

March 16, 2009

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Vanessa,

This letter is in response to the three questions contained in your email of March 2, 2009 regarding "Application for Risk-Based Cleanup of Soil at Haley's Ditch" dated January 9, 2009. Your questions are highlighted in bold followed by Lockheed Martin's response.

1) Clean Fill PCB Concentrations: It is stated in the Executive Summary (page i) and in Section 2 that "The excavation areas, except the stream channel and wetlands, will be backfilled, as needed, with soil containing less than 1 mg/kg total PCBs. The restored stream channel and wetland areas will be covered with clean fill material containing less than 0.5 mg/kg PCBs." The soil cleanup action level is 1 mg/kg whereas the cleanup action level is less than 0.5 mg/kg PCBs for Haley's Ditch sediment. Setting the cleanup action levels and the clean fill material levels to the same values does not provide adequate "buffer" to account for sampling uncertainties and to ensure recontamination does not occur. Dave mentioned the possibility of reusing some of the fill material removed as part of the remediation activities instead of having to bring in all new fill. Ohio EPA cautions against reusing PCB contaminated fill material from the site due to sampling uncertainties and the potential for recontaminating remediated areas. It is recommended that imported clean fill, which has been tested to be generally nondetect for PCBs, be used for restoration activities.

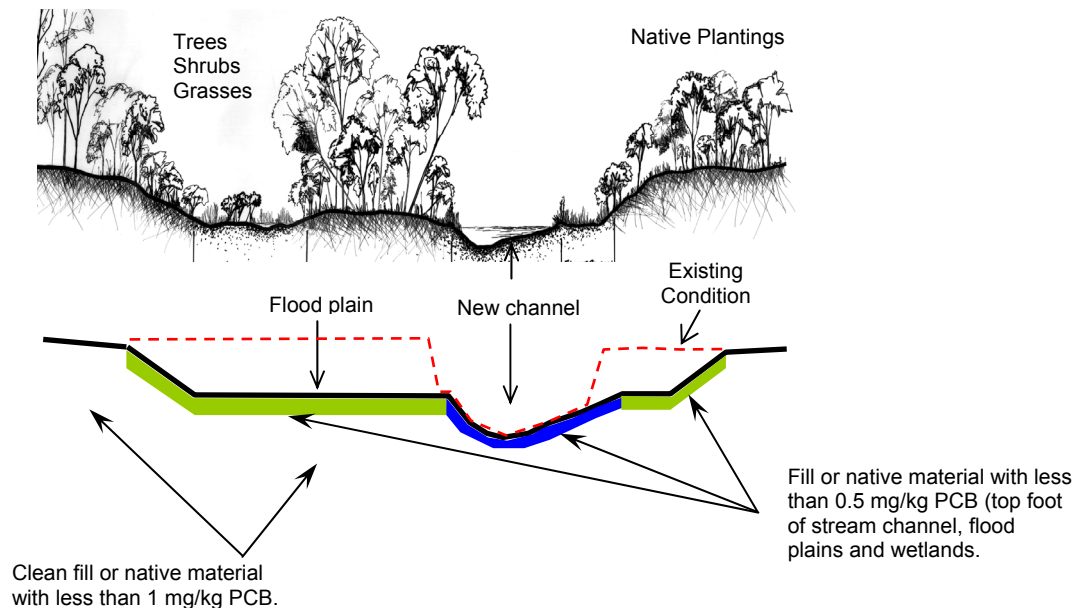
A Remediation Work Plan and a Restoration Work Plan will be submitted prior to beginning work in the field. These plans will provide detailed information regarding the remediation and restoration efforts.

A summary of the basic excavation and restoration activities (which does not include all of the activities associated with the project), along with a figure illustrating the restoration approach, is provided below to further clarify the

ideas and plans set forth in the application submitted to you and US EPA on January 9, 2009.

Summary of Major Restoration Excavation and Remediation Grading Activities Related To The Streambed

- The cleanup standard for this project is 1 mg/kg total PCB.
- Remove all soft sediments from the streambed.
- Collect verification samples from the soil remaining after the streambed sediments are removed and continue to excavate until results are less than 1 mg/kg.
- Create a sub-grade for the stream channel and potentially wetted areas by relocating soils with less than 1 mg/kg total PCB within the project area, or importing soils with less than 1 mg/kg total PCB, as needed.
- Create a final grade in the stream channel with a one-foot thick top layer of sand, gravel, stone and other appropriate materials for erosion control having a total PCB concentration of 0.5 mg/kg or less.
- Create a final grade in potentially wetted areas including the flood plain areas and wetlands with a one-foot thick top layer of soil or other materials as appropriate having a total PCB concentration of 0.5 mg/kg or less.



Restored Channel Schematic

2) Stream Bed Fill Material: It should be clarified in the document that the stream bed fill material will primarily consist of a mixture of sand, gravel, cobble and other similar materials to prevent significant erosion and siltation from occurring downstream. Otherwise, a large rain event could readily wash other types of fill materials downstream.

The restored stream channel will be designed as a natural meandering channel with riffle-pool complexes. The final grade will be restored using imported glacial till from a local sand and gravel quarry containing a heterogeneous mixture of sand gravel and cobble to prevent erosion.

3) Ohio EPA concurs that a Nationwide Permit is appropriate for this project if the U.S. Army Corps of Engineers has determined that the whole area and all wetlands fall under the jurisdictional waters. The exception would be if nonjurisdictional wetlands were present and not part of the Nationwide Permit, then an isolated wetlands permit would be necessary from the state.

The U.S. Army Corps of Engineers determined that it has jurisdiction over the wetlands in the project area. The Corps of Engineers performed a site inspection on October 2, 2008 and a copy of the completed Preliminary Jurisdiction Determination Form is attached.

Please let me know if you have any further questions.

Sincerely,

David Gunnarson

Attachment: US Army Corps of Engineers Preliminary Jurisdictional Determination