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July 9, 2001

Bob Rule
de maximus, Inc.
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RE: Comments on the "Review of the Performance Demonstration Plan, Fields Brook Superfund Site, Ashtabula, Ohio." submitted to Terese Vandonsel, RPM, USEPA Region V dated May 22, 2001 by Marta K. Richards, Engineering Tech Support Center

Dear Mr. Rule:

After review of Ms. Richards's comments and her responses dated May 22, 2001, I would like to offer the following explanations, corrections and potential insertions to the Performance Demonstration Test Plan.

We feel that all EPA's comments were addressed, although after reviewing the notes from our internal PDP review sessions it appears that although we spent a good deal of time discussing these points some items were inadvertently changed in the Work Plan and not formally addressed in the PDP.

To aid in following my comments I have numbered the paragraphs 1-20. In the 5th paragraph there was a discussion of the POHCs and the statement, "as difficult to destroy as any constituent found in the soil". This statement was an opinion that we as a group derived, this statement can be removed and should not significantly affect the PDP. I have enclosed this page for insertion if deemed necessary.

In the 6th the feed rate and baghouse fines were discussed. The feed rates will be approximated during shakeout and finalized during the Performance Demonstration. In addition to the feed rates, we believe the baghouse or knockout box fines do not need to be analyzed. Soil is routed through the rotary dryer where it is heated and the contaminates are volatilized and become part of the process gas stream. The gas stream and fines are routed to the baghouse. The gas stream flows through the bags, which collect the dust as the gas stream is then routed to the thermal oxidizer. The bags are then pulsed, dropping the fines to a slat conveyor and pushed to an auger where they are routed to the hot end of the rotary dryer. The dust is then re-remediated and mixed with treated soil in the discharge mixer cooler. There is no need to sample the fines independently, as they are recombined prior to discharge from the system and sampled at the discharge belt.

Paragraph 7 discusses soil feed rates. Based on the selected POHC's we will attempt to run at a rate of approximately 40 tons per hour. This number was derived by calculating the rotary desorbers residence time as well as the wet scrubs capability to affectively balance the pH levels. The Performance Demonstration will determine actual rates and retention times.

Paragraph 8 discusses additional metering for the wet scrub air pollution control unit. The following three items have been added as additional meters and AWFCOs. The water flow rate will be measured by the water pump (Item No. 38 of Appendix F of the P & ID). The pH level is monitored (Item No. 37 of P & ID) and corrected with the pH control device (Item No. 38 of P & ID).

Paragraph 10 corrects the name "Low Temperature Thermal Desorption System" this has been changed. see insertions.

Paragraphs 11 and 15 – 19 discuss sampling methodologies and their titles. The selected stack testing and analytical contractor will be a certified and approved before any testing is done. The laboratories Quality Assurance Quality Control (QAQC) will be an approved submittal. The company selected will utilize all current, correct and approved testing methodologies. The testing will be done utilizing the most currently accepted testing procedures of the USEPA any deviation in testing methodologies from the PDP will be footnoted.

Paragraph 12 discusses the Organizational Chart. This has been changed please see the inserts for Section 2.

Paragraph 13 was inserted for reference only. The cleanup goals have been established by the USEPA.

Paragraph 14 discusses the sampling ports. The ports were originally designed and placed taking into account isokinetic airflows.

I trust this will adequately addresses the questions and comments from Ms. Richards. Should you have any additional questions or comments please feel free to contact me at 952-928-0100. Thank you for your time.

Sincerely.

SoilPure, Inc.

