



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7

11201 Renner Boulevard  
Lenexa, Kansas 66219

OCT 15 2019

Mr. Paul Rosasco  
Project Coordinator  
Engineering Management Support, Inc.  
25923 Gateway Drive  
Golden, Colorado 80401

Re: Emergency Response Plan, dated September 25, 2019

Dear Mr. Rosasco:

The U.S. Environmental Protection Agency has reviewed the revised Emergency Response Plan, or ERP, West Lake Landfill Superfund Site Operable Unit, or OU, 1. The EPA disapproved the first draft of this document and provided comments in a letter dated July 2, 2019. The document was revised and resubmitted by the Respondents on September 26, 2019, to fulfill Section 5.7(b) of the May 6, 2019, Remedial Design Statement of Work, Operable Unit 1, West Lake Landfill Superfund Site. The revised document and response to comments have sufficiently addressed the comments and the EPA hereby approves this ERP document with the following comments:

1. Section 5.2—Since the 911 operator is not obligated to contact the Emergency Response Manager, or ERM, it is not clear whether the first responders will contact the ERM, if the ERM has not been previously contacted. Further discussion and clarification of this issue should take place during the meeting with first responders on October 23, 2019. The resolution of this issue should then be clearly stated in the next revision of the ERP.
2. Section 7.1 second paragraph—Add the gate numbers used on Figure 4 to the text description for clarity. This modification may be incorporated into the next revision of the ERP.
3. Section 9.0 third paragraph- The text states, "*In the case of a Level 0 emergency, the Post-Response Report may be submitted to EPA and other regulatory and local authorities at the discretion of the Emergency Response Manager, or as circumstances may otherwise dictate.*" Text should be added in the next revision to indicate that summaries for all emergencies, including level 0 emergencies, will be included in OU-1 monthly reports.
4. Section 10- In the next revision, add a sentence that indicates training records for workers will be maintained on site.

Consistent with Section 4.0 of the ERP, this approved Plan must be submitted to the first responders listed in Table 1 of the Plan with a request for comments. It would be beneficial for them to have

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familiarity with this document prior to our meeting with them on October 23, 2019.

Please feel free to contact me with any questions or concerns by phone at (913) 551-7141 or by email at [jump.chris@epa.gov](mailto:jump.chris@epa.gov).

Sincerely,



Christine R. Jump  
Remedial Project Manager  
Site Remediation Branch  
Superfund and Emergency Management Division

cc: Ryan Seabaugh MDNR