

40-8724

CHEMETRON CORPORATION

Suite 200
1615 South Congress Avenue
Delray Beach, Florida 33445

Monday, January 13, 1997

Mr. Jerry Parker, R.S., E.I.T.
Division of Solid and Infectious Waste Management
North East District Office
Ohio Environmental Protection Agency
2110 E. Aurora Road
Twinsburg, OH 44087-1069

Subject: Chemetron Response to Ohio Environmental Protection Agency
Letter dated December 10, 1996

Dear Addressee:

Your letter to Mr. Theodore G. Adams dated December 10, 1996, transmitted two interoffice communications (IOC's) that documented the Ohio Environmental Protection Agency (OEPA) review of:

1. Chemetron Corporation response to the OEPA's April 10, 1996 comments regarding the Groundwater Detection Monitoring Plan (IOC dated November 18, 1996) and
2. Chemetron Corporation response to the July 24, 1996 Closure Plan Approval: Conditions 1 and 4 (IOC dated December 4, 1996).

In a telephone conversation with Mr. Adams, you indicated the IOC dated December 4, 1996 supersedes the IOC dated November 18, 1996. You also asked that we respond to the comments of the December 4, 1996 IOC.

In response to your request, enclosed are the following items:

1. Revisions to the Chemetron Groundwater Detection Monitoring Plan (Enclosure 1) and the
2. Downgradient Groundwater Evaluation for Bert Avenue (Enclosure 2)

Enclosure 1 incorporates the OEPA requested analytical methods, holding times, container type, preservatives and minimum detectable activities for sampling and analysis of groundwater for Gross Alpha, Gross Beta and Total Uranium. Specifically, Table 1 of the

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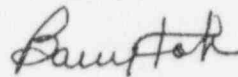
REC'D: NMSS/LLDP

Groundwater Detection Monitoring Plan (August 19, 1996) has been revised to address the information requested by the OEPA IOC dated December 4, 1996 (Condition 4).

Enclosure 2 provides the evaluation of the downgradient groundwater at Bert Avenue. This information addresses the OEPA comments presented in the OEPA IOC dated December 4, 1996 (Condition 1). Since the evaluation concludes that wells cannot be installed downgradient from the waste, the sampling interval (i.e., two days versus seven days) is irrelevant.

If you have any questions regarding our responses to the subject conditions, please call me at (410) 356-6612, or Mr. Theodore G. Adams at (716) 592-3431.

Very truly yours,



Barry Koh, Ph.D.
Project Manager

Enclosures

cc: J. R. Brendel
M. Wetterhahn
T. Adams
M. Seltzer
T. Johnson
E. Ball
Mayor E. Kolar
K. Reilly

TABLE 1
PRESERVATION SUMMARY FOR GROUND WATER SAMPLES

<u>Parameter</u>	<u>Container¹</u>	<u>Preservative²</u>	<u>Recommended Holding Time³</u>	<u>Amount of Sample Required</u>
Alkalinity	P, G	Cool, 4°C	14 days	250 ml
Hardness	P, G	HNO ₃ to pH <2	6 months	150 ml
Total Organic Carbon	G Only	Cool, 4°C H ₂ SO ₄ to pH <2	28 days	2 x 40 ml
Chemical Oxygen Demand	P, G	Cool, 4°C H ₂ SO ₄ to pH <2	28 days	250 ml
Chloride	P, G	None required	28 days	250 ml
Conductivity (Specific Conductance)	P, G	Cool, 4°C	28 days	250 ml
Cyanide	P, G	Cool, 4°C NaOH to pH >12	14 days	1 L
Nitrogen	P, G	Cool, 4°C	28 days	500 ml
Ammonia	P, G	H ₂ SO ₄ to pH <2	48 hours	250 ml
Nitrate	P, G	Cool, 4°C	48 hours	250 ml
Metals	P, G	HNO ₃ to pH <2	6 months, 28 days ⁴	1 L
pH	P, G	None required	Analyze immediately	100 ml
Phenolics	G	Cool, 4°C H ₂ SO ₄ to pH <2	28 days	1 L
Phosphorus (total)	P, G	Cool, 4°C H ₂ SO ₄ to pH <2	28 days	250 ml
Total Dissolved Solids	P, G	Cool, 4°C	7 days	250 ml
Sulfate	P, G	Cool, 4°C	28 days	250 ml
Temperature	P, G	None required	Analyze immediately	100 ml
Turbidity	P, G	Cool, 4°C	48 hours	500 ml
VOCs	G	Cool, 4°C 4 drops HCl	14 days	2 x 40 ml
Gross Alpha, Gross Beta Total Uranium ⁵	P	HNO ₃ to pH <2	6 months	1 L

¹ Polyethylene (P) or Glass (G).

² Sample preservation should be performed immediately upon sample collection.

³ Samples should be analyzed as soon as possible after collection. The times listed are the maximum times that samples may be held before analysis and still considered valid.

⁴ Holding time for metals, except mercury is 6 months. The holding time for mercury is 28 days.

⁵ The Lower Limit of Detection (LLD) for gross alpha is 1.0 pCi/l and gross beta 3.0 pCi/l. The LLD for Uranium analysis is 5.0 ug/l (1.7 pCi/l depleted uranium). The analytical method for gross alpha and gross beta is EPA 900 and for Total Uranium EPA 901.1