



State of Ohio Environmental Protection Agency

Northeast District Office

2110 E. Aurora Road
Twinsburg, Ohio 44087-1969

TELE (330) 425-9171 FAX (330) 487-0769

[REDACTED], Director

May 9, 2003

RE: DIAMOND MAGNESIUM,
RI/FS REPORT COMMENTS

Via Electronic Mail

[REDACTED]
Environmental Project Manager
U.S. Army Corps of Engineers, Buffalo District
1776 Niagra Street
Buffalo, New York 14207-3199

Dear [REDACTED]:

The Ohio Environmental Protection Agency (Ohio EPA) has reviewed the United States Army Corps of Engineers (ACE), Buffalo District's Painesville FUSRAP site (a.k.a. Diamond Magnesium) "*Remedial Investigation and Feasibility Study (RI/FS) Response to Comments*" letter, received on April 23, 2003. The following identifies the comment/response and Ohio EPA's concern with the response.

- #1 Ohio EPA disagrees with the statement "*this constitutes all the areas where the Federal Government is a PRP*" (potentially responsible party). Ohio EPA recognizes the limitations of the FUSRAP program and the inability to expand the FUSRAP area of concern without formal authorization. Portions of the Crompton-owned property have shown the presence of radiological contamination outside of the current FUSRAP area. Because of the limitations of the FUSRAP program these "new" areas could not be investigated. It is not because the Federal Government is not a PRP for the radiological contamination. It is the intention of the Ohio EPA to hereby request the Department of Energy to conduct a determination of eligibility for an investigation of the portion of the property referred to as Landfill 5 and the former pump house under the FUSRAP.
- #7 The information available in the "*Characterization Report for the Painesville Site, May 1998*" is not as detailed and accurate as the geologic data provide in the Uniroyal Chemical Company's (UCC) site specific Remedial Investigation (RI) report dated January 2002. Again, the RI should include, at a minimum by reference, geologic and hydrogeologic data that is readily available in the UCC RI report.
- #9 Again, the USCAE has shown reluctance in incorporating updated information regarding site specific geology and hydrogeology. Ground water flow maps provided in the UCC RI should be incorporated into the RI/FS report. Ohio EPA has stated disagreement with the reference that the ground water is a perched zone. The response does not clarify if the USACE intends to correct this issue.

- # 11 The response states that "*all areas of the site where the Federal Government is a PRP have been investigated.*" Ohio EPA disagrees with this statement. The RI/FS should include language which specifically states that only the portion of the site identified under the FUSRAP was investigated and include the applicable date and document used to defined the FUSRAP area. Please refer to comment # 1, above.
- # 13 The response does not provide the technical rationale needed to address the comment. The fact that Ohio EPA approved the selection of monitoring wells based on 1998 data does not justify the concern. The current site-specific data may demonstrate that the monitoring well network did not determine potential down-gradient impact to ground water. Please include specific **technical** justification to support the monitoring well network relied upon in the RI/FS.
- # 53 Both the U.S. EPA and Ohio EPA have recognized the extreme importance in the redevelopment/reuse of formerly contaminated sites. The proposal to individually cap each FUSRAP radiological-contaminated area would tremendously hinder reuse possibilities for the land. The response states that USACE "*can*" add a statement to include consolidation. The use of the would "*can*" does not mean the USACE will add consolidation as a potential remedial option and included it in the detailed analysis. The RI/FS should evaluate in the Detailed Analysis of Alternatives the consolidation/capping alternative with consideration given to the future reuse of the land.
- # 54 The evaluation of the capping alternative (Alternative #2) in the FS is unclear and inconsistent. For example, under the Executive Summary, page vii, 7th paragraph, the text states that "impacted soil exceeding preliminary remediation goals would be covered in-place by a ten-foot thick soil cap. A soil based cap is also evaluated in Section 7.2's title which identifies a soil cap yet in the 2nd paragraph of this section the text uses an asphalt cap. Section 8.0 uses a soil cap for the comparative analysis. In Section 9.0, Conclusions, 7th paragraph, the text states "impacted soil exceeding the preliminary goals would be covered in-place by a one-foot thick asphalt cap. It is unclear which materials the Detailed Analysis of Alternatives is based on. The majority of text in the FS is based on a soil cap yet the USACE continues to discuss asphalt as the capping material.

The FS needs to provide an appropriate detailed analysis of the alternatives to allow a clear transition into remedy selection. Given the inconsistencies present in the FS and the addition of consolidation as an alternative, Ohio EPA can not offer its concurrence with the document absent a full review of the revised FS.

[REDACTED]
U.S. Army Corps of Engineers, Buffalo District

May 9, 2003

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Should you have any questions concerning this letter, please contact me at (330) 963-1208.

Sincerely,

A

[REDACTED]

Site Coordinator
Division of Emergency and Remedial Response

[REDACTED]

ec: [REDACTED], Ohio EPA, DERR, NEDO
[REDACTED], Ohio EPA, OFFO, SWDO
[REDACTED], Crompton
[REDACTED], Ohio Department of Health