EPA/ROD/R05-86/044
1986

EPA Superfund
Record of Decision:

ARROWHEAD REFINERY CO.
EPA ID: MND980823975
OU 01
HERMANTOWN, MN
09/30/1986

ARROWHEAD REFINERY, DULUTH, MINNESOTA.

#DR
DOCUMENTS REVIEWED

I HAVE REVIEWED THE FOLLOWING DOCUMENTS DESCRIBING THE ANALYSIS OF COST-EFFECTIVENESS OF REMEDIAL ALTERNATIVES FOR THE ARROWHEAD REFINERY SITE:

- ARROWHEAD REMEDIAL INVESTIGATION;

- ARROWHEAD FEASIBILITY STUDY;

- RESPONSIVENESS SUMMARY; AND

- SUMMARY OF REMEDIAL ALTERNATIVE SELECTION.

#DE
DECLARATIONS

CONSISTENT WITH THE COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT, 42 U.S.C. SS9601 (CERCLA) AND THE NATIONAL CONTINGENCY PLAN, 40 CFR PART 300 (NCP), I HAVE DETERMINED THAT THE SELECTED REMEDY IS COST-EFFECTIVE AND EFFECTIVELY MITIGATES AND MINIMIZES THREATS TO AND PROVIDES ADEQUATE PROTECTION OF PUBLIC HEALTH, WELFARE, AND THE ENVIRONMENT. THE STATE OF MINNESOTA HAS BEEN CONSULTED AND MAY WITHHOLD THEIR CONCURRENCE WITH THE APPROVED REMEDY INDEFINITELY. IN ACCORDANCE WITH 104(C)(3) OF CERCLA, THE STATE MAY NOT ENSURE THEIR TEN PERCENT MATCH FOR CONSTRUCTION OF THE REMEDY AND THE CONTINUED OPERATION AND MAINTENANCE OF THE SELECTED REMEDY AFTER THE FIRST YEAR. CONSEQUENTLY, THE DESIGN AND CONSTRUCTION PHASES, AND FUTURE ACTIONS PROVISIONS OF PREDESIGN INVESTIGATIONS FOR THE SELECTED REMEDY MAY NOT BE INITIATED UNTIL THE STATE OF MINNESOTA SATISFIES THE PROVISIONS 104(C)(3).

SEPTEMBER 30, 1986
DATE

VALDAS V. ADAMKUS
REGIONAL ADMINISTRATOR.

SUMMARY OF REMEDIAL ALTERNATIVE SELECTION

#SLD
SITE LOCATION AND DESCRIPTION

THE ARROWHEAD REFINERY SITE IS IN HERMANTOWN, ST. LOUIS COUNTY, MINNESOTA, APPROXIMATELY EIGHT MILES NORTHWEST OF THE CITY OF DULUTH. (SEE FIGURE 1). THE TEN ACRE SITE IS BOUNDED ON THE NORTH BY A SURFACE WATER DIVERSION DITCH, ON THE SOUTH BY MILLER TRUNK HIGHWAY (U.S. 53), ON THE EAST BY UGSTAD ROAD, AND THE WESTERN BOUNDARY EXTENDS TO A CULVERT UNDER U.S. 53. (SEE FIGURE 2).

THE SITE IS ZONED FOR COMMERCIAL USE AND IS SITUATED IN A GENERALLY FLAT AREA WITH A TOPOGRAPHIC RELIEF OF LESS THAN FIFTEEN FEET. THE SURFACE OF THE SITE HAS RELATIVELY POOR DRAINAGE WITH PEATY WETLANDS ONSITE. CURRENT DEVELOPMENT IN THE VICINITY OF THE SITE IS A COMBINATION OF RESIDENTIAL, COMMERCIAL, AND PUBLIC USE (FIGURE 3). POTENTIAL RECEPTORS THAT USE SHALLOW DRINKING WATER WELLS WITHIN 0.3 MILES SOUTH OF THE SITE INCLUDE 23 RESIDENCES AND 3 COMMERCIAL ESTABLISHMENTS. FURTHER SOUTH OF THIS AREA IS A WETLAND WHICH SEPARATES IT FROM A PARTIALLY DEVELOPED AREA ZONED FOR PUBLIC AND RESIDENTIAL USE. A MUNICIPAL WATER SUPPLY WHICH USES LAKE SUPERIOR WATER TERMINATES AT THE CORNER OF U.S. 53 AND UGSTAD ROAD.

#SH
SITE HISTORY

WASTE OIL WAS RECLAIMED AT THE SITE FROM 1945 TO 1977. THE OPERATION GENERATED WASTE BY-PRODUCTS WHICH WERE DISCHARGED INTO AN UNCONTAINED 2 ACRE LAGOON AND A WASTEWATER DITCH IN A WETLAND AREA (FIGURE 2). ARROWHEAD REFINERY COMPANY, INCORPORATED IN 1961, CONTINUED THE RE-REFINING ACTIVITIES, AND ALSO SOLD RECYCLED NAME BRAND OILS AS WELL AS OPERATING A GAS STATION AT ONE TIME. THE SITE WAS REPORTEDLY USED FOR RETINNING MILK CANS AND A TRASH DUMP PRIOR TO DEVELOPMENT OF THE REFINERY OPERATION. IN 1976, THE MINNESOTA POLLUTION CONTROL AGENCY (MPCA) ORDERED ARROWHEAD TO DISCONTINUE RECYCLING OPERATIONS. ALL ARROWHEAD ACTIVITIES CEASED IN 1977. IN 1979, THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (U.S. EPA), AT THE REQUEST OF THE MPCA, INVESTIGATED THE ENVIRONMENTAL EFFECTS RESULTING FROM PAST DISPOSAL ACTIVITIES. IN 1980, U.S. EPA DETERMINED THAT THE SITE WAS IN VIOLATION OF SECTION SS311 OF THE CLEAN WATER ACT BECAUSE SURFACE WATER FLOWED THROUGH THE SITE, TRANSPORTING CONTAMINANTS TO A NEARBY WETLAND AREA AND EVENTUALLY INTO NAVIGABLE WATERS. IN RESPONSE, A DITCH WAS CONSTRUCTED NORTH AND EAST OF THE SITE TO HELP DIVERT SURFACE WATER AROUND THE SLUDGE LAGOON. FIVE MONITORING WELLS WERE ALSO INSTALLED AND LIMITED ONSITE SLUDGE AND SOIL SAMPLING WAS CONDUCTED. THIS DATA AND SUBSEQUENT SAMPLING OF MONITORING WELLS BY THE MPCA SINCE 1980 SUPPORTED THE HAZARD RANKING SCORE (HRS) OF 43.75. THE SITE WAS PLACED ON THE NATIONAL PRIORITIES LIST (NPL) IN AUGUST, 1983, MAKING IT ELIGIBLE FOR FEDERAL FUNDING UNDER THE COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION AND LIABILITY ACT (CERCLA), 42 U.S.C. SS9601 ET.SEQ.

#CSS
CURRENT SITE STATUS

REMEDIAL INVESTIGATION (RI) ACTIVITIES WERE INITIATED AT ARROWHEAD IN MAY 1984 AND ENDED IN AUGUST 1985. BUILDINGS FROM THE ARROWHEAD REFINERY OPERATION WERE REMOVED. THE ONLY BUILDINGS PRESENTLY ONSITE ARE A WAREHOUSE USED BY GOPHER OIL COMPANY AND AN AUTO BODY SHOP. THROUGH THREE PHASES OF FIELD WORK, 23 ADDITIONAL MONITORING WELLS WERE INSTALLED AT VARIOUS DEPTHS AT 15 LOCATIONS (FIGURE 4), 18 SLUDGE SAMPLES WERE TAKEN AT VARIOUS DEPTHS AT 8 LOCATIONS (FIGURE 5), SEVERAL SUBSURFACE SOIL SAMPLES WERE TAKEN AT VARIOUS DEPTHS AT 14 LOCATIONS (FIGURE 6), AND SEDIMENT AND SURFACE WATER SAMPLES WERE TAKEN AT 7 LOCATIONS (FIGURE 5). MONITORING WELL SAMPLES AND WATER LEVEL MEASUREMENTS WERE TAKEN IN DECEMBER 1984 AND JUNE 1985. THE MINNESOTA POLLUTION CONTROL AGENCY (MPCA) ALSO SPLIT SEVERAL OF U.S. EPA GROUNDWATER SAMPLES, MEASURED GROUNDWATER LEVELS AND SAMPLED A LIMITED NUMBER OF MONITORING WELLS IN JUNE 1986. THE FOLLOWING BRIEFLY DESCRIBES THE RI RESULTS.

HYDROGEOLOGY

THE SURFACE OF THE SITE HAS RELATIVELY POOR DRAINAGE WITH PEATY WETLANDS EXISTING ONSITE. THE GEOLOGY CAN BE GENERALLY DIVIDED INTO FOUR UNCONSOLIDATED LAYERS: 4 FEET OF FILL, 3 FEET OF PEAT, 25 FEET OF OUTWASH, AND

12 FEET OF MORAINAL TILL. BELOW THE TILL IS FRACTURED GABBROIC BEDROCK. (SEE FIGURE 7).

THE WATER TABLE UNDERLYING THE SITE IS SHALLOW, GENERALLY 0 TO 4 FEET BELOW THE GROUND SURFACE WITHIN THE PEAT DEPOSIT OR OVERLYING FILL. GROUNDWATER FLOW IS GENERALLY SOUTHWEST (FIGURE 8). AVERAGE GROUNDWATER FLOW VELOCITIES RANGE FROM 7 FEET/YEAR (FT/YR) IN THE PEAT LAYER, 13 FT/YR IN AN UNDERLYING SILTY CLAY ZONE WITHIN THE OUTWASH LAYER IMMEDIATELY BELOW THE PEAT, AND 27 FT/YR IN A SAND AND GRAVEL ZONE WITHIN THE OUTWASH LAYER BELOW THE SILTY CLAY ZONE.

THE GROUNDWATER ELEVATIONS ALSO INDICATE UPWARD VERTICAL GRADIENTS IN WELL NESTS AT MOST LOCATIONS FOR A LEAST PART OF THE YEAR. THE WATER LEVEL CONTOUR MAP, IN CONJUNCTION WITH UPWARD VERTICAL GRADIENTS, ALSO INDICATES THAT THE DIVERSION DITCH COLLECTS SOME GROUNDWATER FOR AT LEAST PART OF THE YEAR.

EXTENT OF CONTAMINATION

RESULTS FROM THE ANALYSIS OF SEVERAL SAMPLES COLLECTED DURING THE RI DOCUMENT THE PRESENCE OF A VARIETY OF PRIORITY POLLUTANT COMPOUNDS. THE FOLLOWING BRIEFLY DESCRIBES THE RI OBSERVATIONS AND CONCLUSIONS REGARDING THE NATURE AND EXTENT OF CONTAMINATION AT EACH OPERABLE UNIT.

CONTAMINATION BY MEDIA IS NOT DEFINED IN THIS RECORD OF DECISION AS CONTAMINANT CONCENTRATION ABOVE BACKGROUND, BUT IS DEFINED AS THE CONCENTRATION OF AT LEAST ONE CONTAMINANT AT A LEVEL KNOWN TO CAUSE CUMULATIVE EXCESS LIFETIME CANCER RISKS EXCEEDING 10-6 IN A COMMERCIAL/INDUSTRIAL SETTING AND/OR EXCEEDING THE ADULT CHRONIC ACCEPTABLE INTAKE (AIC) FOR NONCARCINOGENS. THE MAJOR COMPOUNDS AND CONCENTRATIONS THAT CORRELATE TO THE CONTAMINATION CRITERIA ARE PRESENTED AS PART OF TABLES 1 AND 2. THE MAJOR CHEMICALS OF CONCERN AT THE SITE WITH REGARD TO PUBLIC HEALTH IMPACTS ARE VOLATILE ORGANIC COMPOUNDS (VOCS), POLYNUCLEAR AROMATIC HYDROCARBONS (PAHS) AND LEAD. THE VOCS OF GREATEST CONCERN IN ALL MEDIA ARE BENZENE, CARBON TETRACHLORIDE, CHLOROFORM, TRANS-1,2-DICHLOROETHENE, TRICHLOROETHANE, AND VINYL CHLORIDE. ALL OF THESE CHEMICALS EXCEPT TRANS-1,2 DICHLOROETHENE ARE POTENTIAL HUMAN CARCINOGENS BY BOTH THE INGESTION AND INHALATION ROUTES. TRANS-1,2-DICHLOROETHENE IS THE MOST COMMON ORGANIC CHEMICAL IN THE GROUNDWATER. WHILE IT IS NOT CARCINOGENIC OR THOUGHT TO BE HIGHLY TOXIC, IT CAN DEGRADE IN WATER UNDER THESE SITE CONDITIONS TO VINYL CHLORIDE, WHICH IS A CARCINOGEN AND HIGHLY TOXIC.

PAHS ARE A GROUP OF CHEMICALS FOUND IN THE SOIL AND SEDIMENT OF THE SITE. THEY ARE PERSISTENT AND RELATIVELY IMMOBILE. PAHS WERE NOT FOUND IN GROUNDWATER AT DETECTION LIMITS OF 10 PARTS PER BILLION (PPB). WHILE ONLY ONE PAH, BENZO (A) PYRENE, IS INCLUDED IN THE QUANTITATIVE RISK ASSESSMENT, SIX OTHER PAHS THAT ARE PRESENT IN SOIL AND SEDIMENTS ARE ALSO CONSIDERED TO BE CARCINOGENIC. LEAD CAN BE FOUND THROUGHOUT THE SITE: IN SLUDGE, IN THE SOILS, AND IN THE GROUNDWATER. IT IS PRESENT IN LEVELS WHICH EXCEED ACCEPTABLE HUMAN DAILY INTAKES. LEAD AFFECTS BOTH THE NERVOUS SYSTEM AND THE HEMATOPOIETIC (BLOOD FORMING) SYSTEM. CHILDREN ARE ESPECIALLY SUSCEPTIBLE TO LEAD EXPOSURE.

SLUDGE LAGOON

THE RI ESTIMATES THAT THERE ARE 4,600 CUBIC YARDS OF PETROLEUM-BASED OILY SLUDGE WHICH CONTAIN VARIOUS ORGANIC COMPOUNDS IN THE LOW PART PER MILLION (PPM) RANGE AND HIGH CONCENTRATIONS OF HEAVY METALS. THE SLUDGE ALSO HAS A HIGH ENERGY VALUE, LOW ASH CONTENT, AND IS A VERY CORROSIVE (PH = 1). AVERAGE LEAD CONCENTRATIONS ARE AT LEAST 4,700 PPM AND RANGE AS HIGH AS 14,000 PPM. AVERAGE POLYCHLORINATED BI-PHENYL (PCB) CONCENTRATIONS ARE 2.4 PPM AND RANGE AS HIGH AS 45 PPM. THE ENTIRE SLUDGE LAGOON IS CONSIDERED CONTAMINATED.

SOIL AND SEDIMENTS

THE RI ESTIMATES THERE ARE 14,300 CUBIC YARDS OF CONTAMINATED SOIL THAT EXCEED THE 10-6 EXCESS LIFETIME CANCER RISK AND THE ADULT AIC. THE AREAL EXTENT OF CONTAMINATION, SHOWN ON FIGURES 9 AND 10, IS THOUGHT TO BE LIMITED TO THE PROCESS AREA. THE MAXIMUM DEPTH OF CONTAMINATION IS APPROXIMATELY 12 FEET AND IS LIMITED TO THE FILL, PEAT, AND UPPER FIVE FEET OF OUTWASH. THE PRESENCE OF THE PEAT LAYER APPEARS TO BE LIMITING DOWNWARD CONTAMINANT MIGRATION BECAUSE CONTAMINANTS ARE MUCH MORE CONCENTRATED IN THE PEAT WHEN COMPARED TO THE OUTWASH LAYER.

