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Environmental Protection
Agency

Office of
Emergency and
Remedial Response

EPA/ROD/R05-91/154
November 1990

Superfund Record of Decision:

Summit National Liquid
Disposal Service
(Amendment), OH

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and Subtitle PERFUND RECORD OF DECISION Summit National Liquid Disposal Service, OH First Remedial Action - Final (Amendment)				5. Report Date 11/02/90	
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12. Sponsoring Organization Name and Address U.S. Environmental Protection Agency 401 M Street, S.W. Washington, D.C. 20460				13. Type of Report & Period Covered 800/000	
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16. Abstract (Limit: 200 words) The 11.5-acre Summit National Liquid Disposal Service site is a former liquid waste disposal facility in rural Deerfield Township, Ohio. The site contains two ponds, an inactive incinerator, and several vacant buildings. Surrounding the site are several residences, two landfills, light industries, and farmland. Fifteen to twenty residential wells are located within 1,000 feet of the site. From 1973 to 1978, Summit National operated a solvent recycling and waste disposal facility onsite. Oil, resins, sludge, pesticide and plating wastes, and other liquid wastes were stored, incinerated, and buried or dumped onsite during facility operations. In 1978, the State ordered Summit National to stop accepting waste material and to remove all liquid waste from the site. In 1980, EPA removed three bulk tanks, which contained approximately 7,500 gallons of hexachlorocyclopentadiene along with contaminated soil, and treated some contaminated water. In 1981, the State and eight of the potentially responsible parties removed additional drums, tanks, surface debris, and a small amount of contaminated soil from the site. Subsequently, EPA took interim measures to control the migration of contaminants offsite and excavated an underground storage tank. During the RI/FS, conducted from 1984 to 1987, EPA (See Attached Page)					
17. Document Analysis a. Descriptors Record of Decision - Summit National Liquid Disposal Service, OH First Remedial Action - Final (Amendment) Contaminated Media: soil, sediment, debris, gw, sw Key Contaminants: VOCs (benzene, toluene, TCE, xylenes), other organics (phenols, PAHs, PCBs), metals (arsenic, chromium)					
b. Identifiers/Open-Ended Terms					
c. COSATI Field/Group					
Availability Statement				19. Security Class (This Report) None	21. No. of Pages 44
				20. Security Class (This Page) None	22. Price

Abstract (Continued)

documented onsite contamination of soil, sediment, ground water, and surface water by a variety of organic and inorganic compounds. Contaminated property outside the site perimeters also was found. This Record of Decision (ROD) amends a 1988 ROD that provided for remediation of contaminated soil, sediment, debris, ground water, and surface water. Based on further site investigations, EPA modified their original goal of containing contaminated media to one of long-term cleanup at the site. In both the 1990 proposed remedy for this ROD amendment and the 1988 ROD, the remedy for the most highly contaminated soil and sediment is excavation and treatment; however, the ground water extraction method in the 1990 proposed remedy was significantly different from the 1988 ROD and employed a different technology that will result in long-term soil cleaning, thus eliminating the need for containment of contaminants with a slurry wall and multi-layer cap as provided in the 1988 ROD. The primary contaminants of concern affecting the soil, sediment, debris, ground water, and surface water are VOCs including benzene, TCE, toluene, and xylenes; other organics including PAHs, PCBs, and phenols; and metals including arsenic and chromium.

The amended remedial action for this site includes expanding site boundaries to include contaminated areas along the site perimeters; excavating and incinerating onsite 24,000 cubic yards of soil excavated to a depth of 2 feet, 4,000 cubic yards of sediment from the site perimeter, drainage ditches and offsite ponds, and 900 to 1,600 buried drums, followed by backfilling the residual ash onsite, or disposing of the ash offsite in a RCRA facility if the waste does not meet EPA performance standards; regrading the site; installing a permeable soil cover over 10.6 acres of the site with gas vents for treating and monitoring potential air emissions; dismantling and/or demolishing all onsite structures, and disposing of debris onsite; collecting ground water from the upper aquifer via pipes and drains, and constructing additional extraction wells in the lower aquifer to augment the pipe and drain system, followed by treating ground water onsite; collecting and treating onsite surface water from the two onsite ponds and drainage ditches using precipitation, flocculation, coagulation, oil and water separation, filtration, and carbon adsorption using a pipe and drain collection system; excavating sediment after dewatering the ponds and ditches; relocating one vacant residence; rerouting the south and east drainage ditches to an uncontaminated area beyond the site; ground water monitoring; and implementing institutional controls including deed restrictions. The estimated present worth cost for this amended remedial action is \$34,400,000. NO O&M costs were provided for this amended remedial action.

PERFORMANCE STANDARDS OR GOALS: Performance standards and goals were detailed in the 1988 ROD. Soil clean-up will attain a 2×10^{-5} cancer risk level. Discharge levels for treated ground water and surface water will meet Federal and/or State water quality standards. Individual clean-up goals for soil and ground water contaminants were not provided.

RECORD OF DECISION AMENDMENT

SITE NAME AND LOCATION

Summit National Site
Deerfield, Ohio

STATEMENT OF BASIS AND PURPOSE

This decision document presents the selected remedial action for the Summit National Site in Deerfield, Ohio, developed in accordance with CERCLA, as amended by SARA, and the National Contingency Plan. This decision is based on the administrative record for this site. The attached index identifies the items that comprise the administrative record upon which the selection of the remedial action is based. This decision amends the Record of Decision dated June 30, 1988.

The State of Ohio has concurred in the selected remedy.

DESCRIPTION OF THE AMENDED REMEDY

This remedy will complete the remedial action for the site. The major components of the selected remedy are:

1. Expanding site boundaries to include contaminated areas along the perimeters and the south drainage ditch and constructing an 8-foot chain link fence around this expanded boundary.
2. Excavating and incinerating (in an on-site facility) soils and sediments as follows:

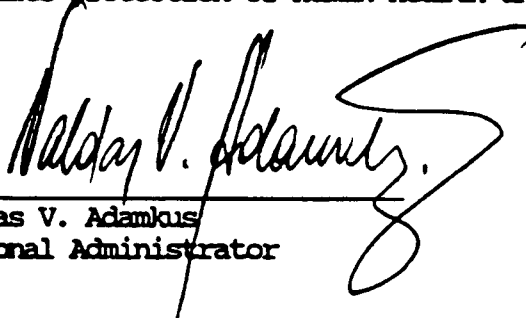
Contaminated soils on-site:	24,000 c.y.
Contaminated perimeter sediments: (including drainage ditches)	4,000 c.y.
Contents of buried drums	900-1600 drums

3. Dismantling and/or demolishing all on-site structures for on-site disposal.

4. Collecting and treating surface water from two on-site ponds and drainage ditches. Sediments would be excavated after ponds and ditches are dewatered.
 5. Extracting groundwater for treatment from the various levels of the water table on-site by two basic components:
 - a. A pipe and media drain system along the southern boundary and lower portions of the eastern and western boundaries rather than a system of wells to extract and treat contaminated groundwater.
 - b. Additional extraction wells installed in the intermediate unit to augment the pipe and media drain system.
- All water extracted will be treated with an on-site treatment system.
6. Relocating one vacant residence.
 7. Incinerated waste material will be tested to ensure it conforms with U.S. EPA and Ohio EPA standards and used as fill to regrade the site before the final cover is placed over the surface. If it fails the tests the waste will be placed in an on-site RCRA landfill.
 8. Regrading site and installing a soil cover over approximately 10.6 acres of site. This cover will consist of an 18-inch layer of loam and 6 inches of topsoil with gas vents installed for treating and monitoring potential air emissions.
 9. Rerouting southern and eastern drainage ditches to an uncontaminated area beyond the site.
 10. The total cost of the remedial action defined in the 1990 proposal is \$34.4 million.

