

WHITMOYER LABORATORIES OU2  
ADMINISTRATIVE RECORD FILE \*  
INDEX OF DOCUMENTS

135210

II. REMEDIAL ENFORCEMENT PLANNING

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1. Letter to Ms. Diane Ajl, U.S. EPA, from Ms. Ellen S. Friedell, Rohm & Haas Company, re: Notification of bid package from Chemical Waste Management for removal of the Whitmoyer vault, 7/7/88. The bid is attached.
  2. Report: Whitmoyer Laboratories Site, Proposed Phase I Remediation, prepared by The Environmental Resources Management Group, 2/26/90. P. 200001-200017.
  3. Report: Whitmoyer Laboratories Site, Background Information, Proposed Phase I Remediation, prepared by The Environmental Resources Management Group, 3/90. P. 200018-200040.

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Administrative Record File available 4/11/90, updated 10/16/90, 12/17/90, 1/15/91, 2/13/91, 6/10/91, 10/28/94, 8/14/95, 12/11/95, 2/3/98, 2/27/98, 5/26/98, and 12/2/98.

The Administrative Record for the Whitmoyer Site includes all documents that form the basis for the selection of a response action. Both publicly available and non-publicly available documents are listed in the Bibliography for the Whitmoyer Response Action in Section III of the Administrative Record, and are hereby incorporated by reference. Publicly available documents may not have been physically included in the Administrative Record. Non-publicly available documents have been physically included in the Administrative Record, and have been listed in the indices.

The Administrative Record is organized according to Operable Units One, Two, and Three, and documents are indexed accordingly. Please note that some documents referenced are relevant to one or more operable units. Therefore, further documentation of the Administrative Record for Whitmoyer Laboratories Site OU2 can be found in the Whitmoyer Laboratories Site OU1 and OU3 Administrative Records.

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This document is classified as Confidential Business Information and is stored at the EPA Region III Headquarters in Philadelphia, Pennsylvania.

4. Letter to Ms. Diane Ajl, U.S. EPA, from Ms. Ellen S. Friedell, Rohm and Haas Company, re: Withdrawal of the confidentiality claim on the Proposed Phase I Remediation Plan and the Background Information Reports, 3/16/90. P. 200041-200041.

### III. REMEDIAL RESPONSE PLANNING

1. Bibliography for the Whitmoyer Response Action.  
P. 300001-300017.
2. Report: Final Remedial Investigation Report (Volume IA of V), Whitmoyer Laboratories Site, Lebanon County, Pennsylvania, prepared by NUS Corporation, 11/22/89.  
P. 300018-300361.
3. Report: Final Remedial Investigation Report (Volume IB of V), Whitmoyer Laboratories Site, Lebanon County, Pennsylvania, prepared by NUS Corporation, 11/22/89.  
P. 300362-300547.
4. Report: Final Remedial Investigation Report (Volume III of V), Appendices A-J, Whitmoyer Laboratories Site, Lebanon County, Pennsylvania, prepared by NUS Corporation, 11/22/89. P. 300548-301291.
5. Report: Final Remedial Investigation Report (Volume IV of V), Appendix K, Whitmoyer Laboratories Site, Lebanon County, Pennsylvania, prepared by NUS Corporation, 11/22/89. P. 301292-302113.
6. Report: Final Remedial Investigation Report (Volume V of V), Appendices L-S, Whitmoyer Laboratories Site, Lebanon County, Pennsylvania, prepared by NUS Corporation, 11/22/89. P. 302114-302436.
7. Report: Final Feasibility Study Report, Volume I of IV, Whitmoyer Laboratories Site, Lebanon County, Pennsylvania, prepared by NUS Corporation, 2/2/90.  
P. 302437-302669.
8. Report: Final Feasibility Study Report, Volume II of IV, Whitmoyer Laboratories Site, Lebanon County, Pennsylvania, prepared by NUS Corporation, 2/2/90.  
P. 302670-302847.
9. Report: Final Feasibility Study Report, Volume III of IV, Appendices A-C, Whitmoyer Laboratories Site, Lebanon County, Pennsylvania, prepared by NUS Corporation, 2/2/90. P. 302848-303111.

