COMMENTS ON THE U.S. EPA PROPOSED PLAN
TEXTILE ROAD SITE
YPSILANTI TOWNSHIP, WASHTENAW COUNTY, MICHIGAN
NOVEMBER 1998

RESPONSIVENESS SUMMARY

This Responsiveness Summary for the Textile Road Site, Ypsilanti Township, Michigan, has been prepared in order to meet the requirements of the regulations at Section 300.415 of Title 40 of the Code of Federal Regulations (CFR) passed in accordance with Section 113(k)(2)(A) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986 (CERCLA), which require the United States Environmental Protection Agency (U.S. EPA) to respond to comments received on this proposed cleanup plan. The U.S. EPA published a notice of availability of the administrative record and proposed plan for the Textile Road Site in the Ypsilanti Press on July 29, 1997. The U.S. EPA published a second notice extending the comment period in the Ypsilanti Press and Ypsilanti Courier on August 26, 1997.

This Responsiveness Summary addresses concerns expressed during the public comment period of July 30 through September 27, 1997. In addition, a public meeting to discuss the proposed plan was held on August 13, 1997, at the Ypsilanti Civic Center. Comments recorded at the meeting are also addressed in this Responsiveness Summary. Some of the comments appearing below have been paraphrased for brevity. The Administrative Record contains copies of written comments received during the comment period. It also contains a transcript from the public meeting, which includes all oral comments received. The Administrative Record can be reviewed at the Ypsilanti District Library, 229 W. Michigan, Ypsilanti; Ypsilanti Civic Center, 7200 South Huron Drive, Ypsilanti; and the U.S. EPA Region 5 office in Chicago.

A. PUBLIC COMMENTS

The following comments were made by the general public or government officials in writing or in person at the public meeting.

Comment #1

Several commenters requested an extension of the public comment period.

Response

The U.S. EPA granted a thirty (30) day extension of the public comment period. The extension allowed the public additional time to review and submit comments on the Proposed Plan.

Comment #2

A commenter commended both the U.S. Environmental Protection Agency and the Michigan Department of Environmental Quality for their joint effort to clean up the Textile Road Site.

Several commenters also expressed concern that the level of contamination of this site will not be reduced to a level that will allow for future residential use.

The commenters expressed support for Ypsilanti Township request for the clean up of contaminated substances to be increased to levels greater than 2 mg/kg as opposed to the proposed 50 mg/kg level (industrial standard).

One comments itemized the following reasons for the use of more protective standards:

- The large amount of adjacent residential property, and its density;
- The bodies of water on the property which could be used for recreation;
- The proximity to Ford Lake, and to a lake at the trailer park ("Lakeview" trailer park) which is used for fishing;
- The adjacent agriculture, producing products going into the food chain from which we all eat;
- The fact that the property has never been used for commercial/industrial use.

Response

The proposed cleanup level for the site was 21 parts per million (ppm) (Michigan generic) industrial. A cleanup to 50 ppm was not proposed. However, the proposed cleanup has been revised and the current recommended alternative proposes to clean a large portion of the site to a the residential level of 1.2 ppm, and a small portion of the site will contain contaminated soil up to 26 ppm. The cleanup will allow unrestricted residential development of 52 acres of the 62-acre site. The remaining ten acres will be open to commercial development with certain restrictions.

Comment #3

A commenter requested that U.S. EPA conduct a second public hearing in regard to the cleanup of the hazardous contamination located at the Textile Road Superfund site located in Ypsilanti Township to allow the opportunity to provide additional information urging U.S. EPA to opt for a higher cleanup standard.

Several commenters noted that the site in question is not zoned for industrial use, but is zoned "B1-Local Business District," and that such zoning is intended to "... meet the day to day convenience shopping and service needs of persons residing in immediately adjacent residential areas." The commenter also noted that the property immediately south of the Superfund site is zoned R4 which, again, is zoned to provide for an environment of predominantly low density one family dwellings along with other residentially related facilities which serve the residents in the district. The commenter states that the proposed cleanup does not meet with the intended future use of the property and that U.S. EPA did not take into consideration the correct zoning classification of the 62-acre site when it recommended Alternative 1A.

The commenter states that alternative 1A should be expanded to include the removal of soils with polychlorinated biphenyl (PCB) contamination greater than 2 mg/kg.

