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Sent: Tuesday, March 03, 2009 3:00 PM  
To: Nordine.John@epa.gov; Gunnarson, David  
Cc: Steve Love; Steve Tuckerman  
Subject: Comments on Haley's Ditch Risk-Based Cleanup

John and Dave,

I have reviewed the "Application for Risk-Based Cleanup of Soil at Haley's Ditch" dated January 9, 2009.

Please find below several comments that I have on this document:

1) Clean Fill PCB Concentrations: It is stated in the Executive Summary (page i) and in Section 2 that "The excavation areas, except the stream channel and wetlands, will be backfilled, as needed, with soil containing less than 1 mg/kg total PCBs. The restored stream channel and wetland areas will be covered with clean fill material containing less than 0.5 mg/kg PCBs." The soil cleanup action level is 1 mg/kg whereas the cleanup action level is less than 0.5 mg/kg PCBs for Haley's Ditch sediment. Setting the cleanup action levels and the clean fill material levels to the same values does not provide adequate "buffer" to account for sampling uncertainties and to ensure recontamination does not occur. Dave mentioned the possibility of reusing some of the fill material removed as part of the remediation activities instead of having to bring in all new fill. Ohio EPA cautions against reusing PCB contaminated fill material from the site due to sampling uncertainties and the potential for recontaminating remediated areas. It is recommended that imported clean fill, which has been tested to be generally nondetect for PCBs, be used for restoration activities.

2) Stream Bed Fill Material: It should be clarified in the document that the stream bed fill material will primarily consist of a mixture of sand, gravel, cobble and other similar materials to prevent significant erosion and siltation from occurring downstream. Otherwise, a large rain event could readily wash other types of fill materials downstream.

3) Ohio EPA concurs that a Nationwide Permit is appropriate for this project if the U.S. Army Corps of Engineers has determined that the whole area and all wetlands fall under the jurisdictional waters. The exception would be if nonjurisdictional wetlands were present and not part of the Nationwide Permit, then an isolated wetlands permit would be necessary from the state.

Let me know if you have any questions or would like to discuss any of these issues further.

Vanessa

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