DECLARATION

The selected remedy is protective of human health and the environment, attains Federal and State requirements that are applicable or relevant and appropriate for this remedial action, and is cost-effective. This remedy satisfies the statutory preference for remedies that employ treatment that reduces toxicity, mobility, or volume as a principal element and utilizes permanent solutions and alternative treatment technologies to the maximum extent practicable. Because this remedy will result in hazardous substances remaining on-site above health-based levels, a review will be conducted within five years after commencement of remedial action to ensure that the remedy continues to provide adequate protection of human health and the environment.


Valdas V. Adamkus
Regional Administrator

November 2nd, 1990.
Date

DECISION SUMMARY
SUMMIT NATIONAL SITE
DEERFIELD, OHIO

SITE HISTORY AND BACKGROUND

The Summit National site, a former liquid waste disposal facility, is located on an abandoned coal strip mine at the intersection of Ohio Route 225 and U.S. Route 224 in Deerfield, Ohio; 20 miles west of Youngstown, and 45 miles southeast of Cleveland. The 11.5 acre fenced site contains two ponds, an inactive incinerator, and several vacant buildings. Immediately surrounding the site are several rural residences, two landfills, light industries and farmland.

From 1973 to 1978, Summit National accepted liquid wastes including oil, resins, sludge, pesticide wastes and plating wastes in drums and tank trucks. These wastes were stored, incinerated, buried or dumped at the site. In June of 1978, Ohio EPA ordered Summit National to stop receiving waste and to remove all liquid waste stored at the site, and in 1979 filed a complaint against the operators for failing to comply with State regulations regarding the handling of solid and liquid wastes.

Ohio's sampling of on-site soils and surface water indicated the presence of hazardous substances potentially harmful to public health and the environment. In 1980, Ohio EPA constructed a fence around the site, installed a drainage system to control surface water flow onto and off the site and six ground water monitoring wells. The same year, under authority granted in Section 311 of the Clean Water Act, U.S. EPA removed three liquid storage tanks and their contents and some contaminated surface soils from the site. In 1981, an agreement between Ohio and eight of the Potentially Responsible Parties

resulted in a \$2.5 million surface cleanup which removed drums, tanks, surface debris and a small amount of contaminated soil from the site. In 1983, U.S. EPA placed the site on the National Priorities List, a federal roster of the nation's uncontrolled or abandoned hazardous waste sites eligible for cleanup under the Superfund program. From 1984 through 1987, U.S. EPA conducted a Remedial Investigation (a number of scientific studies conducted to determine the nature and extent of contamination problems) and a Feasibility Study (an evaluation of remedial alternatives) to define and evaluate the alternatives for addressing the existing contamination identified during the Remedial Investigation. U.S. EPA also took some interim measures to control the migration of contaminants off-site and excavated an underground storage tank due to concern that hazardous substances contained in the tank might leak and contaminate the groundwater.

The Remedial Investigation confirmed the presence of contamination on-site in the groundwater, soils, pond sediments and surface water. In addition to on-site contamination, property outside the site perimeters was also found to be contaminated. A variety of organic and inorganic compounds was detected that could potentially threaten human health through direct contact with sediments and soils or ingestion of the groundwater. U.S. EPA developed nine alternatives for correcting and controlling the contamination and evaluated these alternatives against specific criteria to determine the best solution to the problem. The recommended alternative was presented to the general public in a fact sheet in February 1988, and further explained at a public meeting in Deerfield on February 29, 1988. Public comments on the proposed remedy as well as the Feasibility Study and all the alternatives presented were accepted

by U.S. EPA at the meeting and in writing through March 21, 1988 and at a public meeting. U.S. EPA then carefully evaluated those comments to determine if there were issues or concerns that would cause a change in the proposed remedial plan of action. In June 1988, U.S. EPA Region V Administrator, Valdas Adamkus, signed a Record of Decision specifying U.S. EPA's preferred alternative as the remedy to be implemented for the contamination problems at the Summit National site.

SUMMARY OF 1988 RECORD OF DECISION

The objective of the 1988 ROD was to reduce and control the threats and risks to public health and the environment posed by the contaminated soils, sediments, debris and groundwater at the site. The alternatives proposed to accomplish this goal were carefully evaluated and considered. The remedy selected included a plan to excavate and treat the highly contaminated soils and isolate the site area in order to prevent the contamination from migrating off-site.

The remedial action selected in the 1988 ROD consisted of the following major components:

1. Constructing a chain-link fence around the site perimeter. Seeking deed restrictions from property owners to control future use of the site.
2. Excavating and incinerating (in an on-site facility) the following wastes:

Contaminated "Hot Spot" Soils	32,000 c.y.
Contaminated Off-site Sediments	1,500 c.y.
Contents of Buried Drums	900-1600 drums

3. Dismantling and/or demolishing all on-site structures for on-site disposal.
4. Installing a soil-bentonite slurry wall around the site perimeter to approximately a 40 foot depth to act as a vertical barrier which would prevent lateral migration of contaminants off-site.
5. Collecting and treating surface water from two on-site ponds and drainage ditches. Sediments would be excavated after ponds and ditches were dewatered.
6. Extracting groundwater for treatment from the various levels beneath the site by two basic components:
 - a. A system of 220 extraction wells installed on a 50-foot grid system over the site to remove contaminated water from the water table unit (the most highly contaminated level of the groundwater table closest to surface).
 - b. A system of 12 wells to extract the water from the intermediate unit (the less contaminated portion of the groundwater table beneath the water table unit).All water extracted would be treated on-site, with treated waters to be discharged southeast of the site.
7. Relocating one vacant residence.
8. Creating an on-site landfill, built with an underlying double synthetic liner, to dispose of the residue from incinerated waste material.
9. Regrading site and installing a multi-layer cap over entire site. Cap would consist of a two-foot compacted clay layer covered by a high density polyethylene liner, synthetic drainage net, one foot of clean earth fill, and one foot of top soil.

10. Rerouting southern and eastern drainage ditches to an uncontaminated area beyond the site.
11. The total present worth cost of the remedial action defined in the ROD was \$25 million.

SUMMARY OF 1990 PROPOSED REMEDIAL ACTION

The objectives of the 1990 proposed remedial action are the same as in the 1988 ROD: to reduce and control the threats and risks posed by site contamination. The primary goal, as in the 1988 ROD, is to implement a solution to a complex contamination problem that is protective of human health and the environment and provides a long-term, as well as short-term, solution in keeping with Ohio EPA and U.S. EPA regulations. The major difference between the 1990 proposal and the 1988 ROD is that of long-term cleaning of contaminated media versus isolation. With both the 1990 proposed remedy and the 1988 ROD, the most highly contaminated soils and sediments will be excavated and treated. The groundwater extraction called for by the 1990 proposed remedy, however, will be accomplished by a different technology that will result in a long-term cleaning, thus eliminating the need for isolation by means of a slurry wall and multi-layer cap.

