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SOUTH SUPERFUND
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May 16, 1994

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Mr. Arthur Collins, Chief
AL/GA/MS Section
South Superfund Remedial Branch
U.S. Environmental Protection Agency
345 Courtland Street, NE
Atlanta, Georgia 30365

Re: Olin/McIntosh NPL Site

Dear Mr. Collins:

We received Mr. Ken Lucas' letter of May 12, 1994, regarding the referenced site and our comments on the draft Record of Decision. The intentions and assumptions in that letter are unclear to us. The Remedial Investigation and Feasibility Study were approved by EPA earlier. The rigorous RI/FS process has indicated that a No Action alternative is protective of human health and the environment at this site (Feasibility Study Report, Table 4-1). The FS subjected the OU-1 Groundwater No Action alternative to the required detailed analysis per CERCLA guidance and received regulatory approval. The No Action alternative was specifically addressed in EPA comments dated September 2, 1993 to the PRP concerning revision of the FS. The issue of discrepancy regarding the No Action alternative and its level of protectiveness should be further explained to us.

Our comments and recommendations regarding the draft ROD and modification of the Corrective Action Program have not changed. We agree with EPA's determination that the current Corrective Action Program (CAP) does not address all areas of contamination present at OU-1. Our recommendation for the ROD was to require modification of the CAP to address the dense brine plume. Other RCRA concerns shown on the SUMMARY OF DETAILED ANALYSIS OU-1 GROUNDWATER (attachment to 5-12-94 letter) can be addressed by modification of the RCRA Post-Closure Permit. The comment regarding the effectiveness of the RCRA permit found in the summary table seems to indicate reluctance of CERCLA personnel to rely on RCRA personnel to adequately address these concerns through RCRA permit modification.

Your comments would be appreciated. If there are questions, please contact me at 205-260-2787.

Sincerely,

James L. Bryant

James L. Bryant, Chief
Engineering Section
Special Projects

pc: Mr. Ken Lucas
Mr. Justin Martindale
Mr. Steve Cobb

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