The commenter also noted that the public notice required to be published by the U.S. EPA in regard to this cleanup site was never published in the Ypsilanti Courier, which is the official newspaper of record in the Charter Township of Ypsilanti for notices of this nature.

Response

The U.S. EPA extended the public comment period by thirty (30) days, which allowed the public additional time to provide comments on the Proposed Plan. As described in response to Comment #2, the proposed cleanup has been revised so that the majority of the site will be cleaned up to residential standards (1.2 ppm). See response to Comment #2. A second public meeting will be held to describe and take comments on the revised proposed cleanup.

Also, the U.S. EPA published the public notice in the Ypsilanti Press, in order to reach as many people as possible. The U.S. EPA published the notice of the extension of the public comment period in both the Ypsilanti Press and Ypsilanti Courier. Any further notices will appear in both newspapers.

Comment #4

A commenter noted that Alternative 1A seems appropriate provided that remaining contaminants are capped and post-cleanup inspections are regular and frequent. The commenter also stated that the safety of trespassers should not be a main priority, since they enter the property at their own risk.

Response

The U.S. EPA revised proposed cleanup plan includes a vegetative cap for the remaining excavated and consolidated contaminated soil. The plan also includes post-removal monitoring and maintenance. The safety of trespassers was examined to determine the exposure risk to people at the site after the originally proposed industrial cleanup. Under the revised proposed cleanup, additional risks have been examined.

Comment #5

A commenter expressed concern over the risk to persons living in the area. The commenter stated that cost should not be a factor in the clean up of site and that the U.S. EPA should only consider the effectiveness and permanency of the cleanup.

Response

The risk to area residents is minimized by the revised proposed cleanup plan. All PCB-contaminated soils with concentrations equal to or greater than 26 ppm will be removed from the site. All PCB-contaminated soils with concentrations equal to or greater than 1.2 ppm and less than 26 ppm will be excavated, consolidated, and capped in in area in the northern ten acres of the site. In particular, the cap will minimize the of exposure of residents. For extra security, a deed restriction will be placed on the capped area preventing any activities that might disrupt the cap.

The U.S. EPA considered the cost, effectiveness, and implementability of each removal alternative in order to select an appropriate cleanup plan for the site. Federal law requires that cost be considered by the agency. However, these three criteria are balanced, so that one does not outweigh the others. The U.S. EPA believes that it has struck the proper balance with the revised cleanup plan.

Comment #6

One commenter wanted to know why Alternative 2, described as No Action, had a present worth cost of $390,000.

Response

Alternative 2, the No Action Alternative, involves taking no removal action, but does involve monitoring of site conditions. The costs cover this projection.

Comment #7

A commenter stated that the U.S. EPA recommended action should be to eliminate all contamination from the site.

Response

Elimination of all contamination would be technically difficult and cost prohibitive. However, as described above, the revised proposed cleanup plan will minimize the risks posed by the site and allow for residential development upon the vast majority of the site.

Comment #8

Nearby homeowners and several commenters at the public meeting commented that they would prefer the property to be cleaned up for residential use as opposed to light industrial.

Response

See response to comment #2.

Comment #9

A commenter indicated that no PCB-contaminated material should be removed from the site and disposed of at the Wayne Disposal, Inc., facility. The commenter believes that the Wayne Disposal, Inc., facility was illegally permitted, due to an improper public hearing process.

Response

The U.S. EPA allows for off-site disposal of the contaminated materials with PCB concentrations equal to or greater than 50 ppm at a permitted landfill pursuant to the Toxic Substances Control Act (TSCA). It is likely that potentially responsible parties will perform the removal activities at this site. The U.S. EPA is unable to direct them to use a particular off-site facility for disposal. Off-site disposal of PCB-materials will be conducted at a permitted facility.

Comment #10

A commenter questioned the impact on Ford Lake, an "all sports" lake, if groundwater flows in a northwesterly direction.

Response

A shallow groundwater table, which appears to have been impacted, flows northwesterly. It is being monitored and there is no reason to believe that contaminants have migrated off-site. There is no off-site discharge of surface water. All the runoff is contained on site and goes into the ponds on site.

It is believed that once the contaminated materials are removed, the impact on groundwater will be eliminated. Groundwater will be monitored during the post cleanup period and, if necessary, further treatment will be conducted.

Comment #11

Once all the hazardous waste is removed from the site, what measures are going to be taken to recheck the site to make sure it's maintained at the level that it is meant to be at?