For ease in comparison, the following list of elements is numbered in parallel to the listing under the 1988 ROD. (Table 1, page 13, gives an abbreviated side-by-side comparison of key elements.)

1. Expanding site boundaries to include contaminated areas along the perimeters and the south drainage ditch and constructing an 8-foot chain link fence around this expanded boundary.

2. Excavating and incinerating (in an on-site facility) soils and sediments as follow:

Contaminated soils on-site:	24,000 c.y.
Contaminated perimeter sediments: (including drainage ditches)	4,000 c.y.
Contents of buried drums	900-1600 drums

3. Dismantling and/or demolishing all on-site structures for on-site disposal.
4. No slurry wall would be constructed under this remedial action.
5. Collecting and treating surface water from two on-site ponds and drainage ditches. Sediments would be excavated after ponds and ditches are dewatered.
6. Extracting groundwater for treatment from the various levels of the water table on-site by two basic components:
 - a. A pipe and media drain system along the southern boundary and lower portions of the eastern and western boundaries rather than a system of wells to extract and treat contaminated groundwater.
 - b. Additional extraction wells installed in the intermediate unit to augment the pipe and media drain system.

All water extracted will be treated by a system to be enclosed in an on-site building.

7. Relocating one vacant residence.
8. No on-site landfill would be created unless the wastes fail appropriate testing. Instead, ash from incinerated waste material would be tested to ensure it conforms with U.S. EPA and Ohio EPA standards and used as fill to regrade the site before the final cover is placed over the surface.

9. Regrading site and installing a soil cover over approximately 10.6 acres of site. This cover will consist of an 18-inch layer of loam and 6 inches of topsoil with gas vents installed for treating and monitoring potential air emissions.
10. Rerouting south and east drainage ditches to uncontaminated area beyond the site.
11. The total cost of the remedial action is \$34.4 million.

U.S. EPA, Ohio EPA, and a large group of Potentially Responsible Parties (PRPs) have signed a Consent Decree, whereby the PRPs have agreed to design and implement this amendment ROD. Under terms of the Consent Decree, the responsible parties named in the agreement will retain the contractors who will design and implement the remedial action. Before construction begins, U.S. EPA and Ohio EPA must review and approve all design drawings and specifications, and health and safety, quality assurance, and operation and maintenance plans. U.S. EPA and Ohio EPA will oversee and monitor all activities of the remedial action and ongoing operation and maintenance to ensure compliance with all applicable requirements.

EXPLANATION OF SIGNIFICANT DIFFERENCES

The major differences between the 1988 ROD and 1990 proposed remedial action are as follows:

- * The site perimeter has been extended to include some areas of contamination previously considered "off-site." The site fencing will be expanded to include these areas. Contaminated soils will be removed from these areas for on-site incineration.

- * The method and underlying rationale for extracting and treating the groundwater has changed significantly under the 1990 proposed remedy. The 1988 ROD called for a series of 220 extraction wells to be installed on a grid system on the site to extract contaminated groundwater. Under this method, it was also necessary to build a slurry wall to isolate the site and prohibit clean groundwater from migrating under the site and contaminated groundwater from migrating off-site. The slurry wall afforded the protection needed to reduce or eliminate off-site risks by isolating the contaminants in place.

The new proposal calls for a system that utilizes pipes and drains to collect groundwater over an extended period of time in place of the extraction wells. Under this system, the water that continues to slowly infiltrate site soils and sediments, dissolving contaminants from soil particles during this process, will continually drain and be collected for treatment. Because the pipe and drain system collects from the southern and lower east and west perimeters, which is the natural course of the groundwater flow, contaminated water will be collected and treated and will not migrate off-site, thus eliminating the need for the slurry wall as a part of the remedy.

- * Under the 1990 proposal, contaminated soils will be excavated to depths of two feet below the surface, whereas in the 1988 ROD, some areas were to be excavated to depths of 0-8 feet below the surface. This difference was proposed basically due to the change in the groundwater extraction method. The top two feet of surface soils are generally the most highly contaminated and pose the greatest threat to public health by contact and ingestion. These will be excavated and treated. The lower levels of

contamination remaining in soils below 2 feet will be flushed by rain and snowfall infiltrating the site cover. These contaminants will then be extracted with the groundwater and treated. In the areas where buried drums will be excavated, soils will be excavated to greater depths as necessary.

- * The on-site landfill may not be necessary under the 1990 proposed remedy. The resulting ash from incinerating the contaminated soils and sediments will be tested to ensure that it meets established standards and then used as backfill to regrade the site before placing the final site cover. The selected remedy assumes that the characterization of the ash will allow the State of Ohio to waive their solid waste regulation regarding the final deposition of the ash. The State of Ohio has agreed to consider such a waiver when the analysis of the ash is available. If the ash does not meet the requirements, it will be retreated by the incineration process until it achieves acceptable levels for organic contaminants. If the ash does not meet the U.S. EPA landban requirements because of inorganic contaminants it will need to be placed in a RCRA on-site facility.
- * The 1988 ROD called for an impermeable cap over the site to prevent infiltration and isolate the contamination on-site. The 1990 proposal implements a site cover that will allow infiltration. This controlled infiltration will supplement the removal of contaminants by the ongoing groundwater collection and treatment cycle.

COMPARATIVE ANALYSIS OF ALTERNATIVES

- * The 1988 ROD screened alternatives based on their ability to protect human health and the environment; achieve State and Federal ARARs (applicable or relevant and appropriate requirements); reduction in toxicity, mobility, and volume; cost effectiveness; State and community acceptance. The 1990 proposed remedy was also screened using the same criteria.

OVERALL PROTECTION OF HUMAN HEALTH AND THE ENVIRONMENT

- * The 1990 proposed remedy and the 1988 remedy would provide protection for human health and the environment. Both remedies eliminate the exposure routes to any residual contamination which would result in eliminating any residual risks associated with the site.

COMPLIANCE WITH APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS

- * The 1990 proposed remedy and the 1988 remedy would comply with all applicable or relevant and appropriate Federal, and State laws. The ARARs are listed in the 1988 ROD. The only additional ARAR is the landban requirements of RCRA, which will apply and will be met.

LONG-TERM EFFECTIVENESS AND PERMANENCE

- * The 1990 proposed remedy would achieve a higher degree of permanence and long-term effectiveness than the 1988 remedy. Incineration of soils would destroy virtually all organic contamination. The residual soil will be tested for inorganic contamination and will be placed in a RCRA landfill on-site, if necessary. The soils which remain would be flushed by rainwater and all of the groundwater would be collected by the interceptor

trenches and extraction wells. The water extracted would be treated by an on-site treatment plant to required contaminant levels before being released to surface waters. This system will be in place as long as required to effect a cleanup of the groundwater to acceptable levels. The 1988 remedy required isolation, rather than treatment, of contaminated soils that were not incinerated, making the remedy less permanent and less effective in the long term.