10. Report: Final Feasibility Study Report, Volume IV of IV, Appendices D-H, Whitmoyer Laboratories Site, Lebanon County, Pennsylvania, prepared by NUS Corporation, 2/2/90. P. 303112-303421.
11. Report: Final Remedial Investigation Report (Volume II of V), D-Size Maps, Whitmoyer Laboratories Site, Lebanon County, Pennsylvania, prepared by NUS Corporation, 11/22/89. P. 303422-303433.
12. Letter to Ms. Deborah Dewsbury, U.S. EPA, from Ms. Noreen K. Chamberlain, Pennsylvania Bureau of Waste Management, re: Jackson Township's final comments on the Feasibility Study, 3/2/90. P. 303434-303435.
13. Proposed Plan, Whitmoyer Laboratories, 4/90. P. 303436-303455.
14. Letter to Mr. Anthony T. Dappolone, U.S. EPA, from Mr. Andrew P. Foster, Drinker Biddle & Reath, re: Transmittal of a letter from the Whitmoyer Laboratories Private Study Group (WLPSG) concerning hazardous waste citing regulations, 5/2/90. P. 303456-303463. The letter dated May 2, 1990 is attached.
15. Letter to Mr. Albert W. Peterson and Mr. Anthony T. Dappolone, U.S. EPA, from Ms. Lynn A. Clouser, Morgan, Lewis & Bockius, re: Comments on the Remedial Investigation/Feasibility Study (RI/FS) on behalf of Buckeye Pipe Line Company, 6/14/90. P. 303464-303467.

16. Letter to Ms. Diane Ajl, U.S. EPA, Ms. Ellen Friedell, Rohm and Haas Company, and Ms. Bonnie Allyn Barnett, Drinker Biddle & Roth [sic], from Mr. Robert Abdullah, Pennsylvania Department of Environmental Resources (PADER), re: The Proposed Plan, 6/14/90. P. 303468-303482. The following are attached:
- a) Attachment 1, Table 2-6, Potential RCRA Classification of Materials, Whitmoyer Laboratories Site;
  - b) Attachment 2, a letter regarding the processing of Part A of a Hazardous Waste Permit Application, dated July 29, 1981;
  - c) Attachment 3, a letter regarding a request for Part B of a Hazardous Waste Permit Application, dated October 19, 1982.
17. Letter to Mr. Anthony T. Dappolone, U.S. EPA, from Ms. Ellen Friedell, Rohm and Haas Company, and Ms. Bonnie Allyn Barnett, Drinker Biddle & Reath, re: Comments on the April 1990 Proposed Plan, 6/15/90. P. 303483-303750. The following are attached:
- a) a list of Documents Submitted by the Whitmoyer Laboratories Private Study Group for Inclusion in the Administrative Record;
  - b) a report entitled "Comments of the Whitmoyer Laboratories Private Study Group on the Remedial Investigation, Feasibility Study, and Proposed Plan for the Whitmoyer Laboratories Site;"
  - c) a report entitled "Performance Evaluation of EPA's Preferred Alternative and ERM's Proposed Enhanced Containment System for the Whitmoyer Laboratories Site;"
  - d) a memorandum regarding the application of EPA's pump and treat memorandum and the National Contingency Plan (NCP) to the site, dated June 15, 1990.

18. Letter to Mr. Jeffery Pike, U.S. EPA, from Ms. Ellen S. Friedell, Rohm and Haas Company, and Ms. Bonnie Allyn Barnett, Drinker Biddle & Reath, re: The off-site removal alternative, 6/15/90. P. 303751-303785. A report entitled "Comments on the Ground-Water Alternatives in the Whitmoyer Feasibility Study" and a report entitled "Chemical Waste Management Environmental [sic] Remedial Action Division, Proposed Removal Plan for the Whitmoyer Superfund Site" are attached.
19. Memorandum to Mr. Tony Dappolone, U.S. EPA, from Mr. Gary Gross, U.S. EPA, re: Review of the incineration proposal comments, 7/3/90. P. 303786-303790.
20. Letter to Ms. Deborah Dewsbury, U.S. EPA, from Mr. John J. Trepanowski, NUS Corporation, re: Documents cited in the Remedial Investigation and the Feasibility Study reports, 7/13/90. P. 303791-303842. The following are attached:
  - a) a summary entitled "Waste Solutions Other Than Arsenic Bearing Which are Obtained at the Whitmoyer Plant;"
  - b) a memorandum regarding analysis of ferric sulfate study from a lagoon, dated April 16, 1971;
  - c) a memorandum regarding sub-surface arsenic material balance, dated October 5, 1972;
  - d) a memorandum regarding storm water discharges to a creek, dated December 30, 1975;
  - e) a memorandum regarding 1975 ground water measurements, dated February 11, 1976;
  - f) a memorandum regarding ground water contamination, dated February 16, 1976;
  - g) a memorandum regarding a monthly report on the well discharge program, dated February 24, 1970;
  - h) a memorandum regarding the evaporation of Paulsboro wastes, dated August 11, 1976;