THE EXTENT OF SEDIMENT CONTAMINATION IS SHOWN ON FIGURE 11. CONTAMINATION APPEARS TO BE LIMITED TO THE WASTEWATER DITCH AND THE WESTERN PORTION OF THE DIVERSION DITCH. THE VOLUME FOR SEDIMENTS IS ESTIMATED TO BE 350 CUBIC YARDS, BASED ON EXCAVATION TO A DEPTH OF 1 FOOT. THE SEDIMENTS FOUND IN THE DIVERSION DITCH SOUTH OF TO U.S. 53 ARE CONTAMINATED ABOVE BACKGROUND LEVELS, BUT THE CONCENTRATIONS ARE BELOW THE 10-6 LIFETIME CANCER RISK CRITERIA FOR CONTAMINATION.

SURFACE WATER

FIVE VOLATILE ORGANIC AND SEVERAL INORGANIC COMPOUNDS WERE IDENTIFIED IN SURFACE WATER SAMPLES WITHIN THE WASTEWATER DITCH THAT EXCEED 10-6 CANCER RISK LEVELS AND AIC FOR NONCARCINOGENS. NO CONTAMINANTS WERE FOUND IN THE SURFACE WATER WITHIN THE DIVERSION DITCH. SURFACE WATER RUN-ON TO THE SITE HAS BEEN CONTROLLED BY THE CONSTRUCTION OF THE DIVERSION DITCH. THE UNUSUAL OCCURRENCE OF VOLATILES IN THE WASTEWATER DITCH MAY INDICATE SIGNIFICANT CONTAMINANT RUNOFF FROM ONSITE SOILS AND SLUDGE. THE LOW LEVELS OF CONTAMINANTS FOUND IN MONITORING WELLS WEST OF THE WASTEWATER DITCH MAY INDICATE CONTAMINANT DISCHARGE THROUGH GROUNDWATER INTO THE WASTEWATER DITCH. THUS, THE WASTEWATER DITCH MAY BE A PARTIAL BARRIER FOR GROUNDWATER CONTAMINATION WEST OF THE SITE.

GROUNDWATER

CONTAMINATED GROUNDWATER THAT EXCEEDS THE 10-6 EXCESS LIFETIME CANCER RISK AND AIC FOR ADULTS IS PRESENTED BY SOIL LAYERS IN FIGURE 12 USING CONTRACT LAB PROGRAM (CLP) DATA. THROUGHOUT THE PROJECT THE MPCA SPLIT A SELECTED NUMBER OF MONITORING WELLS SAMPLES. BECAUSE MPCA LABS ANALYTICAL METHODS HAVE LOWER DETECTION LIMITS THAN STANDARD CLP ANALYSIS, MPCA'S RESULTS INDICATE BENZENE ABOVE 10-6 EXCESS LIFETIME CANCER RISK IN OFFSITE WELLS 9 AND 10. ALTHOUGH THIS MPCA DATA HAS NOT BEEN QUALITY ASSURED BY THE U.S. EPA, IT MAY INDICATE A GREATER AREA OF OFF-SITE CONTAMINATION. THE DISCREPANCIES BETWEEN MPCA AND CLP DATA WERE TAKEN INTO CONSIDERATION DURING THE EVALUATION OF ALTERNATIVES IN THE FEASIBILITY STUDY (FS). MOST OF THE CONTAMINANT MASS APPEARS TO BE CONCENTRATED NEAR THE SLUDGE LAGOON, WITHIN THE PROCESS AREA AND WHERE AN UNDERGROUND TANK WAS RECENTLY EXCAVATED, APPROXIMATELY 20 FEET NORTH OF MONITORING WELL 7. THE PEAT LAYER APPEARS TO BE ATTENUATING MOST CONTAMINANTS, AND THUS HAS LIMITED DOWNWARD CONTAMINANT MIGRATION INTO THE OUTWASH. HOWEVER, SOME CONTAMINANTS MAINLY VOCS, HAVE BROKEN THROUGH THE PEAT LAYER OR HAVE ENTERED THE OUTWASH LAYER WHERE THE PEAT LAYER IS NOT PRESENT.

A LIMITED NUMBER OF NEARBY RESIDENTIAL WELLS WITHIN 1/2 MILE OF THE SITE THAT MAY USE GROUNDWATER FROM THE SAME OUTWASH AND BEDROCK FORMATIONS FOUND AT THE ARROWHEAD REFINERY SITE HAVE BEEN SAMPLED PERIODICALLY BY U.S. EPA AND MPCA SINCE 1980. ALL RESIDENTIAL WELL RESULTS TO DATE INDICATE NO SITE RELATED CONTAMINATION.

RISK TO RECEPTORS VIA PATHWAYS

SLUDGE LAGOON

THE SLUDGE LAGOON IS A MAJOR CONTAMINANT SOURCE FOR CONTINUED FUTURE RELEASES INTO GROUNDWATER, AND ALSO CONSTITUTES A PUBLIC HEALTH THREAT BY DIRECT CONTACT THROUGH TOUCH OR INGESTION. LATERAL MOVEMENT OF GROUNDWATER THROUGH THE SLUDGE LAGOON AND SUBSEQUENT LEACHING OF CONTAMINANTS INTO THE OUTWASH LAYER MAKES THE SLUDGE LAGOON A MAJOR SOURCE. THUS, EITHER REMEDIAL ACTION THAT CONTAINS AND HYDRAULICALLY ISOLATES THE LAGOON OR A REMOVAL ACTION IS NECESSARY.

SOIL AND SEDIMENTS

THE SOIL IN THE FILL AND PEAT LAYERS POSES A THREAT TO PUBLIC HEALTH AND WELFARE BY ONSITE EXPOSURES (INGESTION RESULTING FROM OUTDOOR ACTIVITIES, INHALATION OF PARTICULATES OR VOLATILES, AND DERMAL ABSORPTION) OR CONTAMINANT MIGRATION (INTERMEDIATE TRANSFER BY DISSOLUTION INTO GROUNDWATER). POTENTIAL SOIL INGESTION UNDER A COMMERCIAL/INDUSTRIAL SETTING MAY RESULT IN AN EXCESS LIFETIME CANCER RISK AS GREAT AS 4 X 10-5. SHOULD THE SITE EVER BE DEVELOPED FOR RESIDENTIAL PURPOSES, THE EXCESS CANCER RISK FROM SOIL INGESTION COULD BE AS GREAT AS 3 X 10-3. ONSITE SOILS ALSO EXCEED THE AIC FOR LEAD IN A COMMERCIAL SETTING AND FOR A NUMBER OF COMPOUNDS SUCH AS LEAD, CADMIUM, XYLENE AND BARIUM IN A RESIDENTIAL SETTING. LATERAL MOVEMENT OF GROUNDWATER THROUGH THE CONTAMINATED FILL AND PEAT COULD BE LEACHING CONTAMINANTS INTO THE OUTWASH LAYER.

EXPOSURES TO SURFICIAL SOILS VIA AIR BORNE PARTICLES ARE UNKNOWN BUT APPEARS TO BE LIMITED BECAUSE AN OIL COATING HINDERS MIGRATION. SURFICIAL SOIL RUNOFF TO THE DIVERSION AND WASTEWATER DITCHES ADDS TO SEDIMENT CONTAMINATION. SEDIMENT CONTAMINATION MAY ALSO BE DUE TO GROUNDWATER DISCHARGE. REMEDIAL ACTION IS NECESSARY ON THE SOIL AND SEDIMENTS IN ORDER TO REMOVE EXISTING AND FUTURE ENDANGERMENT TO PUBLIC HEALTH AND THE ENVIRONMENT. ALTERNATIVES THAT EITHER CONTAIN, REMOVE, AND/OR HYDRAULICALLY ISOLATE SOIL AND SEDIMENTS HAVE BEEN EVALUATED FOR THIS SITE (SEE ALTERNATIVES EVALUATION). SEDIMENTS WILL BE CONSOLIDATED INTO THE SAME REMEDY AS SOILS.

SURFACE WATER

AS DESCRIBED EARLIER, THE WASTEWATER DITCH IS CONTAMINATED WITH UNACCEPTABLE LEVELS OF VOCS AND INORGANIC COMPOUNDS. THE SURFACE WATER REMEDY WILL BE ADDRESSED AS PART OF THE GROUNDWATER REMEDY.

GROUNDWATER

NO ONSITE OR OFFSITE EXPOSURES TO CONTAMINATED GROUNDWATER ARE KNOWN TO EXIST TO DATE. NEARBY GOPHER OIL AND THE AUTO BODY SHOP ARE REPORTEDLY SERVICED BY THE CITY OF DULUTH'S WATER SUPPLY.

ONSITE GROUNDWATER IS CONSIDERED UNUSABLE. POTENTIAL INGESTION OF ONSITE GROUNDWATER HAS EXCESS LIFETIME CANCER RISKS AS HIGH AS 10-2 REGARDLESS OF WHETHER ONSITE GROUNDWATER IS USED FOR RESIDENTIAL OR COMMERCIAL/INDUSTRIAL PURPOSES. THE 1 DAY AND 10 DAY SUGGESTED NO ADVERSE RESPONSE LEVEL (SNARL) ARE ALSO EXCEEDED FOR VARIOUS COMPOUNDS. A GROUNDWATER FLOW AND CONTAMINANT TRANSPORT MODEL WAS USED TO HELP PREDICT FUTURE CONTAMINANT MIGRATIONS AND POSSIBLE FUTURE CONTAMINANT CONCENTRATIONS IN OFFSITE RECEPTOR WELLS. UNDER ASSUMPTIONS MADE IN THIS MODEL, THE RESULTS INDICATE THAT CONTAMINANTS COULD REACH THE NEAREST OFFSITE RECEPTOR WITHIN 15-40 YEARS AND AT CONCENTRATIONS WHICH COULD EXCEED THE 10-2 EXCESS LIFETIME CANCER RISK. THIS MODEL IS CONSIDERED A WORST CASE SCENARIO AND MAY TEND TO UNDERESTIMATE CONTAMINANT TRAVEL TIMES TO A RECEPTOR. THIS MODEL ALSO DOES NOT ACCOUNT FOR ANY POTENTIAL NATURAL DISCHARGE BARRIERS SUCH AS THE DIVERSION DITCH OR WETLANDS WHICH MAY TEND TO HINDER OFFSITE CONTAMINANT MIGRATION.

OFFSITE CONTAMINANT MIGRATIONS MAY ALREADY BE OCCURRING THAT POSE A FUTURE THREAT TO THE ENVIRONMENT AND PUBLIC HEALTH. GROUNDWATER REMEDIES THAT COULD POSSIBLY MITIGATE THESE THREATS HAVE BEEN EVALUATED FOR THIS SITE (SEE ALTERNATIVES EVALUATION).

#ENF
ENFORCEMENT (ATTACHMENT A) (CONFIDENTIAL)

#AE
ALTERNATIVES EVALUATION

IN RESPONSE TO THE HEALTH THREATS IDENTIFIED BY THE RI, A FEASIBILITY STUDY (FS) WAS PREPARED TO EVALUATE REMEDIAL ALTERNATIVES AT THE ARROWHEAD SITE. THE FS EVALUATES, ASSEMBLES, AND SCREENS OUT ALTERNATIVES CONSISTENT WITH THE REQUIREMENTS OF THE NATIONAL CONTINGENCY PLAN (NCP).

TECHNOLOGY SCREENING

GENERAL RESPONSE ACTIONS WERE IDENTIFIED FOR EACH CONTAMINATED MEDIUM: THE SOIL, GROUNDWATER AND SLUDGE LAGOON. WITHIN EACH GENERAL RESPONSE ACTION, SPECIFIC TECHNOLOGIES WERE SCREENED. TECHNOLOGIES USE IS CLEARLY PRECLUDED OR LIMITED BY SITE CONDITIONS AND WASTE CHARACTERISTICS WERE ELIMINATED FROM FURTHER EVALUATION. SIMILARLY, THE STATE OF DEVELOPMENT IS ASSESSED FOR EACH TECHNOLOGY. INCLUDED IN THESE CONSIDERATIONS WERE LIMITATIONS SUCH AS IMPLEMENTATION DIFFICULTIES, INABILITY TO ACHIEVE THE REMEDIAL OBJECTIVES AT THIS PARTICULAR SITE, AND UNDEMONSTRATED PERFORMANCE OF THE TECHNOLOGY.

THOSE TECHNOLOGIES CONSIDERED APPLICABLE WERE THEN EVALUATED USING THE GUIDELINES SET FORTH BY THE NCP (40 CFR 300.68(G)). EACH TECHNOLOGY WAS SCREENED USING THREE BROAD CRITERIA:

- ACCEPTABLE ENGINEERING PRACTICES: ALTERNATIVES MUST PRESENT A TECHNICALLY APPLICABLE AND RELIABLE MEANS OF ADDRESSING THE

PROJECT GOALS. THE ALTERNATIVE TECHNOLOGIES SHOULD HAVE A DEMONSTRATED PERFORMANCE RECORD FOR THE SPECIFIC APPLICATION, AND BE EASILY, SAFELY, AND READILY IMPLEMENTABLE.

- EFFECTIVENESS: ALTERNATIVES THAT DO NOT EFFECTIVELY CONTRIBUTE TO THE PROTECTION OF PUBLIC HEALTH AND WELFARE AND THE ENVIRONMENT ARE NOT CONSIDERED FURTHER. IF AN ALTERNATIVE HAS SIGNIFICANT ADVERSE EFFECTS, VERY LIMITED ENVIRONMENTAL BENEFITS, LIMITED USEFUL LIFE, OR REQUIRES AN EXCESSIVE PERIOD OF TIME TO ACHIEVE BENEFICIAL RESULTS, IT IS EXCLUDED FROM FURTHER CONSIDERATION.

- COST: FOR EACH ALTERNATIVE, THE COST OF IMPLEMENTING THE REMEDIAL ACTION, INCLUDING OPERATION AND MAINTENANCE COSTS, IS CONSIDERED. ALTERNATIVES WHOSE COSTS FAR EXCEED THE COSTS OF OTHER ALTERNATIVES EVALUATED, AND WHICH DO NOT PROVIDE SUBSTANTIALLY GREATER PUBLIC HEALTH OR ENVIRONMENTAL PROTECTION, OR TECHNICAL RELIABILITY ARE EXCLUDED FROM FURTHER CONSIDERATION.

THOSE TECHNOLOGIES THAT SURVIVED THIS SCREENING WERE THEN ASSEMBLED INTO COMPREHENSIVE REMEDIAL ACTION ALTERNATIVES THAT ADDRESS EACH CONTAMINATED MEDIUM AT THE SITE. THE FS DOCUMENTS THE SCREENING OF TECHNOLOGIES. SOME COMMON TECHNOLOGIES CARRIED FORWARD FOR OTHER SITES BUT NOT THE ARROWHEAD SITE INCLUDE:

OFFSITE INCINERATION - ELIMINATED ON BASIS OF PRELIMINARY COST ESTIMATES AS COMPARED TO ONSITE INCINERATION AND FROM UNCERTAINTIES THAT A FACILITY WILL BE READILY AVAILABLE TO ACCEPT ARROWHEAD WASTE.

FLUIDIZED BED REACTOR - NOT DEMONSTRATED FOR HETEROGENEOUS SOILS AND FULL SCALE INCINERATION OF HAZARDOUS WASTE.

MULTI-LAYER CAP - ELIMINATED DUE TO SITE CONDITIONS (MARSHY AREA). CAN ONLY BE EFFECTIVE IF WATER TABLE IS HYDRAULICALLY CONTROLLED. WOULD REQUIRE MAINTENANCE OVER INFINITY.

ONSITE LANDFILL - SAME AS ABOVE.

CHEMICAL FIXATION - ALTHOUGH TREATABILITY STUDIES WERE NOT PERFORMED, THE LONG TERM EFFECTIVENESS FOR THIS TECHNOLOGY IS NOT DEMONSTRATED FOR THE ARRAY OF ORGANIC COMPOUNDS FOUND IN ARROWHEAD WASTE.

CEMENTATION - SAME AS ABOVE.

DESCRIPTION OF ALTERNATIVES

THE FOLLOWING BRIEFLY DESCRIBES THE REMEDIAL ALTERNATIVES.