REDUCTION OF TOXICITY, MOBILITY OR VOLUME

- * The 1990 proposed remedy would satisfy the statutory preference for treatment as a principal element. Both the incineration of the soils and the groundwater collection and treatment systems would provide a large reduction in the toxicity and mobility of the contaminated soil and groundwater. The 1988 remedy would not achieve as great a reduction in the toxicity, mobility, or volume of contamination because it called for isolation, rather than treatment, of contaminated soils that were not incinerated.

SHORT-TERM EFFECTIVENESS

- * Both the proposed remedy and the 1988 remedy could result in short-term effects during excavation, materials handling, incineration and groundwater treatment. With on and off site monitoring of air emissions and an effective safety plan for site work, no adverse impacts to workers, the community or the environment will occur.

IMPLEMENTABILITY

- * This proposed remedy utilizes proven technologies for extraction and treatment of soil and groundwater. Equipment and expertise to implement these processes are readily available. It is in this area that the proposed remedy is substantially better than the 1988 remedy. While the technologies chosen in the 1988 ROD are proven technologies, they are not commonly employed in the combination required by the ROD. Specifically the installation of an impermeable cap would not usually be combined with the installation of numerous extraction wells through this cap. The proposed remedy would avoid the potential problems caused by this combination of technologies which could limit the effectiveness of the remedy.

COST

- * The cost of the 1990 proposed remedy is \$34.4 million. The cost of the 1988 remedy is \$25 million. These costs were estimated by different contractors using different criteria for contingencies. Actual cost are expected to be about equivalent.

STATE ACCEPTANCE

- * The State of Ohio has indicated that they concur with the 1990 proposed remedy and Consent Decree and they are a signatory to the Consent Decree. A copy of the State's concurrence letter is attached.

COMMUNITY ACCEPTANCE

- * U.S. EPA accepted public comments on the proposed ROD amendment during the

comment period which occurred between July 16, 1990 and August 17, 1990 and at the public meeting on August 1, 1990. Following the comment period, a Responsiveness Summary was prepared which addressed the comments received. The Responsiveness Summary is attached. In general, the public indicated that they concurred with the proposed remedy. Several people did express their concern about the incineration at the site. As explained in the Responsiveness Summary, by utilizing a state-of-the-art incinerator and with careful monitoring of the incinerator and off-site monitoring, incineration should not pose a problem for the community.

STATUTORY DETERMINATIONS

- * This remedy will be protective of human health and the environment. It will greatly reduce the volume, toxicity, and mobility of hazardous substances through incineration and treatment of groundwater. The site will be capped to prevent any direct contact with the materials left on site.

This remedy will attain all Federal, State and local ARARs. The ARARs were listed in the 1988 ROD. The only additional ARAR is the landban requirements of RCRA, which will be met.

The remedy is cost-effective and will be implemented by the PRPs under a Consent Decree.

The remedy also uses permanent solutions and alternative treatment technologies to the maximum extent practicable. The proposed remedy utilizes permanent solutions to greater degree than the 1988 ROD through the use of a groundwater collection and treatment system instead of isolating these contaminants.

TABLE ONE

SUMMIT NATIONAL, OHIO

<u>Original ROD (signed)</u>	<u>Revised ROD</u>
Access/Deed Restrictions	Same
Razing On-Site Structures and Disposal	Same
Removal and Incineration of Drum and Tank Contents	Same
Eliminate On-Site Surface Waters	Same
Regrade the Site	Same
Water Treatment Plant to Treat Groundwater and Ponded Surface Water	Same
Characterized and Close the Tipple Well	Same
Long Term Operation and Maintenance for Remedial Actions	Same
Remediation of Off-Site Sediments	Same
Relocate Residence	Same
Remediation of Off-Site Soils by Cover	Remediation by Incineration
Remediation of On-Site Soils 32,000 c.y.	Remediation of 24,000 c.y.
Disposal of Incineration Ash in On-Site RCRA Landfill	Disposal as fill on-site if non-hazardous waste. If hazardous waste in on-site RCRA landfill.
Impermeable Cover	Permeable Cover
Install Extraction Wells	Install collection trench in upper aquifer and extraction wells in lower aquifer.
Install Slurry Wall	No slurry wall.
Extend Site Boundaries	Extend site boundaries and remove contaminated soil for on-site treatment.



State of Ohio Environmental Protection Agency

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Richard F. Celeste
Governor

October 10, 1990

RE: Summit National Superfund Site
ROD Amendment
Ohio ID 267-0779

Valdas V. Adamkus
Regional Administrator
United States Environmental Protection Agency, Region V
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Adamkus;

The Ohio Environmental Protection Agency has reviewed the draft Record of Decision (ROD) amendment for the Summit National Site in Portage County, Ohio. Ohio EPA concurs with the remedy as outlined in the Consent Decree and the amended ROD. The selected remedial alternative as described in the amended ROD includes:

- Access and deed restrictions for the site
- Surface and groundwater monitoring
- Removal and disposal of on-site structures
- Excavation and incineration of on-site soils as defined in the Consent Decree, SOW and appendices
- Excavation and incineration of buried tanks and drums and their contents
- Excavation and incineration of contaminated off-site sediments
- Disposing of non-hazardous incineration ash on-site
- Installation of a permeable cap over the entire site
- Installation of a pipe and media drain system around the southern half of the site
- Installation of a groundwater extraction system for the intermediate aquifer
- Installation of a treatment system to treat extracted groundwater and on-site surface water

Valdas V. Adamkus

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- Rerouting the perimeter drainage ditches to offsite locations
- Regrading and revegetating the site surface
- Relocating the Watson residence to another area not affected by the site or removal of the residence
- Operation and maintenance of the systems described above

The Ohio Environmental Protection Agency has been consulted throughout the Remedial Investigation, Feasibility Study, and Record of Decision process. The Agency has participated extensively in the development and negotiation of the three party Consent Decree and attached Statements of Work for the site and we have participated in the development of the ROD amendment for the remedy proposed by the PRP group. Based on this history of participation the Ohio EPA concurs with the amended ROD.

The present worth cost of the selected remedial alternative is estimated at \$34,400,000 including operation and maintenance costs. These costs will be born by a Facility Trust Fund established by the PRP group as outlined in the Trust Agreement appended to the Consent Decree.

Sincerely,


Richard Shank
Director

cc: Cynthia Lyman, AGO
Daniel Markowitz, NEDO
Kathy Davidson, DERR
Fran Kovac, Legal
Dave Ullrich, USEPA
Don Bruce, USEPA
Tony Rutter, USEPA

RS/DM/

SUMMIT NATIONAL SUPERFUND SITE
DEERFIELD, OHIO

RESPONSIVENESS SUMMARY
EXPLANATION OF SIGNIFICANT DIFFERENCES

I. RESPONSIVENESS SUMMARY OVERVIEW

In accordance with CERCLA Section 117, a public comment period was held in February and March of 1988 to allow interested parties to comment on the United States Environmental Protection Agency's (U.S. EPA's) Feasibility Study (FS) and Proposed Plan for a remedy at the Summit National site. At a February 29 public meeting in Deerfield, Ohio, U.S. EPA presented the Proposed Plan for the Summit National Superfund site, and answered questions and accepted comments from the public. A Record of Decision (ROD) documenting U.S. EPA's chosen site remedy was signed in June 1988 by the Region V Administrator, Valdas V. Adamkus. Following the signing of the ROD, U.S. EPA and Ohio EPA entered into negotiations with the Potentially Responsible Parties to implement the cleanup action defined in the ROD. These negotiations resulted in the signing of a Consent Decree outlining the remedial action which will be implemented to clean up the Summit National Superfund site. This Consent Decree was signed by the U.S. Environmental Protection Agency, the Ohio Environmental Protection Agency, and the parties potentially responsible for the contamination at the site.