- i) a summary entitled "Groundwater Protection in Land Disposal of Arsenic Bearing Wastes;"
  - j) a memorandum regarding the arsenic storage vault, dated March 16, 1979;
  - k) a memorandum regarding a leachates study, dated August 20, 1980;
  - l) an Arsenical Process Flow Diagram;
  - m) Aniline Still Bottom Tars information;
  - n) a Monitoring Data Sheet for Arsenical Storage Vault;
  - o) a letter regarding the Remedial Investigation report, dated July 18, 1989;
  - p) a letter regarding a minute map showing the Karst features, dated March 15, 1990.
21. Report: Draft Test Report, Pilot-Scale ESP and Hydro-Sonic Scrubber Parametric Tests for Particulate, Metals and HCl Emissions, prepared by Radian Corporation, 6/89. P. 303843-303918.
  22. Letter to Mr. Terry R. Rajah, NUS Corporation, from Mr. Jacob I. Sitlinger, Pennsylvania Game Commission, re: Explanation of inability to provide a Game Commission Fish & Wildlife Database Search, 6/16/89. P. 303919-303919.
  23. Letter to Terry R. Rojahn [sic], NUS Corporation, from Mr. Clark N. Shiffer, Pennsylvania Game Commission, re: Examination of a map showing the location of proposed remedial investigation activities at the site, 6/20/89. P. 303920-303920.
  24. Magazine article entitled "Thermal Remediation Industry; Markets, Technologies, Companies," prepared by James J. Cudahy and Anthony R. Eicher, 11/89. P. 303921-303925.
  25. Magazine article entitled "Roasting of Refractory Au Concentrates at New Consort," prepared by P.M. Ferreira, K. Knott-Craig, and D.W. Boydell, 12/89. P. 303926-303929.

26. Letter to Mr. Tony Dappolone, U.S. EPA, from Mr. John J. Trepanowski, NUS Corporation, re: Response to a request for clarification of comments on the Feasibility Study, 3/15/90. P. 303930-303932. The response is attached.
27. Memorandum to Ms. Deborah Dewsbury, Ms. Mindi Snoparski, Mr. Dick Brunker, Ms. Alyce Fritz, Mr. Jeff Pike, Ms. Diane Ajl, and Mr. Al Peterson, U.S. EPA, from Mr. Anthony T. Dappolone, U.S. EPA, re: Volumes I and II of the draft Soils Feasibility Study and a request for comments, 5/3/90. P. 303933-303933.
28. Memorandum to Mr. Tom Voltaggio, Mr. Ken Kryszczun, Ms. Diane Ajl, Mr. Jeff Pike, Mr. Abe Ferdas, Mr. Fred MacMillan, Ms. Deborah Dewsbury, Ms. Mary Coe, and Mr. Al Peterson, U.S. EPA, from Mr. Anthony T. Dappolone, U.S. EPA, re: A meeting requested by the Whitmoyer Laboratories Private Study Group with EPA to discuss technical and legal issues, 5/17/90. P. 303934-303934.
29. Meeting sign-in sheet, 6/5/90. P. 303935-303936. A list of Whitmoyer Laboratories Private Study Group Representatives is attached.
30. Memorandum to Mr. Tony Dappolone, U.S. EPA, from Mr. Gary Gross, U.S. EPA, re: Review of incineration related comments on the Feasibility Study and Proposed Plan, 7/3/90. P. 303937-303941.
31. Letter to Mr. Albert W. Peterson, U.S. EPA, from Ms. Lynn A. Clouser, Morgan, Lewis & Bockius, re: Request for an extension to the Proposed Plan public comment period, 7/24/90. P. 303942-303943. An envelope is attached.



32. Letter to Mr. Kenneth Dostal, U.S. EPA, from Mr. John J. Trepanowski, NUS Corporation, re: The final Soils Fixation Treatability Study and Soil Leaching/Solvent Extractions Reports, 8/23/90. P. 303944-303960. The following are attached:

- a) a letter regarding a budget estimate for the Odgen Environmental Services Circulating Bed Combustor, dated July 25, 1990;
- b) a letter regarding adaptations to the Circulating Bed Combustor to ensure removal of arsenic, dated July 31, 1990;
- c) a Calculation Sheet;
- d) a telecon note regarding arsenic removal, dated July 24, 1990;
- e) a letter regarding brochures describing the Weston Services, Inc. Transportable Incineration System, dated August 7, 1990;
- f) a letter regarding incineration of arsenic wastes, dated August 6, 1990;
- g) a telecon note regarding transportable units, dated July 20, 1990;
- h) a telecon note regarding test burns and APC calculations on high arsenic and organic wastes, dated July 30, 1990;
- i) a telecon note regarding transportable and fixed based units for arsenic waste streams, dated July 30, 1990;
- j) a telecon note regarding acceptance of high arsenic wastes, dated July 30, 1990;
- k) a telecon note regarding an inquiry to determine if Rollins can accept high arsenic wastes, dated July 30, 1990;
- l) a telecon note regarding an inquiry to determine if LWD can accept wastes, dated July 30, 1990.

33. Report: Final Technical Memorandum, Arsenic Volatilization, Capture, and Risks Resulting from Incineration of the Upper Vault Waste for Whitmoyer Laboratories Site, Lebanon County, Pennsylvania, prepared by Ebasco Services Incorporated, 9/90. P. 303961-304172.
34. Response to late comments Whitmoyer Laboratories OU2, 9/11/90. P. 304173-304174. A list of attendees from a September 11, 1990 Potentially Responsible Party (PRP) meeting is attached.
35. Telecon note of Mr. Bill Kochanov, PADER, with Mr. John Trepanowski, re: Sinkholes in the Myerstown area, 9/21/90. P. 304175-304230. An article entitled "Engineering Geological Approaches to Foundations in the Karst Terrain of the Hershey Valley" and a report entitled "Evaluation of Sinkhole Occurrences, Engineering, Construction and Maintenance Problems in Lehigh Valley Limestone Areas" are attached.
36. Report: Assessment of Burning Toxic Metal-Bearing Wastes in a Hazardous Waste Incinerator, prepared by Velzy Associates, 10/90. P. 304231-304281.
37. Report: Presentation, Incineration of Toxic Metal Bearing Wastes, Stack Emissions Concerns, prepared by Velzy Associates, 10/90. P. 304282-304299.
38. Memorandum to Mr. Tony Dappolone, U.S. EPA, from Mr. Richard L. Brunner, U.S. EPA, re: Review of the draft Record of Decision, 10/10/90. P. 304300-304300.
39. Memorandum to Mr. Robert A. Olexsey, U.S. EPA, from Mr. Kenneth Kryszcun, U.S. EPA, re: Request for information about arsenic for use in support of the preferred remedial action, 10/26/90. P. 304301-304302.
40. Letter to Mr. Anthony Dappolone, U.S. EPA, from Ms. Bonnie Allyn Barnett, Drinker Biddle & Reath, re: Transmittal of the sign-in sheet from a meeting concerning incineration issues, 11/6/90. P. 304303-304304. The sign-in sheet is attached.

41. Memorandum to Mr. Anthony T. Dappolone, U.S. EPA, from Mr. Robert E. Mournighan, U.S. EPA, re: Comments on the PRP's presentation on incineration, 11/15/90. P. 304305-304507. The following are attached:
- a) a letter regarding two papers concerning summary results of parametric test programs, dated November 14, 1990;
  - b) a paper entitled "Trace Metal Fate In a Rotary Kiln Incinerator With an Ionizing Wet Scrubber;"
  - c) a paper entitled "Pilot-Scale Testing to Evaluate the Fate of Trace Metals In a Rotary Kiln Incinerator;"
  - d) a report entitled "The Behavior of Arsenic In a Rotary Kiln Incinerator."
42. Letter to Ms. Bonnie Allyn Barnett, Drinker Biddle & Reath, from Mr. Anthony T. Dappolone, U.S. EPA, re: A meeting to discuss additional comments regarding the proposed remedies, 11/20/90. P. 304508-304509.
43. Letter to Mr. Tim Alexander, PADER, from Mr. Anthony T. Dappolone, U.S. EPA, re: Confirmation of a November 20th telephone call establishing a meeting with the Whitmoyer Laboratories Private Study Group to discuss additional comments regarding the proposed remedies, 11/21/90. P. 304510-304510.
44. Letter to Mr. Anthony T. Dappolone, U.S. EPA, from Mr. James R. Hagan, SmithKline Beecham Pharmaceutical, re: Agenda for meeting with the Whitmoyer Laboratories Private Study Group to discuss incineration and the group's approach to the Feasibility Study, 11/26/90. P. 304511-304512.
45. Letter to Ms. Bonnie Allyn Barnett, Drinker Biddle & Reath, from Mr. Anthony T. Dappolone, U.S. EPA, re: Letters to be used as a partial response to a request for documents referenced in the arsenic volatilization study, 11/28/90. P. 304513-304513.

