Message

From: Gravelding, Mark [Mark.Gravelding@arcadis.com]
Sent: 9/15/2020 9:20:32 PM
To: Sacks, Victoria [Sacks.Victoria@epa.gov]; Putnam, Lauren [Lauren.Putnam@arcadis.com]
CC: Singerman, Joel [Singerman.Joel@epa.gov]; Luo, Jacky X (DEC) [Jacky.Luo@dec.ny.gov]; Donald Hesler [donald.hesler@dec.ny.gov]; alma.lowry@gmail.com; jjheath1946@gmail.com; Cirillo, Argie [Cirillo.Argie@epa.gov]; Ludmer, Margo [ludmer.margo@epa.gov]
Subject: RE: Lower Ley Creek PDI Data Summary Report - EPA response to RTC

Thank you for the response, we will plan on delivering the revised PDI by October 15th.

Regards,
Mark

Mark O. Gravelding | Senior Vice President | mark.gravelding@arcadis.com

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From: Sacks, Victoria <Sacks.Victoria@epa.gov>
Sent: Tuesday, September 15, 2020 12:25 PM
To: Gravelding, Mark <Mark.Gravelding@arcadis.com>; Putnam, Lauren <Lauren.Putnam@arcadis.com>
Cc: Singerman, Joel <Singerman.Joel@epa.gov>; Luo, Jacky X (DEC) <Jacky.Luo@dec.ny.gov>; Donald Hesler <donald.hesler@dec.ny.gov>; alma.lowry@gmail.com; jjheath1946@gmail.com; Cirillo, Argie <Cirillo.Argie@epa.gov>; Ludmer, Margo <ludmer.margo@epa.gov>
Subject: Lower Ley Creek PDI Data Summary Report - EPA response to RTC

Dear Mark,

The US Environmental Protection Agency (EPA) and the New York State Department of Environmental Conservation (DEC) have reviewed your August 27, 2020 response to EPA's July 28, 2020 comment letter. We have the following responses:

General Comments

General Comment 1. Accepted with note: the PDI Work Plan was approved by EPA.
General Comment 2. Accepted
General Comment 3. Accepted
General Comment 4. Accepted. Post-excavation sampling will determine if the depth removal for SED-J8, and SED-L2 are sufficient to achieve SCOs.
General Comment 5. Accepted
General Comment 6. Accepted

Specific Comments

1. Accepted
2. Accepted
3. Accepted

4. Accepted. Please note, the purpose of the PDI report is to define the horizontal and vertical boundaries of contamination that exceed the cleanup goals. From those boundaries, the RD will determine the final excavation limits.
5. Accepted
6. Accepted
7. In your response to this comment, you state "SOIL-F was sampled for PCBs at the request of EPA in its November 9, 2018 letter. Due to PCB results being less than the screening criteria, SOIL-F was proposed as a removal extent reduction area."
   The November 9, 2018 letter stated "The precision of the Remedial Investigation delineation was fairly crude, and the purpose of the Remedial Design is to tighten up the excavation contours. **It shouldn't make any difference if the contaminants are PCBs or metals. Please add a couple of samples within Soil- F so that we can be sure that "clean" is defined laterally and by depth.**" Upon review of the bolded language, it suggests that sampling for metals was expected.
   EPA agrees with the three bullet points in the response and accepts SOIL-F as a removal extent reduction area. Soil Location LLCD34 may have also been removed due to the construction of the drainage swale for the Crouse Hinds Landfill. Please confirm.
8. Accepted
9. Accepted
10. Accepted
11. Accepted
12. Accepted
13. Accepted
14. Post-excavation sampling will be necessary to ensure that we have reached clean material. Post-excavation sampling should be addressed in the RD.
15. Accepted
16. Accepted
17. Accepted
18. Please explain in the revised text what the rationale behind the original 14 ft excavation was and why it should now be 3 feet.
19. Accepted
20. Accepted
21. Submittal of the RDWP will be 60 days from approval of the Revised PDI Data Summary Report. The SOW states "60 days after EPA concurrence with the Local Disposal Assessment." All that is changing is the triggering deliverable (Revised PDI Data Summary Report). This is correctly written in the August 27, 2020 comment letter Attachment 2 (Updated Schedule), but miswritten in Attachment 1, Figure 4.
22. Accepted
23. Accepted
24. Descriptions of the drainage swale are included in the ROD on pages: 4, 7, 8, 23, 39, 40, and 41. The locations of the swale and swale samples are shown in ROD Figures 1 and 3. The swale is further described in the RI and FS reports. Data from the 2010 sampling has already been included in this report ("historical samples"). A discussion of the area and basis for contamination should be added to the dialogue of the PDI Data Summary Report.
25. Accepted. Topography was used as a stopping point for further samples but if data was not collected beyond those points to indicate that those areas are clean, confirmatory samples will be required in these areas to ensure that there are not materials above the ROD criteria. The boundaries of SOIL-I3 should extend to clean samples.
26. Accepted
27. Accepted
28. This printed incorrectly when sent to EPA. We will look for an update in the revised PDI Data Summary Report.
29. This printed incorrectly when sent to EPA. We will look for an update in the revised PDI Data Summary Report.
30. Accepted
31. Accepted
32. Accepted

33. Accepted
34. Accepted
35. After the as-built limits of the Town of Salina Landfill remediation have been added to the map (see comment 16), ensure that L-7 is within the limits of the Salina Landfill.
36. Accepted
37. Accepted
38. Accepted
39. Accepted. Post-excavation sampling will be necessary to ensure that we have reached clean material. Post-excavation sampling should be addressed in the RD.
40. See comment 35. After the as-built limits of the Town of Salina Landfill remediation have been added to the map (see comment 16), ensure that L-7 is within the limits of the Salina Landfill.
41. After the as-built limits of the Town of Salina Landfill remediation have been added to the map (see comment 16), ensure that L-107, SB/SS-20, and SB/SS-19 are within the limits of the removal action. If they are outside, this area should be handled as in comment 39 (2-foot removal with post-excavation sampling to ensure that soil meeting SCOs has been reached).
42. Accepted. Topography was used as a stopping point for further samples but if data was not collected beyond those points to indicate that those areas are clean, confirmatory samples will be required in these areas to ensure that there are not materials above the ROD criteria. See Comment 25.
43. After the as-built limits of the Town of Salina Landfill remediation have been added to the map (see comment 16), ensure that TP-46, TP-8, TP-45, SW/SED-22 are within the limits of the Salina Landfill.
44. Accepted
45. Accepted
46. Accepted
47. Accepted
48. Accepted
49. Accepted
50. We received an updated figure file on 6/12/2020. Comment 50 was referring to the outer boundary of SOIL H. Please indicate in the text that the removal boundary was based on topography in this area.
51. Accepted
52. Please add SYW-11 to the main text figures as requested.
53. Accepted
54. The area surrounding LLCD13 was identified as a removal area based on metals. Additional samples were taken in this area as part of the PDI to further delineate (SOIL-C-038, -039, -040, -041, and -042). None of these additional samples were analyzed for metals so there is no way to determine that LLCD13 is an isolated case. The area should not be reduced without further delineation.
55. Accepted
56. Accepted
57. Accepted
58. Accepted
59. Accepted
60. Accepted
61. Accepted
62. Accepted
63. Accepted
64. Accepted
65. Accepted. Post-excavation sampling will be necessary to ensure that we have reached clean material.

Please let me know if you have any questions regarding the above. We look forward to seeing an updated PDI Data Summary report in 30 days.

Thank you for your attention to detail and cooperation,

Victoria

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