The negotiations resulting in the Consent Decree also resulted in some changes to the initial ROD signed in 1988. Under Section 117 of CERCLA of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, U.S. EPA is required to publish an explanation of the significant differences between the 1990 proposed remedial action and the 1988 ROD. Under Department of Justice regulations, notice of the Consent Decree was published in the Federal Register and public comments regarding the decree were also received.

The public was notified of this Explanation of Significant Differences (ESD) and the public comment period on these differences in a newspaper advertisement published in the Ravenna Record-Courier on July 16, 1990. A fact sheet was mailed to site mailing list summarizing the significant differences and a public meeting was held in Deerfield on August 1, 1990. Public comments were received by U.S. EPA at the public meeting and in writing from July 16 to August 17, 1990. These comments are contained in Appendix A of this document. The purpose of this Responsiveness Summary is to document the comments received and to provide U.S. EPA's responses to these comments. All comments summarized in this document were considered in U.S. EPA's final decision for the Amended Record of Decision at the Summit National site.

II. BACKGROUND ON COMMUNITY INVOLVEMENT

Appendix B contains a summary listing of the community relations activities sponsored by the U.S. EPA for the Summit National Superfund site. The following is additional information regarding the community's interest and participation in site events.

The Summit National site is a former liquid waste disposal facility located on an abandoned coal strip mine at the intersection of Ohio Route 225 and U.S. Route 224 in Deerfield, Ohio. The site is 20 miles west of Youngstown and 45 miles southeast of Cleveland. The 11.5 acre fenced site contains two ponds, an inactive incinerator, and several

vacant buildings. Immediately surrounding the site are several rural residences, two landfills, light industries, and farmland.

Community concern about the site dates back to 1973, when residents concerned about air pollution from Summit's incinerator contacted the local Ohio EPA office. Resident concern increased throughout the next five years, and in December, 1978, a community organization called Concerned Citizens of Deerfield (CCD) held its first public meeting. CCD collected donations from all interested parties and hired an attorney to begin the legal action necessary to request that Summit be closed.

In that same year, the Mahoning Valley Sanitary District (MVSD) joined CCD's efforts when its chief engineer became concerned about potential contamination of the MVSD-owned Berlin Reservoir, the main source of drinking water for the Deerfield area. MVSD was successful in gaining the attention of a number of state legislators, and in August, 1979, CCD, MVSD, Ohio EPA, the Ohio Attorney General's office, and the area's state representative brought a large group of state legislators to tour both the site and the Berlin Reservoir. Shortly thereafter, the Ohio State Assembly allocated the funds necessary to carry out emergency cleanup actions.

Since the 1980 site action, the community surrounding the site has maintained a consistently high level of interest in the site. CCD has dismantled, and its key players have reorganized into a community group called Residents Against Garbage Environments (RAGE). RAGE has been extremely effective in bringing the site to the attention of the media and in mobilizing the community to actively participate in the entire RI/FS process.

U.S. EPA conducted the Remedial Investigation and Feasibility Study, and in February, 1988, recommended a cleanup alternative and presented it to the general public in a fact sheet. A public meeting was held in Deerfield, Ohio that year and public comments on the proposed plan and feasibility study were accepted by U.S. EPA at the meeting and in writing. In June, 1988, EPA Region V Administrator Valdas V. Adamkus signed a ROD specifying the remedial action to be implemented at the site.

U.S. EPA and Ohio EPA's negotiations with the PRPs resulted in the signing of a Consent Decree and significant changes to the 1988 Record of Decision. (See Section I). Oral comments were accepted at the public meeting. U.S. EPA also received several written comments in the form of letters from the community (See Appendix A).

III. SUMMARY OF SIGNIFICANT COMMENTS RECEIVED DURING THE PUBLIC COMMENT PERIOD AND EPA RESPONSES

The comments in the Responsiveness Summary are paraphrased in order to effectively summarize them in this document. The reader is referred to the full transcript of public meeting comments and written comments received by U.S. EPA contained in Appendix A for further information.

1. Will the trench system and extraction wells impact the well water or water table?

Since the trenching system and extraction wells have not been designed, their effects on the groundwater table or any specific well cannot be determined at the present time. The depth of the local wells would also factor in determining the impacts on the wells from the groundwater extraction system. The feasibility study indicates that the effects of the groundwater extraction system must be further addressed with pump tests before detailed design and implementation of the selected groundwater remediation alternative.

2. Where will the east drainage ditch be located?

During the design phase of the remedial action, the plans for the surface water drainage facilities will be finalized. It now appears that the south ditch will be relocated further south. Presently, there are not any plans to reroute the east ditch.

3. How much water will flow in the east ditch? If the east ditch is located in the Ringers' front yard, will the existing six-inch drain pipe in their front yard continue to overflow?

During the design phase of the remedial action, the drainage pattern for the site and the surrounding area will be evaluated in detail and designed to ensure that there is adequate drainage for all of the areas surrounding the site.

4. How can U.S. EPA and Ohio EPA be sure the water will be treated properly? How often will the wastewater be tested?

A complete water treatment plant will be constructed as described in Appendix D of the Statement of Work. The discharge from the water

treatment plant will meet State effluent discharge requirements. A schedule for testing the water can be found in the Statement of Work.

5. How soon will the cleanup of the site begin?

After the Record of Decision is amended, the Consent Decree will be entered by the U.S. District Court for the Northern District of Ohio. The design of the remedial action will begin and require approximately one year. After the design is completed and approved by the federal and state EPA, construction of the remedial action will begin. The estimated time required to remediate the upper groundwater aquifer is 30 years and the estimated time required to remediate the intermediate aquifer is 5 to 10 years.

6. How often will the residential well water and soil in the surrounding area be tested?

The residential well water will be monitored during implementation of the remedial action. The State of Ohio will also monitor the residential wells. The monitoring frequency has not been established, but will be determined by site conditions. The soil in the area around the site will not be tested again unless an unusual event such as flooding occurs.

7. How will citizens in and around the site be protected from exposure to airborne vapors and toxic gases from the incinerator?

The incinerator will be equipped with air pollution control devices to destroy toxic gases and remove particulate matter. The air emissions from the incinerator will be monitored frequently to ensure the incinerator is operating properly and that all air emission requirements are met. Before contaminated materials are processed through the incinerator, a trial burn will be conducted using the incinerator to demonstrate that the equipment will perform within acceptable standards and thus protect the surrounding community from exposure.

8. Could the groundwater collected from the extraction facilities be treated more safely and effectively?

The water treatment facilities will be designed to safely and effectively treat the contaminated water. The effluent discharged from the treatment facilities will be monitored frequently to ensure compliance with federal and state requirements.

9. Since the prevailing westerly winds are directly in line with residential housing and a State-operated reservoir, would a failure of the incinerator produce harmful effects?

