

Reminder

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21 June 1989

Carol MRS. Larner, Proj. Mgr. CBH

Box 6340, R.F. #2

Union, Me. 04762

RE: RIF - 1B - Union Chemical Co. per our Conf.

Region I - EPA

JFK Bldg. - Waste Mng. Dept.

Attn: Mike Jasinski HPS-CAM 1

Boston, Mass. 02203

Superfund Records Center

SITE: Union ChemicalBREAK: 37OTHER: 531642

Mike:

As discussed at our conference (DEP Rep. EPA Rep. and CBH Rep.) the following changes must be included in the Phase 1B-RIF proposal.

1. Complete res. well testing of all wells within a 1 mile radius of U.C. (This was requested by CBH in 1984 and was recd. by MBH, DEP and EPA during "Emergency" removal) Testing to include, but not limited to, Ch. Hydrocarbons - Dioxin - pesticides - heavy metals - cyanides and PAH - (All dug wells to have sediment testing plus reg. testing - includes "springs" used for drinking water)

2. Complete "Scientifically sound" modeling of air emissions impact on area: To include, but not be limited to: A. Wind flow patterns of this area (Note: Augusta - Portland etc. are not acceptable and historically have not been acceptable before SEP as a basis of proj. impact.) B. All incineration equipment to be considered and the accurate date of 1968 to be used as "beginning date of impact." C. All data in Groulx report to be

Mike
Copy of original
sent on 23 June 1989

used - not selective / self serving sections. D. Complete testing of incinerators/boilers and impact areas.

C. Fugitive emission modeling including "ash dispersal" off site and asbestos testing.

Note
"Cellar tests"
in homes
within 1 mi.
radius.
VI?

3. Complete surface and ground water testing "on and off site" (some of "3" addressed in review of Phase 1B)

To include, but not limited to A. Additional testing of H₂O + sediment Fish / Hobbs / Q.B. in impact areas determined in # 2.

B. Expand to include Biological, radioactive and dioxin + asbestos + PH C. Leeward Pond + Grassy Pond to be added to test areas.

D. Swamp areas within 1 mile radius of site

4. Soil Sampling off site - Testing of soils on all properties within 1 mi. radius of MC.

For "incineration impact" Must be "all inclusive" for Chemicals, metals, dioxin, Asbestos, Surfactants, radioactive and PH + all other "wastes" found in

documentation of "on site waste". Testing to be done scientifically re: location on property re: "wind flow" patterns, possible run off "pockets" etc.

The 4 are all "testings" that CCIT have been requesting since 1984 and are no longer negotiable. Canonic must have this as PRIORITY in Phase 1B, before work begins. The "public Health and Safety" must be addressed (past -> future).

As we discussed, we do not want to turn the RIF-1B into an adversarial situation, however, failure to address these long overdue requests will require us to seek an injunction to address same.

I suggest that these changes and any others for RIF-1B proposal, be discussed at a meeting at MDEP with Rep. of all parties, including MBH, DEP, EPA, Canonic, ATSDR, Randy and/or PRP Rep. and CCH. Suggest and request that said meeting take place as soon after the 7 July 1989 deadline for Canonic's amended RIF-1B proposal and prior to approval of same. Let us work together to get a "responsible, scientific, credible and fair" 1B. proposal and "get on" with the work that needs to be done at the Union Chemical site.

Please respond re: T. ref. meeting.

Sincerely,

Carl M. Slamer, Proj. Mgr. CCH

Note: This "Reminder" is not to be considered as "all inclusive" re: RIF 1A/1B. It is "in addition to" our submission on RIF 1A and rec. for 1B plus our input at our meeting.

CM Slamer