46. Meeting sign-in sheet, 11/30/90. P. 304514-304657. A Comprehensive Feasibility Study Project Schedule and a thesis entitled "Fixation of Arsenic in Copper Smelter Flue Dust" are attached.
47. Report: Comments of the Whitmoyer Laboratories Private Study Group on the NUS/Ebasco Final Technical Memorandum Regarding Arsenic Volatilization, Capture & Risk, prepared by Environ Corporation, 12/3/90. P. 304658-304690. A cover letter is attached.
48. Standard Calculation Sheet, prepared by NUS Corporation, re: Groundwater Modeling Calibration Reruns, 12/5/90. P. 304691-304707. Four Bedrock Flow Model Tables are attached.
49. Memorandum to file from Mr. Anthony T. Dappolone, U.S. EPA, re: Summary of a November 30, 1990 meeting concerning the Proposed Plan, 12/13/90. P. 304708-304717. The meeting minutes and comments on Operable Units Two and Three are attached.
50. Memorandum to file from Mr. Anthony T. Dappolone, U.S. EPA, re: Summary of a November 2, 1990 meeting concerning the incineration of liquid arsenic, 12/14/90. P. 304718-304719.
51. Memorandum to file from Mr. Anthony T. Dappolone, U.S. EPA, re: Summary of a November 5, 1990 meeting between EPA, NUS Corporation, and PADER concerning proposed remedial actions, 12/14/90. P. 304720-304728. A response to PADER's comments on the soils Feasibility Study is attached.
52. Record of Decision, Operable Unit Two, Whitmoyer Laboratories Site, 12/17/90. P. 304729-304820.
53. Report: The Fate of Heavy Metals in EPA's Mobile Incineration System, prepared by Foster Wheeler Enviresponse, Inc. and U.S. EPA, 9/89. P. 304821-304838.
54. Report: Incorporation of Wet Deposition in the Industrial Source Complex Model, prepared by PEI Associates and H.E. Cramer Company, (undated). P. 304839-304854.

55. Letter to Mr. Christopher J. Corbett, U.S. EPA, from Mr. Stephen T. Washburn, Environ Corporation, re: Request for issuance of an Explanation of Significant Differences to allow for off-site incineration, 4/15/94. P. 304855-304867. Attachment 1, Wastes excavated from the Vault; Attachment 2, Miscellaneous Products/Feedstocks and Debris from Buildings and Structures; and Attachment 3, Transformers and Associated Wastes, are attached.
56. Letter to Mr. Christopher J. Corbett, U.S. EPA, from Mr. Stephen J., Washburn and Mr. Stephen Song, Environ Corporation, re: Information regarding the request for off-site incineration of combustible wastes and transmittal of a proposal to conduct the off-site incineration, 8/24/94. P. 304868-304917. The proposal is attached.
57. Summary of Proposed Change to the Selected Remedy, Whitmoyer Laboratories Superfund Site, Myerstown, Lebanon County, PA, (undated). P. 304918-304920.
58. Explanation of Significant Differences (ESD), Whitmoyer Laboratories Superfund Site, 12/28/94. P. 304921-304933.
59. Whitmoyer Laboratories Site, Summary of 12/94 ESD, (undated). P. 304934-304934.
60. Table of Wastes, Volumes, Treatments and Costs for the ESD, Whitmoyer Laboratories Site, (undated). P. 304935-304935.
61. Table entitled Summary of Hazardous Material Disposal, OU2, Whitmoyer Laboratories Site, (undated). P. 304936-304937.
62. Letter to Mr. Christopher J. Corbett, U.S. EPA, from Mr. Stephen T. Washburn and Mr. Stephen Song, Environ, re: Test results and background documentation for the request for the ESD to the remedy for lower vault wastes, 3/8/95. P. 304938-304944. A table entitled Large Scale Demonstration Test Results is attached.