ALTERNATIVE 1 - NO ACTION

UNDER THIS ALTERNATIVE, NO ADDITIONAL WORK OF ANY KIND WOULD BE DONE AT THIS SITE. GROUNDWATER MONITORING AND MAINTENANCE OF THE EXISTING FENCE, DRAINAGE DITCH, AND MONITORING WELLS WOULD CONTINUE ON A REGULAR BASIS. SINCE REMEDIAL ACTIONS WOULD NOT BE TAKEN AT THE SITE, THE PUBLIC HEALTH AND ENVIRONMENTAL RISKS WOULD BE IDENTICAL TO THOSE DESCRIBED IN THE PUBLIC HEALTH ASSESSMENT OF THE RI REPORT. IN SUMMARY, UNDER NO ACTION, USE OR DEVELOPMENT OF THE SITE COULD RESULT IN NEGATIVE HEALTH EFFECTS ON PEOPLE USING THE SITE AS MEASURED BY COMPARISON WITH STANDARDS, CANCER RISK ESTIMATION, AND COMPARISON TO ACCEPTABLE INTAKES. DEVELOPMENT COULD RESULT IN EXPOSURE TO CONTAMINANTS (VOCS, PAHS AND LEAD) IN THE GROUNDWATER AND SOIL PRIMARILY THROUGH EXPOSURE BY INGESTION AND INHALATION. CURRENTLY, OFFSITE EXPOSURES ARE NOT OCCURRING, BUT A POTENTIAL EXISTS FOR CONTAMINANT MIGRATION TO OFFSITE RECEPTORS.

ALTERNATIVES 2A AND 2B

ALTERNATIVE 2 INCLUDES THE DISPOSAL OF SLUDGE, CONTAINMENT OF SOIL, AND THE REMOVAL AND ONSITE TREATMENT OF GROUNDWATER (ALTERNATIVE 2A) OR THE REMOVAL AND DISPOSAL OF GROUNDWATER (ALTERNATIVE 2B). AN ESTIMATED 4,600 YD3 OF OILY SLUDGE, OILSATURATED PEAT, AND FILTER CAKE WOULD BE NEUTRALIZED AND SOLIDIFIED PRIOR TO TRANSPORT TO A RCRA-PERMITTED LANDFILL FOR DISPOSAL. THE SOIL WITH CONTAMINANT CONCENTRATIONS EXCEEDING THE 10-6 EXCESS LIFETIME CANCER RISK AND THE ADULT AIC WOULD BE COVERED WITH A 2-FOOT LAYER OF TOPSOIL. CONTAMINATED SEDIMENT WOULD BE REMOVED AND CONSOLIDATED WITH THE CONTAMINATED SOIL PRIOR TO COVERING. THE GROUNDWATER WOULD BE COLLECTED BY A COMBINATION FRENCH DRAIN AND EXTRACTION WELL SYSTEM. THE TOTAL ESTIMATED FLOW OF 72 GPM FROM THE GROUNDWATER EXTRACTION SYSTEM WOULD BE TREATED ONSITE (2A) OR DISCHARGED UNTREATED TO THE SEWER (2B).

RESIDENTIAL WELLS WOULD BE SEALED AND THE EXISTING WATER MAIN WOULD BE EXTENDED TO PROVIDE AN ALTERNATIVE WATER SUPPLY.

ALTERNATIVES 3A AND 3B

ALTERNATIVE 3 INCLUDES THE OFFSITE DISPOSAL OF BOTH SLUDGE AND SOIL, AND EITHER ONSITE TREATMENT OF GROUNDWATER (3A) OR OFFSITE DISPOSAL GROUNDWATER (3B). THE BASIC REMEDIAL RESPONSE FOR THE SLUDGE IS THE SAME AS IN ALTERNATIVE 2. IN ADDITION, THE SOIL WITH CONTAMINANT CONCENTRATIONS EXCEEDING THE 10-6 EXCESS LIFETIME CANCER RISK AND ADULT AIC WOULD BE EXCAVATED AND TRANSPORTED TO A RCRA-PERMITTED LANDFILL FOR DISPOSAL. AN ESTIMATED 14,300 YD3 (IN-PLACE) OF SOIL WOULD BE EXCAVATED FROM AN AREA OF 45,000 FT2. IN ADDITION, ABOUT 6,100 YD3 OF PEAT UNDERLYING THE SLUDGE LAGOON WILL BE REMOVED. THE GROUNDWATER REMEDIAL RESPONSE ACTIONS FOR ALTERNATIVES 3A AND 3B WOULD BE SIMILAR TO THOSE OF ALTERNATIVES 2A AND 2B EXCEPT THAT THE EXTENT OF THE FRENCH DRAIN SYSTEM WOULD BE REVISED BASED UPON THE AMOUNT OF SOIL REMOVED, AND THE EXTRACTION FLOW WOULD ONLY BE 45 GPM. RESIDENTIAL WELLS WOULD BE SEALED AND THE EXISTING WATER MAIN WOULD BE EXTENDED TO PROVIDE AN ALTERNATIVE WATER SUPPLY.

ALTERNATIVES 4A AND 4B

ALTERNATIVE 4 INCLUDES THE THERMAL TREATMENT OF SLUDGE, CONTAINMENT OF SOIL, AND EITHER THE REMOVAL AND ONSITE TREATMENT OF GROUNDWATER (4A), OR THE REMOVAL AND DISPOSAL OF GROUNDWATER (4B). APPROXIMATELY 4,600 YD3 OF OILY SLUDGE, OIL-SATURATED PEAT, AND FILTER CAKE WOULD BE INCINERATED ONSITE OVER A PERIOD OF LESS THAN 9 MONTHS OF CONTINUOUS OPERATION. THE CONTAINMENT OF SOIL WOULD BE ACHIEVED IN THE MANNER DESCRIBED FOR ALTERNATIVE 2. THE REMEDIAL ACTIONS FOR GROUNDWATER IN ALTERNATIVES 4A AND 4B WOULD ALSO BE THE SAME AS DESCRIBED FOR ALTERNATIVES 2A AND 2B. RESIDENTIAL WELLS WOULD BE SEALED AND THE EXISTING WATER MAIN WOULD BE EXTENDED TO PROVIDE AN ALTERNATIVE WATER SUPPLY.

ALTERNATIVES 5A AND 5B

ALTERNATIVE 5 INCLUDES THE THERMAL TREATMENT OF SLUDGE, DISPOSAL OF SOIL AND TREATMENT OF GROUNDWATER. THE TREATMENT OF SLUDGE WOULD BE ACHIEVED BY INCINERATION IN THE MANNER DESCRIBED FOR ALTERNATIVE 4. CONTAMINATED SOIL WOULD BE EXCAVATED AND DISPOSED OF OFFSITE AS DESCRIBED IN ALTERNATIVE 3. THE GROUNDWATER RESPONSE ACTIONS WOULD BE SIMILAR TO THAT OF ALTERNATIVES 2A AND 2B EXCEPT THAT THE EXTENT OF FRENCH DRAINS WOULD BE REVISED BASED ON THE EXTENT OF SOIL REMOVAL. THE EXTRACTED GROUNDWATER WOULD BE EITHER BE TREATED ONSITE TO REMOVE CONTAMINANTS (5A), OR DISCHARGED UNTREATED TO THE SEWER (5B). RESIDENTIAL WELLS WOULD BE SEALED AND THE EXISTING WATER MAIN WOULD BE EXTENDED TO PROVIDE AN ALTERNATIVE WATER SUPPLY.

ALTERNATIVES 6A AND 6B

ALTERNATIVE 6 INCLUDES THE ONSITE THERMAL TREATMENT OF SLUDGE AND SOIL AND EITHER THE ONSITE TREATMENT OF GROUNDWATER (6A), OR THE OFFSITE DISPOSAL OF GROUNDWATER (6B). UNDER THIS ALTERNATIVE, BOTH THE SOIL AND SLUDGE WOULD BE EXCAVATED AND INCINERATED ON-SITE. INCINERATION OF AN ESTIMATED 4,600 YD3 OF SLUDGE AND 20,500 YD3 OF SOIL AND SEDIMENT WOULD BE ACHIEVED OVER A PERIOD OF LESS THAN 2 YEARS. THE REMEDIAL ACTIONS FOR THE CONTAMINATED GROUNDWATER WOULD BE THE SAME AS DESCRIBED IN ALTERNATIVES 2A AND 2B EXCEPT THAT THE EXTENT OF THE FRENCH DRAIN SYSTEM WOULD BE REVISED BASED UPON THE EXTENT OF SOIL REMOVAL.

THE TOTAL EXTRACTION FLOW (45 GPM) WOULD EITHER BE TREATED ONSITE FOR THE REMOVAL OF CONTAMINANTS OR DISCHARGED TO THE SEWER UNTREATED. RESIDENTIAL WELLS WOULD BE SEALED AND THE EXISTING WATER MAIN WOULD BE

EXTENDED TO PROVIDE AN ALTERNATIVE WATER SUPPLY.

#OEL
CONSISTENCY WITH OTHER ENVIRONMENTAL LAWS

IN DETERMINING APPROPRIATE ACTIONS AT CERCLA SITES, CONSIDERATION MUST BE GIVEN TO THE REQUIREMENTS OF OTHER FEDERAL ENVIRONMENTAL LAWS IN ADDITION TO CERCLA. THE NCP, EXCEPT AS PROVIDED IN 300.68(I), REQUIRES SELECTION OF A REMEDY THAT ATTAINS OR EXCEEDS APPLICABLE OR RELEVANT AND APPROPRIATE FEDERAL PUBLIC HEALTH AND ENVIRONMENTAL REQUIREMENTS IDENTIFIED AT THE ARROWHEAD SITE. THE IMPACT OF APPLICABLE OR RELEVANT ENVIRONMENTAL AND PUBLIC HEALTH REQUIREMENTS ARE SUMMARIZED IN TABLE 3.

OTHER ENVIRONMENTAL REQUIREMENTS CONSIDERED IN THE ARROWHEAD REFINERY SELECTION AND EVALUATION OF ALTERNATIVES INCLUDE THE CLOSURE AND GROUNDWATER PROTECTION STANDARDS, AND INCINERATOR OPERATION REQUIREMENTS UNDER THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA). OTHER CONSIDERATIONS INCLUDE THE WASTEWATER DISCHARGE REQUIREMENTS UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES), THE HAZARDOUS AND SOLID WASTE AMENDMENTS (HSWA) OF 1984, U.S. EPA'S "PROCEDURES FOR PLANNING AND IMPLEMENTING OFF-SITE RESPONSE ACTIONS, MAY 6, 1986, AND THE PROVISIONS OF THE CLEAN AIR ACT RELATING TO OPERATION OF AN AIR STRIPPER AND INCINERATOR.

IN GENERAL, ALTERNATIVES 3A, 3B, 5A, 5B, 6A, AND 6B ARE CONSIDERED TO ATTAIN APPLICABLE OR RELEVANT AND APPROPRIATE FEDERAL PUBLIC HEALTH AND ENVIRONMENTAL REQUIREMENTS. ALTERNATIVES 2A, 2B, 4A, AND 4B MEET THE REQUIREMENTS OF CERCLA IN THAT THEY REDUCE THE LIKELIHOOD OF PRESENT AND FUTURE HEALTH THREATS BUT THEY DO NOT FULLY MEET THE REQUIREMENTS OF OTHER ENVIRONMENTAL LAWS.

DETAILED EVALUATION OF ALTERNATIVES

EACH ALTERNATIVE WAS EVALUATED USING TECHNICAL AND ENVIRONMENTAL CRITERIA, AND A COST ESTIMATE WAS PREPARED. FOR THE TECHNICAL ANALYSIS, EACH ALTERNATIVE WAS EVALUATED ON PERFORMANCE, RELIABILITY, AND IMPLEMENTABILITY. FOR THE ENVIRONMENTAL ANALYSIS, EACH ALTERNATIVE WAS EVALUATED FOR COMPLIANCE WITH APPLICABLE, OR RELEVANT AND APPROPRIATE FEDERAL AND STATE ENVIRONMENTAL LAWS AND REGULATIONS, PROTECTION OF PUBLIC HEALTH AND WELFARE, AND EFFECTS ON INSTITUTIONAL CONCERNS. THE DETAILED COST ANALYSIS FOR EACH ALTERNATIVE INCLUDES ESTIMATES OF OPERATION AND MAINTENANCE (O&M) COSTS, CAPITAL COSTS, REPLACEMENT COSTS, AND DEVELOPMENT OF PRESENT WORTH INCLUDES THE INITIAL CONSTRUCTION COSTS AND THE PRESENT WORTH OF O&M COSTS AND REPLACEMENT COSTS. A SUMMARY OF THE RESULTS OF THE DETAILED ANALYSIS IS PRESENTED IN TABLE 4.

SELECTION OF REMEDY

THE U.S. EPA SELECTED A RECOMMENDED ALTERNATIVE UPON COMPARISON OF THE ALTERNATIVES AND CONSIDERATION OF SITE-SPECIFIC REMEDIAL ACTION GOALS. SECTION 300.68(I) OF THE NCP REQUIRES THE U.S. EPA TO SELECT THE "COST EFFECTIVE REMEDIAL ALTERNATIVE THAT EFFECTIVELY MITIGATES AND MINIMIZES THREATS TO AND PROVIDES ADEQUATE PROTECTION OF PUBLIC HEALTH AND WELFARE AND THE ENVIRONMENT.". THE SELECTED REMEDIAL ACTION SHOULD ATTAIN OR EXCEED APPLICABLE OR RELEVANT AND APPROPRIATE FEDERAL PUBLIC HEALTH AND ENVIRONMENTAL REQUIREMENTS. IN SELECTING THE APPROPRIATE REMEDY FROM AMONG THE ALTERNATIVES THAT WILL ACHIEVE ADEQUATE PROTECTION OF PUBLIC HEALTH, WELFARE AND THE ENVIRONMENT, THE AGENCY MUST CONSIDER COST, TECHNOLOGY, RELIABILITY, ADMINISTRATIVE CONCERNS, AND THEIR RELEVANT EFFECTS ON PUBLIC HEALTH, WELFARE, AND THE ENVIRONMENT.

IT IS THE U.S. EPA'S POLICY TO PURSUE ONSITE RESPONSE ACTIONS THAT USE TREATMENT, REUSE, OR RECYCLING RATHER THAN LAND DISPOSAL TO THE GREATEST EXTENT PRACTICAL BUT CONSISTENT WITH CERCLA REQUIREMENTS FOR A COST-EFFECTIVE REMEDIAL ACTION. THIS POLICY AND THE NCP REQUIRE THE U.S. EPA TO CONSIDER THE LONG TERM EFFECTIVENESS OF TREATMENT, REUSE, AND RECYCLING IN COMPARING THEIR FREQUENTLY HIGHER SHORT-TERM COSTS TO OTHER ALTERNATIVES WITH LONG-TERM COSTS AND/OR CONTINUING LIABILITIES SUCH AS LAND DISPOSAL.

BOTH THE EXISTING CERCLA STATUTE AND THE SELECTION FRAMEWORK IN THE CURRENT NCP PROVIDE FOR THE CONSIDERATION OF TECHNOLOGIES WHICH CAN DESTROY OR DETOXIFY HAZARDOUS SUBSTANCES FOR MAXIMUM RISK REDUCTION. THE NCP DEFINES REMEDIAL ACTIONS AS "THOSE RESPONSES TO RELEASES THAT ARE CONSISTENT WITH PERMANENT REMEDY" (40 CFR 300.68(A)), AND THE NCP PREAMBLE STATES THAT "THE USE OF PERMANENT SOLUTIONS MAY BE THE MOST COST-EFFECTIVE RESPONSE AND SHOULD BE ENCOURAGED" (50 FR 47929).

