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Olin CHEMICALS

LOWER RIVER RD., P.O. BOX 248, CHARLESTON, TN 37310

JUL 21 1992

July 17, 1992

VIA FAX 3657

Cheryl W. Smith
Senior Remedial Project Manager
United States Environmental Protection Agency
345 Courtland Street Northeast
Atlanta, Georgia 30365

Re: Revised Schedule
Olin Chemicals/McIntosh Plant Site
McIntosh, Alabama

Dear Ms. Smith:

This is in response to your letter of July 9, 1992, and its enclosure, a proposed revision to the Remedial Investigation/Feasibility Study (RI/FS) schedule dated July 2, 1992. The proposed schedule is generally acceptable. However, it does not appropriately reflect required dependencies among certain RI/FS activities. These are detailed in the attached schedule and are discussed below. Amending the proposed schedule in accordance with these dependencies will provide a tremendous benefit: incorporation of the Phase III sampling results into the Remedial Investigation (RI) report, Feasibility Study (FS), and any treatability studies. We believe this benefit is justified and necessary. While these amendments would change several interim submission dates, they essentially maintain your proposed draft FS submission date (1/15/93 rather than 1/4/93).

The draft RI report should incorporate the Phase III sampling results. We discussed whether the RI report should be written without these data. Since we have learned that the Old Plant (CPC) Landfill is likely a continuing source of organic contaminants to groundwater and since we have not determined the extent of contamination in OU-2, it is absolutely necessary to include these data. Additionally, the Phase III Sampling and Analysis Plan (SAP) includes investigation of eleven other SWMUs. Drafting the RI report without proper consideration of these data could mislead decision-makers of both the agencies and the company as to the scope of any problems at the site. Olin submitted a comprehensive Preliminary Site Characterization Summary (PSCS) to provide EPA with a thorough report of work to date. If the draft RI report is submitted at EPA's suggested submittal date, the report would be largely the same characterization that was included in the PSCS. We believe you want to reconsider your date for the RI report and suggest that we use the attached schedule date of December 7, 1992.

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The Treatability Study Work Plan (assuming a treatability study is necessary) must be submitted after the Revised Candidate Technologies Technical Memorandum (RCTTM) is reviewed. Otherwise, applicable treatment technologies will not have been screened properly, which is an absolutely necessary step, as you correctly noted in your July 14, 1992, letter regarding the initial CTTM. The technology screening will be presented in the Remedial Technologies Alternative Screening Technical Memorandum (RTASTM). After reviewing the schedule and EPA comments to the CTTM, Olin proposes to combine the RCTTM and RTASTM. This combined document would incorporate the preliminary Phase III data and would be submitted to EPA five weeks after completion of the Phase III field work. Assuming a 30-day review time by EPA indicates that the Treatability Study Work Plan (TSWP) will be submitted about October 12, 1992.

The Work Plan currently calls for the Baseline Risk Assessment (BLRA) to be submitted as a chapter of the RI report. We believe that this is the appropriate way to proceed, particularly since both documents are dependent on the Phase III data. The projected date for the BLRA should be the same as the RI report.

Your proposed schedule notes that Olin's response to EPA's review comments on the Revised Remedial Action Objectives Technical Memorandum (RRAOTM) should be submitted June 26. However, the letter transmitting the review comments requested Olin's response by July 8, 1992. The response was submitted on July 8. The proposed schedule should be changed to reflect this.

When the proposed schedule is amended to reflect the dependencies noted above, the FS report submission changes to January 15, 1993. This is different from Olin's February 28 proposed schedule because several activities have occurred at later dates than that proposed schedule projected. It is only eleven days after the FS submission date proposed in the schedule attached to your letter.

Please let me know if you have any questions regarding this submission or any work in progress at McIntosh, Alabama.

