background conditions for ravine surface water and sediment and to supplement the existing septic tank and dry well inventories.

3.0 SCOPE OF WORK

The USEPA provided comments on the Draft RI Report in a letter dated 8 July 1993. Those comments requested additional investigation, sampling and analysis of the surface water, sediment, surface soil, subsurface soil, ground water, septic tanks, and dry wells. In addition, the Pathway Analysis Report also indicated the need for additional sampling and analysis in some of the areas listed above. In response to the comments and Pathway Analysis Report, the Respondents submitted a proposed approach for additional RI sampling on 13 August 1993 for USEPA and NYSDEC review. The USEPA provided comments on the Respondents' proposed approach in a letter dated 3 September 1993. The following subsections present the Respondents' revised SOW for additional RI sampling for each of the environmental media listed above. The USEPA comments in the letters dated 8 July 1993 and 3 September 1993 as well as the concerns presented in the Pathway Analysis Report, where applicable, have been addressed to the degree possible prior to knowing the findings of the background soil sampling program.

3.1 SURFACE WATER

The USEPA 8 July 1993 comments #102 and #103 address the collection of background surface water sampling to provide inorganic analytical data for comparison with the Draft RI surface water analytical results and comments #152 and #155 address additional surface water sampling in Ravine 1b. Further comments concerning the sample collection procedures and schedule for the proposed additional surface water sample collection were provided in the USEPA letter dated 3 September 1993. In addition, the Pathway Analysis Report (Section 3.0, A.) indicates surface water samples should be collected at multiple points in Ravine 1b and in the other ravines (2a, 2b, and 2c) southwest of the MRFA Site. The Respondents are in agreement that background surface water analytical data will be useful for



TITLE

PROPOSED PHASE II
SURFACE WATER AND SEDIMENT
SAMPLE LOCATION MAP

PREPARED FOR

MALTA ROCKET FUEL AREA SITE

ERM ERM-Northeast Environmental Resources Management

SCALE 1":2000

DATE 8/93

FIGURE 1

comparison with site surface water data and that the sampling of multiple points in certain ravines is appropriate. Additional sampling of Ravines 2a, 2b, and 2c, however, is not necessary as these ravines are already sampled quarterly as part of the Early Warning Monitoring System (EWMS). Therefore, the Respondents propose additional surface water sampling in Ravines 1b and 6a only.

Topographically and hydrologically, there are no surface water bodies upstream or upgradient of the MRFA Site or the Draft RI surface water sampling locations. As can be seen on the topographic map (Figure 1), the MRFA Site is located in close proximity to the drainage divide between Saratoga Lake and Round Lake and the various ravine seeps that surround the site (1a, 1b, 2a, 2b, 2c, 3, 4, 5, 6a, 6b, 7, and 8). Even though all these ravines are topographically and hydrologically located downgradient of the MRFA Site, sampling a ravine north of the site will most likely provide the most accurate assessment of background conditions for surface water. The reason for this is twofold: (1) most, if not all, groundwater affected by the MRFA Site flows to the southwest and (2) the ravines north of the site are not believed to be affected by site activities. Therefore, the Respondents propose to collect three surface water samples from Ravine 6a for inorganic analyses (TAL plus boron) to provide background analytical data to compare to MRFA Site surface water analytical data. The locations of these proposed surface water sampling points are shown on Figure 1.

The Respondents are also proposing the sampling of Ravine 1b at three different locations shown on Figure 1 for inorganic analyses (TAL plus boron). This sampling of Ravine 1b will assess the potential of site-affected ground water discharging along multiple points along the ravine, which will provide useful data for the risk assessment evaluation for surface water exposure.

Surface water samples will be collected in accordance with the sampling procedure outlined in Section 5.17.1 of the USEPA approved POP, where applicable, or as modified for stream sampling (i.e., by 1) collecting samples from downstream to upstream; 2) immersing the sample container into the steam with the mouth of the sample container pointing upstream; and 3) taking precautions not to create disturbances upstream of the sampling locations). Samples will be properly preserved following sample collection and care will be taken to prevent loss of preservative due to overfilling the sample container.