THE USE OF ALTERNATIVE TECHNOLOGIES THAT TREAT OR DESTROY HAZARDOUS WASTES IS FURTHER ENCOURAGED BY THE 1984 HAZARDOUS AND SOLID WASTE AMENDMENTS (HSWA), THE CERCLA POLICY ON "PROCEDURES FOR PLANNING AND IMPLEMENTING OFF-SITE RESPONSE ACTIONS" (ISSUED MAY 6, 1985), AND PROPOSALS FOR CERCLA REAUTHORIZATION CURRENTLY BEFORE CONGRESS THAT GIVE A STRONG PREFERENCE TO TREATMENT/DESTRUCTION OPTIONS TO PROVIDE PERMANENT SOLUTIONS TO THE MAXIMUM EXTENT PRACTICABLE. OVERALL THIS RESULTS IN CONCERN AGAINST DISPOSAL WITHOUT TREATMENT, EITHER ONSITE OR OFFSITE.

THE LONG-TERM EFFECTIVENESS OF ALTERNATIVES WAS EVALUATED IN NCP TERMS, THAT IS, IN ASSESSING WHETHER THE TECHNOLOGY "EFFECTIVELY MITIGATES AND MINIMIZES THREATS TO AND PROVIDES ADEQUATE PROTECTION OF PUBLIC HEALTH AND WELFARE AND THE ENVIRONMENT" (40 CFR 300.68(J)(L)). LONG-TERM RELIABILITY OF THE REMEDY WAS ANALYZED IN TERMS OF THE EFFECTIVENESS OF EACH TECHNOLOGY OVER TIME. A DESIRABLE OBJECTIVE WAS TO MINIMIZE THE LONG-TERM MANAGEMENT OR MAINTENANCE REQUIREMENT AT THE SITE (I.E., TO ATTAIN A "CLEAN CLOSURE" OR "WALKAWAY" STATUS AT DELETION). THE RELIABILITY/EFFECTIVENESS ASSESSMENT FOCUSED ON A SERIES OF KEY FACTORS INCLUDING THE FOLLOWING:

- LONG-TERM UNCERTAINTIES OF LAND DISPOSAL
- PERSISTENCE, TOXICITY, MOBILITY, AND PROPENSITY OF WASTE TO BIOACCUMULATE
- SHORT-TERM RISKS OF TREATMENT/WASTE HANDLING
- THREATS ASSOCIATED WITH OFF-SITE DISPOSAL
- UNCERTAINTIES ASSOCIATED WITH LONG-TERM O&M
- REDUCTION OF MOBILITY, TOXICITY, AND VOLUME OF WASTE ATTAINABLE VIA TREATMENT.

LAND DISPOSAL OR INSITU CONTAINMENT OF UNTREATED HIGHLY MOBILE AND TOXIC WASTE WAS ANALYZED CRITICALLY GIVEN THE POSSIBILITY OF LONG-TERM MIGRATION AND THE ATTENDANT POTENTIAL FOR LONG-TERM OPERATION AND MAINTENANCE.

ALTERNATIVE COMPARISON

ALTERNATIVE 1

THE NO ACTION ALTERNATIVE IS INEFFECTIVE IN PREVENTING FURTHER CONTAMINATION AND DOES NOT MITIGATE OR MINIMIZE THE EXISTING THREATS TO PUBLIC HEALTH AND WELFARE AND THE ENVIRONMENT. CHAPTER 6, PUBLIC HEALTH ASSESSMENT OF THE RI, CONCLUDES THAT THERE IS A POTENTIAL FOR EXPOSURE OF THE PUBLIC TO CONTAMINANTS FROM THE SITE AT LEVELS THAT MAY ADVERSELY AFFECT THE PUBLIC HEALTH AND WELFARE. THEREFORE, REMEDIAL ACTION IS REQUIRED TO MITIGATE OR MINIMIZE THIS EXPOSURE. THUS, THE NO ACTION ALTERNATIVE IS NOT APPROPRIATE AND IS NOT RECOMMENDED BY THE U.S. EPA.

ALTERNATIVES 2, 3, 4, 5, AND 6

SLUDGE RESPONSE. ALTERNATIVE 2 AND 3 INCLUDE DISPOSAL OF SLUDGE IN AN OFFSITE RCRA LANDFILL, WHEREAS THE SLUDGE RESPONSE ACTION IN ALTERNATIVES 4, 5, AND 6 IS THERMAL TREATMENT. DISPOSAL OF SLUDGE IN A RCRA LANDFILL IS CONSIDERED A TECHNICALLY EFFECTIVE MEANS OF CONTROLLING CONTAMINANTS IN THE SLUDGE. THIS DISPOSAL RESPONSE ACTION MEETS RCRA STANDARDS AND ACHIEVES CERCLA GOALS, AND SIGNIFICANTLY IMPROVES THE POTENTIAL FUTURE LAND USE ON THE SITE. ALTHOUGH THE LONG TERM RELIABILITY OF THIS REMOVAL AND DISPOSAL ACTION AS IT PERTAINS TO THE SITE IS CONSIDERED GOOD, LAND DISPOSAL IS NOT CONSIDERED AS RELIABLE AS INCINERATION IN THE LONG-TERM BECAUSE IT DOES NOT PERMANENTLY DESTROY CONTAMINANTS.

BECAUSE RCRA LAND DISPOSAL ONLY TRANSFERS THE WASTE TO A MORE CONTROLLED ENVIRONMENT, THE U.S. EPA POLICY HAS BECOME MORE RESTRICTIVE ON LAND-FILLING. AS REGULATIONS BECOME MORE STRINGENT, THE AVAILABILITY OF RCRA-APPROVED DISPOSAL SITES IS EXPECTED TO DECREASE. COST ESTIMATES FOR THE LAND DISPOSAL ACTION ARE ALSO SENSITIVE TO RCRA LANDFILL AVAILABILITY. CURRENTLY, A VERY LIMITED NUMBER OF RCRA FACILITIES COMPLY WITH U.S. EPA'S "OFFSITE POLICY" REQUIREMENTS. THEREFORE FEW ARE ELIGIBLE TO RECEIVE CERCLA WASTES.

INCINERATION OF THE SLUDGE HAS CLEAR ADVANTAGES OVER DISPOSAL. THE ACTION WILL DESTROY (NOT SIMPLY TRANSFER) ORGANIC CONTAMINANTS, THUS REDUCING THE OVERALL WASTE VOLUME BY 60% AND MOBILITY AND TOXICITY OF ORGANICS TO ZERO. THERE ARE, HOWEVER, DISADVANTAGES TO INCINERATION. THERMAL TREATMENT IS EFFECTIVE FOR DESTRUCTION OF ORGANICS BUT NOT OF METALS.

SINCE THERE ARE METALS PARTICULARLY LEAD, IN THE SLUDGE THAT ARE NOT LIKELY TO BE DESTROYED BY INCINERATION, PARTICULATE EMISSIONS (IN VIOLATION OF OUR QUALITY STANDARDS) AS WELL AS HIGH METAL CONCENTRATIONS IN THE ASH ARE POSSIBLE PROBLEMS THAT WILL HAVE TO BE ADDRESSED. PRELIMINARY TESTING (PREBURNS) AND COMPLIANCE WITH TECHNICAL REQUIREMENTS OF PERMITS (E.G., AIR QUALITY) WILL BE REQUIRED. IF THE METAL CONTENT RESULTS IN THE ASH BEING HAZARDOUS, ADDITIONAL TREATMENT OR DISPOSAL IN AN OFFSITE RCRA LANDFILL MAY BE NECESSARY. FINALLY, IN VIEW OF THESE CONCERNS, IMPLEMENTATION TIME FOR INCINERATION IS EXPECTED TO BE GREATER THAN FOR REMOVAL AND DISPOSAL.

THE U.S. EPA BELIEVES THAT LONG-TERM ENVIRONMENTAL RELIABILITY AND COST EFFECTIVENESS ARE THE MOST IMPORTANT FACTORS TO CONSIDER IN SELECTING AN ALTERNATIVE. INCINERATION IS CLEARLY MORE RELIABLE THAN LANDFILLING AS A PERMANENT REMEDY AT THIS SITE, BY VIRTUE OF THE PERMANENT DESTRUCTION OF ORGANIC CONTAMINANTS THAT IS ACHIEVED. IN ADDITION, COST ESTIMATES FOR DISPOSAL AT A LANDFILL ARE NOT APPRECIABLY LESS THAN INCINERATION.

THEREFORE, THERMAL TREATMENT IS SELECTED OVER LAND DISPOSAL AS THE PREFERRED RESPONSE ACTION FOR SLUDGE, ELIMINATING ALTERNATIVES 2 AND 3.

SOIL RESPONSE. IN ALTERNATIVE 4, CONTAMINATED SOIL AND SEDIMENT ARE CONTAINED ONSITE, WHEREAS IN ALTERNATIVES 5 AND 6, THEY ARE DISPOSED OF OFFSITE AND TREATED ONSITE, RESPECTIVELY. CONTAINMENT OF SOIL AND SEDIMENT VIA CAPPING SERVES ONLY TO MINIMIZE DIRECT EXPOSURE AND DOES NOT MEET RCRA CLOSURE REQUIREMENTS. LEACHING OF CONTAMINANTS FROM SOIL WILL CONTINUE, AND AN EFFECTIVE GROUNDWATER COLLECTION OR ALTERNATIVE WATER SUPPLY SYSTEM WOULD BE REQUIRED TO LIMIT EXPOSURE VIA THE GROUNDWATER PATHWAY.

BECAUSE CONTAMINANT MOVEMENT IS SLOW, THE LONG-TERM RELIABILITY OF THE GROUNDWATER COLLECTION SYSTEM IS OF MAJOR CONCERN. WITHOUT ANY SOIL REMOVAL, THE COLLECTION SYSTEM WOULD HAVE TO OPERATE FOR A PERIOD ESTIMATED TO BE GREATER THAN 100 YEARS TO RESTORE THE AQUIFER TO ACCEPTABLE CONCENTRATION LEVELS POSING LESS THAN A 10-6 LIFETIME CANCER RISK.

THE LONG-TERM RELIABILITY OF THIS ACTION IS CONSIDERED POOR. IF SOIL IS REMOVED, HOWEVER, THE LONG-TERM RELIABILITY OF THE GROUNDWATER EXTRACTION AND TREATMENT SYSTEM MAY BE SIGNIFICANTLY IMPROVED.

WITH THE SOIL REMOVED, IT WILL BE POSSIBLE TO PLACE FOUR ADDITIONAL EXTRACTION WELLS IN THE PROCESS AREA WITHOUT DEWATERING LAYERS OF CONTAMINATED SOIL. THIS WOULD DECREASE THE AMOUNT OF TIME NEEDED TO ACHIEVE A 10-6 LIFETIME CANCER RISK GROUNDWATER CLEANUP GOAL TO 25-50 YEARS OF GROUNDWATER EXTRACTION AND TREATMENT. IN VIEW OF INCREASED LONG-TERM RELIABILITY, THE SOIL REMOVAL ACTION IS RETAINED OVER THE SOIL CONTAINMENT ACTION, ELIMINATING ALTERNATIVES 2 AND 4.

BECAUSE OF THE COMBINATION OF OFFSITE SOIL DISPOSAL AND ONSITE SLUDGE INCINERATION, ALTERNATIVE 5 IS THE MOST COSTLY OF ALL ALTERNATIVES. THE COST PER CUBIC YARD FOR THERMAL TREATMENT DECREASES IN ALTERNATIVE 6 BECAUSE THE INCINERATOR IS ALREADY IN PLACE AND HAS GONE THROUGH PRELIMINARY TESTING AND STARTUP PHASES. A KEY ASSUMPTION REGARDING ALTERNATIVE 6, HOWEVER, IS THAT RESIDUES FROM INCINERATION COULD BE MANAGED AS NONHAZARDOUS SUBSTANCES. IF THESE RESIDUES MUST BE LANDFILLED AT A RCRA PERMITTED LANDFILL, THE PRESENT WORTH OF ALTERNATIVE 6 COULD INCREASE BY AS MUCH AS $6 MILLION, (ASSUMING TRANSPORTATION TO A FACILITY WITHIN 800 MILES). IN THAT CASE THE DIFFERENCE IN PRESENT WORTH BETWEEN ALTERNATIVES 5 AND 6 WOULD BE REDUCED. BECAUSE AN ONSITE ACTION HAVING SUPERIOR LONG-TERM RELIABILITY MIGHT BE ACHIEVED AT A LOWER COST (REGARDLESS OF RESIDUE DISPOSAL), THERMAL TREATMENT OF SOIL IS RETAINED AS THE SOIL RESPONSE ACTION ACTION, ELIMINATING ALTERNATIVE 5.

ALTERNATIVE 6 (COMBINED INCINERATION OF SLUDGE AND SOIL) IS THEREFORE RETAINED AS THE SELECTED SLUDGE AND SOIL RESPONSE.

GROUNDWATER RESPONSE. THE U.S. EPA HAS DETERMINED THAT REMOVAL OF CONTAMINATED GROUNDWATER UNTIL THE AQUIFER IS RESTORED TO 10-6 LIFETIME CANCER RISK LEVELS IS THE PREFERRED GROUNDWATER RESPONSE. HOWEVER, A DECISION ON THE EXACT METHOD FOR TREATING THE CONTAMINATED GROUNDWATER WILL BE DEFERRED PENDING FURTHER INVESTIGATION OF THE TWO POSSIBLE RESPONSES.

THE POSSIBLE RESPONSE FOR THE EXTRACTED GROUNDWATER HAVE BEEN REFERRED TO IN THIS FS UNDER THE ALTERNATIVE SUBHEADINGS "A" AND "B" AS FOLLOWS:

- "A" - ONSITE TREATMENT AND DISCHARGE TO DIVERSION DITCH.

- "B" - DISCHARGE TO A MUNICIPAL SEWER FOR TREATMENT AT THE WESTERN LAKE SUPERIOR SANITARY DISTRICT (WLSSD) SEWAGE TREATMENT FACILITY.

DISPOSAL OF GROUNDWATER TO A PUBLICLY OWNED TREATMENT FACILITY (POTW) SUCH AS WLSSD IS CONSIDERED MORE RELIABLE IN THE LONG TERM THAN ONSITE TREATMENT. ALTHOUGH A POTW IS TYPICALLY NOT SPECIFICALLY DESIGNED TO TREAT A WIDE RANGE OF CONTAMINANTS AND CONCENTRATIONS, EPA HAS RECENTLY ESTABLISHED THAT ACTIVATED SLUDGE PLANTS SUCH AS THE WLSSD POTW ARE CAPABLE OF TREATING A VARIETY OF CONTAMINANTS AT LOW CONCENTRATIONS. THE HIGH DILUTION FACTOR, THE ESTABLISHED MAINTENANCE, MONITORING, AND OPERATING PROCEDURES, THE POTENTIAL FOR MONITORING FOR VOCS EMISSIONS AT THE POTW, AND THE PRACTICE OF SLUDGE BURNING ALL CONTRIBUTE TO THE HIGH RELIABILITY OF POTWS AS A GROUNDWATER RESPONSE ACTION.

ENVIRONMENTAL BENEFITS OF A DISCHARGE TO WLSSD ARE CONSIDERED TO BE SUPERIOR AT THIS SITE BECAUSE, SHOULD THE ONSITE TREATMENT SYSTEM FAIL, WETLANDS AND RECEIVING WATERS MAY BE AFFECTED BY THE DISCHARGE OF UNTREATED WATER. SINCE BOTH THE ENVIRONMENTAL BENEFITS AND LONG-TERM RELIABILITY OF POTW DISPOSAL ARE CONSIDERED SUPERIOR, DISCHARGE OF CONTAMINATED GROUNDWATER TO WLSSD IS RETAINED AS THE PREFERRED RESPONSE ACTION FOR GROUNDWATER AT THIS SITE. THE POTW OPTION IS ESTIMATED TO COST LESS THAN ONSITE TREATMENT, AND IS CONSIDERED MUCH LESS COST-SENSITIVE THAN ONSITE TREATMENT.

