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April 21, 2000

Mr. Brian Farrier
Remedial Project Manager
U.S. Environmental Protection Agency
Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-3104

10066107



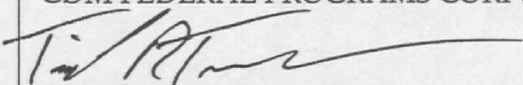
Project: RAC Contract No. 68-W5-0022
Work Assignment No. 033-RICO-04JF
DCN: 3280-033-RT-FEAS-07192
Subject: Response to Comments on
Draft Feasibility Study Report
Chemfax, Inc. Superfund Site
Gulfport, Mississippi

Dear Mr. Farrier:

CDM FEDERAL PROGRAMS CORPORATION (CDM Federal) is pleased to submit our responses to NOAA's and MDEQ's comments on the December 1999 Draft Feasibility Study Report. CDM Federal is pleased to assist EPA with this assignment, and we look forward to providing further technical assistance on this project. If you have any questions concerning the attached, please send me an e-mail (TURNERTR@CDM.COM).

Sincerely yours,

CDM FEDERAL PROGRAMS CORPORATION


Timothy R. Turner, P.E.
Project Manager

Attachments

cc: Robert P. Stern, EPA Project Officer w/o attachments
Gary Clemons, CDM Federal Region IV Program Manager w/o attachments
Document Control (Golden) w/ attachments
Project File (Atlanta) w/ attachments

Response to Comments on the December 1999 Draft FS Report for the Chemfax Site

NOAA Comments

According to the executive summary, several of the primary objectives of the FS are to identify remedial goals for contaminated media; determine the extent of contamination above remediation goals; identify, screen, and select remedial technologies and process options applicable to the contamination associated with the site; and develop and analyze remedial action alternatives. Since the U.S. Environmental Protection Agency has not addressed groundwater contamination and contamination at offsite areas including the Bernard Bayou/Big Lake/Back Bay area and the Beat 2 Landfill, the Service believes that the objectives for the FS cannot be accomplished.

Comment acknowledged, however, no changes made to text.

MDEQ Comments

1. EXECUTIVE SUMMARY, page ES-1, first paragraph, third sentence: the word "previously" is misspelled.

Correction made.

2. 2.1.4.1 Site and Local Surface Pathways, page 2-3: A figure should be included that indicates all of the site features (i.e., drainage ditches, holding ponds, etc.). The site features should be labeled accordingly.

Comment incorporated.

3. 2.2. REMEDIAL INVESTIGATION RESULTS, page 2-7: The Soil, Groundwater, and Sediment and Surface Water Sections should include or reference figures depicting the soil sample locations, monitoring well locations, and surface water and sediment locations. The site features should be labeled accordingly. If figures are utilized, that are already located in the Feasibility Study Report, they should be referenced accordingly.

Figures depicting sample and monitor well locations have been added to the report.

4. 2.2.4 OTHER INVESTIGATIONS, page 2-10, second paragraph: A figure should be included depicting the three source areas based on the evaluation of the Geoprobe and monitoring well data.

Comment incorporated.

5. 2.3 SUMMARY OF HUMAN HEALTH RISK ASSESSMENT, page 2-11, first paragraph: The sentence referring to the "estimate" that is within EPA's target range for Superfund sites should be reworded (e.g., this estimate is below EPA's target range for Superfund sites).

Comment incorporated.

6 2.5.8 INORGANICS, Terrestrial Fate, page 2-22, first paragraph, third sentence: The word "is" should be replaced with the word "in" after metals.

Comment incorporated.

7. 4.2.5.1 Description, page 4-32, first paragraph, seventh sentence: the word "the", prior to the word "supersaturates" should be removed.

Comment incorporated.

8. 4.2.5.3 Implementability, page 4-33, first paragraph, first sentence, first word: Replace the word "Once" with the word "One"

Comment incorporated.

9. 4.5.2 GROUNDWATER ALTERNATIVES, page 4-39: (In Situ treatment) should follow Alternative 5.

Comment incorporated.

10. The State of Mississippi has had concerns in past, on retained on-site remedial alternatives which could possibly result in the discharge of vapors, gases, particulates, etc. These concerns have mainly arisen from concerned citizens and/or groups. If this alternative is a possible selection, strict detail in the compliance with local, state, and federal discharge standards should be addressed.

Comment acknowledged. The description of each alternatives short-term effectiveness addresses the need for air monitoring. Specific types of monitoring and appropriate action levels will need to be specified in the remedial design of the selected remedy.

11. Excavation of contaminated surface and subsurface soil with Off-site disposal or treatment was apparently not addressed in the Feasibility Study.

Each of the treatment alternatives includes an option for treatment followed by offsite disposal of the treated material. In addition, an alternative that includes excavation and offsite disposal into a Subtitle C landfill has been added to the FS.