63. Letter to Mr. Christopher J. Corbett, U.S. EPA, from Mr. Dennis D. Embert and Mr. Stephen T. Washburn, Environ, re: Request for explanation of the ESD to allow for off-site chemical fixation and off-site macroencapsulation of selected products, 5/25/95. P. 304945-305010. The following are attached:
- a) Table 1, Residual Arsenic Wastes - Primarily Powdered Products/Feedstocks;
  - b) Table 2, Low-Strength Arsenic Wastes - Primarily Corn Meal;
  - c) Attachment A, Low Strength and Residual Arsenic Wastes;
  - d) Attachment B, Additional Materials for Chemical Fixation, Solid Product Residuals and Residual Mixed Waste;
  - e) Attachment C-1, Combustible Debris for Off-Site Macroencapsulation;
  - f) Attachment C-2, Non-Combustible Debris CWM Confirmation Letter.
64. Letter to Mr. Christopher J. Corbett, U.S. EPA, from Mr. Stephen T. Washburn and Mr. Stephen Song, Environ, re: Request for the ESD to the remedy for the upper vault carbon/tar and tar wastes, 6/8/95. P. 305011-305017. Two letters dated September 21, 1994, concerning waste stream acceptance at the Aptus Aragonite facility are attached.
65. Letter to Mr. Christopher Corbett, U.S. EPA, from Ms. Noreen K. Wagner, Pennsylvania Department of Environmental Protection (PADEP), re: PADEP's concurrence with the ESD No. 2 for the Whitmoyer Laboratories Site, 10/3/95. P. 305018-305018.
66. Explanation of Significant Differences No. 2, Whitmoyer Laboratories Site, 11/7/95. P. 305019-305025.

67. Letter to Mr. Christopher J. Corbett, U.S. EPA, from Mr. Stephen T. Washburn, Environ, re: Outline of WLPSG proposed plans for the bench-scale fixation treatability tests for the soils excavated from the upper portion of the vault at the site, 12/19/94. P. 305026-305030. Table 5-3, Selected Data Summary - Soil is attached.
68. Letter to Mr. Christopher J. Corbett, U.S. EPA, from Mr. Paul T. Cichy, Rohm and Haas, re: Transmittal of information which was faxed to U.S. Ecology and Chemical Waste Management, Inc., (CWM) regarding the issue of increased leachability of aniline from the soil after it has been stabilized for arsenic, 4/25/97. P. 305031-305049. The following are attached:
- a) an April 16, 1997, facsimile memorandum to Mr. Zaki Naser, U.S. Ecology, from Mr. Paul T. Cichy, Rohm and Haas, regarding transmittal of information on composition of the soils;
  - b) an April 16, 1997, facsimile memorandum to Mr. Jimmy Street, CWM, from Mr. Paul T. Cichy, Rohm and Haas, regarding transmittal of information on the soils for discussions with the state;
  - c) excerpts from a July 29, 1994, report entitled, "Vault Wastes Characterization Results Report, Operable Unit Four, Whitmoyer Laboratories Superfund Site;"
  - d) Table 5-3, "Selected Data Summary - Soil, Whitmoyer Laboratories Superfund Site, Operable Unit Four;"
  - e) an arsenic and aniline analysis table;
  - f) a November 14, 1995, analytical report;
  - g) a December 10, 1996, analytical report.

69. Letter to Mr. Christopher J. Corbett, U.S. EPA, from Mr. Stephen T. Washburn and Ms. Kim Cizerle, Environ, re: WLPSG request for EPA to issue an ESD to allow off-site fixation of the soils, 5/30/96. P. 305050-305071. Attachment A, "Results of Bench-Scale Treatability Tests," Attachment B, "Superfund LDR Guide #6A," and Attachment C, "Alabama and Nevada Notification Response Letters," are attached.
70. Letter to Mr. Christopher J. Corbett, U.S. EPA, from Ms. Noreen K. Wagner, PADEP, re: PADEP's support of the request for an ESD for the off-site treatment and disposal of the wastes at the site, 7/22/96. P. 305072-305072.
71. Report: Preliminary Remedial Design for On-Site Loading and Off-Site Transportation, Treatment, and Disposal of Upper Vault Soils, Operable Unit Four, Whitmoyer Laboratories Superfund Site, prepared by Environ, 8/96. P. 305073-305184.
72. Letter to Mr. Christopher J. Corbett, U.S. EPA, from Ms. Kim Cizerle and Mr. Tom Fizzano, Environ, re: Description of the proposed procedures to conduct full-scale demonstration tests of off-site fixation of vault soils at the site, 11/18/96. P. 305185-305194. U.S. EPA's comments on WLPSG's October 29, 1996, letter and a July 31, 1996, Building 18 Waste Storage Layout figure are attached.
73. Letter to Mr. Christopher J. Corbett, U.S. EPA, from Ms. Jennifer Bryson, Ms. Kim Cizerle, and Mr. Thomas G. Fizzano, Environ, re: Results of the full-scale demonstration tests on the upper vault soils at the site, 3/6/97. P. 305195-305211. Attachment A, "Laboratory Analytical Results," is attached.
74. Letter to Ms. Judy Sopianopoulos, U.S. EPA, from Mr. Tom Fizzano, Environ, re: Transmittal of the May 30, 1996, request for ESD to the remedy for vault soils and the March 6, 1997, results of full-scale demonstration tests for the upper vault soils, 5/16/97. P. 305212-305213.