WHILE DISPOSAL OF THE CONTAMINATED GROUNDWATER TO WLSSD IS THE PREFERRED ACTION, IT CANNOT BE IMPLEMENTED UNLESS A NUMBER OF INSTITUTIONAL AND TECHNICAL REQUIREMENTS ARE SATISFIED. THE MAIN REQUIREMENT IS THAT WLSSD MUST FORMALLY ACCEPT THE WASTEWATER AND MEET STATE AND FEDERAL GUIDELINES. TO DATE, THE WLSSD OFFICIALS HAVE NOT INDICATED ANY RELUCTANCE TO ACCEPT THE WASTEWATER GIVEN THE ANTICIPATED CONTAMINANT CONCENTRATIONS AND EFFLUENT DISCHARGE RATE.

ALTERNATIVES 6A AND 6B WILL BE CONSIDERED DURING THE PRELIMINARY DESIGN OF THE REMEDIAL ACTION. ADDITIONAL DATA AND PILOT TESTING WILL BE REQUIRED TO DETERMINE THE LEVEL OF WATER TREATMENT NEEDED. THE U.S. EPA WILL THEN DETERMINE WHICH OF THE TWO WATER TREATMENT METHODS CAN OR SHOULD BE USED.

#CR
COMMUNITY RELATIONS (SEE ATTACHMENT B)

#RA
U.S. EPA'S RECOMMENDED ALTERNATIVE

THE CONCEPTUAL CONFIGURATION OF U.S. EPA'S RECOMMENDED ALTERNATIVE, ALTERNATIVE 6A/6B IS SHOWN ON FIGURE 13 AND DESCRIBED IN DETAIL IN CHAPTER 5 OF THE FS. THE ALTERNATIVE CONSISTS OF THESE ELEMENTS:

SLUDGE/SOIL/SEDIMENT RESPONSE

- DESIGN AND CONSTRUCTION OF AN INCINERATOR PROVEN USABLE FOR THERMAL TREATMENT OF HAZARDOUS WASTES. DESIGN, PERMITTING, INSTALLATION, PILOT TESTING, AND STARTUP ARE EXPECTED TO TAKE 3.0 TO 4.5 YEARS (APPENDIX E OF THE FS).

- DESIGN AND CONSTRUCTION OF AN INTERIM STORAGE STRUCTURE FOR INCINERATOR FEED. THE STRUCTURE WILL BE USED TO STOCKPILE INCINERATOR FEED (I.E., SLUDGE, SOIL, SEDIMENT) FOR INCINERATION DURING PERIODS OF INCLEMENT WEATHER (COLD WEATHER MAY INHIBIT EXCAVATION ACTIVITIES). THE STRUCTURE WILL CONSIST OF PREFABRICATED STEEL FRAMEWORK AND WALLS, AND A CONCRETE FLOOR SLOPED TO CHANNEL LEACHATE TO A SUMP. LEACHATE WOULD BE PUMPED TO THE GROUNDWATER TREATMENT FACILITY, OR DISCHARGED INTO THE SEWER FOR TREATMENT AT THE POTW. FUGITIVE EMISSIONS OF DUST AND VOC'S WOULD BE COLLECTED AND USED AS COMBUSTION AIR DURING

INCINERATOR OPERATION AND WOULD BE VENTED TO THE ATMOSPHERE DURING INCINERATOR DOWNTIME.

- REMOVAL AND THERMAL TREATMENT OF THE CONTAMINATED SLUDGE IN THE LAGOON, CONSISTING OF THE OILY SLUDGE, OIL SATURATED PEAT, AND FILTER CAKE (4,600 YD3). TREES IN THE LAGOON AREA WOULD BE REMOVED AND CHIPPED. THE EXACT METHOD USED FOR HANDLING THE SLUDGE MUST BE DETERMINED THROUGH PILOT TESTING. FOR COST ESTIMATING PURPOSES, THIS REMEDY ASSUMES THAT THE SLUDGE COULD BE EXCAVATED VIA MECHANICAL MEANS SUCH AS A BACKHOE, MIXED WITH CONDITIONING MATERIALS SUCH AS WOOD CHIPS AS NECESSARY TO PRODUCE A MORE EASILY HANDLED MATERIAL THEN CONVEYED TO THE THERMAL TREATMENT FACILITY OR STORED FOR FUTURE TREATMENT.

- REMOVAL AND THERMAL TREATMENT OF SOIL AND SEDIMENT CONTAINING CONTAMINANT CONCENTRATIONS EXCEEDING THE 10-6 EXCESS LIFETIME CANCER RISK LEVEL AND ADULT AIC LEVELS (14,300 YD3 OF SOIL AND 350 YD3 OF SEDIMENT). AN ADDITIONAL LAYER OF PEAT UNDERLYING THE SLUDGE WOULD ALSO BE REMOVED (6,100 YD3). THE 20,700 YD3 OF EXCAVATED SOIL AND SEDIMENT WOULD BE TRUCKED TO SOIL CONDITIONING EQUIPMENT WHICH WOULD REMOVE AND/OR REDUCE ANY OVERSIZED MATERIALS. THE SOILS OR SEDIMENT WOULD THEN BE CONVEYED DIRECTLY TO THE THERMAL TREATMENT FACILITY OR STORED FOR FUTURE THERMAL TREATMENT.

- THE RESULTING ASH FROM THE INCINERATION OF THE CONTAMINATED SLUDGE, SOIL AND SEDIMENT WOULD BE PLACED ONSITE, PROVIDED IT CAN BE MANAGED AS NON-HAZARDOUS MATERIAL.

GROUNDWATER RESPONSE

- CONSTRUCTION OF A GROUNDWATER EXTRACTION SYSTEM. A SYSTEM OF 2,600 FEET OF FRENCH DRAINS AND 16 EXTRACTION WELLS WOULD BE CONSTRUCTED. THE EXTRACTION WELL SYSTEM WOULD CONSIST OF 12 WELLS SITUATED DOWNGRADIENT OF THE EXCAVATED AREA, AND 4 WELLS SITUATED WITHIN THE AREA FROM WHICH THE CONTAMINATED SOIL WAS EXCAVATED. THE FRENCH DRAINS WOULD EXTRACT A TOTAL OF 20 GPM, THE 4 CENTRALIZED WELLS WOULD PUMP A TOTAL OF 7 GPM, AND THE 12 DOWNGRADIENT WELLS WOULD PUMP A TOTAL OF 18 GPM.

- GROUNDWATER TREATMENT. THE EXTRACTED GROUNDWATER WOULD BE TREATED IN ONE OF TWO WAYS UNDER ALTERNATIVE 6:

  A. AN ONSITE WATER TREATMENT FACILITY WOULD BE CONSTRUCTED. THE TOTAL EXTRACTION FLOW (45 GPM) WOULD BE TREATED. AN AIR STRIPPING TOWER WOULD BE USED TO REMOVE 98 PERCENT OF THE VOC'S. GRANULAR ACTIVATED CARBON FILTRATION WOULD REMOVE BASE/NEUTRAL COMPOUNDS, AND LIME PRECIPITATION WOULD BE USED TO REDUCE HEAVY METAL CONCENTRATIONS. THE TREATED GROUNDWATER WOULD BE DISCHARGED TO THE DIVERSION DITCH, AND THE WATER TREATMENT RESIDUE (SLUDGE) WOULD BE DISPOSED OF AT AN OFFSITE MUNICIPAL LANDFILL, ASSUMING IT CAN BE MANAGED AS A NON-HAZARDOUS WASTE.

  B. THE TOTAL EXTRACTION FLOW (45 GPM) WOULD BE DISCHARGED DIRECTLY TO THE MUNICIPAL SEWER SYSTEM. THIS WOULD REQUIRE THE CONNECTION OF A LATERAL FROM THE GROUNDWATER COLLECTION

PUMPHOUSE TO THE 8-INCH-DIAMETER SEWER MAIN BORDERING THE HIGHWAY. BASED UPON THE ESTIMATED EXTRACTED GROUNDWATER CONCENTRATIONS OF VOC'S, PAH'S AND HEAVY METALS, PRETREATMENT WOULD NOT BE REQUIRED TO MEET STANDARDS FOR DISCHARGE TO WLSSD.

- CONSTRUCTION OF GROUNDWATER MONITORING WELLS. THE COST ESTIMATE FOR ALTERNATIVE 6 ASSUMES CONSTRUCTION AND QUARTERLY SAMPLING OF FOUR NEW GROUNDWATER MONITORING WELLS. THE LOCATION OF THESE WELLS WILL BE DETERMINED DURING DESIGN.

- EXTENSION OF THE EXISTING WATER MAIN WESTWARD TO PROVIDE 10 RESIDENTIAL SERVICE CONNECTIONS. PRIVATE WELLS WOULD NO LONGER BE USED BY THESE RESIDENTS.

DESIGN INVESTIGATIONS

ACCORDING TO THE FEBRUARY, 1985 SUPERFUND REMEDIAL DESIGN AND REMEDIAL ACTION GUIDANCE, "REMEDIAL ACTION INVOLVING THE ONSITE TREATMENT OR DISPOSAL OF CONTAMINATED WASTES (I.E., GROUNDWATER, SLUDGE LAGOON AND CONTAMINATED SOILS) MAY REQUIRE ADDITIONAL STUDIES TO SUPPLEMENT THE TECHNICAL DATA AVAILABLE FROM THE RI/FS ACTIVITIES SO THAT THE OPTIMUM TREATMENT OR DISPOSAL METHODS MAY BE DETERMINED. ADDITIONAL STUDIES COULD INCLUDE FIELD WORK AND/OR BENCH AND PILOT SCALE STUDIES. THE FACT THAT SUCH STUDIES WILL BE PERFORMED SHOULD BE EXPLICITLY ADDRESSED IN THE RECORD OF DECISION (ROD), AND IF NECESSARY, THE ROD SHOULD AUTHORIZE THE REGION TO MAKE ANY NECESSARY CHOICE AMONG TREATMENT OR DISPOSAL OPTIONS".

IN VIEW OF THIS GUIDANCE, THE FOLLOWING PREDESIGN ACTIVITIES ARE RECOMMENDED PRIOR TO IMPLEMENTATION OF THE DESIGN AND CONSTRUCTION PHASES OF THE REMEDIAL ACTION RESPONSES DESCRIBED ABOVE:

- PREBURN ON SLUDGE AND SOIL. SAMPLES OF SLUDGE AND SOIL SHOULD BE THERMALLY TREATED IN A PILOT-SCALE OR FULL-SCALE UNIT. RESULTS OF THIS TESTING WOULD INDICATE THE LIKELIHOOD OF ACHIEVING APPLICABLE STANDARDS AND CRITERIA IN A FULL-SCALE SYSTEM OPERATING ONSITE. ANALYSIS OF RESIDUES WOULD INDICATE THE NEED FOR FURTHER TREATMENT NECESSARY TO MANAGE THEM AS NONHAZARDOUS MATERIALS. THE MAJOR TASKS ANTICIPATED IN PERFORMING THE PREBURN ARE LISTED IN APPENDIX I OF THE FS.

- AQUIFER TESTING. PUMP TESTS SHOULD BE CONDUCTED TO BETTER DEFINE PARAMETERS INFLUENCING DESIGN OF THE EXTRACTION SYSTEM, E.G., PERMEABILITY. THE EXISTING WATER TABLE SHOULD BE INVESTIGATED FURTHER BY PIEZOMETRIC MEASUREMENTS.

- WATER TREATMENT BENCH-SCALE/PILOT STUDY. EXTRACTED GROUNDWATER WILL REQUIRE TESTING TO DETERMINE ITS COMPATIBILITY WITH THE ONSITE WATER TREATMENT FACILITY OR THE WLSSD PRETREATMENT STANDARDS. AGREEMENTS PERTAINING TO DISCHARGE MUST BE FORMALIZED WITH WLSSD IF THE DISPOSAL OPTION IS USED.

- IN RESPONSE TO CONCERNS RAISED BY THE STATE OF MINNESOTA, TECHNOLOGIES ELIMINATED EARLY IN THE FS WILL BE EVALUATED IN MORE DETAIL. THEY INCLUDE VITRIFICATION, CHEMICAL FIXATION, AND CEMENTATION. BENCH-SCALE STUDIES WILL ALSO BE CONSIDERED ON THESE REMEDIAL TECHNOLOGIES. THE U.S. EPA AGREES WITH THE STATES CONCERNS AND BELIEVES THAT SUCH EVALUATIONS WILL RESULT IN SELECTION OF THE OPTIMUM TREATMENT PROCESS.

- SLUDGE HANDLING BENCH-SCALE/PILOT STUDY. THE FEASIBILITY OF MECHANICAL EXCAVATION AND ALTERNATIVE METHODS OF REMOVING

SLUDGE SHOULD BE EVALUATED. THE NEED FOR PRECONDITIONING OF SLUDGE PRIOR TO THERMAL TREATMENT SHOULD ALSO BE ASSESSED.

- ADDITIONAL SITE INVESTIGATIONS. GROUNDWATER AND SOIL SAMPLING SHOULD BE PERFORMED TO BETTER DEFINE THE EXTENT OF CONTAMINATION. IF THE ONSITE WATER TREATMENT OPTION IS USED, ANALYSIS OF RECEIVING STREAMFLOW SHOULD BE DONE TO DETERMINE THE POSSIBLE EFFECTS OF THE DISCHARGE.

- AN INCINERATOR SITING INVESTIGATION SHOULD BE CONDUCTED TO DETERMINE WHETHER OR NOT SPECIAL FOUNDATIONS WILL BE REQUIRED TO CONSTRUCT THE INCINERATOR ONSITE, AND TO IDENTIFY ANY OTHER ACCESS IMPEDIMENTS.

#OM
OPERATION AND MAINTENANCE

OPERATION AND MAINTENANCE (O&M) WILL BE REQUIRED FOR THE GROUNDWATER EXTRACTION AND TREATMENT SYSTEM FOR A PERIOD OF 25-50 YEARS IF RESTORATION OF THE AQUIFER TO 10-6 LIFETIME CANCER RISK LEVELS IS TO BE ACHIEVED.

A SCHEDULE AND TYPE OF O&M ACTIVITIES WILL BE SPECIFIED AS PART OF THE DESIGN PHASE.

#FA
FUTURE ACTIONS

THE STATE OF MINNESOTA MAY WITHHOLD CONCURRENCE WITH THIS REMEDY UNTIL THE RESULTS OF THE PREDESIGN INVESTIGATIONS ARE KNOWN. AT THIS TIME, U.S. EPA FEELS THERE IS ENOUGH INFORMATION AVAILABLE TO DETERMINE THAT REMOVAL AND INCINERATION OF SOIL AND SLUDGE AT THE ARROWHEAD SITE IS NECESSARY. HOWEVER, PREDESIGN INVESTIGATIONS ARE NECESSARY FOR THE PURPOSE OF ASSURING THAT INCINERATION IS THE OPTIMUM TREATMENT PROCESS, AND SELECTING THE PROPER INCINERATOR AND REFINING THE GROUNDWATER REMEDY (FOR EXAMPLE, THE NUMBER, LOCATION, SIZE, AND PUMPING FREQUENCY OF THE GROUNDWATER EXTRACTION WELLS). THE FEASIBILITY STUDY DOCUMENTS THAT CONSTRUCTION OF A NEW ONSITE INCINERATOR IS MORE COST EFFECTIVE THAN SHIPPING TO AN OFFSITE HAZARDOUS WASTE INCINERATOR OR USING A MOBILE INCINERATOR. HOWEVER, THE USE OF INCINERATION OR OTHER TREATMENT TECHNOLOGY IS AN APPLICATION OF A SOPHISTICATED PROCESS AND WILL REQUIRE SPECIAL ENGINEERING CONSIDERATIONS AND STUDIES. THE USE OF OFFSITE AND MOBILE INCINERATION AND OTHER TREATMENT OPTIONS WILL CONTINUE TO BE EVALUATED ALONG WITH ON-SITE INCINERATION. OUR FINAL SELECTION WILL BE THE OPTION WHICH WILL MOST EFFICIENTLY TREAT ARROWHEAD WASTE AT THE LEAST COST. IN THE EVENT THAT INFORMATION OBTAINED DURING PRE-DESIGN OR DESIGN ACTIVITIES DEMONSTRATES THAT THE COSTS OF THE SELECTED REMEDY WILL EXCEED THE ESTIMATES CONTAINED HEREIN BY MORE THAN 50%, THE SELECTED REMEDY WILL BE REVIEWED, AND IF NECESSARY, REVISED. IN ADDITION, IF SUCH ACTIVITIES SHOW THAT A MORE COST-EFFECTIVE REMEDY IS AVAILABLE WHICH MEETS THE OBJECTIVES CONTAINED HEREIN, THIS RECORD OF DECISION WILL BE REVIEWED AND REVISED AS APPROPRIATE.