Sincerely,

J. C. Brown
Manager, Environmental Technology

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Attachment

cc: W. A. Beal
D. E. Cooper (2)
W. J. Derocher
M. L. Fries
W. G. McGlasson
J. L. McIntosh
T. B. Odom
R. A. Pettigrew

OLIN MCINTOSH RI/FS SCHEDULE
(Revised 7/17/92)

Item No	Description	Actual Date	Projected Date[1]	Dependencies/Comments
	TASK 3: SITE CHARACTERIZATION			
3-1	Phase III SAP to EPA	04/02/92		
3-2	EPA Review and Comment	05/26/92		
3-3	Olin Response and Resubmittal	06/25/92		
3-4	EPA Approval		07/27/92	
3-5	Preliminary Site Characterization Summary to EPA	04/16/92		
3-6	EPA Review and Comment		07/17/92	
3-7	Additional Sampling Complete		08/31/92	Five weeks after 3-4
3-8	Draft RI Report to EPA		12/07/92	Fourteen weeks after 3-7 and six weeks after 3-6 (See Note 2)
3-9	EPA Review and Comment		01/06/93	
3-10	Olin Response and Resubmittal		02/05/93	
3-11	EPA Approval		02/25/93	
	TASK 4: BASELINE RISK ASSESSMENT			
4-1	Exposure Assessment to EPA	06/02/92		
4-2	EPA Review and Comment		07/24/92	
4-3	Olin Response and Resubmittal		08/24/92	
4-4	EPA Approval		09/07/92	
4-5	Environmental Evaluation TM to EPA	07/15/92		
4-6	EPA Review and Comment		08/14/92	
4-7	Olin Response and Comment		09/14/92	
4-8	EPA Approval		09/28/92	
4-9	Baseline Risk Assessment to EPA		12/07/92	Submitted with draft RI report (also dependent of 4-4 and 4-8[5])
4-10	EPA Review and Comment		01/06/93	
4-11	Olin Response and Resubmittal		02/05/93	
4-12	EPA Approval		02/25/93	
	TASK 5: TREATABILITY INVESTIGATIONS (if required, See Note 4)			
5-1	Candidate Technologies TM (Limited to OU-2)	05/14/92		
5-2	EPA Review and Comment	07/14/92		
5-3	Revised Candidate Technologies TM		10/05/92	Five weeks after 3-7 (to be submitted with 6-1)
5-4	EPA Review and Comment		11/04/92	
5-5	Treatability Study Work Plan/SAP		10/12/92	Six weeks after 3-7
5-6	EPA Review and Comment		11/11/92	
5-7	Olin Response and Resubmittal		12/11/92	
5-8	EPA Approval		12/28/92	
5-9	Treatability Study Report		01/25/93	Four Weeks after 5-8 (See Note 4)
5-10	EPA Review and Comment		02/24/93	
5-11	Olin Response and Resubmittal		03/26/93	
5-12	EPA Approval		04/09/93	

Item No	Description	Actual Date	Projected Date[1]	Dependencies/Comments
	TASK 6: DEVELOPMENT AND SCREENING OF REMEDIAL ACTION ALTERNATIVES			
6-1	Remedial Technologies Alternatives Screening TM to EPA		10/05/92	To be submitted with 5-3; five weeks after 3-7
6-2	EPA Review and Comment		11/04/92	
6-3	Olin Response and Resubmittal		12/04/92	
6-4	EPA Approval		12/18/92	
	TASK 7: DETAILED ANALYSIS OF REMEDIAL ACTION ALTERNATIVES			
7-1	Draft Feasibility Study Report		01/15/93	Four weeks after 6-4
7-2	EPA Review and Comment		02/15/93	
7-3	Olin Response and Resubmittal		03/17/93	
7-4	EPA Approval		04/16/93	

NOTES:

1) Projected Date is constrained by dependencies and assumes the listed EPA approval dates.

2) When the submittal date is contingent on two items (e.g., a period of time after EPA approval of more than one document), the scheduled submittal date will be the later of the two.

3) Submittal of baseline risk assessment is also dependent on items 4-4 and 4-8. Based on these dependencies, the earliest submittal date is 11/2/92. However, submittal with the RI report will allow for incorporation of the Phase III data.

4) The scope and schedule for treatability investigation (if any are required) would be included in the Treatability Study Work Plan (TSWP). This schedule assumes that the treatability investigations can be completed within four weeks of approval of the TSWP. Submittal of the draft FS report is not dependent on completion of the treatability investigations. Any modifications to the FS that may be required as a result of the treatability studies would be incorporated into the final RI/FS report.

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