Response

The work plan will have a very comprehensive post-removal operation and maintenance program. The required activities will include confirmatory soil sampling, installation of monitoring wells and periodic groundwater testing as well as care of any cover installed during the removal action.

Comment #12

What would it cost to conduct the removal action to an unlimited residential level?

Response

The originally proposed cleanup alternative was proposed based on a light industrial future use of the site. The cleanup proposed had a present worth cost of approximately $1.36 million. The revised proposed cleanup alternative modifies the original in light of the current zoning and expressed future use plans for the site. The cleanup will result in the vast majority of the site being open to the unlimited residential use. This cleanup proposal has a present worth cost of approximately $1.95 million.

Comment #13

A commenter requested further description of the health risks posed by the site, specifically in terms of the medical literature.

Response

Exposure to PCBs may cause a variety of serious health effects. Experiments have shown that some PCB mixtures produce adverse health effects in animals, including liver damage, skin irritations, reproductive and developmental effects, and cancer. While the limited studies on cancer effects in humans from PCB exposure may be most appropriately viewed as inconclusive, some studies provide supportive evidence for the opinion that PCBs cause these various health effects in humans. The U.S. EPA and other organizations have concluded that PCBs are probable human carcinogens.

However, any health risk posed by the site would only exist if a human would be exposed to the PCBs. The fence around the site restricts access by residents, thereby significantly reducing the risk of exposure to the current contamination on site. The proposed cleanup of the site will result in the vast majority of the site containing PCB-concentrations of no more than 1.2 ppm. The remainder of the site containing PCBs in concentrations up to 26 ppm will be covered with an appropriate soil cover system. The estimated cancer risk for persons who would live on a site with soil containing PCB concentrations equal to 1.2 ppm is 3.75×10^{-6}. This means that if 270,000 people live on this site with even contamination of 1.2 ppm PCBs in the soil, one person would be at risk to get cancer from the PCBs. It should be noted that this conservative estimate is based on an assumption that 1.2 ppm contamination exists across the entire site. However, portions of the site already contain PCB concentrations of less than 1.2 ppm and will not be impacted by the cleanup. PCB exposure from the area containing PCB concentrations up to 26 ppm will be virtually eliminated because of the cover that will be placed on the area. Therefore, the risk from that area is nearly zero.

Comment #14

Are there any private wells north of Textile Road, just across from the trailer park, that might be impacted by the site contaminants?

Response

There are no private potable water wells north of the site. The only well in existence is the test well for a pumping test which is also in the lower sands aquifer. The well was sampled along with the municipal wells and found not to be impacted by the site. Also, the monitoring wells along the perimeter of the site indicate that no contaminants are migrating off-site through groundwater.

B. PRP Comments

The following comments were made by Conestoga-Rovers and Associates on behalf of the Textile Road Site Cooperating Parties Group.

Comment #15

Page 1, Paragraph 1, Sentence 2 and 3: This section of the Proposed Plan refers to the Engineering Evaluation/Cost Analysis (EE/CA) as the source for the information contained in the information sheet. No reference is made to other significant documents which provide relevant information on the Textile Road Site (Site) and the proposed removal action alternatives. Specifically, the "Re-evaluation of Select Removal Action Alternatives: Addendum to EE/CA" (Addendum to EE/CA), report prepared by Conestoga-Rovers & Associates (CRA) (February 1996) provides significant additional information on the on-Site and off-Site disposal alternatives which was utilized in the final selection of a removal action.

Response

The proposed plan was issued in the form of a very concise fact sheet. The public can review detailed information in the Repositories, as well as at the Records Center in Chicago. The reference to EE/CA in the proposed plan was intended to include all amendments to the original EE/CA. Any disclarity should be resolved in the revised proposed plan.

Comment #16

Page 1, Paragraph 2, Sentence 4: "Soils with polychlorinated biphenyl (PCB) contamination greater than 50 mg/kg would be removed from the site for disposal at a TSCA-permitted landfill: soils with PCB contamination greater the 500 mg/kg would be incinerated in a TSCA-permitted incinerator."

The referenced sentence does not accurately reflect the disposal options provided by TSCA or the removal action proposed by the Cooperating Parties Group (Group) for the Textile Road Site. Disposal options for the excavated soil depend upon the concentrations of PCBs contained within

the soil. Soils containing PCBs in the range of 21 to 50 mg/kg will be disposed of at a Michigan Act 451, Part 115 Type II sanitary landfill (i.e. RCRA Subtitle D sanitary landfill). Soils containing PCBs above 50 mg/kg will be disposed of in the Environmental Quality Company's (EQ) TSCA permitted landfill located in Belleville, Michigan.