U.S. EPA WILL BEGIN DESIGN AND CONSTRUCTION OF THE REMEDY UPON ASSURANCE BY THE STATE OF MINNESOTA OF ITS COMMITMENT OF THE FUNDS NECESSARY TO MEET THE STATUTORY 10% STATE SHARE OF CAPITAL COSTS AND O&M REQUIREMENTS. THE STATE OF MINNESOTA MAY CONCUR THAT PREDESIGN INVESTIGATIONS SHOULD BE IMPLEMENTED, AND BASED ON THE RESULTS OF PREDESIGN ACTIVITIES, MAY EVENTUALLY CONCUR WITH OUR RECOMMENDED ALTERNATIVE.

ASSUMING THAT CERCLA IS REAUTHORIZED AND DESIGN AND CONSTRUCTION FUNDS ARE READILY AVAILABLE, THE DURATION FOR PERFORMANCE OF THE REMEDY AT THIS SITE COULD BE AS FOLLOWS:

#SCH
SCHEDULE

PREDESIGN INVESTIGATION	5 QUARTERS
STATE CONCURRENCE	ONGOING
REMEDIAL DESIGN	4 QUARTERS
CONSTRUCTION	4 QUARTERS
OPERATION	8 QUARTERS
INCINERATOR DEMOBILIZATION	1 QUARTER
GROUNDWATER (PUMPING & TREATING)	25-50 YEARS.

#TMA
TABLES, MEMORANDA, ATTACHMENTS

#RS

RESPONSIVENESS SUMMARY
ARROWHEAD REFINERY SITE, HERMANTOWN, MINNESOTA

THE U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) HAS GATHERED INFORMATION ON THE TYPES AND EXTENT OF CONTAMINATION, EVALUATED REMEDIAL MEASURES, AND RECOMMENDED REMEDIAL ACTIONS AT THE ARROWHEAD REFINERY SITE. AS PART OF THIS PROCESS, SEVERAL PUBLIC MEETINGS WERE HELD TO EXPLAIN THE INTENT OF THE PROJECT, TO DESCRIBE THE RESULTS, AND TO RECEIVE COMMENTS FROM THE PUBLIC. PUBLIC PARTICIPATION IN SUPERFUND PROJECTS IS REQUIRED IN THE NATIONAL OIL AND HAZARDOUS SUBSTANCES CONTINGENCY PLAN (NCP). COMMENTS RECEIVED FROM THE PUBLIC ARE CONSIDERED IN THE SELECTION OF THE REMEDIAL ACTION FOR THE SITE. THIS DOCUMENT SUMMARIZES THE COMMENTS RECEIVED AND DESCRIBES HOW THEY WERE INCORPORATED INTO THE DECISION-MAKING PROCESS.

THE COMMUNITY RELATIONS RESPONSIVENESS SUMMARY HAS THREE SECTIONS:

- SECTION 1. OVERVIEW. THIS SECTION DISCUSSES THE EPA'S RECOMMENDED ALTERNATIVE TO REMEDY POTENTIAL EXPOSURE TO CONTAMINATED SLUDGE, SOIL, AND SEDIMENT AT THE ARROWHEAD REFINERY SITE.

- SECTION 2. BACKGROUND ON COMMUNITY INVOLVEMENT AND CONCERNS. THIS SECTION PROVIDES A BRIEF HISTORY OF COMMUNITY INTEREST AND CONCERNS RAISED DURING REMEDIAL PLANNING ACTIVITIES AT THE SITE.

- SECTION 3. SUMMARY OF PUBLIC COMMENTS RECEIVED DURING PUBLIC COMMENT PERIOD AND EPA RESPONSES. BOTH ORAL AND WRITTEN COMMENTS ARE GROUPED BY TOPICS. EPA RESPONSES TO THESE COMMENTS ARE ALSO PROVIDED.

THE DETAILED TRANSCRIPT OF THE FEASIBILITY STUDY PUBLIC MEETING AND THE WRITTEN COMMENTS ARE NOT INCLUDED IN THE REPORT. THEY ARE AVAILABLE FOR PUBLIC INSPECTION FROM EPA REGION V IN CHICAGO, ILLINOIS.

1. OVERVIEW

DURING THE PUBLIC COMMENT PERIOD, THE EPA PRESENTED FIVE ALTERNATIVES AS POSSIBLE REMEDIAL ACTIONS AT THE SITE AND THE NO ACTION ALTERNATIVE. THE EPA RECOMMENDED A SPECIFIC ALTERNATIVE, CONSISTING OF EXCAVATING

CONTAMINATED SLUDGE, SOIL, AND SEDIMENT, AND INCINERATING THESE MATERIALS ONSITE. IN ADDITION, THE EPA RECOMMENDED EXTRACTION OF CONTAMINATED GROUNDWATER TO BE FOLLOWED BY EITHER ONSITE TREATMENT OR DISCHARGE TO THE SANITARY SEWER. THIS RECOMMENDATION REFLECTS EPA'S GOAL OF SELECTING A COST-EFFECTIVE SOLUTION THAT EFFECTIVELY MITIGATES AND MINIMIZES THREATS TO AND PROVIDES ADEQUATE PERMANENT PROTECTION OF PUBLIC HEALTH AND WELFARE AND THE ENVIRONMENT.

THE PUBLIC COMMENTS RECEIVED WERE VARIED IN THEIR JUDGMENT OF THE EPA'S RECOMMENDATION, AND THERE WAS NOT A GENERAL AGREEMENT REGARDING THE EXTENT OF REMEDIATION REQUIRED OR HOW EXPEDITIOUSLY REMEDIAL MEASURES SHOULD BE UNDERTAKEN. MOST COMMENTERS, HOWEVER, SUPPORTED THE IDEA OF EXTENDING THE MUNICIPAL WATER SUPPLIES TO NEARBY RESIDENTS. SEVERAL COMMENTERS BELIEVED THE RECOMMENDED ALTERNATIVE WAS EXCESSIVE IN TERMS OF COST, AND THAT LESS EXPENSIVE MEASURES WOULD BE ADEQUATE. MANY OF THE RESIDENTS LIVING CLOSE TO THE SITE EXPRESSED CONCERN THAT REMEDIAL ACTIONS WOULD NOT BE UNDERTAKEN IN THE NEAR FUTURE, BECAUSE OF LACK OF SUPERFUND REAUTHORIZATION AND NONCONCURRENCE BY THE STATE AGENCY. AT A MINIMUM, SUPPORT WAS EXPRESSED FOR MONITORING CONDITIONS AT THE SITE AND RELAYING THIS INFORMATION TO THE COMMUNITY.

2. BACKGROUND ON COMMUNITY INVOLVEMENT AND CONCERNS

RESIDENTS AND LOCALLY ELECTED OFFICIALS WERE NOTIFIED OF THE START OF THE REMEDIAL INVESTIGATION (RI) BY NEWSPAPER NOTICE AND PUBLIC MEETING IN MAY 1984. IN OCTOBER 1984, A PRESS CONFERENCE WAS HELD ONSITE AS DRILLING COMMENCED AND WAS ACCOMPANIED BY A FACT SHEET DISTRIBUTED TO THE MAILING LIST. MEDIA INTEREST WAS VERY HIGH DURING THIS EARLY STAGE OF THE PROJECT.

COMMUNITY RELATIONS DURING THE RI/FS WAS A COOPERATIVE EFFORT WITH EPA FUNDING THE MINNESOTA POLLUTION CONTROL AGENCY (MPCA) TO CONDUCT THE MAJORITY OF THE COMMUNITY RELATIONS WORK. OWNERS OF PRIVATE AND COMMERCIAL WELLS THAT WERE SAMPLED RECEIVED PHONE CALLS AND LETTERS FROM THE EPA INFORMING THEM THAT NO SITE-RELATED CONTAMINATION OF THEIR WELLS HAD BEEN DETECTED. COMMUNITY AND MEDIA INTEREST WAS AT A MINIMUM DURING THE RI/FS.

ANNOUNCEMENTS OF A 21-DAY PUBLIC COMMENT PERIOD ON A RECOMMENDED REMEDY FOR THE SITE WENT TO THE ENTIRE MAILING LIST AS WELL AS THE MEDIA. FACT SHEETS ON THE RI AND FS WERE MAILED A WEEK LATER. THE PUBLIC MEETING, SCHEDULED FOR THE CONVENIENCE OF THE STATE, WAS HELD TOWARD THE END OF THE PUBLIC COMMENT PERIOD. COMMENTS AT THE MEETING BY CONGRESSMAN OBERSTAR'S STAFF AND THE IZAAK WALTON LEAGUE REQUESTING ADDITIONAL TIME WERE RESPONDED TO BY EXTENDING THE COMMENT PERIOD TO A FULL MONTH. NOTICE OF THIS ACTION WAS BY PHONE CALLS AND A MEMO MAILED TO THE MEDIA AND RESIDENTS.

THE MAIN CONCERNS EXPRESSED BY THE COMMENTERS ARE: HEALTH, HIGH COST OF THE REMEDY, TIMING, AND LACK OF MPCA CONCURRENCE. CHOICE OF TECHNOLOGY AND USE OF THE SITE WERE OF LESS IMPORTANCE. NONCONCURRENCE BY THE STATE HAS CREATED THE IMPRESSION THAT THIS PROJECT WAS NOT A COOPERATIVE EFFORT.

3. SUMMARY OF PUBLIC COMMENTS RECEIVED DURING PUBLIC COMMENT PERIOD AND U.S. EPA'S RESPONSES

COMMENTS RAISED DURING THE ARROWHEAD REFINERY RI/FS PUBLIC COMMENT PERIOD ARE SUMMARIZED BRIEFLY BELOW. THE COMMENTS HAVE BEEN DIVIDED INTO TWO CATEGORIES: GENERAL COMMENTS AND MPCA COMMENTS.

GENERAL COMMENTS

1) ONE COMMENTER (MR. ZENTNER OF THE IZAAK WALTON LEAGUE) WANTED THE SITE CAPPED, WITH A REEXAMINATION OF SITE CONDITIONS EVERY 2 OR 3 YEARS.

EPA'S RESPONSE. THIS ALTERNATIVE WAS RULED OUT EARLY IN THE STUDY BECAUSE IT DID NOT EFFECTIVELY ADDRESS THE CONDITIONS AT THE SITE OR THE POTENTIAL FOR THE SPREAD OF CONTAMINANTS FROM THE SITE.

2) SEVERAL COMMENTERS (REPRESENTATIVE J.L. OBERSTAR, MR. ZENTNER) FELT THAT THE COMMENT PERIOD WAS TOO SHORT TO ALLOW A COMPLETE RESPONSE TO THE FS BY THE COMMUNITY.

EPA'S RESPONSE. THE EPA FOLLOWS A PROCEDURE FOR COMMUNITY RELATIONS AND PUBLIC INVOLVEMENT THAT IS SET FORTH IN FEDERAL SUPERFUND GUIDANCE. THIS GUIDANCE IS BASED UPON THE NATIONAL ENVIRONMENTAL POLICY ACT COMMUNITY RELATIONS PROCEDURES. THE NATIONAL OIL AND HAZARDOUS SUBSTANCE CONTINGENCY PLAN (NCP), WHICH CONTAINS THE REGULATIONS FOR IMPLEMENTING THE SUPERFUND LEGISLATION, SAYS ". . . RESPONSE PERSONNEL SHOULD TO THE EXTENT PRACTICABLE, . . . BE SENSITIVE TO LOCAL COMMUNITY CONCERNS (IN ACCORDANCE WITH APPLICABLE GUIDANCE).". (SUBPART F 300.61) THE GUIDANCE IS CONTAINED IN "COMMUNITY RELATIONS IN SUPERFUND: A HANDBOOK.".

ACCORDING TO THE GUIDANCE, A MINIMUM 3-WEEK PUBLIC COMMENT PERIOD ON THE FS MUST PRECEDE THE SELECTION OF AN ALTERNATIVE. AT THE REQUEST OF THE CITIZENS AT THE PUBLIC MEETING, THIS PERIOD WAS EXTENDED TO A FULL MONTH TO ALLOW THE PUBLIC TO MORE EFFECTIVELY COMMENT ON THE STUDY.

3) THREE RESIDENTS OF THE AREA (MR. CARLSON, MR. BENSON, MR. HARTLEY) EXPRESSED CONCERNS ABOUT ACCESS AT THE SITE. MR. CARLSON COMMENTED THAT THERE WAS NO FENCE AROUND THE DIVERSION DITCH AT THE NORTH OF THE SITE, AND MR. BENSON AND MR. HARTLEY COMMENTED THAT THE ENTIRE SITE SHOULD BE FENCED.

EPA'S RESPONSE. PRIOR TO RI ACTIVITIES AT THE SITE, A FENCE WAS CONSTRUCTED AROUND AREAS OF THE SITE BELIEVED TO POSE A RISK TO HUMAN HEALTH FROM DIRECT EXPOSURE. THIS AREA DOES NOT INCLUDE THE DIVERSION DITCH CONSTRUCTED IN 1980. THIS DITCH WAS INTENDED TO RESTRICT THE OVERLAND FLOW OF SURFACE WATER FROM UNCONTAMINATED AREAS ONTO THE SITE. SAMPLES OF SEDIMENT TAKEN FROM THE DITCH ALONG UGSTAD ROAD HAVE NOT INDICATED THE PRESENCE OF A RISK TO HUMANS FROM EXPOSURE TO WATER OR SEDIMENT IN THE DITCH. AT THIS TIME, IT DOES NOT APPEAR NECESSARY TO CONSTRUCT ADDITIONAL ACCESS RESTRICTIONS AROUND THE DITCH. EPA PREFERS A REMEDY THAT REMOVES AND REDUCES THE CONTAMINATION RATHER THAN JUST FENCING OFF THE SITE, A TEMPORARY MEASURE.

4) MR. CARLSON ALSO WAS CONCERNED THAT THE INCINERATOR COULD PRODUCE EMISSIONS THAT WOULD AGGRAVATE HIS RESPIRATORY ILLNESS.

EPA'S RESPONSE. EMISSIONS FROM THE INCINERATOR WOULD HAVE TO COMPLY WITH THE LIMITATIONS ESTABLISHED BY THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA), AS WELL AS EMISSION STANDARDS SET BY THE STATE. THE INCINERATOR WOULD ALSO HAVE TO COMPLY WITH THE TECHNICAL REQUIREMENTS OF A STATE AIR QUALITY PERMIT, WHICH SPECIFIES THE TYPES OF AIR MONITORING REQUIRED. WIND DIRECTION AND LOCATION OF NEARBY RESIDENTS WOULD BE TAKEN INTO ACCOUNT IN SELECTING AN APPROPRIATE LOCATION FOR THE INCINERATOR ON THE SITE.

5) ONE RESIDENT (MR. BLACK) INQUIRED HOW MUCH OF THE EXISTING SEWER CAPACITY WOULD BE USED BY THE RECOMMENDED ALTERNATIVE (6B), AND WHAT ADVERSE EFFECTS THIS MIGHT HAVE ON ECONOMIC AND RESIDENTIAL DEVELOPMENT IN THE AREA.

EPA'S RESPONSE. IT IS ESTIMATED THAT THE DISCHARGE OF 45 GALLONS PER MINUTE (GPM) WOULD UTILIZE LESS THAN 20 PERCENT OF THE FLOWING-FULL CAPACITY OF THE 8-INCH- DIAMETER LINE RUNNING EAST ALONG HIGHWAY 53 FROM UGSTAD ROAD. THEREFORE, FUTURE DEVELOPMENT MIGHT BE ADVERSELY AFFECTED, ALBEIT MINIMALLY.

