On February 23, 2018, representatives of the Potentially Responsible Parties, or PRPs, provided topics to the U.S. Environmental Protection Agency in advance of a meeting held on February 27, 2018, between the PRPs' representatives and the EPA staff in the Regional Office. The EPA encourages all stakeholders to submit official comments on the Proposed Plan, including on the information presented below, so that the EPA may develop a complete response in the Responsiveness Summary. However, to assist stakeholders, including the PRPs and interested members of the public in understanding the information contained in the Proposed Plan, the EPA is providing the following references to certain supporting information contained in the Operable Unit-1, or OU-1, Administrative Record file. This document will be included in the Administrative Record file.

1. Discuss the basis of 52.9 pCi/g in Alternative 4

EPA Response:
Please refer to pages 8 and 9 of the EPA Region 7's December 26, 2017, Summary of Actions to address the February 20, 2012, NRRB consultation (https://semspub.epa.gov/src/document/07/30337920). This topic is also summarized on pages 10 and 16 of the EPA's February 6, 2018, Proposed Plan (https://semspub.epa.gov/src/document/07/30352175).

2. Discuss the basis of 16 foot depth limit in Alternative 4

EPA Response:
Per Section 12 of the Proposed Plan, the EPA is requesting public comments on this topic. The Proposed Plan also discusses the 16-foot excavation limit on pages 16 and 26. A more detailed description is included on pages 8 and 9 of the EPA Region 7's December 26, 2017, Summary of Actions to address the February 20, 2012, National Remedy Review Board consultation (https://semspub.epa.gov/src/document/07/30337920). Also see the October 31, 2014, draft "Estimated Volumes for Partial Excavation Options Identified" by the EPA that includes partial excavation volume estimates (https://semspub.epa.gov/work/07/30323181.pdf). The EPA notes that the proposed plan acknowledges on page 16 that the 16 foot depth for alternative 4 was developed before the additional investigation work was completed at the Site.

3. Discuss the Jan 20, 2005 topographic surface described in Alternative 4

EPA Response:
The 2005 topographical surface referenced in the EPA's preferred alternative is discussed on page 8 of the October 31, 2014, draft Estimated Volumes for Partial Excavation Options Identified by the EPA (https://semspub.epa.gov/src/document/07/40479602). As discussed in this document, the 2005 topographical surface was the same topographic surface used for the evaluations in the December 16, 2011, Supplemental Feasibility Study (https://semspub.epa.gov/src/document/07/30284988). This concept was also incorporated into EPA's December 9, 2015, Statement of Work for the Remedial Investigation Addendum, or RIA, and Final Feasibility Study, or FFS (https://semspub.epa.gov/src/document/07/30285885).

4. Total activity reduction calculation and objective

EPA Response:
A description of when and why the EPA developed the estimates for the total excavated RIM activity for each alternative is described on page 8 of the EPA's February 5, 2018, approval letter (https://semspub.epa.gov/work/07/30352115.pdf) to the January 26, 2018, FFS. This discussion also includes a description of how this metric may be relevant for evaluating certain of the nine criteria specified in the National Contingency Plan that EPA must consider for remediation of Superfund Sites. This topic is also discussed in Section 8.3 and Section 9 of the EPA's February 6, 2018, Proposed Plan (https://semspub.epa.gov/src/document/07/30352175).

5. Pilot test and RD schedule.

EPA Response:
The PRP group noted and the EPA acknowledged that the costs and schedule impacts related to the performance of a full scale pilot test to separate and segregate RIM from non-RIM materials for the purpose of reducing volume were not included with the estimates of cost and schedule presented in the FFS for each alternative. The EPA notes that this pilot test is discussed in Sections 4, 5, and 6 of the January 26, 2018, Final Feasibility Study (https://semspub.epa.gov/src/document/07/30352116).