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Ted Strickland, Governor
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October 23, 2007

RE: VOLUNTARY ACTION PROGRAM
TECHNICAL ASSISTANCE # 06GR054
AKRON AIRDOCK
AKRON, OHIO, SUMMIT CO.

Ms. Jennifer Johnson Krueger
URS
36 East Seventh Street, Suite 2300
Cincinnati, Ohio 45202-4434

Dear Ms. Johnson Krueger:

The Ohio Environmental Protection Agency (Ohio EPA), Voluntary Action Program (VAP), has completed its review of the "*Application for 40 CFR 761.61(c) Risk-Based Cleanup of Soil*" for the Akron Airdock." It is understood that this document was generated primarily for U.S. EPA's review and approval as part of the cleanup of the facility that is being conducted pursuant to a Consent Agreement and Final Order (CAFO) and several risk-based approvals granted by U.S. EPA TSCA. However, as requested, Ohio EPA's review and comments focused on risk assessment issues that may impact the VAP property-specific risk assessment currently being completed for the property in accordance with Ohio Administrative Code (OAC) 3745-300-07, 08 and 09.

1. Executive Summary and 1. Introduction: The second bullet under the first paragraph discusses the "Removal and off-site disposal of soil containing PCBs greater than 25 parts per million (ppm) and backfilling with clean (<1 ppm total PCB) fill. It should be clarified here that by removing soil with concentrations greater than 25 ppm, the remaining concentration of PCBs in soil will be 15 ppm or less. The VAP commercial and industrial land use generic direct contact soil standard for PCBs is 16 ppm.

2. Section 2.3 Soil Removal Areas: It is stated that "soils containing PCBs greater than 25 ppm in individual soil core samples will be excavated." It should be clarified that this removal goal will result in the remaining concentration of PCBs in soil to be 15 ppm or less.

3. Section 2.3 Soil On-Parcel, and Section 3.1.1 Southeast Area: It is stated that "The average PCB concentration of all soil samples collected in the on-parcel area (156 samples) is 1.5 ppm and the 95 percent upper confidence level (UCL) is 1.8 ppm." Based on the sampling data, the concentrations of PCBs in soil are elevated in the southeast area of the property, as shown in Figure 4 and discussed in Section 3.1.1. As a result, excavation has been proposed in this

area. In accordance with OAC 3745-300-07, the southeast area should be considered a separate identified area and its concentration determined separately from the remaining areas for all risk assessment purposes.

4. Section 2.3 Soil Off-Parcel and Section 3.2.1 South Area Off-Parcel: It is discussed that 38 samples were collected, with only one location exceeding 1 ppm PCBs. Samples were collected at seven locations in the south areas, with sampling location LM-SO122 containing a level of 1.7 ppm PCBs. The extent of PCB contamination around this area should be verified. The South Area Off-Parcel Area does not currently meet the VAP applicable standard of 1.1 for total PCBs. The South Area is not contiguous with the North off-parcel Area and, therefore, should be assessed separately. Additional remediation and verification sampling appears to be warranted in the South Area.

5. Section 3 Sampling Locations, Figure 3: Figure 3 shows the soil sample locations. Figure 3 should be modified to also show the PCB concentrations in soil at each location.

6. Section 4.4 Verification Sampling: In addition to the proposed sampling of the base of each excavation sub-area, the horizontal extent of the contamination needs to be verified or confirmed in accordance with OAC 3745-300-07. For example, in the southeast area, additional verification samples need to be taken horizontally, to the south, southwest, and west of LM-SO009 and LM-SO045, and to the north, northeast, and east of LM-SO051. Please make sure adequate verification sampling has been conducted to demonstrate that VAP applicable standards have been met around the proposed excavation areas. The maximum or 95% UCL for each VAP identified area must meet the applicable standard in accordance with OAC 3745-300-07, 08, and 09.

7. Section 5.1 Risk and Hazard Summary: As discussed in the previous comments, the Southeast Area should be considered a separate identified area due to its relatively elevated concentrations and spacial distribution of PCBs. Similarly, the South Area off-parcel should be assessed separately from the North Area off-parcel. The Akron Airdock property is over 19 acres, with off-parcel areas that are discontiguous and far away from each other. As a result, they should be assessed separately in accordance with OAC 3745-300-07, 08, and 09, and to demonstrate that the proposed remedy meets applicable standards in accordance with OAC 3745-300-15.

8. General VAP Risk Assessment Comment, Cumulative Risk: Prior to initiation of excavation activities, the property specific risk assessment should be completed for the property and all identified areas, to assure that the VAP cumulative risk

3745-300-09(C).

9. General VAP Risk Assessment Comment, Impacts to Surface Water: It is understood that after the cleanup of the pavement and soils has been completed, the storm drainage system will be addressed followed by Haley's Ditch. An assessment should be conducted to determine whether PCBs remaining in the soils on the property could result in ongoing and future PCB contamination entering the storm drainage system and emanating from the property. This potentially complete PCB migration pathway needs to be assessed to demonstrate that applicable standards have been met.

If you have any questions or need additional clarification, please contact me at (330) 963 -1219.

Sincerely,

Vanessa Steigerwald Dick

Vanessa Steigerwald Dick, Ph.D.
Site Coordinator
Division of Emergency and Remedial Response

VSD/kss

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