In the EE/CA, incineration of soils with PCB concentrations greater than 500 mg/kg was listed as an alternative to landfilling in a TSCA permitted landfill. However, under TSCA, any non-liquid PCBs at concentrations of 50 ppm (50 mg/kg) or greater in the form of contaminated soil, rags, or other debris can be disposed of in a TSCA chemical waste landfill (40 CFR § 761.60 (a) (4) (ii)). EQ's TSCA Permit is consistent with the TSCA requirements and therefore does not include any additional restrictions. Material containing PCBs at concentrations greater than 500 mg/kg do not require incineration. Therefore, all soils over 500 mg/kg will be disposed to the TSCA landfill.

Response

Off-site disposal of contaminated soils will be conducted in compliance with TSCA regulations and the U.S. EPA off-site rule. This has been clarified in the Revised Proposed Plan.

Comment #17

Page 2, Paragraph 2: Although the area of contamination is limited to the northern 10 to 20 acres of the property, the discussion of the Site background contained in the information sheet correctly refers to the property as a "*62-acre industrial property.*" The reference to the property as industrial is based on the historic land use (gravel extraction operations) and the reasonably foreseeable future land use for the property. The Master Plan for Future Land Use of Ypsilanti Township currently contemplates a "light industrial" land use (EE/CA, 1995/1996). This use is consistent with land use planning principles which would contemplate a transition from the general industrial land use to the east to residential/agricultural use to the south and west. The current zoning for the Site is a mix of local business (B-1) and one family residential (R-4). The legal description of the zoning indicates that a portion of the Site 430 feet along Bunton Road, and 1,019 feet along Textile Road (approximately 10 acres), is "B-1 Local Business." The remaining 52 acres of the Site is zoned R-4 - One Family Residential (6,000 sq. ft.).

In developing the Extent of Contamination (EOC) Report and the Engineering Evaluation/Cost Analysis (EE/CA), CRA, in consultation with the U.S. EPA, determined that the most reasonably foreseeable land use for the Site is light industrial. As a result, a removal action of contaminated materials at the Site to Michigan Act 451, Part 201 industrial direct contact criteria (i.e. 21 mg/kg for PCBs[1]) will provide a flexible standard for future development while maintaining protectiveness of human health and the environment. A generic industrial cleanup would allow

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[1]See MDEQ Operational Memorandum #14, Revision 2, June 6, 1995.

unrestricted industrial or commercial use of the Site in addition to a restricted residential use of the Site. As noted above, the southern 40 to 50 acres of the Site is uncontaminated and therefore could be used for any unrestricted land use.

The decision to employ industrial cleanup criteria was based on the following factors:

- historically (since the early 1940s) the Site has been used for industrial purposes (as identified in the U.S. EPA information sheet, the U.S. EPA review of historical aerial photographs and described in the EE/CA at page 9);

- the current Master Plan for Future Land Use of Ypsilanti Township indicates that the intended development of the Site is "light industrial";

- the adjacent property to the east of the Site (Ford Automotive Plant), which runs the entire length of the Site, is currently zoned "General Industrial". The Automotive Plant has been in operation since the late 1950s. After consultation with Ford, Ford has indicated that this plant will remain operational for the foreseeable future. Therefore, a "light industrial" or "commercial" use of the Site provides a buffer zone between the general industrial property to the east, and the residential property to the west (across Bunton Road). The buffer zone concept is consistent with accepted land use planning principles;

- the Master Plan for Future Land Use indicates that the currently proposed land use of the property to the south of the Site is light industrial; and

- the current zoning of B-1 in the primary areas of contamination would dictate a cleanup to the Generic Commercial, Subcategory IV Direct Contact Value of 58.0 mg/kg, therefore, a removal action to industrial cleanup standards provides flexibility for future land uses which are consistent with both the current zoning and the reasonably foreseeable future land use.