3.2 SEDIMENTS

The USEPA 8 July 1993 comments (#106, 109-111, 156, 181, 185, 248, and 258) address the collection of additional sediment sampling. Comment #106 requests the analysis of total organic carbon (TOC) in sediment (comment #106). Comment #109 and the Pathway Analysis Report (Section 3.0, A.) indicate the need for background sediment sampling to provide inorganic analytical data for comparison with the Draft RI site sediment data. Comment #156 requests additional sampling of Ravine 1b sediment to assess the extent of inorganic constituents in the sediment. Comments #181 and 185 request re-sampling of the Building 3 and 4 quench pit sediments since some of the Draft RI analytical data were rejected during data validation due to excessive moisture content. Lastly, comments #110, 248, and 258 request additional soil sampling to address potential stormwater and sediment overflow out of the Magazine Pond and Muggett's Pond Drainage Ditch. Further comments concerning sample collection procedures, schedule, and analysis for the proposed additional sediment sample collection were provided in the USEPA letter dated 3 September 1993.

The Respondents are in agreement that certain additional sediment sampling is appropriate. The background sediment sampling is considered to be

useful in providing inorganic analytical data for comparison to site sediment analytical data. Thus, the collection of three background sediment samples from Ravine 6a is proposed at the same locations of the proposed background surface water sampling points provided on Figure 1. Three Ravine 1b sediment samples are also proposed for collection at the same locations as the proposed Ravine 1b surface water sampling locations (see Figure 1). This sediment sampling will help assess the extent of inorganic constituents in sediment detected during the previous investigation. TOC will not be analyzed for in the ravine sediment samples since only inorganic constituents are being investigated. Sediment samples from Ravine 6a and 1b will be collected in accordance with the sampling procedure outlined in Section 5.16.1 of the USEPA approved POP as conducted during the initial RI investigation.

The need to perform surface and subsurface soil sampling adjacent to the Magazine Pond and Muggett's Pond Drainage Ditch will be re-evaluated after the proposed background soil sampling program is complete and the background report has been approved by USEPA. The proposed background soil sampling may indicate the levels of inorganic constituents previously observed are natural background.

The Respondents will review the Long and Morgan, 1990 document and the US Fish and Wildlife's Eisler Contaminant Hazard Review Series referenced in Comment #16 of the 3 September 1993 USEPA letter and will assess the analytical results from the initial RI sampling and the sampling proposed above in light of those documents as well as the New York State Technical Administrative Guidance Memorandum (NYSTAGM) on sediments. The analytical results of sediment samples from the quench pits (Buildings 3, 4, and 25), Muggetts Pond, Muggetts Pond Drainage Ditch, the Magazine Pond, and the Ravines (1b and 6a) will be included in this assessment. Based on those reviews and the applicability of these documents and the assessments, an evaluation will be made regarding the

need for additional sampling. Any additional sampling considered necessary will be proposed along with, but separate from, the technical memorandum summarizing the results of the background program.

3.3 SURFACE SOIL

The USEPA comments (#29, 123, 127, 134, 139, 142, 150, 159, 163, 192, 196, 218, 220, 226, 229, 231, 232, 242, 245, 248, 249, 250, 258, 260, and 261) requested additional surface soil sampling. An evaluation of the need for additional surface soil sampling will be performed after receipt of the analytical results of the proposed background soil sampling program. A surface soil sampling program can then be designed to focus only on the constituents and areas of concern. In accordance with the USEPA cover letter and comments dated 3 September 1993, the sampling program for any additional surface soil sampling at the MRFA Site will be prepared and submitted with the technical memorandum presenting the results of the background soil investigation. This sampling program will include surface soil sampling locations, sampling methods, analysis methods, and a detailed schedule for conducting any additional surface soil investigation.

3.4 SUBSURFACE SOIL

The USEPA comments (#29, 100, 123, 127, 130, 136, 139, 147, 150, 154, 159, 163, 166, 168, 177, 184, 188, 191, 194, 206, 208, 231, 232, 245, 248, 249, and 250) requested additional subsurface soil sampling. As with the surface soil, additional subsurface soil sampling and analysis will be deferred until after the results of the proposed background sampling program are received. The background data will be evaluated and a subsurface soil sampling program focused on the constituents and areas of concern can be designed at that time. In accordance with the USEPA cover letter and comments dated 3 September 1993, the sampling program for any additional subsurface soil sampling at the MRFA Site will be prepared and

submitted with the technical memorandum presenting the results of the background soil investigation. This sampling program will include subsurface soil sampling locations, sampling methods, analysis methods, and a detailed schedule for conducting any additional subsurface soil investigation.