Martin V. Aschenbener

Martin V. Aschenbener
General Manager

Cc: Jeff Daniels, CRA
file

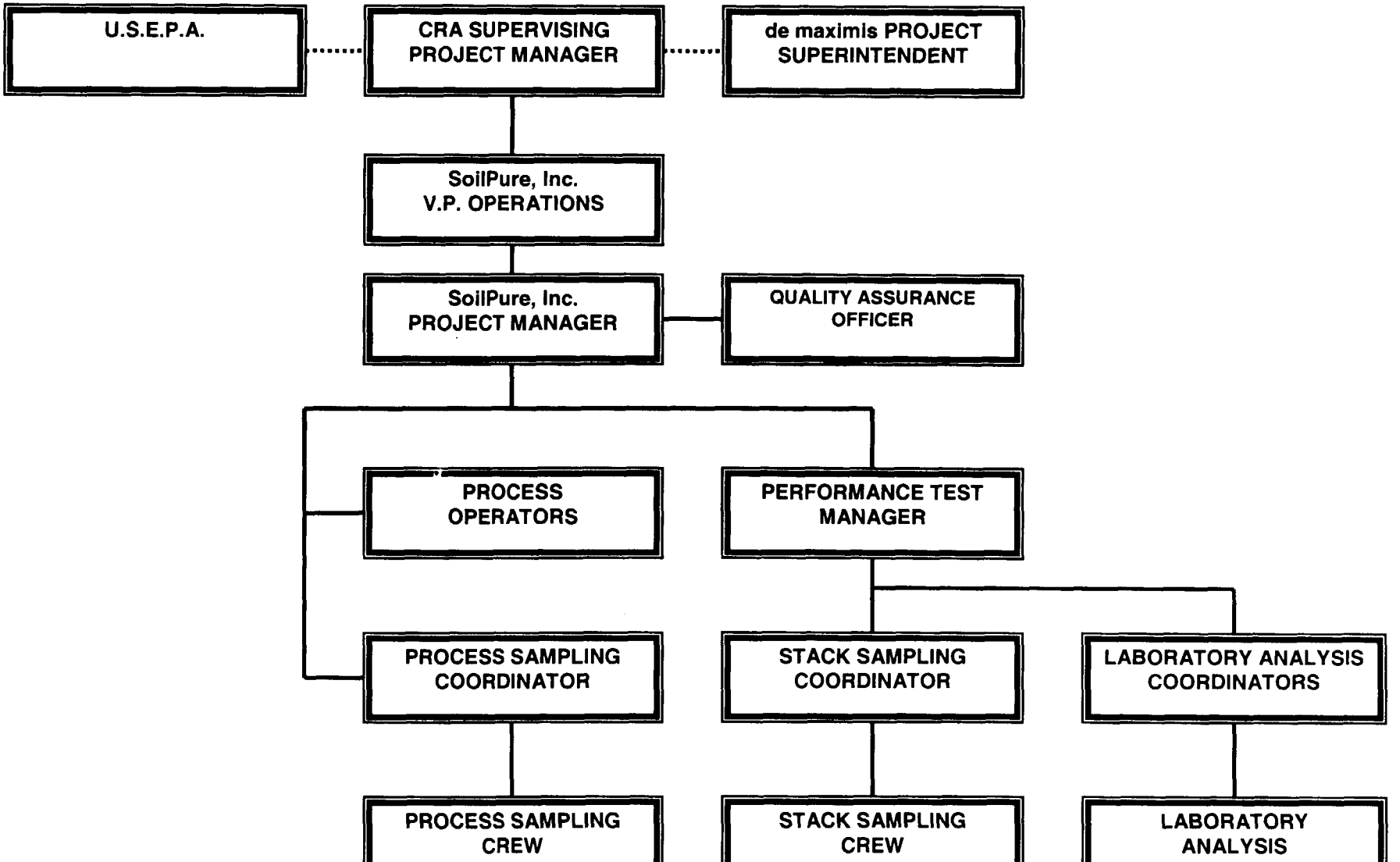


Figure 2 -1 Performance Demonstration Test Project Organization and Responsibility

2.0 PROJECT ORGANIZATION

The remedial activities at Fields Brook Superfund Site, Ashtabula, Ohio are being performed under the oversight of USEPA Region V and the Ohio Environmental Protection Agency (OEPA). The Remedial Project Manager (RPM) or his/her representative will be on-site during the performance demonstration test. Other regulatory observers, technical assistance groups, and oversight contractors may also be at the site during the performance demonstration test.