75. Letter to Mr. Zaki Naser, U.S. Ecology, Inc., from Mr. Jeffrey C. Denison, re: Response to U.S. Ecology's May 19, 1997, letter requesting that the Nevada Department of Environmental Protection (NDEP) reconfirm it's acceptance of an EPA variance for the waste stream at the site, and NDEP's support of the EPA to grant or deny a variance, 5/21/97. P. 305214-305216. A May 27, 1997, facsimile memorandum to Mr. Christopher Corbett, U.S. EPA, from Mr. Paul Cichy, Rohm and Haas, and a May 22, 1997, facsimile cover sheet are attached.
76. Letter to Mr. Jimmy J. Street, CWM, from Ms. Jewell Grubbs, U.S. EPA, re: Response to the CWM letter requesting concurrence with the treatability variance at the site, 6/19/97. P. 305217-305218.
77. Memorandum to Mr. Tom Fizzano and Ms. Jennifer Bryson, Environ, from Ms. Kim Cizerle, Environ, re: Notification that it is not necessary to publish a notice in the Federal Register in order to issue a treatability variance for the OU4 soils, based on EPA's procedural requirements, 9/18/97. P. 305219-305234. Pages from the EPA's procedural requirement handbook, pages from the Federal Register, and a September 30, 1997, facsimile cover letter to Mr. Christopher Corbett, U.S. EPA, from Mr. Tom Fizzano, Environ, are attached.
78. Memorandum to Mr. Christopher Corbett, U.S. EPA, from Mr. Douglas A. Donor, U.S. EPA, re: EPA Resource Conservation and Recovery Act (RCRA) Programs approval and concurrence with the Draft ROD Amendment/Treatment Variance for the site, 1/7/98. P. 305235-305235.
79. Letter to Mr. W. Michael McCabe, U.S. EPA, from Mr. Michael R. Steiner, PADEP, re: PADEP concurrence with Draft ROD Amendment for the site, 1/9/98. P.305236-305237.
80. Draft Amendment to the Record of Decision, Operable Unit Two, Whitmoyer Laboratories Superfund Site, 1/30/98. P. 305238-305250.

81. Amendment to the Record of Decision, Operable Unit Two, Whitmoyer Laboratories Superfund Site, 5/12/98. P. 305251-305266. A February 3, 1998, through March 4, 1998, Responsiveness Summary for the Amendment to the Record of Decision Operable Unit Two, Myerstown, Lebanon County, Pennsylvania is attached.
82. Letter to Mr. Christopher Corbett, U.S. EPA, from Ms. Jennifer Bryson and Mr. John M. Butziger, Environ, re: Response to EPA's March 6, 1998, comments on the September 23, 1997, Bench-Scale Treatability Testing Results Report and presentation of the follow-up treatability testing results performed in January 1998 on additional samples collected from the consolidated lagoon area, 4/30/98. P. 305267-305279. Attachment: ENRECO Laboratories Report and Laboratory Data Package for Follow-up Treatability Testing, Whitmoyer Laboratories Superfund Site, Myerstown, Pennsylvania is attached.
83. Letter to Mr. Christopher Corbett, U.S. EPA, from Ms. Jennifer Bryson and Mr. Thomas G. Fizzano, Environ, re: Request for an ESD to the ROD for consolidated lagoons, excavated lagoons, and heavily contaminated unsaturated soils at the site and discussion regarding the transfer of the excavated lagoons from Operable Unit 5 (OU5) to OU3, 8/3/98. P. 305280-305286.
84. Letter to Mr. Christopher Corbett, U.S. EPA, from Ms. Jennifer Bryson and Mr. Thomas G. Fizzano, Environ, re: Description of the on-site waste handling and transportation activities, the off-site treatment testing activities, the waste analysis and analytical procedures, and the reporting and scheduling associated with the full-scale demonstration tests for off-site fixation of hazardous lagoon wastes, 8/31/98. P. 305287-305298. Attachment 1, Bench-Scale Treatability Study Results: U.S. Ecology is attached.
85. Letter to Mr. Christopher Corbett, U.S. EPA, from Mr. Michael R. Steiner, PADEP, re: Concurrence with the proposed ESD No. 3 to the ROD for OU2 and OU3, 10/29/98. P. 305299-305299.
86. Report: Final Consolidated Lagoons Delineation Report, Operable Unit 5, Whitmoyer Laboratories Superfund Site, prepared by Environ, 11/2/98. P. 305300-305526.