3.5 GROUND WATER

The USEPA comments (#117, 130, 131, 133, 165, 173, 179, 183, 193, 213, 223, 228, 231, 236, 240, 263, 270, and 275) requested additional groundwater investigations at several areas across the site (Areas S-2, S-3, S-5, S-10, D-5, Triangular Parcel, GE/Exxon, and Buildings 1, 2, 3, 5, 20, 21, 23, 24, and 25). Most of the additional investigation requested is focused within the footprint of the ground water plume identified in the Draft RI Report. Further comments concerning monitoring well construction, development, and sampling procedures as well as laboratory analyses for the proposed additional ground water investigation were provided in the USEPA letter dated 3 September 1993.

The areal extent of ground water affected by site activities has been investigated; however, six additional wells have been proposed by the Respondents' to refine the delineation of the extent of the plume. The Respondents propose installing these six wells at three locations (see Figure 2). Five of these wells (a well pair downgradient of Area D-1, a single shallow well downgradient of Building 6, and a well pair northeast of Building 25) were proposed in the Draft RI Report. The sixth well is proposed in lieu of a ground water model (Comment #89). This would be a deep well (approximately 300 feet deep) screened in the deep aquifer tapped by the Cold Springs public water supply well. This deep well will be northeast of Building 25 at the same location of the well pair proposed in the Draft RI Report, which will become a three well cluster. This well cluster can then be added to the EWMS quarterly sampling.

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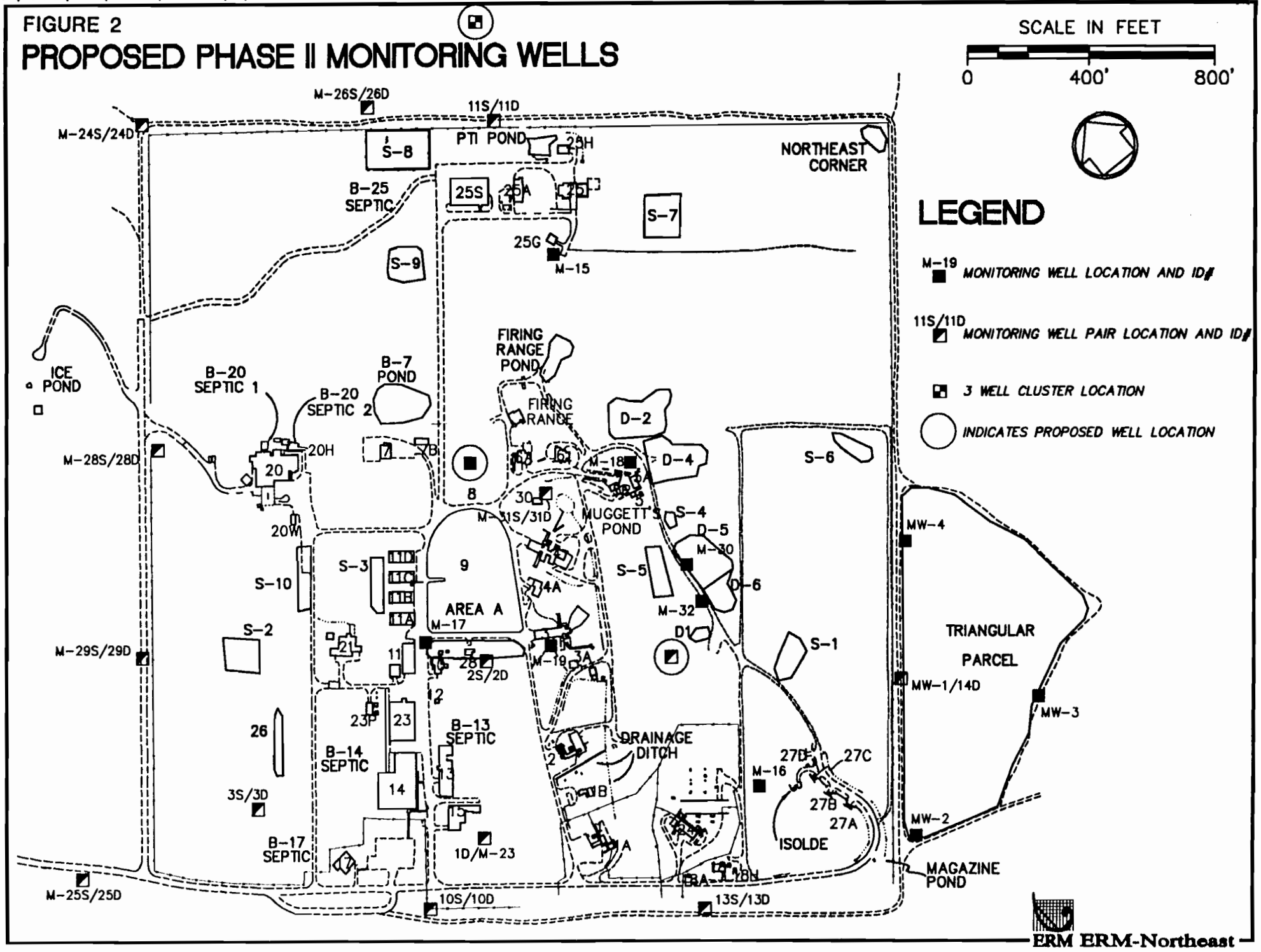
FIGURE 2