Even if U.S. EPA gave greater weight to the current zoning in choosing cleanup criteria, the proposed plan still would result in a more stringent cleanup at the Site than the zoning would indicate. Most of the contaminated area at the Site is zoned as a B-1, Local Business District. The Ypsilanti Township B-1 zoning classification corresponds closely to the Michigan DEQ's Commercial Subcategory IV which has a direct contact value of 58 mg/kg for PCBs[2] . Thus,

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[2]The B-1 zoning classification includes a retail businesses that supply foods, drugs, dry goods, clothing, etc. on the premises; personal service establishments that perform services on the premises; banks, loan companies, etc.; publicly owned buildings; and similar uses. Ypsilanti Charter Township Code, Appendix A (Zoning Code) §§ 901, 903. Similarly, the DEQ's Commercial Subcategory IV includes retail businesses whose principal activity is the sale of food or merchandise within an enclosed building; banks, Credit unions, savings and loan institutions, etc.; publicly owned office building; and personal service establishments which perform services

while the Cooperating Parties are not advocating for a 58 mg/kg cleanup standard for PCBs, that is the standard that would apply for the majority of the Site's contaminated soils if U.S. EPA were to look solely to the Site's zoning in choosing cleanup criteria. The proposed plan's Generic Industrial Soil Direct Contact Criteria standard for PCBs (21 mg/kg) is almost three times more stringent than the Commercial Subcategory IV standard of 58 mg/kg. The industrial soil contact direct contact criteria from the basis of the proposed plan because they are intended to protect individuals from the systemic health effects from ingestion and dermal adsorption of hazardous substances in soil.

Even for residential purposes, compliance with direct contact criteria (2.3 mg/kg for PCBs) are required throughout the affected media in the unlimited (emphasis noted) residential land use category. Moreover, Part 201 of Michigan Act 451 also provides for "limited" use cleanups. For limited use cleanups, site specific exposure assessment, exposure controls and land use restrictions may be employed to prevent exposures to more highly contaminated soils. In addition, average on-Site soil concentrations may be used to determine compliance with the soil direct contact value.

Under the proposed removal action, all soil contaminated above 21 mg/kg would be removed from the Site (approximately 50,000 square feet of surface area). The remaining soils would represent approximately 50,000 square feet of area with material contaminated between 2.3 mg/kg and 21 mg/kg, and 59.5 acres of material contaminated at levels below 2.3 mg/kg, if at all (the majority of which would not contain PCBs). Based on this information, and the use of conservative assumptions, the following calculation can be used to illustrate the estimated average PCB concentration in soil at the Site remaining after the proposed removal action has been implemented:

Average PCB	= 50,000 ft^2 x 11.63 mg/kg (average of 2.3-21 mg/kg portion)
Concentration	+ 50,000 ft^2 x 0 mg/kg (removed portion)
	+ 2,593,000 ft^2 x 0.5 mg/kg (remainder of Site)
	/ 2,690,000 ft^2 (total site area)
	= 0.70 mg/kg

Therefore, on a property wide basis, the average PCB concentration in the soil material would be approximately 0.70 mg/kg (based on conservative assumptions) and significantly less than the 2.3 mg/kg Generic Residential Soil Direct Contact Criteria (after the cleanup to industrial standards). Therefore, the residual risk for the property, associated with cleanup of the contaminated areas of the property to industrial standards, will be below residential standards.

Furthermore, if a specific land use (e.g. recreational or limited residential) was proposed for the Site, Michigan Act 451, Part 201 provides algorithms which can be used to calculate site-specific risk-based cleanup criteria. The algorithms account for site-specific exposure assumptions and

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indoors. DEQ Memorandum 14 at page 18.

pathways to provide cleanup criteria that are less stringent but equally protective to human health and the environment for the intended land use. The site-specific risk-based cleanup approach, in conjunction with appropriate land use restrictions, could produce a cleanup standard consistent with that proposed by the Cooperating Parties Group and the U.S. EPA.

Response

The Revised Proposed Plan selects new cleanup levels from the original Proposed Plan; these levels are described fully in Response to Comment #2. The U.S. EPA does not agree with a description of the cleanup that includes the averaging of PCB concentrations throughout every square foot of the site property, as suggested by the comment. This type of averaging may be misleading.

Comment #18

Site Investigations Section:

The information sheet provides a discussion of the Site investigations that were performed by the MDNR and the U.S. EPA during the period of 1983 through 1991. Although the information presented is correct, the information sheet does not include any of the Site characterization information that has been collected at the Site by the Group.