The performance demonstration test program will be performed by a project team consisting of representatives of de maximis, SoilPure, and a group of subcontractors. A subcontractor who is experienced in the testing of thermal treatment systems will conduct the stack testing for this project. One or more analytical laboratory subcontractors will provide analytical services. A performance testing consultant will serve as the Performance Test Manager (PTM). The overall project organization and lines of responsibility are shown in Figure 2-1.

The CRA Project Manager has overall responsibility for the implementation of remedial actions and providing contractor oversight, under contract to the Fields Brooks Superfund Site. The de maximis Project Manager serves as the key technical interface with USEPA and Ohio EPA.

The de maximis Project Superintendent shares overall responsibility for coordinating site activities. He or she will have oversight responsibilities for SPI's operations during the Remediation System performance demonstration testing.

The SPI Principal in Charge is a corporate officer with overall responsibility for the financial, operational, and health and safety aspects of the project. The Principal in Charge interacts with the client, regulatory agencies, and the SPI Project Manager as required.

The SPI Project Manager is responsible for coordinating Remediation Systems operations with the test team and providing liaison with the Remedial Project Manager (RPM), de maximis and (potentially) any regulatory agencies that need onsite direction. Some of his or her responsibilities include:

- Working with the PTM in planning and implementing the Performance Demonstration Plan
- Preparing the Remediation System for testing
- Calibrating instruments prior to the test
- Testing automatic waste feed cutoff (AWFCO) prior to the test
- Operating the Remediation System at planned test conditions

3.3 Selection of PHOC

The two compounds selected as POHCs for DRE performance demonstration are hexachloroethane and trichloroethene. The selection of these compounds is based upon the following factors:

- Both compounds are present on the site in quantities so as spiking will be mitigated and DRE can be readily shown.
- Hexchloroethane: 50.000 mg/kg
- Trichloroethene: 45.000 mg/kg

Table 3.2. Clean Up Goals
FIELDS BROOK SITE
ASTABULA, OHIO

Chemical of Concern	Residential (mg/kg)	Occupational (mg/kg)
1.1.1- Trichloroethane	393.451.00	766.500.00
1.1.2.2-Tetrachloroethane	51.00	119.00
1.1.2- Trichloroethane	179.00	418.00
1.1.2-Dichloroethene	17.00	40.00
1.2.4-Trichlorobenzene	43.717.00	85.167.00
1.2-Dichlorobenzene	393.451.00	766.500.00
1.2- Dichloroethene (trans)	87.433.00	170.333.00
1.4- Dichlorobenzene	425.00	994.00
2-Chlorophenol	21.858.00	42.583.00
Acenaphthene	262.300.00	511.000.00
Anthracene	1.311.502.00	2.555.000.00
Antimony	1.749.00	3.407.00
Arsenic*	5.80	14.00
Benzene	352.00	822.00
Benzidine	0.04	0.10
Benzo(a)anthracene	13.97	33.00
Benzo(a)Pyrene	1.40	3.30
Benzo(b)fluoranthene	13.97	33.00
Benzo(k)fluoranthene	13.97	33.00
Beryllium	2.40	5.50
Alpha-BHC	1.60	3.80
Gama BHC (Lindane)	7.80	18.00
Bis(2-ethylhexyl)phthalate	729.00	1.703.00

