



State of Ohio Environmental Protection Agency

STREET ADDRESS:

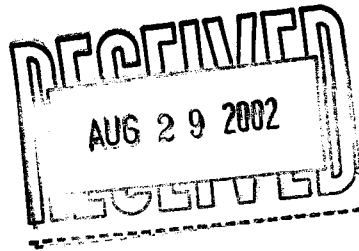
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August 26, 2002



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CC
JF

Ms. Sue Ruley, President
Board of Lake Township Trustees
12360 Market Ave. North
Hartville, OH 44632

Re: Industrial Excess Landfill (IEL) Superfund Site, Uniontown, Ohio

Dear Ms. Ruley:

I am in receipt of your letter and attachments, dated July 12, 2002, regarding the above-referenced site. I would like to respond to your request for comment in response to potential, additional radiation testing at the site by the Concerned Citizens of Lake Township (CCLT) through a proposed Resolve Grant.

Ohio EPA has stated, on numerous occasions, in correspondence, that we believe the radiation issue has been thoroughly investigated during the 1992 and 1993 ground water surveys by U.S. EPA, and more recently in 2000, and 2001 by the Potentially Responsible Parties (PRP's). During the sampling in 1992 and 1993, the U.S. EPA undertook significant efforts to resolve issues concerning radiological contamination. Among those efforts, the U.S. EPA empaneled a special committee of the Scientific Advisory Board (SAB) to review the radiological data for the site. The SAB issued its final report in September 1994, and concluded that radiological tests performed at the site were "appropriate and adequate." Additionally, the SAB concluded that "the current weight of evidence argues that the issue of radioactive contamination should not be pursued further and the confirmed issue of chemical hazards and remediation thereof should proceed expeditiously." Ohio EPA is in agreement with the conclusions of the SAB Panel that the radiochemical issue was thoroughly investigated at the IEL. Currently, Ohio EPA is in concurrence with your position that additional radiation testing at the landfill is not warranted, and that we believe the issue of potential radiochemical contamination has been thoroughly evaluated.

Additionally, the evaluation by U.S. EPA/NAREL for the August, 2000 sampling results found no evidence of elevated radiation levels at the landfill, with most of the results falling below method detection levels. This data set appears to be consistent with data collected

Bob Taft, Governor
Maureen O'Connor, Lieutenant Governor
Christopher Jones, Director

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in 1992 and 1993. It was concluded by EPA that radiation levels were indicative of natural background conditions in the area for that data set. Similarly, it was concluded by NAREL that the analytical results for radionuclides collected during the December 2000, and March 2001 sampling events were consistent with the data collected in August 2000. That is, only natural background concentrations of radionuclides were present in the samples.

With respect to the U.S. EPA proposed remedy as it relates to current environmental conditions at IEL, Ohio EPA stated its conditional support during the April 18, 2002 public meeting in Uniontown. To reiterate our position on the main components of the remedy, we believe that the enhanced vegetative cover will prevent future exposure of any site contamination by reducing erosion, and eliminating direct contact. This will be supplemented with additional engineering controls, and institutional controls that will limit land use until data shows future use can be modified. With respect to ground water conditions at the site, a review of the data collected, since 1988, shows significant reductions in the numbers and concentrations of contaminants in both on-site and off-site monitoring wells. We support a comprehensive long-term monitoring plan which will be designed to measure attenuation, and ensure protection of human health and the environment. Ohio EPA also strongly supports additional design studies on a site wide basis to evaluate the existing methane system, and areas of the site not addressed by the current system. We will also like to see a final remedy in place which ensures landfill gasses continue to be controlled and, through monitoring, show that no off-site migration is occurring.

With respect to the proposal by CCLT through a federally issued grant to conduct additional sampling of ground water for radiation, it is my understanding that certain conditions must be met first. As communicated to you by EPA Region 5, it will be necessary for their group to obtain permission for site access. If site access is successfully obtained, the agencies would then require an acceptable site health and safety plan (HSP), field sampling plan (FSP), and a quality assurance project plan (QAPP). These are established EPA procedures which apply and are required by any interested parties wishing to perform work at EPA Superfund sites. If the CCLT is successful in obtaining site access, and can produce the above plans which are acceptable to the U.S. EPA, Ohio EPA would likely agree to the sampling.

Finally, Ohio EPA has supported and will continue to support U.S. EPA's efforts to collect additional information which addresses a final cleanup for the landfill. I hope this letter has sufficiently clarified your concerns. Ohio EPA appreciates your interest in the progress at

Ms. Sue Ruley, President

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the IEL Superfund site. Please feel free to contact Lawrence Antonelli at our Northeast district Office, or myself, if you require additional information into these matters.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher Jones". The signature is written in a cursive, flowing style.

Christopher Jones
Director

CJ:LA/kss

cc: Steve Love, Ohio EPA, DERR, NEDO
Ross del Rosario, U.S. EPA, Region 5
Timothy Kern, Assistant AGO, CO
Lawrence Antonelli, Ohio EPA, DERR, NEDO