



"Steve Williams" <steve.williams@epa.state.oh.us> on 01/27/2004 10:17:55 AM

To: Andrew S Hartten/AE/DuPont@DuPont
cc: "Michael Preston" <michael.preston@epa.state.oh.us>
Subject: Re: Draft Surface Soil Procedure

Andrew,

I looked over the draft soil/biota sampling procedure and have a few questions/comments. By the way, I decided after the meeting on the 15th not to attend the meetings this week. Probably, a good thing considering the weather. I will try to tie in by phone for the fluoropolymer technical workgroup meeting on Wednesday.

Some questions/comments:

1. The draft indicates that the "dry" event is defined as greater than 72 hours with less than 0.1 inch of precipitation. Is this time frame based on any references or simply selected for this investigation? My preference would be to extend the "dry" period to at least five days with no precipitation, as indicated in Dave Rurak's December 3 letter. The increased duration would allow more time for particulate deposition.
2. Following the "wet" period, the soil samples are to be collected within 24 hours. I recommend adding "as soon as possible, but not to exceed 24 hours".
3. Of course wind direction plays a large role in deposition during any particular time period. Will wind direction be measured prior to the events? Should the timing of the sampling events be dependent on not only precipitation but also wind direction? 
4. There needs to be some clarification (maybe not in this document) regarding the purpose of the biota and soil sampling. This purpose will help define the specifics of what portions of the biota/soil profile to sample.
5. The draft indicates that the sample will be divided into two portions - (1) vegetation, litter layer and root zone; and (2) 6 inches of mineral matter below the root zone. Is portion (1) considered the biota sample? If so, will soil be included in the biota sample as part of the root zone? Should it be? Is the biota sample to look at potential uptake by plants or deposition on plants and possible ingestion by other animals (ie. cows).
6. The second portion of the sample is to be collected below the root zone. What is the potential thickness of the root zone and how deep could the top of the 6 inch sample be collected. Possibly, the soil in the root zone should be analyzed. Will all of the the 6 inch soil sample be analyzed or should there be a preference to more organic soil?
7. Additional clarification is needed on the reason to "wash" soil with deionized water.

These comments are a bit rough, but I wanted to provide some feed back for discussion. Let me know if you have any questions.

Steve

>>> "Andrew S Hartten" <Andrew.S.Hartten@USA.dupont.com> 01/23/04 08:29AM >>>
Steve,

As per our conversation the other day, I wanted to forward the attached draft soil/biota (grass) sampling procedure that was recently drafted to satisfy the soil sampling request at Lubeck well field. Our intention is to use this same procedure for all off-site soil/biota sampling points.

I would like your input/comments on this as we would like to develop a procedure that is agreeable to all interested parties, especially OEPA and

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WVDEP. I gave a copy of this to Dave Watkins early last week. As has been mentioned, there will be a project conducted by the laboratory to develop a validated analytical procedure for the biota (grass) sample.

(See attached file: Lubecksoil.doc)

Thanks for your help.

* Will you be attending the meetings in DC next week?

Andrew

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