

DECEMBER 1, 1981

Mr. Wayne C. Smith, Ph.D., P.E.
Manager
Pollution Central Services
Dames and Moore
1626 Cole Boulevard
Golden, Colorado 80401

Dear Dr. Smith:

This letter conveys my response to the key points you raised in your October 23 letter.

The following explanation should clarify our intent with regard to the required replicate analysis and statistical comparisons:

Section 265.92 (c) (2) on sampling and analysis requires that the initial background mean and variance for each indicator parameter be determined by peeling the replicate measurements for the respective parameter concentrations in samples obtained from the upgradient well(s) during the first year. Replicate analyses are not required for downgradient wells during the first year.

After the first year of monitoring, §265.92 (d) (2) on sampling and analysis and §265.93(b) on preparation, evaluation, and response require the owner or operator to analyze for and calculate the mean and variance of each indicator parameter (i.e., pH, Specific Cond???????, Total Organic Carbon, and Total Organic Halogen), based on at least four replicate measurements on each sample, for each well in the monitoring system. Results for each indicator parameter from each sampling event (for each and every well in the monitoring system) must be compared with the initial background mean (i.e., that established for the upgradient well(s) during the first year).

I hope that my clarifications of your key points provide you with the guidance needed to carry out your work.

Sincerely yours,

John P. Lehman
Acting Director
Land Disposal Division (WH-564)

WH-564, CD, L?, 2632, 59120, W&M, 11/23/81

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Dames & Moore

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October 23, 1981

Mr. John R. Lehman
Acting Division Director
Mail Stop WH 564
Office of Solid Wastes
Environmental Protection Agency
Washington, D.C. 20460

Dear Sir:

Dames & Moore requests written interpretation by the Environmental Protection Agency on 40 CFR 265.93b. Our question concerns the interpretation of "its initial background arithmetic mean". Are data from the upgradient well to be compared to themselves and data from each downgradient well to be compared to themselves, or are data from the downgradient wells to be compared to data from the upgradient wells?

Also, it is our understanding that replicate analysis are only required for the upgradient well. Please clarify this also.

Sincerely,

DAMES & MOORE

Wayne C. Smith, Ph.D., P.E.
Manager
Pollution Control Services

WCS:clc

cc: Donald J. Shosky, Jr.

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