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November 15, 1994

Mr. Rick Leland, Esq.
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575 Madison Avenue
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Re: Review of RI Report
47266

Dear Rick:

I have had the opportunity to review the RI report, focusing on Sections 5 through 8. It appears that the report has been partially modified in accordance with the PRP committees previous suggestions. However, the general conclusions have not changed. In reviewing the report, we noted the following issues:

1. The properties that warrant soil remediation are generally determined in the risk analysis, as well as the feasibility study. [page 5-2]
2. The detection of VOCs or BNAs, in waste oils at a site, is indicative that the site is a likely source of soil and ground water contamination, if the site is known to have spilled or discharged waste oils to the environment. [page 5-4, bullets number 2 and 3]
3. The presence of VOCs in soil piles is indicative of soil impacts at the site. Even if the VOCs were placed on the soils after their excavation, it shows that the employees discharged VOCs to soil as part of their normal operating practice. In the absence of a soil pile, they would likely discharge to undisturbed soil areas. [page 5-5, bullet number 1]
4. Soil gas surveys are only used for screening; and they are not an appropriate tool for evaluating a release from the VIHA UST, especially considering the spacing of the soil gas probes and the depth to ground water at the VIHA site. [page 5-7, paragraphs number 1 and 3]
5. There is no reference to the actual discharge pipe operated by the Curriculum Center; and the alleged discharge pipe and pit should be combined as an alleged discharged pipe and pit. [page 5-8, paragraph number 3]
6. It was my understanding that all alleged statements would be removed from the report, especially considering that no still bottom wastes were found at the alleged pit. [page 5-8, paragraph number 3]

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7. Clarify the statement that "releases of chlorinated VOCs and BTEX VOCs have occurred at the Curriculum Center" to include "based on the criteria developed by Geraghty & Miller, Inc." [page 5-10, paragraph number 3]
8. Soil samples collected from the soil pile contained chlorinated VOCs. [page 5-13, last paragraph].
9. The drum storage area pavement was stained by spilled liquids, indicating that a viable route for soil contamination exists. Also, waste oils were disposed to the infiltration pit in the past; and we have no reason to suspect that previous waste oils were free of chlorinated VOCs. [page 5-14, 1st paragraph]
10. There is no mention about how the high concentrations of BTEX may interfere with the detection of chlorinated VOCs. [page 5-14]
11. BB&L's laboratory data for chlorinated VOCs should be reported. The uncertainty appears to be in regard with BNA results not chlorinated VOCs. [page 5-20, paragraph number 3]
12. The basis for not listing Western Auto as a source of chlorinated solvent contamination appears to be related to the fact that the soil sample showing chlorinated solvents was disposed off site. All of the Curriculum Center soil samples have also been disposed off site. Remove the Curriculum Center from the list of sources based on this criteria or else leave Western Auto on the list. [page 5-22, last paragraph]
13. Chlorinated VOCs have been detected at depth near the separators and these data should be presented. [page 5-24, 1st paragraph]
14. The northern plume is classified as originating at the Curriculum Center. However, chlorinated solvents are detected upgradient of the Curriculum Center and a large number of chlorinated VOCs potential and actual sources are located within the northern plume, so the use of the word "originates" is unclear. [page 5-37, 1st paragraph]
15. The data could also be interpreted to suggest that a DNAPL source originating near the Four Winds Plaza has migrated vertically effecting deeper ground water concentrations. [page 5-42, second full paragraph]

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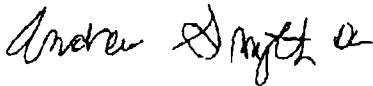
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16. There are many likely and proven sources of chlorinated solvent contamination other than the Curriculum Center that could have contributed to the northern plume. [page 5-47, paragraph number 2; page 6-13, last paragraph; and page 8-4, 2nd paragraph]
17. The allegation of a waste pit at the Curriculum Center for the disposal of dry cleaning liquids and sludges is not substantiated. The presence of wastes in the pits would be readily noticeable to the eye. a more likely source of any observed soil contamination could be the drums and current waste disposal practices of the Curriculum Center employees. [page 6-13, last paragraph]

Sincerely,



Andrew Smyth

/dl