PROPOSED PHASE II MONITORING WELLS



After the proposed wells are installed they will be developed. These six wells will be purged and sampled after a decision is made concerning the possible installation of additional monitoring wells. If no additional wells are required then only these six wells will be sampled, however, if additional wells are required, then these six wells will be sampled along with any other required monitoring wells in a single sampling event. In either case, the monitoring wells sampled will be analyzed for full TCL organics and TAL inorganics (TAL plus boron). The same analytical methods (CLP low level) used during the second round of ground water sampling will be applied for this proposed ground water sampling.

Ground water monitoring well construction, development, purging, and sampling will be conducted in accordance with Sections 5.11 and 5.14 of the USEPA-approved POP, with some modifications necessary for the 300 foot deep well. Because of the significant depth anticipated for this well, it will be drilled using conventional rotary drilling techniques. Using a bentonite mud, a 14-inch diameter boring will be advanced into the clay underlying the shallow lake sand aquifer (i.e., to a depth of 100 to 120 feet). Next an 8-inch diameter black-steel casing will be set into the clay within the borehole and tremie-grouted in place to the surface; thus, effectively sealing off the shallow aquifer. After allowing the grout to cure for at least 24 hours, water rotary drilling will resume though the 8-inch casing advancing a 7.5-inch boring until the deep sand and gravel are encountered. A 4-inch diameter stainless steel monitoring well will then be constructed according to the procedures described in the POP.

3.6 SEPTIC TANKS

The USEPA comments (#15-19, 81, 95, 202, 203, 208, and 227) requested (1) a septic tank and leachfield inventory describing the location, as-built design details, and the nature and volume of material contained in the septic tanks, (2) containerization of the material in the septic tanks, and (3)

additional soil sampling in leachfields and adjacent to septic tanks. Further comments (i.e., #24) concerning additional sampling of the septic tanks, a supplemental inventory, and scheduling for additional work associated with the septic tanks were provided in the USEPA letter dated 3 September 1993. An inventory of the septic tanks was prepared and included in the LSR. This inventory can be supplemented with known design details, physical measurements of dimensions of inflow and outflow pipes, integrity, construction materials, and estimates of material volumes (i.e., liquid, sludge, sediment) but precise details may not be obtainable. Therefore, Respondents propose to supplement the information in the LSR to the extent that information is obtainable. This will be done by revisiting and opening each septic tank listed in Table 1, and measuring and recording the following:

1) as-built dimensions;
2) construction materials and integrity;
3) the location and size of inflow or outflow pipes; and
4) the volume and nature of material within the tanks.

This information will be collected to the extent that these features are visibly ascertainable and measurable without entering the tank. A correlation of historical use with detected contamination will also be presented in the RI report.

