137739 4/9 EPA Headquarter comments

00062

Brad

Attached are some comments on the Johns-Manville ROD. Give me a call if you have any questions (our phones are out of order... I can get a message at 382-4812 and call you back)

Kate Sellers

RECEIVED
APR 13 1987
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRAN

Comments on draft ROD - Johns Manville site

PAGE 4

ENFORCEMENT ANALYSIS IS CONFIDENTIAL, SO IT SHOULD BE ON A SEPARATE PAGE THAT CAN BE DETACHED FROM THE REST OF THE ROD.

PAGE 5 - TABLE AT THE TOP OF THE PAGE

THE DISTINCTION BETWEEN "SOURCE CONTROL" AND "OFF SITE" ISN'T CLEAR. ISN'T OFF SITE DISPOSAL (#6) A FORM OF SOURCE CONTROL? MAYBE THE DISTINCTION SHOULD BE "ON SITE OR OFF-SITE"

PAGE 5 - LINE 5 OF TEXT.

BE CAREFUL ABOUT DISMISSING A REMEDY BECAUSE IT ISNT A PROVEN TECHNOLOGY. SARA §121 (b)(2): "The president may select an alternative remedial action ... whether or not such action has been achieved in practice at any other facility or site that has similar characteristics ..."

THIS IS ESPECIALLY IMPORTANT SINCE ON-SITE STABILIZATION (the unproven technology) IS THE ONLY TREATMENT OPTION CONSIDERED, AND SARA STRESSES TREATMENT OVER LAND DISPOSAL. INSTEAD, STRESS TECHNICAL IMPRACTICABILITY (its physically difficult or unlikely to work) and THE ~~THE~~ RISKS OF IMPLIMENTATION.

PAGE 5 - LINE 14 OF TEXT

ITS NOT CLEAR IN THE ROD <u>WHY</u> GROUNDWATER CONTAMINATION IS NOT OF PRIMARY CONCERN. (NEED TO STATE THAT MAJOR CONTAMINANTS ARE RELATIVELY INSOLUBLE, AND THAT NOT ONLY IS EXISTING CONTAMINATION/RISK MINOR, BUT LIKELY FUTURE CONTAMINATION/RISK IS MINOR).

[illegible] statement in the

PAGE 6 - LINE 7 AND FOLLOWING
WHAT IS THE LIFETIME FOR THE ESTIMATED O+M COSTS?
(ie: 30-yr standard, or 100-yr estimated life of cap?)

PAGE 10 - DESCRIPTION OF RECOMMENDED ALTERNATIVE not addressed
NEED TO CLARIFY THE DISCUSSION OF THE ACTIVE WASTE DISPOSAL AREAS: WHY THE 7/89 CLOSURE DATE?
WILL DISPOSAL ACTIVITIES INTERFERE W/ SUPERFUND ACTION?
IS THERE ANY RISK TO PUBLIC HEALTH + THE ENVIRONMENT FROM CONTINUING DISPOSAL THERE? (reference to NESHAP requirements answers the last question)

PAGE 10
PLEASE CHANGE THE LAST SENTANCE. WE CAN'T WRITE A PRP INTO A ROD WHEN THEY HAVEN'T SIGNED UP FOR THE REMEDY YET. SUGGEST: "A soil cover monitoring program will be developed to ensure that no asbestos reaches the surface of the covering layer and becomes releasable to the air in the future."

PAGE 16 - SECOND PARAGRAPH
THIS IS A TECHNICAL QUESTION WHICH MAY NOT NEED TO BE CLARIFIED FOR THE ROD: WHY DOESNT SAND FORM ICE LENSES LIKE CLAY?
not addressed