THE ADDITIONAL FLOW AT THE WASTEWATER TREATMENT FACILITY IS LESS THAN 0.2 PERCENT OF THE CURRENT FLOW, THUS THE FACILITY COULD EASILY ACCOMMODATE THE ADDITIONAL FLOW. THE FACILITY IS CURRENTLY OPERATING AT LESS THAN DESIGN CAPACITY OF 43 MGD.

6) TWO COMMENTERS (MR. CARLSON, MR. STRESOW) WERE CONCERNED THAT LOCAL PROPERTY VALUES COULD BE ADVERSELY AFFECTED IF REMEDIAL ACTIONS ARE NOT CONDUCTED AT THE SITE. ONE COMMENTER (MR. BENSON) FELT THAT THE SITE HAD LITTLE RESIDENTIAL OR COMMERCIAL VALUE, AND BELIEVED THAT MORE SUITABLE LAND IS AVAILABLE IN THE AREA FOR ANY FUTURE DEVELOPMENT.

EPA'S RESPONSE. WHILE DEVALUATION OF PROPERTY VALUES IS A CONCERN, EPA HAS NOT BEEN GRANTED THE AUTHORITY UNDER SUPERFUND TO EVALUATE THIS ISSUE.

7) ONE COMMENTER (MR. BLACK) INQUIRED AS TO THE REUSABILITY OF THE POLLUTION CONTROL EQUIPMENT.

EPA'S RESPONSE. THE DESIGN OF THE POLLUTION CONTROL EQUIPMENT WILL SPECIFICALLY ADDRESS CONCERNS AT THE SITE, THUS COST ESTIMATES PRESENTED IN THE FS ASSUME NO SALVAGE VALUE FOR THE PROCESS EQUIPMENT USED. THE ACTUAL SALVAGE VALUE WILL DEPEND UPON THE CONTRACT PROCUREMENT, THE USEFUL LIFE OF THE EQUIPMENT, AND THE COMPATIBILITY OF THE REUSED EQUIPMENT WITH THE EXISTING SYSTEMS AT ITS NEW LOCATION. AS ONE EXAMPLE, THE CLEANUP CONTRACTOR MIGHT UTILIZE A PORTABLE INCINERATOR THAT MAY HAVE BEEN USED AT OTHER SITES AND/OR COULD BE USED ON SUBSEQUENT PROJECTS.

8) FOUR COMMENTERS (MR. AND MRS. STRESOW, MR. ZENTNER, AND MR. BENSON) REQUESTED THAT THE SITE HAVE SOME TYPE OF CONTINUOUS MONITORING TO TRACK THE CONDITIONS OF THE SITE.

EPA'S RESPONSE. MONITORING ALONE IS AN INEFFECTIVE AND TIME-CONSUMING ACTIVITY AND WOULD BE NEEDED AT THE SITE FOREVER. MONITORING DOES NOT MEET EPA'S GOALS UNDER SUPERFUND, WHICH CALL FOR TREATING, REDUCING, AND STABILIZING CONTAMINATION.

9) SEVERAL COMMENTERS (MR. BLACK, MR.ZENTNER, MR. R. NELSON) FELT THAT THE ADDITIONAL STUDY RECOMMENDED BY THE MPCA, IF CONDUCTED OVER A RELATIVELY SHORT PERIOD, WAS ACCEPTABLE.

EPA'S RESPONSE. EPA HAS AGREED TO UNDERTAKE STUDIES THAT WOULD REFINE THE DATA BASE DURING THE PREDESIGN/DESIGN PHASE OF THE PROJECT. THE DETAILS OF SOME OF THE ISSUES TO BE ADDRESSED ARE FOUND IN THE RESPONSES TO THE MPCA COMMENTS.

10) ALMOST ALL OF THE COMMENTERS SUPPORT AN EXTENSION OF CITY WATER TO THE POTENTIALLY AFFECTED RESIDENCES.

EPA'S RESPONSE. EPA ACKNOWLEDGES THEIR SUPPORT FOR PART OF THE RECOMMENDATION FOR THIS SITE.

11) ONE COMMENTER (MR. B. NELSON) EXPRESSED CONCERNS ABOUT THE ODOR THAT WOULD ACCOMPANY DISTURBING THE SLUDGE IF IT WERE REMOVED.

EPA'S RESPONSE. THE POSSIBILITY DOES EXIST THAT ODORS MAY BE CAUSED BY EXCAVATION OF SLUDGE MATERIALS. MITIGATING MEASURES WILL BE USED DURING EXCAVATION TO MINIMIZE ODORS. EPA WILL INFORM THE NEARBY RESIDENTS OF THE WORK SCHEDULE AND WHEN THE POTENTIAL FOR ODORS WOULD MOST LIKELY OCCUR. DURING ALL WORK AT THE SITE, AIR WILL BE MONITORED TO PROTECT WORKERS AND NEARBY RESIDENCES.

12) FOUR COMMENTERS (MRS. RODDA, MR. AND MRS. STRESOW, MR. BLACK) WERE IN FAVOR OF EPA PROCEEDING WITH THE RECOMMENDED REMEDY TO CONTROL THE SOURCE OF CONTAMINATION.

EPA'S RESPONSE. THE EPA ACKNOWLEDGES THE SUPPORT FOR ITS RECOMMENDED REMEDY.

13. MANY COMMENTERS EXPRESSED CONCERN OVER WHAT APPEARED TO BE A LACK OF COMMUNICATION AND COOPERATION BETWEEN EPA AND THE STATE AGENCY.

EPA'S RESPONSE. ON A YEARLY BASIS, EPA REQUESTS THE STATES TO ESTABLISH PRIORITIES FOR THEIR SITES FOR ALLOCATION OF FUNDS THAT WILL BE USED FOR PLANNING AND SUBSEQUENT INVESTIGATION AND STUDY ACTIVITIES. WORK AT THE ARROWHEAD REFINERY SITE WAS BEGUN IN 1984, AFTER THE MPCA CHOSE THE ARROWHEAD REFINERY SITE FOR

INVESTIGATION. AT MANY POINTS DURING THE 2-YEAR INVESTIGATION, THE STATE WAS CONSULTED AND SAMPLING DATA WERE SHARED BETWEEN THE TWO AGENCIES. THE STATE'S CONCERNS ABOUT EPA'S RECOMMENDED REMEDY IS NOT BASED UPON THE LACK OF COORDINATION OR INVOLVEMENT IN THE PROJECT.

MPCA COMMENTS

THE COMMENTS MADE BY THE MPCA, SUBMITTED SEPTEMBER 17, 1986, REGARDING THE ARROWHEAD REFINERY FS ARE SUMMARIZED IN THIS SECTION. THE BASIC CONCERNS CONVEYED BY THE MPCA ARE THAT POSSIBLE REMEDIAL ACTIONS LESS EXPENSIVE THAN THE RECOMMENDED ALTERNATIVE WERE NOT FULLY EXPLORED, AND THAT IMMEDIATE ACTION IS UNNECESSARY SINCE CURRENT HUMAN RECEPTORS OF CONTAMINATION HAVE NOT BEEN IDENTIFIED. ALTHOUGH THE ABSENCE OF CURRENT HUMAN RECEPTORS IS NOT DISPUTED, RELEASE OF CONTAMINANTS FROM THE SITE WITH SUBSEQUENT DEGRADATION OF THE ENVIRONMENT IS OCCURRING. MOREOVER, UNCONTROLLED DEVELOPMENT AT OR AROUND THE SITE COULD CREATE SIGNIFICANT EXPOSURES TO PERSONS LIVING OR WORKING AT OR NEAR THE SITE. EPA BELIEVES THAT THE ALTERNATIVE THAT BEST MITIGATES AND MINIMIZES THREATS TO AND PROVIDES ADEQUATE PROTECTION OF PUBLIC HEALTH AND WELFARE AND THE ENVIRONMENT IN A COST-EFFECTIVE MANNER HAS BEEN RECOMMENDED.

THE FOLLOWING RESPONSES ARE MADE IN REGARD TO NUMBERED COMMENTS ISSUED BY THE MPCA ON SEPTEMBER 17, 1986.

1) THE MPCA STATES THAT "WHILE THE INCINERATION OPTION WAS CARRIED FORWARD FOR SLUDGE DISPOSAL, ADDITIONAL TECHNOLOGIES SUCH AS CEMENTATION, VITRIFICATION AND CHEMICAL FIXATION, WERE QUICKLY DISMISSED DUE EITHER TO THE WIDE RANGE OF CONTAMINANTS PRESENT IN THE SLUDGE OR TO SITE CONDITIONS.".

EPA'S RESPONSE. TECHNOLOGIES CONSIDERED TO HAVE A LOW LIKELIHOOD OF SUCCESSFUL APPLICATION WERE SCREENED OUT IN THE EARLY SECTIONS OF THE FS. THIS SUCCESSIVE ELIMINATION OF POTENTIAL RESPONSE ACTIONS IS AN INTRINSIC PART OF THE SELECTION PROCESS. THE SCREENING LEVEL ANALYSIS IS NOT INTENDED TO BE IN-DEPTH. AN IN-DEPTH ANALYSIS WILL INORDINATELY INCREASE THE COST AND TIME TO COMPLETE THE FS WITHOUT A CORRESPONDING INCREASE IN INFORMATION TO ENABLE EPA TO FURTHER EVALUATE ALTERNATIVES.

CEMENTATION OF SOILS AND ADDITION OF SORBENTS TO SLUDGE WERE CARRIED FORWARD BEYOND INITIAL SCREENING FOR FURTHER ANALYSIS. VITRIFICATION AND CHEMICAL FIXATION WERE SCREENED OUT EARLY DUE TO LIMITED DEVELOPMENT/DEMONSTRATION IN SLUDGES AND ORGANIC SOILS. A RECENT PUBLICATION ON HAZARDOUS WASTE TREATMENT TECHNOLOGIES LISTS NO USERS OR AVAILABILITY OF THIS TECHNOLOGY (EPA/600/8 - 86/017, P. 33).

ASIDE FROM THE DIFFICULT TASK OF BLENDING CEMENTING MATERIALS INTO 4,600 CUBIC YARDS OF SLUDGE FROM THE LAGOON AREA, AND ASSUMING SUFFICIENT CEMENTING MATERIALS CAN BE ADDED TO CREATE A HARDENED CEMENT BLOCK, THE INTEGRITY OF THE SOLIDIFIED MASS REMAINS SUSPECT. EVENTUAL DECOMPOSITION OF ORGANIC MATERIALS THAT COMPOSE THE MAJORITY OF THE SLUDGE MASS WILL RESULT IN A LESS STABLE MATRIX THAT COULD CRACK OR MORE READILY LEACH THE CONTAMINANTS THAT HAD BEEN EITHER FIXED, SORBED, OR ENCAPSULATED. THUS, THESE TECHNOLOGIES WERE ELIMINATED NOT ONLY BECAUSE OF UNCERTAINTIES REGARDING IMPLEMENTATION, BUT ALSO BECAUSE OF THEIR SUSPECT LONG-TERM RELIABILITY TO MITIGATE RELEASES OF CONTAMINANTS.

1) (CONTINUED): THE MPCA STATES THAT ". . . NO PRE-BURN HAS BEEN CONDUCTED TO DETERMINE IF THE SAME RANGE OF CONTAMINANTS WOULD POSE A PROBLEM TO THE ENVIRONMENT, PUBLIC HEALTH, OR TO THE INCINERATOR ITSELF.".

EPA'S RESPONSE. ALTHOUGH INCINERATION OF HAZARDOUS MATERIALS HAS HAD LIMITED APPLICATION ON CERCLA SITES TO DATE, IT HAS BEEN APPLIED SUCCESSFULLY AT A NUMBER OF HAZARDOUS WASTE SITES AND LICENSED HAZARDOUS WASTE MANAGEMENT FACILITIES. THE SUCCESS EXPERIENCED TO DATE WITH MATERIALS SIMILAR IN TERMS OF CHEMICAL AND PHYSICAL COMPOSITION TO THOSE AT THE ARROWHEAD REFINERY SITE INDICATES THAT THE LIKELIHOOD OF SUCCESSFUL TREATMENT OF HAZARDOUS SUBSTANCES FROM THE ARROWHEAD REFINERY SITE IS GOOD.

ORGANIC CONTAMINANTS TREATED BY THE INCINERATOR ARE EXPECTED TO BE DESTROYED BY THE PROCESS (DESTRUCTION AND REMOVAL EFFICIENCY GE 99.99 PERCENT). INTERMEDIATE PRODUCTS OF COMBUSTION THAT COULD BE HAZARDOUS TO THE

ENVIRONMENT OR PUBLIC HEALTH ARE EXPECTED TO EITHER BE DESTROYED IN THE INCINERATION PROCESS OR CONTROLLED (BY THE GAS AND ASH TREATMENT SYSTEMS) TO WITHIN LIMITS ESTABLISHED BY STATE AND FEDERAL REGULATIONS. IN ADDITION, THE VOLUME OF MATERIAL WILL BE SIGNIFICANTLY REDUCED.

1) (CONTINUED): THE MPCA STATES THAT "IN ADDITION, KNOWING FULL WELL THAT HEAVY METALS WOULD BE CONCENTRATED IN THE ASH RENDERING THE ASH HAZARDOUS, THE RECOMMENDED ALTERNATIVE DOES NOT INCLUDE THE COST OF DISPOSAL.".

EPA'S RESPONSE. THE EPA DOES NOT DISAGREE, NOR DID IN ANY WAY AVOID THE ISSUE OF POSSIBLE CONCENTRATION OF INORGANIC CONTAMINANTS IN INCINERATOR RESIDUES (ASH). THIS POSSIBILITY, HOWEVER, DOES NOT PRESCRIBE THAT THEY MUST BE DISPOSED OF OFFSITE IN A RCRA-APPROVED LANDFILL. IT WAS STATED IN THE FS THAT THE RESIDUES MUST BE MANAGED AS HAZARDOUS MATERIALS UNTIL PROVEN OTHERWISE. SHOULD IT BE DETERMINED BY THE EPA THAT THE RESIDUES MUST BE MANAGED AS HAZARDOUS WASTE, IT MAY STILL BE POSSIBLE TO TREAT THE RESIDUES TO CREATE A NON HAZARDOUS SUBSTANCE. THE RESIDUES GENERATED FROM TREATING THE SLUDGE AND PEAT WILL BE MUCH SMALLER IN VOLUME AS COMPARED TO THE INITIAL VOLUME, AND SHOULD BE MORE AMENABLE TO ANY SUBSEQUENT TREATMENT AND/OR DISPOSAL ACTION REQUIRED THE VOLUME OF RESIDUE FROM SLUDGE (THAT POSE THE GREATEST CONCERN REGARDING INORGANIC CONTAMINANTS) IS ESTIMATED TO BE LESS THAN 10 PERCENT OF THE TOTAL RESIDUE GENERATED (I.E., THE TOTAL INCLUDES ASH FROM THE INCINERATION OF SOIL AND SLUDGE).

THE COST OF OFFSITE DISPOSAL WAS ADDRESSED AS A POTENTIAL COST AND WAS CONSIDERED IN WEIGHING THE ALTERNATIVES. COMPARED TO ALTERNATIVE 5 (EXCAVATION AND INCINERATION OF SLUDGE, AND EXCAVATION AND COMPLETE OFFSITE DISPOSAL OF CONTAMINATED SOIL), THE COST OF THE RECOMMENDED REMEDY INCLUDING THE COST OF OFFSITE DISPOSAL OF RESIDUES IN A RCRA LANDFILL WOULD BE LESS, AND WOULD ALSO ACHIEVE THE BENEFITS OF DESTRUCTION OF ORGANIC CONTAMINANTS.

2) THE MPCA STATES THAT "THE OPTION OF A CONTAINMENT VAULT FOR EITHER SLUDGE OR SOIL WAS QUICKLY ELIMINATED DUE TO THE PRESENCE OF BOTH ORGANIC SOIL (PEAT) AND A HIGH WATER TABLE . . . IF THIS COULD BE DONE, A MORE COST-EFFECTIVE ALTERNATIVE MAY EXIST.".