The incinerator will be closely monitored and would be shut down if any problems developed. Air monitoring will also be performed in the area around the site.

10. Are there any evacuation plans for the area residents?

U.S. EPA and Ohio EPA do not routinely require that evacuation plans be developed for remedial actions involving onsite mobile incinerators. Evacuation plans may be required at the discretion of U.S. EPA and Ohio EPA, depending upon the potential risks to nearby residents from the remedial action. At the present time, a determination has not been made as to whether an evacuation plan will be required. Evacuation and other emergency plans would be closely coordinated with local regional response authorities.

11. How many hazardous waste incinerators are operating in the United States and in other countries?

There are approximately 150 hazardous waste incinerators operating in the United States. The U.S. EPA does not have information concerning the number of incinerators operating in other countries.

12. Why incinerate the wastes at all?

Section 121 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986, indicates that remedial actions in which treatment that permanently and significantly reduces the volume, toxicity, or mobility of the hazardous waste are to be preferred over remedial actions that do not involve treatment. This section of CERCLA also indicates that offsite transport and disposal of hazardous wastes without treatment should be the least favored remedial action. Consequently, alternatives that incorporate treatment technologies such as incineration are preferred over alternatives that do not incorporate treatment.

Several treatment technologies were identified as potentially applicable based on the site conditions, waste characteristics, ability to meet the objectives of the National Contingency Plan, implementability of the technology, and demonstrated performance of the technology. The treatment technologies identified as potentially applicable were screened based on their effectiveness, implementability and cost and then subjected to a detailed evaluation. Incineration was selected as the preferred treatment technology since it is a proven technology and would provide protection to public health and the environment, significantly reduce the volume, toxicity, and mobility of the contaminants, and be cost-effective.

13. Why not transport the waste to an offsite incineration facility?

Since substantial transportation costs would be incurred if the wastes were incinerated at an offsite facility, onsite incineration would be more cost-effective. Generally, if more than 5,000 to 10,000 cubic yards of wastes must be incinerated, it is more cost-effective to bring a mobile incinerator onsite to treat the waste.

Since approximately 27,000 cubic yards of waste will be incinerated, it is more cost-effective to incinerate the wastes onsite.

In addition, potential adverse impacts associated with offsite transport and disposal of the wastes can be avoided by onsite incineration. These adverse impacts include increased traffic and noise near the site and an increased risk of traffic accidents and spills of hazardous substances.

14. Is there an organized effort to build an incinerator at this site to replace the incinerator that was constructed in Nova, Ohio?

This incinerator would not be constructed to replace any other incinerator. It will be a mobile incinerator which will be brought to the site to burn products from this site only.

15. After completion of the site cleanup, will the incinerator remain active and incinerate hazardous wastes from other sites, including out-of-state wastes?

After completion of the onsite remedial action, the incinerator will be removed from the site.

16. Would you live next to an incinerator?

If the incinerator was cleaning up a specific hazardous waste site, was constructed using state-of-the-art technology, and was closely monitored, living near an incinerator would be acceptable.

17. What will happen to the abandoned house adjacent to the site?

The house will either be removed or demolished. The potentially responsible parties will make the necessary arrangements with the owners of the house.

18. Will U.S. EPA publish and distribute a monthly or bi-monthly newsletter to the area residents?

U.S. EPA plans to publish quarterly updates to keep area residents informed on the status of the site.

19. Are U.S. EPA testing methods for colloids and filtered samples acceptable?

U.S. EPA uses the most current analytical methods. These analytical methods are continually being revised to ensure that the sample analyses are accurate. All analytical sampling and analyses are performed in accordance with a comprehensive Quality Assurance/Quality Control plan for the site.

20. Are there any plans to monitor the health of the residents living near the site?

Because there is no known exposure of residents to the contaminants from the site, the health of the residents near the site is not being monitored. If residents near the site were exposed to contaminants at a level of concern, a monitoring plan would be implemented.

21. What will be done with the Jones Landfill that is adjacent to the Summit National site?

The Jones Landfill is in the process of being evaluated by U.S. EPA to determine whether the site meets the criteria necessary to be a Superfund site. If the landfill meets this criteria, it would be placed on the National Priorities List (NPL) as a Superfund site.

22. Will the previous mining activities at the Summit National site interfere with the site cleanup?

The effects of the previous mining activities were evaluated during the RI/FS. The design of the remedial action for the site will allow

for necessary adjustments required as a result of the previous mining activities.

23. A comment was received which said, "I don't like your conceptual method of setting up your program. I like my programs cut and dried; we will do this and we will do that."

Since the Potentially Responsible Parties (PRPs) are performing the design and construction of the remedial action, they will determine the exact type of incinerator that will be used. For most of the other activities, the work plan specifies how the construction will be completed. The work plan and all of the work performed by the PRPs will be reviewed by the U.S. EPA, Ohio EPA, and the U.S. EPA's oversight contractor.

24. What will happen if the material from the BFI landfill flows into the trench that will be constructed at the Summit National site?

Because of the distance to the BFI landfill and the type of construction used for the BFI landfill, material from the BFI landfill would not migrate to the Summit National site. The BFI landfill was constructed with a liner that would preclude leakage in any significant amounts.

APPENDIX A

Comments Received During the August 1, 1990
Public Hearing and Comment Letters Received
Subsequent to the Public Hearing

August 9, 1990

Richard V. Miller
1701 Alliance Rd.
Deerfield, Oh 44411

216-947-3736

RECEIVED

AUG 10 1990

**OFFICE OF
PUBLIC AFFAIRS**

U.S.EPA
Cheryl Allen
SPA-14
230 S Dearborn St.
Chicago, Ill. 60604

RE: Summit National Dump, Clean up

Ms. Allen,

I have a few questions concerning the proposed clean up of the Summit National Dump in Deefield, Ohio. Hopefully you could find time to answer them.

1. How many incinerators are there operating, like the one your proposing to build, at the Summit National Dump, in the U.S.A.? Other countries?
2. Why not transport this material to one of these other Incinerator sites?
3. I am aware that you are having problems with the installation of an Incinerator in Nova, Ohio, Is this an organized effort to build an Incinerator in this area to replace what has not been built in Nova, Ohio?
4. After completion of the clean up, will this incinerator remain active incinerating other Toxic waste from other areas including Out of State Waste?
5. Would you live next to an Incinerator??

Thank You for your time and effort. Any answers on these questions would help me understand what is really trying to be done.

Sincerely Yours:


Richard V. Miller

RECEIVED

AUG 15 1990

OFFICE OF
PUBLIC AFFAIRS

Aug 8, 1990

Dear Mr. Allen:

We live at 8258 State Route 224, Springfield, Ohio just about 300 ft east of the Summit National Site. We are very concerned about the cleanup and the health and safety of where we are located and the rest of our community. First of all, listed in the summary of the 1990 proposed remedial action under the consent decree, the ground water will be extracted for treatment. My question is, will our well water or our water table be affected? Then the decree goes on to say there must be a drainage system installed along the lower portions of the east boundary which would affect us if you route the ditch towards us. We already put a 6" pipe through our front yard to drain the little creek that comes from the ditch. When it rains hard, the 6" pipe can't handle the pump so it overflows into our yard. Question, where will the new drainage ditch be located? How much water will be flowing, and if it is located across our front yard, how are you going to prevent the 6" pipe from overflowing into our yard? Are you going to pipe through our yard too?