The Respondents propose no further sampling of the septic tanks at this time. The Respondents will evaluate the need for any sampling within the leach fields or adjacent to the septic tanks following the background investigation and will also evaluate the comparison of the analytical results to ground water standards and/or the NYSTAGM for soil as proposed in Comment #23 in the 3 September 1993 letter. If deemed necessary, a sampling program for any additional sampling associated with the leach

TABLE 1
MALTA ROCKET FUEL AREA SITE
IDENTIFICATION OF BUILDINGS WITH SEPTIC TANKS

BUILDING	NO. OF SEPTIC TANKS	LOCATED	SAMPLED
1	0	-	-
1A	0	-	-
1B	0	-	-
2	0	-	-
3	0	-	-
3A	0	-	-
4	0	-	-
4A	0	-	-
5	0	-	-
5A	0	-	-
5P	0	-	-
6	0	-	-
6A	0	-	-
7	0	-	-
7B	0	-	-
8	0	-	-
9	0	-	-
10	0	-	-
11	0	-	-
11A	0	-	-
11B	0	-	-
11C	0	-	-
11D	0	-	-
12	0	-	-
13	1	yes	yes
14	1	yes	yes
15	0	-	-
16 (Guard House) (a)	1	no	no
17	1	yes	yes
18	0	-	-
18A	0	-	-
18H	0	-	-
20	2	yes	yes
20H	0	-	-
20E	0	-	-
20W	0	-	-
21	0	-	-
22	0	-	-
23	0	-	-
23P	0	-	-
24 (b)	1	no	no
25	1	yes	yes
25A	0	-	-
25G	0	-	-
25H	0	-	-
25S	0	-	-
26	0	-	-
27A	0	-	-
27B	0	-	-
27C	0	-	-
27D	0	-	-
28	0	-	-
29	0	-	-
30	0	-	-
GE/Exxon	1	yes	yes

Notes:

1. (a) = The guard house septic tank was exempted from the RI sampling as described in the RI Work Plan.
2. (b) = The Building 24 septic tank was not sampled because its presence was unknown at the time of sampling.

fields and/or septic tanks will be prepared and submitted with the technical memorandum presenting the results of the background soil investigation.

3.7 DRY WELLS

The USEPA comments (#12, 13, 14, 19, 77, 95, 100, 169, 177, 178, 179, 184, 188, 212, 234, 235, and 272) requested (1) a dry well inventory describing the locations, as-built construction details, and the nature and volume of material contained in the dry well or affected by the dry well, (2) collecting additional soil samples adjacent, below, or within dry wells (i.e., Buildings 2, 3, 4, 5, 15, and 24), and (3) sampling the six remaining GE/Exxon dry wells and include radioactivity in the analysis. Further comments concerning additional sampling of the dry wells were provided in the USEPA letter dated 3 September 1993.

The Respondents propose to sample six of the GE/Exxon dry wells but not with the inclusion of radioactive analyses. The radiation survey (i.e., geiger counter) performed at GE/Exxon during the RI indicated no evidence of radioactivity. The LSR indicates this facility was rigorously decontaminated and that there was no residual radioactivity. Based on the radiation survey and the historical documentation, the inclusion of radioactive parameters is not proposed. The dry wells will be sampled for the purpose of attempting to identify the source of the 1,2-dichloroethene detected in soil gas behind the building.

The collection of soil samples in or adjacent to dry wells is not proposed at this time. The need to sample soil around the dry wells will be evaluated after the results from the background boring program are assessed. As discussed in the surface and subsurface soil sections, the background data will help guide and focus subsequent soil sampling tasks. If deemed necessary, a sampling program for any additional soil sampling associated

with the dry wells will be prepared and submitted with the technical memorandum presenting the results of the background soil investigation.

An inventory of the dry wells was prepared and included in the LSR. This inventory can be supplemented to include dry well design details. This will be done by revisiting all locatable and accessible dry wells listed in Table 2, and measuring and recording the following:

1) as-built dimensions;
2) construction materials and integrity;
3) the location and size of inflow or outflow pipes; and
4) the volume and nature of material with the dry wells, if any.

This information will be collected to the extent that these features are visibly ascertainable and measurable without entering the dry well. A correlation of historical use with detected contamination will also be presented in the RI. Thus, the Respondents are proposing to sample GE/Exxon Building dry wells and supplement the dry well inventory to the extent that information is obtainable.

