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January 26, 1993

HSRL-6J

Richard S. Williams
Golder Associates, Inc.
1809 North Mill St., Suite C
Naperville, Illinois 60563

Re: Yeoman Creek Landfill Site

Dear Mr. Patterson:

U.S. EPA approves the Addendum to the RI/FS Work Plan for the Additional Landfill Gas Monitoring subject to addition of the sampling points and transects identified on the attached map.

Another purpose of this letter is to confirm the results of the meeting on January 21, 1993, and to respond to your letter dated January 29, 1993. The participants in the January 21 meeting included representatives from Golder Associates, Outboard Marine Corporation, Browning Ferris Industries, Steve Nussbaum of IEPA, and myself. The following agreements resulted from this meeting:

1. Since the due dates for the Source Characterization Memorandum and the revised Migration Pathway Assessment Memorandum are not far apart, it will be acceptable to U.S. EPA if the information in these documents is combined into one document with a due date of March 8, 1993. This document must be responsive to the comments on the Migration Pathway Assessment in the January 5, 1993 letter from U.S. EPA. Golder Associates, also expressed a desire to submit a preliminary screening of the potential exposure routes at the same time. This is acceptable to U.S. EPA. However, Steve Nussbaum and I emphasized that ~~the bases and screening out any exposure route must be based on hard data.~~ ^{supportive evidence for, fully documented} ~~and objective site information~~.
2. U.S. EPA also encourages early submission of the Preliminary Data Transmittal information for all data available at that time. Golder Associates representatives indicated a desire to include the Preliminary Data Transmittal information with the March 8 transmittal. If this is done, the Preliminary Data Transmittal due on June 29, 1993 could simply address the remaining data. U.S. EPA agrees that it is desirable to produce a document soon after most of the data is available that will help in informing the public of the results of the investigation.
3. Although the Preliminary Screening for Ecotoxicological Risks is not required as a submission in the Consent Order, U.S. EPA encourages the Respondents to revise and resubmit this document,

so that the procedures for this risk assessment can be worked out. Richard Williams of Golder Associates stated that the Respondents would be approached regarding this issue.

Regarding your letter dated January 29, 1993, it should be made clear that your letter does not fulfill the requirement for submission of a Migration Pathway Assessment, since the document previously submitted was not responsive to the requirements of the Consent Order. In addition, the documents submitted on March 8, 1993 must include a presentation of all of the physical data collected including field observations and boring logs since this data was not submitted in the Monthly Progress Reports as required in the Consent Order. ~~Failure to submit~~ the physical data or the information required in the Migration Pathway Assessment ~~on~~ March 8, 1993 will be considered a violation of the Consent Order. ~~Consequently to fulfill the obligations of the~~

Regarding the Migration Pathway Assessment, please keep in mind (especially in the evaluation of the erosion potential) that U.S. EPA requires the evaluation of the no action alternative (that is no fence and no maintenance tasks) over a long period of time.

Regarding the landfill cover characterization, personnel from the Agency for Toxic Substances and Disease Registry as well as risk assessment specialists have informed me that an evaluation of the risks from contact with soils can not be completed without use of representative chemical analytical data from the upper few inches of the cover. For purposes of evaluation of the final remedial actions, it can not be assumed that the soils in the existing cover are uncontaminated, because ^{the wastes for this means, include} representative chemical analyses of the soil cover have not been completed, because ⁽³⁾ there is no lack of documentation of where the soils came from, because ⁽³⁾ there is potential that the soils were mixed with the wastes during placement, because ⁽³⁾ there is potential that the soil cover is thin in spots, because ⁽³⁾ there is potential that the soil cover will erode in the future, because ⁽³⁾ there is potential for upward migration of contaminants into the soil cover, ~~and possibly other reasons~~. Soil sampling for chemical analysis of the soil cover was not required to be included in the RD/RA Work Plan because it was assumed to be very likely that the selected final remedial action at this site would include a new or upgraded cover over the existing soil cover. If this ends up not to be the case, then a statistically valid sampling of the site cover for chemical analyses will likely be required.

Regarding your response to U.S. EPA Comment 3, please keep in mind that the comment addresses migration pathways not exposure pathways.

The Respondents are urged to proceed expeditiously with further remedial actions at the 1400 Sunset Avenue Building, since the screening data clearly indicates that landfill gases are

continuing to enter that building. Please inform us immediately of the schedule for starting and completing this work.
If you have any further questions or concerns feel free to call me at (312) 886-4740.

Sincerely yours,

Richard E. Boice
Remedial Project Manager

cc: O. Patel, Weston
S. Nussbaum, IEPA
S. Bleiweis, MWE
D. Vallance, BFI

bcc: E. Helmer, HSRL-5J