At the moment, our yard and the creek coming out of the woods is uncontaminated (tested by the Ohio EPA). How can you be sure the water will be treated properly, and how often will it be treated. I would appreciate all the questions answered, as I am worried about our property.

How soon will this cleanup project begin? How often will our well water be tested and will the soil on our property?

Thank you
Mr. & Mrs. Richard [unclear]
8258 State Route 224
Springfield, Ohio

RECEIVED

AUG 17 1990

OFFICE OF
PUBLIC AFFAIRS

Ms. Allen,

I feel that incineration at the Deedfield site should not be allowed.

It is my belief that you cannot protect citizens in and around the site from exposure to air borne vapors and burned toxic gases.

The incinerator may function fine at times for specific toxins, but certainly not for all chemicals contained. It's my contention that the drain leach collection system has merit if monitored correctly, and that fluid gathered from this could be handled more accurately & safely.

By covering the surface you could stop excess rain water from being polluted, and concentrate the fluids leaching out into gathering points.

In this area the winds prevail from the west. This is directly in line with Housing and a state operated reservoir. Any failure of this incinerator could not be beneficial.

What is The EPA prepared to do if evacuation should need to occur? The Watson family was forced to relocate but they were poorly compensated.

There must be other options than Incineration. Even if it does take longer.

P.S. We have 3 daughters
and other family in
Deedfield.

Thank you,
Wm. E. Harker
2283 Fenton Rd
Huntington, W. Va 25701

1 MS. ALLEN: Okay. We're going to take public
2 comments now. As I stated before, they are statements not
3 questions. You could put it as a question, but we will not
4 be answering them directly. We will be responding to them
5 in the response and summary. So, whoever wants to start.
6 We'll start on this side of the room and go to the middle
7 and then go to this side. Anyone on this side? Okay.
8 Please state your name for the court reporter.

9 MISS SAINTCLAIR: Carol Saintclair. I would like
10 to know what you're going to do with the abandoned house.
11 It's an eyesore to the community, the Watson property or
12 what used to be the Watson property.

13 MR. MARKOWITZ: We're not really supposed to
14 answer these questions, but the quick and dirty answer
15 is, it's going to be, it will either be moved or
16 demolished, depending on what the settlement has been
17 between the Watsons and the company.

18 MR. MALCHOK: My name is Richard Malchok. I would
19 just like to make a comment. I think the questions here
20 tonight could be answered very easily if you could determine
21 a certain radius within the site, say about five or eight or
22 ten miles, and take a listing of all the people who live in
23 that area and send out either a monthly newsletter or a
24 bimonthly newsletter telling them the status of what is

1 happening so that they don't feel like they are uninformed
2 of what is going on.

3 MS. ALLEN: Anyone else?

4 MR. COWDEN: My name is Cowden. Just to comment
5 about groundwater quality and the current EPA testing
6 methods. There are two areas of study that cast doubt on
7 current EPA methods as far as accuracy for testing
8 groundwater. One is the work that has been done in New York
9 state that says particularly in areas where there are
10 chloric contents that you can't get accurate organic
11 readings unless you fully characterize the major lines
12 before you do that work.

13 There's also some very interesting studies just
14 reported this year, suggesting that filtration of samples
15 of groundwater is the wrong way to go. The worst was done
16 in Los Alamos. It has been reported recently in Science
17 News and other journals where they say, if you have any
18 organic fractions, they're liable to form colloids. Those
19 are so small, that the usual theory of trapping sediment in
20 that, chemical-bearing sediment, just does not apply because
21 the fractures are just so small that they carry both
22 organics and even metal lines through the ground wall.

23 They have found that Los Alamos is radioactive,
24 They found it with conventional testing, but they could not

1 find it off site. This particular study, using different
2 methods without filtration on groundwater samples found
3 radioactives and fumes from over a mile away. Now, I think
4 that the Agency ought to investigate this very carefully in
5 doing monitoring of this site.

6 MS. ALLEN: Thank you, sir. Anyone else?

7 MR. MARKER: Okay. My name is Bill Marker, and
8 I'm a resident up there. I will say right now, I am dead
9 set against this incineration. What's there, you got to
10 keep there. I don't believe the incinerator is going to be
11 99.9 percent effective, especially if you get some of the
12 things that are not working, like the heat, okay, and the
13 disturbance of that is as big a problem as any.

14 Also, in all of this planning, I didn't see
15 anything about local monitoring of health, either now or
16 in the future. And some people do have complaints about the
17 water, that being one, now where you got to worry about the
18 air. So as far as residents, the residents and the locals
19 are concerned, I think you ought to be concerned as much as
20 we are about health conditions right around here. And I
21 haven't heard anything in this plan or in your plan about
22 that. You haven't come to my door and said, "Hey, I'm
23 going to watch your health." And that does bug me a little
24 bit." So I think you ought to take a step there. That's

1 something that hasn't even been mentioned.

2 MS: ALLEN: Thank you. Anyone else?

3 MISS CARVER: I have another question. Doris
4 Carver. Summmit National butts right up against
5 Jones' Landfill, and Jones' Landfill is every bit as bad as
6 Summit National is. Where are you going to draw the line?
7 It's like cleaning half of a barn and taking half of the
8 manure out of the barn. I know it's not your job or
9 anything, but you guys really do know that Jones' Landfill
10 is bad. It has the same chemicals, it's actually been
11 there longer, and it has leachate. So, I'm just wondering,
12 I know that that's not Superfund site, but it really should
13 have been. Call it a statement, a question, whatever you
14 want, you know, whatever you want, but it's a very -- it's
15 something that needs to be addressed. You can't ignore it.
16 We only clean one site up here, and we have got the Jones
17 Landfill right next to it, and they accepted the same type
18 of things that went into Summit National.

19 And another thing, monorex is in Summit National.
20 And I read in the paper about a site in Salem, Ohio, where
21 there was mirex in it, it migrated at least 40-some miles
22 least down a creek, went into a farmer's fields. The cattle
23 cattle ate the pasture, and there was mirex in the milk, the
24 cow's milk. This is something to think about.

1 I know about the C56 and the mirex and stuff that
2 was at Summit National. I just wonder if that can't be
3 removed. Can it be incinerated? Will it filter through the
4 ground if it's already saturated in there, those drums,
5 those buried drums that have been leaking since God knows
6 when they've been there, since about 1975? Anyone got an
7 answer?

8 MR. CARVER: My name is Jess Carver. I'm Mr.
9 Doris. The problem I have with this whole thing is, we've
10 got a mine behind our farm. We're a quarter mile east of
11 this. That mine goes west. I know everybody, they say that
12 mine is not recorded, but there's a couple guys here, I know
13 back here in the corner, Bill knows about it. He's been
14 around here longer than I have. But there's also a mine
15 that comes north out of that cut that BFI runs into, down at
16 the bottom of the strip level.

