UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
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NEW YORK, NY 10007-1866

Lauren Putnam
Arcadis of New York, Inc.
One Lincoln Center
110 West Fayette Street
Suite 300
Syracuse, NY 13202

July 27, 2021

Re: Revised Draft Remedial Design Work Plan for Lower Ley Creek Subsite of the Onondaga Lake Superfund Site submitted June 10, 2021

Dear Ms. Putnam:

We have reviewed the Revised Draft Remedial Design Work Plan for Lower Ley Creek Subsite of the Onondaga Lake Superfund Site submitted June 10, 2021. The draft is acceptable contingent on providing the changes provided in the responses below. Please submit an updated draft of the RDWP within 15 days. We request that you submit clean and redline/strikeout versions.

Sincerely,

Victoria Sacks
Remedial Project Manager, USEPA

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USEPA Specific Comment 35, March 22, 2021 Section 5.7.2 Air Monitoring: delete last sentence "Because volatile … VOCs are not needed". The ROD states that VOCs will be measured. Whether VOCs are COCs is irrelevant. If they are present, they may volatilize and pose a human health risk. Therefore, monitoring should be conducted.

> **Respondents April 9, 2021:** As stated in of the Final RI Report, VOCs are not a major contaminant driver at the Subsite. The Final RI Report indicates acetone was the only VOC detected above NYDEC unrestricted use soil criteria (see Section 4.1.4 of the Final RI Report) and 1,1,2,2-tetrachloroethane, benzene, tetrachloroethene, and vinyl chloride were the only VOCs to exceed the NYSDEC sediment criteria (see Section 4.1.5 of the Final RI Report). So, although prior sampling indicates VOCs may be present in some limited areas, if they are present their concentrations are generally below screening criteria and are not expected to result in generation of localized airborne VOCs. As such, routine monitoring for VOCs is not needed. A similar approach has been approved by USEPA for other sites where VOCs are not a major contaminant driver.
> **USEPA May 26, 2021:** The Statement of Work sets forth the procedures and requirements for implementing the Work as specified by the Record of Decision (ROD). The ROD requires "appropriate controls and monitoring (e.g., community air monitoring) would be utilized to ensure that during remediation activities, airborne particulate and volatile organic vapor concentrations surrounding the excavation area are acceptable." EPA is not aware of any new findings that warrant a change to the remedy selected in the ROD. Monitoring of VOCs should be conducted and described in section 5.7.2 and Appendix A.
> **Respondents June 10, 2021:** As stated in USEPA's May 26, 2021 response related to NYSDEC Comment 7, monitoring plans are developed in the RD and are generally based on COCs present at the site. VOCs are not considered a COC at this subsite, and routine monitoring for VOCs is not needed. A similar approach has been approved by USEPA for other sites where VOCs are not a major contaminant driver.
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> **USEPA response: As VOCs in soil and sediment were detected above their NYSDEC unrestricted use criteria (2013 RI) and there are residential receptors within half a mile from the site, monitoring of VOCs should be conducted as stated in our comment from March 22, 2021.**

NYSDEC Comment 7, March 22, 2021: Section 5.7.2 Air Monitoring, page 30: PCBs should be used for air monitoring as well as the baseline monitoring in Appendix A. The ROD states there will be VOC monitoring that will be required.

> **Respondents April 9, 2021:** The ROD does not require PCB air monitoring. See USEPA Specific Comment #35 and associated response regarding VOC monitoring.
> **USEPA May 26, 2021:** Air monitoring is conducted to ensure health and safety during the RA. The ROD does not need to specify all monitoring requirements; monitoring plans are developed in the RD and are generally based on COCs present at the site. Please include air monitoring for PCBs in the RD as they are considered "appropriate."
> **Respondents June 10, 2021:** As stated in USEPA's May 26, 2021 response related to USEPA's Specific Comment 35, the ROD requires air monitoring of airborne particulate. Particulate monitoring provides near real-time information on air quality, allowing for rapid response to protect health and safety during the RA. PCB sample results will be received after the hazard, if any, has passed or been mitigated. Monitoring airborne particulates, which can be a vehicle for airborne transport of PCBs, will better ensure health and safety during the RA.
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> **USEPA response: As stated in our May 26, 2021 response, the ROD does not need to specify all monitoring requirements; monitoring plans are developed in the RD and are generally based on COCs**

present at the site. Since the particulate results will be received after the fact, to allay any concerns about PCB releases, there should also be limited monitoring for PCBs. Please include air monitoring for PCBs in the RD.

A. Section 1.1.2 Last paragraph beginning "Only the data adopted for use…": What is the justification for excluding L-7 from the design? Do the respondents intend to collect a new sample at location L-7?

B. Section 2.2 second to last paragraph: change the word hatch to "stippled" for where it represents the proposed removal extent reduction area.

C. Section 2.2 last paragraph: change the word hatch to "stippled" for where it represents the proposed removal extent reduction area.

D. Section 4.2 Phase IA Cultural Resource Survey, first paragraph: "The schedule for the Phase IA CRS will be determined after USEPA and the New York State Historic Preservation Office approve the work plan."
NYSHPO does not need to approve the work plan. What is the schedule for the Phase 1A CRS?

E. Section 4.2.2.1 Documentary Research, second paragraph after bullet section: "Discussions with appropriate Tribal representatives and/or groups…"
Change the word "Tribal" to "Onondaga Nation"

F. Table 5-1, National Grid gas line, Removal Area(s) Potentially Affected by Offset (Proposed Removal Depth), second line: This line states "SOIL-L (5-foot)". Comparing this with the last draft, I believe this may be a typo for "SED-L (5-foot)". Please check.

G. Section 5.7.2 Air Monitoring, first paragraph: See response to NYSDEC Comment 7 above. Please include air monitoring for PCBs in the RD.

H. Section 5.7.2 Air Monitoring, second paragraph: See response to USEPA Comment 35 above. As VOCs in soil and sediment were detected above their NYSDEC unrestricted use criteria (2013 RI), monitoring of VOCs should be conducted.

I. Figure 1-3c: There was an error in printing this page - see white boxes at bottom left. Please reprint.