87. Explanation of Significant Differences No. 3, Whitmoyer  
Laboratories Superfund Site, 11/16/98. P. 305527-  
305536.

V. COMMUNITY INVOLVEMENT/CONGRESSIONAL CORRESPONDENCE/IMAGERY

1. Transcript of proceedings for the Proposed Plan for Whitmoyer Laboratories, 4/24/90. P. 500001-500057.
2. Letter to Mr. Anthony T. Dappolone, U.S. EPA, from Mr. Dean O. Moyer, Jackson Township Board of Supervisors, re: Comments on the Proposed Plan, 6/12/90. P. 500058-500059.
3. Letter to Mr. Anthony Dappolone, U.S. EPA, from Mr. David J. Brightbill, Senate of Pennsylvania, re: Opposition to the proposed remedial action, 6/15/90. P. 500060-500060.
4. Letter to Mr. Anthony T. Dappolone, U.S. EPA, from Mr. Dean Moyer, Mr. William Swonger, and Mr. Clyde Deck, Jackson Township Board of Supervisors, re: Summary of an October 12th meeting between the Township Board of Supervisors and the Whitmoyer Laboratories Private Study Group, 10/13/90. P. 500061-500061.
5. Letter to Mr. Edwin Erickson, U.S. EPA, from Mr. Nicholas B. Moehlmann, Pennsylvania House of Representatives, re: Opposition to the plan for incineration of arsenic wastes from the site, 10/31/90. P. 500062-500062.
6. Letter to Mr. Anthony T. Dappolone, U.S. EPA, from Mr. Edward H. Treat, Borough of Myerstown, re: Transmittal of a letter expressing concern about EPA's plans for clean up of the site, 11/6/90. P. 500063-500064. The letter dated October 29, 1990 is attached.
7. Letter to the Honorable Arthur A. Davis, PADER, from Mr. David J. Brightbill, Senate of Pennsylvania, re: Opposition to EPA's proposed incineration of arsenic contaminated matter, 11/13/90. P. 500065-500066.
8. Letter to Mr. Edwin B. Erickson, U.S. EPA, from Mr. David J. Brightbill, Senate of Pennsylvania, re: Questioning EPA's good faith intentions, 11/14/90. P. 500067-500070. An interoffice route slip and a letter dated November 13, 1990 regarding opposition to the incineration plan are attached.

9. Letter to the Honorable David J. Brightbill, Senate of Pennsylvania, from Mr. Edwin B. Erickson, U.S. EPA, re: Arrangements for a working meeting between EPA and the Whitmoyer Laboratories Private Study Group, 11/28/90. P. 500071-500072. An unsigned copy of the letter is attached.
10. Letter to the Honorable Nicholas B. Moehlmann, Pennsylvania House of Representatives, from Mr. Edwin B. Erickson, U.S. EPA, re: Summary of the incineration process for arsenic wastes at the site, 11/28/90. P. 500073-500073.
11. U.S. EPA Fact Sheet, Whitmoyer Laboratories OU2 Superfund Site, re: EPA's issuance of draft Explanation of Significant Differences (ESD) for OU2 remedial action, 8/95. P. 500074-500075.
12. Transcript of public meeting, Whitmoyer Laboratories Site OU2, 2/10/98. P. 500076-500111.
13. Letter to Mr. Christopher Corbett, U.S. EPA, from Mr. David Brightbill, Senate of Pennsylvania, re: Letter of support for EPA proposal to remove contaminated vault soil, 2/24/98. P. 500112.
14. Letter to Mr. Christopher Corbett, U.S. EPA, from Mr. Peter Zug, U.S. House of Representatives, re: Letter of support for EPA proposal to remove contaminated vault soil, 2/26/98. P. 500113.

### GUIDANCE DOCUMENTS

1. U.S. EPA Superfund Publication, Quick Reference Fact Sheet: "Superfund LDR Guide #6A (2nd Edition), Obtaining a Soil and Debris Treatability Variance for Remedial Actions," OSWER 9347.3-06FS, September 1990.
2. U.S. EPA Superfund Publication, Quick Reference Fact Sheet: "Regional Guide: Issuing Site-Specific Treatability Variances for Contaminated Soils and Debris from Land Disposal Restrictions (LDRs)," OSWER 9380.3-08FS, January 1992.