17 If they cut this ditch with this perforated pipe,
18 whether you use big plastic or whatever, I don't know what
19 you're going to use, you're going to be down at the same
20 level as a lot of these mines. I mean this is a fact. I
21 know these mines are there because a hole fell into the east
22 side of our barn, it went down about 25 feet right where we
23 have a driveway. So I know the mines are there.

24 Now, the problem I have with this, we know that

1 that land was stripped from right there, especially where
2 that pit was at. That deep pit was full of all that stuff.
3 What was that 50 by 30, or something like that? Now, the
4 bottom that is down quite a ways. Are you going to
5 excavate all that? Is that going to be excavated, because
6 that's got to be set free? That lays in there for years.
7 He was hoping that it would leak out and he wouldn't have
8 to get rid of all that much. We know that to be a fact.
9 Tow feet is not going to eliminate that. That's something
10 that is going to have to be done with all that ground
11 underneath that. But the problem, what we're concerned
12 about, the facts that that land was all stripped from that
13 area clear south to the borderline of Jones Landfill. I
14 know because when I was a kid I hauled junk back in there, I
15 saw chemical tankers dumping stuff. I had no idea. I know
16 it was really pungent odors, terrible stuff. To me, in all
17 reality, this 11-acre Summit National site, as far as I'm
18 concerned, is almost a nothing.

19 I feel that we have, that whole area has been used
20 illegally by people for years. And I see that whole area
21 probably is just about as bad as what you people are
22 going to spend the \$34 million to try to clean up. And that
23 is, Jones Landfill has been turned upside down, the whole
24 thing, the whole perimeter. I have been down them cuts. I

1 know. And those cuts were deep.

2 If you're going to dig down 70 feet, you will be
3 deeper than the cut. But I'm just saying this is nothing
4 but just a minute part of that area that you're going to
5 touch. And I'll tell you, in all reality, the way I feel
6 about it, it's almost a wasted \$34 million bucks. I say we
7 that we've got far worse than that to the south of us.

8 Now, that's being closed, covered up, capped.
9 They're walking away from it, eventually just walking from
10 Jones Landill. This is the way I feel, and anybody's been
11 around here any period of time knows what I just said,
12 they're all facts. I can prove every one of them.

13 MS. ALLEN: Thank you. Anyone else?

14 MISS KLINE: Beverly Kline. I don't like your
15 conceptual method of setting up your program when you say
16 that we may do this and we might have to do that, and we
17 have this great big surprise coming some place down the road.
18 I like my programs cut and dried; we will do this and we are
19 going to do that.

20 MS. ALLEN: All right. Anyone else?

21 MR. HURST: I got -- I have several questions
22 really. I'm Chuck Hurst, the township trustee here. What
23 are your intentions for that house just east of that dump?

24 MR. MARKOWITZ: We're doing public comments on

1 We did questions and answers before. These are comments to
2 be taken for the record that are statements and comments
3 being made. If you want to --

4 MR. HURST: That's a comment.

5 MR. MARKOWITZ: We did answer this question before.
6 If you have specific detailed questions, we can sit and chat
7 about them after the comment session.

8 MR. HURST: The only thing is, I don't think you
9 know what you're doing, any of you. I don't think you're
10 really qualified to do any of this type of work. That's my
11 opinion.

12 MS. ALLEN: If you would like to stay after the
13 comment portion to ask those questions and have those
14 questions addressed, we would be very happy to talk with you
15 about it. Does anyone else have any comments?

16 MR. STONE: Yeah, Bob Stone. I just wanted to
17 know, a little bit further to ask this question here. What
18 happens when you make this cut, if the landfill next door,
19 BFI, all the barrels have been down there for 44 years, that
20 have been decayed, if the flow suddenly comes into your
21 cut that you're trenching and it's really hazardous
22 materials, how are you going to stop it? What are you going
23 to do with it? And suddenly it might become very dangerous
24 and you might have to evacuate most of the communities

1 because there is a possibility if you're down below where
2 they were dumped about 40, 50 feet, and you go down 70 feet,
3 and the flow is usually from the west to east. Just a
4 comment.

5 MR. WEBER: I would like to comment. Gordon
6 Webber again. The sad thing of this whole thing, we're
7 spending \$34 million on a Band-Aid. It would have been
8 better if we would have given George Ott about \$5 million
9 and told him to go down to the Bahamas and buy a condo. He
10 would have made more money, and we wouldn't have lost
11 anything.

12 Even the sadder part of it is, rather than spend
13 all of this time in remediation, I think we ought to be a
14 little more energetic in prevention. And while we're
15 sitting here arguing about how we're going to clean up this
16 mess, we're still creating more messes. And there's one
17 right across the road that's being created, you know,
18 4,000 ton a day, and nobody is doing anything about it.

19 I realize this is not your problem, but it's
20 somebody's problem, and that after you get through with this
21 one, you can just go down the road and start cleaning up
22 another one that's being created today. Until we get
23 ambitious about saying we're not going to let this stuff go
24 on anymore, we're going to be in this process, thousands and

1 thousands and millions and millions of dollars from now on.
2 And I think it's ridiculous. It was ridiculous to start
3 with and it's getting to be ridiculous because we know what
4 the problem is now and we're not doing nothing about it.

5 MR. LYDEN: I'm Carl Lyden again. I appreciate
6 you folks being here tonight. I hope that five or ten years
7 from tonight we're not here for the same topic. I think I
8 conveyed that to everyone. The place needs cleaned up. So
9 study, study, study. Let's do something and let's clean it
10 up. Thank you.

11 MS. ALLEN: Anyone else?

12 MISS SAINTCLAIR: Cheryl Saintclair. In the
13 future, do you know when you plan on having another meeting
14 like this?

15 MS. ALLEN: I'll talk to you after the meeting.
16 Anyone else? If not, we'll close it now. And I encourage
17 you, if you didn't make verbal comments tonight and you want
18 to make written comments and send them to me, my address is
19 on the back of the fact sheet, and you have until August 17
20 to get them to me.

21 I would like to thank you for coming. Thank you.

22 * * *

APPENDIX B

COMMUNITY RELATIONS ACTIVITIES AT SUMMIT NATIONAL SUPERFUND SITE

Community Relations activities conducted at the Summit National Superfund site to date have included:

1. U.S. EPA conducted community interviews and prepared the Community Relations Plan in September, 1984.
2. U.S. EPA established the Information Repository in September, 1984.
3. U.S. EPA prepared and distributed a fact sheet updating the community on the Remedial Investigation in July, 1985.
4. U.S. EPA prepared and distributed a fact sheet updating the community on the Remedial Investigation in October, 1986.
5. U.S. EPA prepared and distributed a fact sheet updating the community on the completion of the Remedial Investigation and Feasibility Study, February, 1988.
6. U.S. EPA conducted community interviews for the revised Community Relations Plan in February, 1989.
7. U.S. EPA prepared the revised Community Relations Plan in March, 1990.
8. U.S. EPA prepared and distributed a fact sheet updating the community on the significant differences between the 1988 Record of Decision and the Consent Decree in July, 1990.
9. U.S. EPA held a public meeting regarding the significant differences between the 1988 Record of Decision and the Consent Decree in August 1990.
10. U.S. EPA sent letters to participants who attended the public meeting held in August 1990, thanking them for their participation in the public comment period. The letter encouraged the community to continue to communicate any concerns to the EPA on Summit National.