Significant relevant information with respect to contaminant characterization at the Site was provided in the Extent of Contamination (EOC) Study conducted for the U.S. EPA by the Group. The information provided in the EOC forms the primary basis for the development of alternatives presented and evaluated in the EE/CA. In general, the EOC investigation identified exceedances of cleanup levels in the upper sand/fill materials located to the north and west of Pond 1. No exceedances of cleanup levels were observed in pond sediments during the EOC investigation. PCBs were observed above cleanup levels in one groundwater monitoring well (but are not expected to be mobile).

The Site characterization data collected by the Group and presented in the EOC Report, forms the basis for the EE/CA and the evaluation of alternatives. A discussion of this data (or a reference to the data) is essential in order to objectively evaluate the proposed alternatives.

Response

Information on the EOC Study is included in the Revised Proposed Plan. All supporting documents, including the EOC study and EE/CA and its addendum, are available to the public at the Ypsilanti Library, Ypsilanti Township Civic Center, or the U.S. EPA Region 5 office in Chicago.

Comment #19

Page 2, Paragraph 4, Last Sentence: This sentence refers to the risks associated with the contaminants present at the Site. The reference to risk should be qualified to reflect the "potential" risks associated with Site contaminants.

Page 2, Paragraph 6: Risks associated with exposure to Site related contamination should be discussed in terms of potential risks to human health and the environment.

Response

The U.S. EPA has made clarifications in the Revised Proposed Plan to reflect the fact that these risks are potential.

Comment #20

Page 2, Paragraph 7: Paragraph 7 misrepresents the potential risks at the Site. The contaminants present at the Site could lead to potential risks over long periods of time (i.e. chronic exposures). The concentrations of PCBs are not present at levels which could lead to the imminent and substantial endangerment of the public health.

During the drilling of the boreholes to characterize the Site, a clay stratum was encountered at a depth of 15 to 22 feet below ground surface (BGS) with a thickness of 14 to 18 feet. This clay stratum, lacustrine clay, exists across the entire Site and has been identified throughout Wayne and Washtenaw Counties. Lacustrine clay typically exhibits a hydraulic conductivity of 10^{-7} - 10^{-10} cm/sec. (Groundwater, Freeze/Cherry, 1979). A U.S. EPA Field Investigation Team (FIT) identified an unconsolidated lacustrine clay deposit approximately two miles north of the Site. The FIT, in a report titled, "Extent of Contamination Study, Willow Run Site, Washtenaw and Wayne Counties, Michigan", and dated February 1984, determined the hydraulic conductivity to be on the order of 10^{-8} cm/sec. The hydraulic conductivity of samples collected from the clay stratum on Site were also determined to be on the order of 10^{-8} cm/sec. The thickness and low hydraulic conductivity of this clay stratum effectively serves as a natural barrier to limit the downward migration of groundwater from the upper water table zone to the lower sands aquifer.

Response

The paragraph correctly states the potential for endangerment of the public health, welfare and the environment if the conditions are not addressed. High levels of PCBs are present in the surface soils.

Comment #21

Page 2, Last Paragraph: The last paragraph of Page 2 discusses the potential risks associated with recreational usage of the Site such as fishing. Fish tissue samples were collected by the MDNR in June, 1983. The samples were analyzed for PCBs and pesticides. The results of the

five tissue samples indicated no detections of PCBs or pesticides. In addition, PCBs have not been detected in surface water samples collected from the Site and sediment samples collected during the EOC investigation. Finally, it is not reasonable to assume a potential risk to on-Site trespassers for exposure to groundwater. This exposure scenario will not exist during a trespass event.

Response

As long as soils on-site are contaminated, there is a risk of tracking, ingesting, and inhaling contaminated dust by individuals accessing the ponds. The language referring to the risk of exposure to groundwater has been removed in the Revised Proposed Plan.

Comment #22

Page 3, Alternative 1A - Off-Site Disposal: The description of the U.S. EPA's recommended alternative includes soils with a PCB concentration greater than 500 mg/kg being incinerated at a TSCA permitted incinerator. Furthermore, the description does not reference the disposal of material containing PCB concentrations in the range of 21 to 50 mg/kg at a Michigan Act 451, Part 115 Type II sanitary landfill.

Response

The U.S. EPA has clarified Alternative 1A in the Revised Proposed Plan.

Comment #23

Page 3, Alternative 2 - No Action: The discussion of the no action alternative should include mention of the monitoring program that would be implemented at the Site to track groundwater quality and provide warnings if contaminants are detected above regulatory levels.

Response

The description in the fact sheet should have included the mention of monitoring program as covered in EE/CA. The U.S. EPA's Revised Proposed Plan corrects this oversight.

