

**From:** James Innes  
**To:** Daniel Schultz  
**Subject:** Re: Linden Rd Dump

Dan,

The methylene chloride concentration in that soil sample was an estimated value, but it was the highest one in the report so I used it. It was taken in May of 1991 from a test pit, approximately 3 feet below the ground surface. No remediation of that particular area was ever documented. A perched water bearing zone (determined to be groundwater not in an aquifer) exists in this area at approximately 5 feet below the ground surface. Downgradient monitoring well located at the site perimeter has never shown the presence of methylene chloride. Perimeter groundwater monitoring is included in site O&M.

The decision that 30" of clean soil and a vegetative cover would be protective was made prior to my being assigned as project manager. You should know, due to the existing topography the final grading plan shows this particular area will have approximately six feet of cover. All ambient air monitoring prior to the cover being constructed was non-detect. There will be no underground utilities (water lines, etc) to act as potential pathways and deed restrictions will forbid breaching the cover.

I don't think you are being problematic. It would, however, be a lot easier if those who made these (pre-FOQRT) decisions were the ones that signed off. Trying to apply today's procedure to a RAP that's been 'in the works' for over three years tends to get confusing.

Let me know if you need more info.

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>>> Daniel Schultz Jun 10, 1999 3:58 PM >>>

Jim, I don't want to open old issues, but Brad Irmish came up and asked me to sign the Conditions to Evaluate form for the above. If I'm reading it right, there is some 56,000,000 ppb of methylene chloride on site (reference #6 on the form). I am concerned about 2 things: 1) That number is twenty times the Csat number for mc, as I read it. If that's true, what is the potential for free product to exist there? Has that been addressed? and 2) Ambient air hazards: Who confirmed that the 30" cover of soil would be protective for kids playing soccer on the field? I don't mean to be problematic, but I'm not comfortable signing it with the info I have in front of me....thnx....

Dan Schultz  
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**CC:** Rodney Mosier