UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

13 MAR 1986

S. Michael Tymiak, P.E.
Manager, Previously Operated Properties
Environmental Resources
Koppers Company Inc.
1940 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219

RE: Geophysical Feasibility Study Report,
South Cavalcade site

Dear Mr. Tymiak:

The U.S. Environmental Protection Agency (EPA) would like to respond to the February 4, 1986, letters from Koppers and McBride-Ratcliff and Associates (MRA) . Rather than discuss specifics, I would like to discuss four issues that seem to be the heart of Koppers' and MRA's letters.

1. Does EPA have the authority to review (and reject) the geophysical feasibility study report (GFSR)?

2. Was the GFSR adequate?

3. Is a follow up GFSR necessary?

4. Should Koppers be making individual submissions (power auger, EM survey, surface water, etc.) to EPA for review prior to the draft Remedial Investigation (RI) report?

Let me address each of these issues in detail. First, what authority does EPA have to review and reject the GFSR? In MRA's letter it is stated, "To provide specific engineering conclusions ... (on the usefullness of geophysical methods) ... before the Remedial Investigation report is completed may be premature and misleading. Therefore, we anticipate that the Task 2 data report deliverables will be submitted for informational purposes only; and will not be contingent upon EPA approval before completing or starting a new subtask." We believe that EPA approval authority is spelled out in the RI/FS Work Plan on page 4-17, "The review and guidance of EPA with respect to the (geophysical) test results ... shall determine whether additional geophysical work should be carried out ... ". Though we could discuss the meaning of the phrase "review and guidance", EPA believes that it is clear that Koppers submission is for more than "informational purposes".

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The second issue addresses the adequacy of the GFSR. In a word, the GFSR is not adequate. We believe that our review was a fair one; we critiqued Koppers' GFSR in the same manner as we would have critiqued a report submitted by our Zone Contractor. EPA's approval of the GFSR (i.e. granting permission to conduct a full site survey using EM profiling) was solely to expedite the RI.

The third issue, a follow up GFSR, seems to be of great importance to Koppers and MRA. EPA is not going to force Koppers to submit a follow-up GFSR. On the other hand, the comments presented in our January 3, 1986, letter will be the basis for EPA's review/approval of the geophysical portion of the draft RI report.

Finally, should Koppers make individual submissions (power auger, EM survey, surface water, etc.) to EPA for review prior to the draft RI report? Our staffs have discussed this issue and agreed that individual submissions for EPA review would greatly reduce the work load associated with writing and reviewing the draft RI report. Importantly, with both Koppers and EPA in general agreement on the contents of the individual submissions there will not be any "harsh surprises" for either of us in the draft RI report. For these reasons, I strongly support the segmented reports and hope that our staffs can make this work.

Should you have any questions, please contact John Cochran of my staff at (214) 767-9700.

Sincerely yours,

Larry Wright, Chief
Superfund Enforcement Section

cc: C. Faulds, THC
B. Kier, CDM
B. Tobin, MRA

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