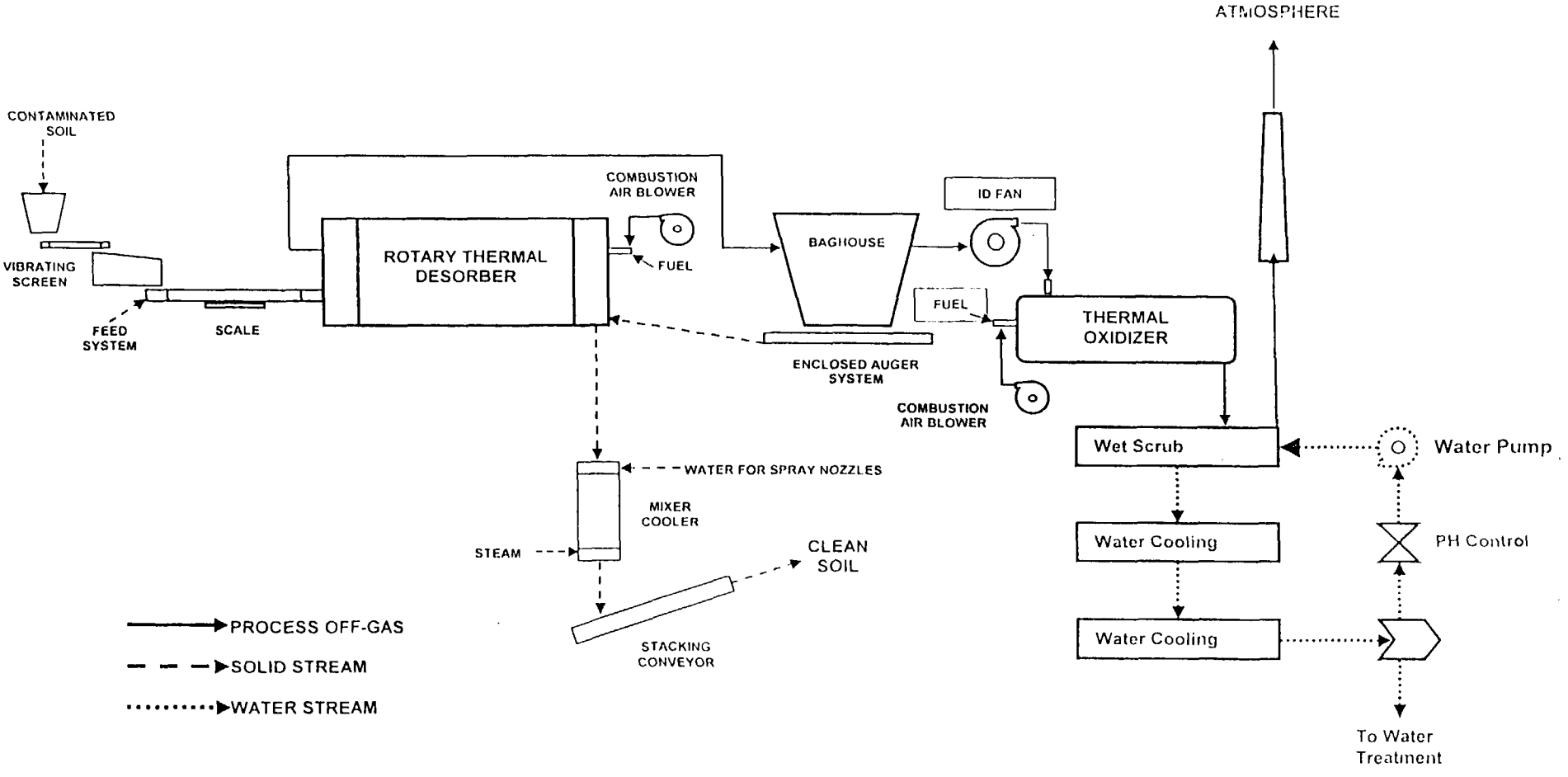
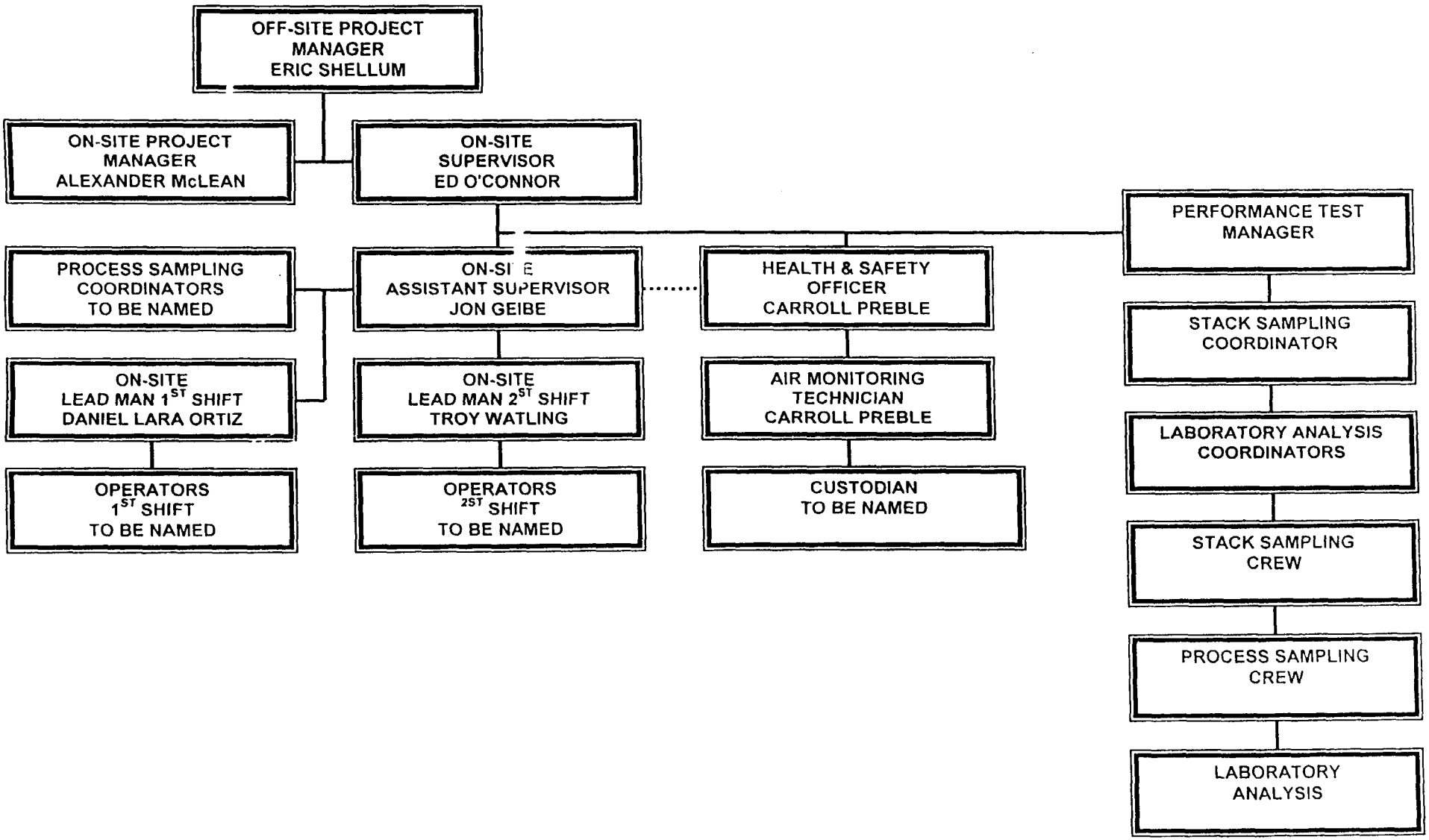


Figure 4 - 1 Thermal Desorption System Block Flow Diagram



SoilPure, Inc. FIELDS BROOK PROJECT ORGANIZATIONAL CHART

REV.2	6/22/01	