EPA'S RESPONSE. THE OPTION OF A CONTAINMENT VAULT WAS SCREENED OUT EARLY FOR SEVERAL REASONS. IT WAS ASSUMED THAT VAULT CONSTRUCTION WOULD HAVE TO MEET STANDARDS FOR A RCRA-TYPE LANDFILL. SINCE BELOW-THE-WATER-TABLE LANDFILLS ARE NOT ACCEPTABLE FOR THE DISPOSAL OF HAZARDOUS WASTES, EITHER THE SITE WOULD HAVE TO BE FILLED IN AND THE VAULT CONSTRUCTED ON TOP OF THE FILL, OR THE GROUNDWATER TABLE WOULD HAVE TO BE LOWERED. IN THE ABOVE GROUNDWATER TABLE LANDFILL OPTION, THE RESULTING LANDFILL COULD BE A MOUND RISING 20 TO 30 FEET ABOVE THE SURROUNDING GROUND SURFACE TO COMPLY WITH RCRA DISTANCE-TO-GROUNDWATER REQUIREMENTS. IF THE GROUNDWATER TABLE IS LOWERED, PUMPING WOULD BE REQUIRED TO MAINTAIN THE LOWERED LEVELS INDEFINITELY.

IN EITHER SITUATION, THE EFFECTS ON THE LOCAL WETLANDS WERE BELIEVED TO BE ADVERSE. THE CONSTRUCTION OF THE VAULT WOULD ELIMINATE THE FUTURE DEVELOPMENT OF THE AREA (I.E., A LOSS OF NATURAL RESOURCES). CONSTRUCTION OF A VAULT, WHETHER CLAY-LINED OR CONCRETE-LINED, ON TOP OF PEAT SOILS MAY BE UNSTABLE AND SUBJECT TO EXCESSIVE SETTLEMENT. THIS MAY REQUIRE THE COMPLETE REMOVAL OF THE PEAT SOIL BEFORE LANDFILL CONSTRUCTION CAN BEGIN.

FINALLY, SITE INVESTIGATIONS INDICATE THAT DUE LARGELY TO THE PRESENCE OF THE HUMIC SOILS (PEAT), THE MOVEMENT OF CONTAMINANTS HAS BEEN, AND IS EXPECTED TO BE, RELATIVELY SLOW. THE PEAT LAYER HAS PROBABLY SERVED AS A CONTAINMENT LAYER TO A SIGNIFICANT EXTENT. STILL, THE POTENTIAL FOR OFFSITE MIGRATION, OVER THE LONG-TERM, EXISTS. HENCE, THE LONG-TERM BENEFITS ARE A KEY CONSIDERATION, AND THE LONG-TERM BENEFITS OF THE CONTAINMENT OPTION ARE CONSIDERED TO BE SMALL, SINCE PERMITTED HAZARDOUS WASTE LANDFILLS HAVE BEEN KNOWN TO LEAK.

3) THE MPCA STATES THAT ". . . A GROUT CURTAIN WAS QUICKLY ELIMINATED BECAUSE OF ALLEGED DIFFICULTIES IN DETERMINING THE INTEGRITY OF THE BARRIER . . . THIS IS AN OPTION

THAT MAY WORK . . .".

EPA'S RESPONSE. DETERMINING THE INTEGRITY OF ANY GROUT CURTAIN IS DIFFICULT. IN GENERAL, PHYSICAL BARRIERS ARE USED IN CONJUNCTION WITH PUMPING (E.G., TO REDUCE THE PUMPING REQUIRED), NOT ALONE. THUS, IF A GROUT CURTAIN OR SLURRY WALL WERE TECHNICALLY FEASIBLE BECAUSE OF SITE CONDITIONS, PUMPING (AND THEREFORE TREATMENT) OF GROUNDWATER WOULD BE REQUIRED ANYWAY.

SLURRY WALLS WERE ELIMINATED BECAUSE OF THE TECHNICAL DIFFICULTIES ANTICIPATED IN TRYING TO CONNECT THEM TO AN IMPERMEABLE LAYER OF ROCK OR CLAY. THE SURFACE OF BEDROCK AT THE SITE IS SUSPECTED TO BE FRACTURED AND HIGHLY IRREGULAR.

4) THE MPCA STATES THAT "... THE RI/FS DOES NOT SHOW THE GRADIENT CONTROL WELLS WILL BE ABLE TO CONTROL THE OFFSITE SPREAD OF CONTAMINATION IN OR AT THE BEDROCK. IN ADDITION, THE RECHARGE RATES OF MOST OF THE MONITORING WELLS ONSITE INDICATE THAT GRADIENT CONTROL WELLS MAY NOT BE ABLE TO PUMP GROUNDWATER AT THE RECOMMENDED DISCHARGE RATE. THIS SUGGESTS THAT AQUIFER CHARACTERISTICS ...WERE NOT REPRESENTATIVE OF REAL CONDITIONS...".

EPA'S RESPONSE. THE NECESSITY FOR CONTROLLING THE SPREAD OF CONTAMINANTS IN OR AT THE BEDROCK WAS NOT SUGGESTED BY THE RI DATA. THESE DATA INDICATED THE LIKELIHOOD OF UPWARD, RATHER THAN DOWNWARD, GROUNDWATER GRADIENTS IN THE AREA. CONTAMINATION WITH UNACCEPTABLE RISK WAS NOT OBSERVED IN THE DEEPER MONITORING WELLS. SLUG TESTS TAKEN DURING THE RI PRODUCED THE INFORMATION USED TO ESTIMATE PUMPING RATES. LOW RECHARGE RATES IN SOME MONITORING WELLS LOCATED IN THE FILL OR PEAT INITIATED THE CONSIDERATION OF FRENCH DRAINS IN THESE SOILS. RECHARGE RATES IN MONITORING WELLS SCREENED IN THE FILL OR PEAT ARE DEPENDENT UPON THE SOIL TYPE, THE SCREEN AREA, AND DRAWDOWN IN THE WELL, ALL OF WHICH ARE DIFFERENT FOR EXTRACTION WELLS SCREENED IN THE OUTWASH.

DURING THE COURSE OF THIS RI/FS, IT WAS DETERMINED THAT SUFFICIENT INFORMATION WAS AVAILABLE TO DETERMINE THE NEED FOR GROUNDWATER EXTRACTION AND THAT METHODS OF EXTRACTING THE CONTAMINATED GROUNDWATER ARE AVAILABLE. THE EXTRACTION SCHEME PRESENTED IS CONCEPTUAL. IF PUMP TESTS INDICATE THAT EXTRACTION VIA PUMPING IS NOT FEASIBLE, THEN ALTERNATIVE EXTRACTION TECHNIQUES, SUCH AS FRENCH DRAINS, COULD BE UTILIZED TO AN EXTENT GREATER THAN DESCRIBED IN THE FS TO ACHIEVE THIS GOAL.

5) THE MPCA STATES THAT "ACCORDING TO THE FS, REMOVAL OF FILL, PEAT, AND THE UPPER OUTWASH WOULD ELIMINATE THE NEED FOR CONSTRUCTION OF A FRENCH DRAIN. HOWEVER, THE FRENCH DRAIN IS INCLUDED IN THE RECOMMENDED ALTERNATIVE AT A PRESENT WORTH CLOSE TO $500,000.".

EPA'S RESPONSE. THE REMOVAL OF CONTAMINATED SOIL WOULD ELIMINATE THE NEED FOR A FRENCH DRAIN IN THE EXCAVATED AREAS. THE FRENCH DRAIN WOULD STILL BE PLACED IN PEAT SOIL AREAS HAVING CONTAMINATED GROUNDWATER, BUT NOT CONTAMINATED SOIL. THIS IS STATED IN THE ALTERNATIVE DESCRIPTIONS IN CHAPTER 5. COSTS LISTED IN APPENDIX G FOR ALTERNATIVES 3, 5, AND 6 INCLUDE $350,000 FOR CONSTRUCTION OF THIS DRAIN.

6) THE MPCA STATES THAT: "...THERE IS NO LOGIC TO SELECTIVELY CONNECTING ONLY THOSE RESIDENCES ALONG ROSE ROAD AND ALONG THE SOUTH SIDE OF U.S. HIGHWAY 53...THE RI/FS HAS NOT SHOWN THE NEED TO CONNECT ANY RESIDENCES TO CITY WATER.".

EPA'S RESPONSE. THE RI/FS NOTES THAT GROUNDWATER MOVEMENT APPEARS TO BE IN A SOUTHWESTERLY DIRECTION. BASED UPON THAT INDICATION, THE RESIDENTS LIVING DIRECTLY SOUTH ALONG UGSTAD ROAD SHOULD NOT BE REACHED BY THE GROUNDWATER PLUME. IF THE RESIDENTS RECOMMENDED IN THE FS FOR CITY WATER SERVICE ARE NOT CONNECTED AND PERIODIC MONITORING OF WELL WATER QUALITY IS CONDUCTED (E.G., QUARTERLY) INSTEAD, THE ESTIMATED PRESENT WORTH OF MONITORING WOULD EXCEED THE ESTIMATED PRESENT WORTH OF CONNECTIONS TO CITY WATER.

7) THE MPCA STATES THAT "THE ENVIRONMENTAL ASSESSMENT IS INCOMPLETE..." AND "...IT SHOULD BE COMPLETED DURING THE RI/FS...".

EPA'S RESPONSE. ALTHOUGH SAMPLING OF AQUATIC OR TERRESTRIAL LIFE WAS NOT CONDUCTED DURING THE RI/FS, THE CHARACTERISTICS OF THE SITE, CONCENTRATIONS OF CONTAMINANTS, AND THE POTENTIAL PATHWAYS FOR CONTAMINANT MIGRATION HAVE BEEN IDENTIFIED AS WELL AS THE PRESENCE OF DEAD VEGETATION. ENVIRONMENTAL ASSESSMENTS WERE CONSIDERED INCONSEQUENTIAL SINCE ENDANGERMENT TO HUMANS WAS ALREADY IDENTIFIED.

8) THE MPCA STATES THAT "...THE IMPACT OF DISCHARGING TO SURFACE WATER (IN TERMS OF FLOW AND LOAD) HAS NOT BEEN ADDRESSED IN THE DRAFT FS.".

EPA'S RESPONSE. ALTHOUGH IMPACT WAS NOT ASSESSED IN TERMS OF FLOW AND LOAD, IT WAS STATED THAT THE EXTRACTED GROUNDWATER WOULD BE TREATED TO AN EXTENT NECESSARY TO MEET THE TECHNICAL REQUIREMENTS OF A DISCHARGE PERMIT, WHICH WOULD TAKE FLOW, LOAD, AND ENVIRONMENTAL IMPACT INTO ACCOUNT.

9) THE MPCA STATES THAT "A FINAL...QUALITY ASSURANCE PROJECT PLAN (QAPP) HAS NEVER BEEN APPROVED...THE ENTIRE PROJECT SHOULD NOT PROCEED UNTIL THE QAPP IS FINALIZED, THE SITE RESAMPLED, AND THE RI FINALIZED WITH A THOROUGH, COMPLETE AND VALID DATA BASE.".

EPA'S RESPONSE. THE QAPP DOES NOT APPROVE OR DISAPPROVE THE QUALITY ASSURANCE (QA) PROGRAM FOR ROUTINE ANALYTICAL SERVICES PROVIDED BY THE CONTRACT LABORATORY PROGRAM (CLP). THE CLP QA PROGRAM IS MONITORED UNDER A SEPARATE CONTRACT BETWEEN THE EPA AND THE CLP. UPON THE REVIEW OF RI DATA BY THE EPA, RECOMMENDATIONS ARE MADE AS TO HOW QUALITATIVE DATA MAY BE USED. THESE QUALIFIERS HAVE BEEN TAKEN INTO ACCOUNT IN THE RI/FS. ANY DATA THAT WERE INDICATED UNUSABLE WERE NOT USED.

THE EPA FEELS THAT WHILE THERE ARE SOME INCONSISTENCIES IN THE DATA BASE, THE DATA ARE ADEQUATE TO MAKE A VALID ASSESSMENT OF RISK AND SUBSEQUENT REMEDY SELECTION. THE FS DOES RECOMMEND ADDITIONAL SAMPLING TO VERIFY CERTAIN ASSUMPTIONS MADE IN THE FS.

10) THE MPCA STATES THAT "...A CURSORY GLANCE AT THE MAPS CLEARLY SHOWS THAT A GROUNDWATER LOW EXISTS ALONG THE SOUTHERN BOUNDARY OF THE SITE WHICH...IS A BARRIER TO MIGRATION OF CONTAMINANTS FROM THE SITE TO RECEPTORS TO THE SOUTH.".

EPA'S RESPONSE. INFORMATION REPORTED IN THE RI COULD SUGGEST THE POSSIBILITY THAT CONTAMINATION OF THE RESIDENTIAL WELLS WILL NOT OCCUR AND THAT GROUNDWATER MOVING SOUTHWESTERLY WILL DISCHARGE INTO THE DIVERSION DITCH RUNNING ALONG HIGHWAY 53 RATHER THAN PROCEED SOUTHWARD UNDER THE HIGHWAY. CONSIDERABLE SPATIAL (HORIZONTAL AND VERTICAL) AND TEMPORAL (SPRING, SUMMER, WINTER, AND FALL) SAMPLING AND TESTING WOULD BE REQUIRED TO SUPPORT THIS IMPLICATION WITH THE DEGREE OF CONFIDENCE NECESSARY TO EFFECTIVELY PROTECT PUBLIC HEALTH AND THE ENVIRONMENT. EVEN IF SOME NEAR SURFACE GROUNDWATER WERE DISCHARGING TO THE DIVERSION DITCH, DEEPER GROUNDWATER FLOW PATHS COULD BE CONVEYING CONTAMINANTS SOUTHWARD UNDER THE HIGHWAY.

CONNECTION OF NEARBY RESIDENTS TO MUNICIPAL WATER SUPPLIES IS CONSIDERED A LOW-COST SAFEGUARD. THE PROXIMITY OF THE NEARBY RESIDENCES TO THE PLUME (ALTHOUGH ESTIMATED TO BE MORE THAN 20 YEARS IN TRAVEL TIME) PROVIDES ONLY A MARGINAL BUFFER ZONE (LESS THAN 500 FEET) FOR AN AQUIFER SYSTEM THAT CANNOT BE COMPLETELY UNDERSTOOD.

11) THE MPCA STATES THAT "...WATER TREATMENT SLUDGE HAS TO BE TREATED AS HAZARDOUS WASTE...WHICH WILL RAISE THE COST OF THE RECOMMENDED ALTERNATIVE EVEN HIGHER.".

EPA'S RESPONSE. IF THE SLUDGE IS DETERMINED TO BE TOO HAZARDOUS TO BE MANAGED ONSITE OR DISPOSED OF IN A MUNICIPAL WASTE LANDFILL, THE INCREMENTAL COSTS OF MANAGING THIS MATERIAL AS HAZARDOUS WASTE ARE EXPECTED TO

BE LESS THAN $25,000 ANNUALLY (I.E., PRESENT WORTH LESS THAN $240,000); INSUFFICIENT TO INFLUENCE THE BASIC DECISION TO TREAT THE GROUNDWATER. ANY INCREASE IN WATER TREATMENT SLUDGE DISPOSAL COSTS WOULD BE REFLECTED IN ALL THE ALTERNATIVES.

12. THE MPCA STATES THAT "...THE RECOMMENDED ALTERNATIVE HAS NOT BEEN SHOWN TO BE COST EFFECTIVE. PART OF THE DETERMINATION OF THE COST EFFECTIVENESS OF AN ALTERNATIVE INCLUDES ADDRESSING THE IMPACT ON THE STATE; THAT IS, CAN THE STATE AFFORD THE REQUIRED MATCH...".

EPA'S RESPONSE. UNDER SECTION 300.68 OF THE NCP, NO MENTION IS MADE REGARDING ASSESSING THE AVAILABILITY OF FUNDS IN THE STATE SUPERFUND FOR COST SHARING.