Comment #24

Page 3, Alternative 3 - Limited Action: The limited action alternative description should note that all of the elements of Alternative 2 would be included in Alternative 3.

Response

The U.S. EPA's Revised Proposed Plan corrects this oversight.

Comment #25

Page 3, Alternatives 4A and 4B: It should be noted in the discussion of the physical containment alternatives that all elements of Alternative 3 would be included in Alternatives 4A and 4B.

Response

The U.S. EPA's Revised Proposed Plan corrects this oversight.

Comment #26

Page 3, Alternative 5A - Solidification/Stabilization and Capping: The discussion of Alternative 5A includes a description of the solidification/stabilization process indicating that all excavated waste materials would be treated by solidification/fixation. The wording of this alternative is unclear and as a result misleading. The description should be clarified to indicate that under this alternative, all contaminated material would be excavated and treated, in batches, using solidification/stabilization, and replaced in the excavated area. A cap system, as outlined in Alternative 4A, would then be constructed over the treated material. It should also be noted that the solidification/stabilization treatment procedure immobilizes the PCBs in the soil in a hard, high-strength matrix, resistant to water infiltration and leaching action.

Page 3, Alternative 5B - Solidification/Stabilization and Capping, and Groundwater Cutoff Wall: Please refer to above for a discussion on the solidification/ stabilization process.

Response

The U.S. EPA has modified the Revised Proposed Plan to reflect these clarifications.

Comment #27

Page 3, Alternative 5D - Gas-Phase Chemical Reduction, Solidification /Stabilization and Capping: It should be noted that at the time of the EE/CA this process was an emerging technology that had not been proven or utilized in a large scale application. This technology has still not been routinely applied to remediate sites.

Response

The U.S. EPA has modified the Revised Proposed Plan to reflect this comment.

Comment #28

Page 3, Alternative 5E - Low Temperature Thermal Desorption (LTTD), Solidification/ Stabilization and Capping: The description under Alternative 5E of the LTTD technology

suggests that this process is only applicable to treating VOC compounds. LTTD is an effective technology for removing organic compounds (specifically the more volatile compounds) from soils. LTTD has been shown to be effective at treating materials contaminated with coal tars, petroleum hydrocarbons, semi-volatile and volatile organic compounds (SVOCs, VOCs), and higher boiling compounds such as PCBs. The discussion on LTTD should be revised to refer to the treatment of organic compounds which have a greater tendency to volatilize, rather than specifically referencing VOC compounds.

Response

The EE/CA report identified LTTD as an emerging technology generally effective for remediation of VOCs even though it has been applied to wastes containing semi-volatile organic compounds and PCBs. The Proposed Plan describes the process as it is understood by the U.S. EPA.

Comment #29

Page 4, Last Paragraph: It should be noted that the Cooperating Parties Group have played an active role in developing the removal action at the Textile Road Site. It is the full intention of the Cooperating Parties Group to participate in the proposed removal action and negotiate an agreement with the U.S. EPA for the Cooperating Parties Group to implement the Proposed Plan.

Response

The Cooperating Parties Group's expressed willingness to participate in the proposed removal action is noted in the Revised Proposed Plan.

Comment #30

Page 7, Cleanup Alternatives Summary Table:

The estimated present worth cost for the off-Site disposal option (Alternative 1A) is based on the Proposed Removal Action Engineer's Project Cost Estimate, prepared by CRA and forwarded to the U.S. EPA in a letter to Mr. Mony Chabria and Mr. P.C. Lall dated July 18, 1997. This estimate was prepared to provide an update to the Addendum to EE/CA which was submitted to the U.S. EPA on February 28, 1996. In order to prevent confusion, the off-Site disposal present worth cost presented in the summary table should reference that the information was not taken from the Addendum to EE/CA.

The On-Site disposal option (Alternative 1B) was also re-evaluated in the Addendum to the EE/CA. This document provided a revised cost estimate for Alternative 1B based on additional sampling and a re-revaluation of contaminant delineation. The revised present worth cost of $1.7 million should be presented in the summary table and reference noted, rather than the original

cost estimate provided in the EE/CA.

The present worth cost for the on-Site incineration, solidification/stabilization, and capping presented in the EE/CA was $31.74 million. The summary table presents a present worth cost of $32.74 million.

Response

The U.S. EPA has referenced the most recent cost estimates in the Revised Proposed Plan.