



Lake Township

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Community Advisory Group

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April 25, 2002

COMMUNITY ADVISORY GROUP'S (CAG) COMMENTS ON THE PROPOSED AMENDMENT TO THE ROD FOR THE INDUSTRIAL EXCESS LANDFILL (IEL)

As the USEPA and the OEPA are well aware, Lake Township's Community Advisory Group (CAG) has been in existence for approximately two years. Our members, nine in number, consist of long-time residents of Lake Township. Our members have lived in the community ranging from 5 to 50 years. All of us live in close proximity to the Industrial Excess Landfill (IEL). Our meetings, some of which your Agency has attended, are open to all persons and the media whether they live in the community or not. We have encouraged input from anyone who wanted to provide it.

As citizens of Lake Township we have endured many years of indecisiveness and lack of direction as it pertains to the selection and implementation of a final remedy for the IEL. Where does the blame lie? While some might like to point to one person, agency, or organization, that would not be true. There have been many at fault. Our community has endured long enough without a decisive plan to address this closed landfill. As evidenced at the recent public meeting on April 18, 2002, there is a lot of misinformation concerning contamination at the site and the potential for exposure to it. We believe that the IEL is not one of the worst toxic dumps in the country. We also fully acknowledge the presence of groundwater contamination beneath the site and the potential continued presence of landfill gases at the site. However, we believe that the seriousness of this contamination impacting our community has been grossly over exaggerated by a limited number of persons and groups who not only do not live in the community but also do not represent the community interests.

The CAG is in favor of the proposed amendment to the cleanup plan calling for the placement of a vegetative cover at the site for the following reasons:

- 1) We believe it is as protective to human health and the environment as the clay cap;
- 2) We believe that the groundwater data collected to date clearly demonstrates that, with the exception of benzene in the groundwater in the central part of the site, natural attenuation of the contaminants has been occurring;
- 3) We believe that there is a much greater possibility of landfill gases migrating laterally offsite if a clay cap were used instead of a vegetative cover;
- 4) We believe that the remaining contaminants, in particular benzene, would much more likely degrade naturally if a vegetative cover was at the landfill instead of a clay cap inasmuch as a vegetative cover will allow more oxygen and nutrients to enter into the subsurface;
- 5) We believe that by using a vegetative cover, it will allow for the investigation and remediation of groundwater contamination beneath the site on an effective basis more than if a clay cap was placed over the landfill;

John Birk ♦ John Ondick ♦ Jonathan Fleming ♦ Patricia Schorr ♦ Ted Walls ♦ Roy Leckonby
Tom Roberts ♦ Larry Wittmer ♦ Dan Clay ♦ Mike Pearch

Lake Township CAG

- 6) We believe that if there were any “toxic gases” coming out of the landfill’s present cover at significant concentrations, there would not be the presence of extensive and healthy flora at the site today;
- 7) With all the above being demonstrated and scientifically proven, we are in favor of the vegetative cover because it allows for more flexible land use and development of potential greenspace for the community once the site is proven to be safe for human occupancy.

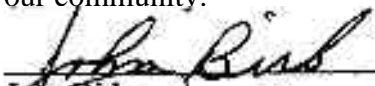
As you are aware, our Township received a \$100,000 grant to be used toward potential redevelopment of this site. We are presently finalizing the development of a website to be used to inform all citizens of the developments at the IEL and to allow people to give us their input specifically on what should be done with the site once it is deemed safe by the Agencies. We are also in the preliminary stages of surveying the residents of Lake Township and in soliciting bids from landscape architectural firms to give the Township ideas for potential development of the approximately 17 acres surrounding the landfill.


We understand that the subject site will be fenced and have deed restrictions placed on it prohibiting access to it until it is deemed safe for human occupancy. We are in full agreement with those measures. However, the CAG wants testing of the landfill gases and other media (surface soils, sediments) that are deemed appropriate to be included in this Record of Decision. The anticipated future land use of the site (someday) is recreational. Therefore, applicable onsite testing needs to be included in the ROD to demonstrate that the site is safe for its intended future land use.


For the past two years, it has been encouraging for us to see all the different “stakeholders” in IEL come together and discuss the real environmental issues and come to agreement on a lasting solution to the black cloud hovering over our community for the past 20 years. Our group, as well as your Agency, are fully aware that there are selected individuals and small groups, the vast majority of whom do not live in our community or represent us, that despise what is taking place and will do all they can to thwart the progress being done at the site. We believe that the proposed remedy has scientific basis and is the best for the community. We ask that your Agency listen to the residents of the community and not become sidetracked in false accusations and misrepresentations about the landfill. This being said, here is a reminder of the Township issues that we want addressed in order for us to be fully supportive of the proposed amendment in the cleanup plan:


- 1) Long term groundwater monitoring;
- 2) A contingency plan to be implemented in the unlikely event that groundwater monitoring indicates that natural attenuation of the contamination ceases to occur at the site;
- 3) Site-wide study of landfill gases, evaluation of the current gas extraction system, and upgrading or modifying it, if warranted;
- 4) Evaluation and remediation of the benzene in the groundwater beneath the site;
- 5) Installation of additional monitoring wells up and downgradient of the site, as warranted, to verify groundwater flow direction in the immediate area of the site;
- 6) Maintenance of groundwater monitoring wells (quality assurance, security, and aesthetically)
- 7) Replacement and maintenance of the fence;
- 8) Risk assessment of the site to assure that all pathways of exposure have been evaluated and deemed to not pose a risk before human access to the site is granted.

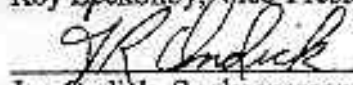
Our group will continue to push for a scientific approach in addressing the environmental issues at the landfill. We will continue to have monthly meetings, open to the public to seek their input. Our community has suffered enough. We must move forward. Our vision is that someday this site will be effectively cleaned up and that we make the site into a useful and beneficial asset to our community.



John Birk



Dan Clay, President



Jonathan Fleming


Roy Leckonby, Vice-President


Jon Ondick, Spokesperson


Mike Pearch, Secretary


Tom Roberts


Patricia Schorr


Ted Walls