TABLE 2
MALTA ROCKET FUEL AREA SITE
IDENTIFICATION OF BUILDINGS WITH DRY WELLS

BUILDING	NO. OF DRY WELLS	TYPE OF DRY WELL	LOCATED	SAMPLED
1	4	1 floor drain without piping 2 buried drywells 1 open pit	yes no yes	yes no yes
1A	0	-	-	-
1B	1	1 buried drywell	no	no
2	3	1 floor drain without piping 2 buried drywells	yes approximately	yes yes
3	2	2 open drywells	yes	yes
3A	0	-	-	-
4	2	1 buried drywell, 1 open swale	approximately	yes
4A	0	-	-	-
5	2	2 catch basins	yes	yes
5A	0	-	-	-
5P	0	-	-	-
6	0	-	-	-
6A	1 (a)	1 floor drain with piping	yes	no
7	0	-	-	-
7B	0	-	-	-
8	2	2 buried drywells	no	no
9	2	2 buried drywells	no	no
10	0	-	-	-
11	0	-	-	-
11A	0	-	-	-
11B	0	-	-	-
11C	0	-	-	-
11D	0	-	-	-
12	0	-	-	-
13	0	-	-	-
14	0	-	-	-
15	1 (a)	1 floor drain with piping	yes	yes
16 (Guard House)	0	-	-	-
17	0	-	-	-
18	1 (a)	1 floor drain with piping	yes	yes (b)
18A	0	-	-	-
18H	0	-	-	-
20 (c)	1	1 buried drywell with manhole	yes	no
20H	1	1 catch basin	yes	yes
20E	1	1 buried drywell	no	no
20W	0	-	-	-
21	0	-	-	-
22	0	-	-	-
23	0	-	-	-
23P	0	-	-	-
24	2	2 catch basins	yes	yes
25	0	-	-	-
25A	0	-	-	-
25G	0	-	-	-
25H	0	-	-	-
25S	0	-	-	-
26	0	-	-	-
27A	0	-	-	-
27B	0	-	-	-
27C	0	-	-	-
27D	0	-	-	-
28	0	-	-	-
29	0	-	-	-
30	0	-	-	-
GE/Exxon	7	1 floor drain, 6 dry wells with manholes	yes	yes

Notes:

1. (a) = Floor drain without a drywell, which is the same as floor drain with piping.
2. (b) = At Building 18, surface soil was sampled at floor drain outfall (completed 12/10/91).
3. (c) = The dry well at Building 20 was not sampled because it receives roof drain stormwater and/or potable water.
4. A complete inventory of stormwater catch basins across the MRFA Site was not performed. In general, the catch basins known to receive discharge from building floor drains were included in the inventory.

4.0 SCHEDULE

ERM anticipates that the scope of work described herein can be accomplished within ten weeks of commencement of field work which includes the receipt and validation of the analytical data. Additional time may be required for installation and completion of the deep well. The actual start date of field activities will be dependent on USEPA approval, subcontractor availability and access, both physical and legal. The selected sampling locations will be chosen to minimize physical access constraints. Legally, there are existing access agreements with neighboring property owners but additional details regarding potential clearing and exact sampling locations will be required. The septic tank and dry well inventories will be performed following the completion of the well installations and development.

5.0 SUMMARY

In summary, the Respondents' propose to perform the following field activities in addition to the background soil sampling proposal attached to the Respondents' 30 July 1993 letter which was revised and submitted on 20 August 1993 and approved by USEPA on a letter dated 3 September 1993. The scope of work described herein and summarized below was prepared in response to the USEPA comments presented in letters dated 8 July 1993 and 3 September 1993.

Surface water:	3 samples from Ravine 1b 3 samples from Ravine 6a
Sediment:	3 samples from Ravine 1b 3 samples from Ravine 6a
Groundwater:	Install and sample well pair downgradient of Area D-1 Install and sample single shallow well downgradient of Building 6 Install and sample three well cluster northeast of Building 25
Septic tanks:	Supplemental inventory
Dry Wells:	Sample 6 GE/Exxon Dry wells Supplemental inventory

Additional field activities may be recommended after evaluating the background soil data. As previously stated, sampling programs for any additional sampling will be prepared and submitted along with but as a separate document from the technical memorandum presenting the results of the background soil investigation.