

**TECHNICAL REVIEW COMMENTS:
OU3 Superfund Proposed Plan**

General Comments:

1. **Groundwater near OW-21A and Area (OW-10/OW-11) :** Reviewed the US EPA Proposed Plan for Operable Unit 3 (OU 3) for groundwater at location **OW-21A and Area (OW-10/OW-11):**

Page 6, ph 1.....The scope of the RI included: compiling data to close gaps in site characterization; identify the nature and extent of contamination. (RI focused on locations where there was no available data and also locations where additional data was needed).

Page 20, P 2, S 4-8. ...Total PCBs (7,400 ug/l, PNP (16,000 ug/l), parathion (11,000 ug/L), and sulfotepp (59 ug/L). Several wells were installed to define the extent of contamination. Existing data indicated a localized area of groundwater impacts, separate from WMA II. The attempt to locate an upgradient source was not successful because moving further upgradient from a temporary monitoring well T-04 would have run into successive obstructions of the railroad and the WMA II Groundwater Corrective Action System.

A subsurface soil and groundwater investigation took place in March 2008 to determine a possible source for the OW-21A contamination. The soil remaining in place does not appear to be providing an ongoing source to groundwater.

The US EPA chose Alternative GW-C which includes the optimization and expansion of the existing groundwater corrective action system as described in GW-B. GW-C also provides for the use of natural attenuation parameters to optimize PNP and parathion recovery.

- A. **Could US EPA provide material to the community explaining how contamination can occur within groundwater without a source?**
- B. **Could US EPA explain to the community how the extent of groundwater contamination cannot be defined, when defining the plume is essential in monitoring natural attenuation?**
- C. **The document does not explain how Natural Attenuation will be accomplished by abiotic or biotic processes. Will attenuation cause a more toxic compound?**
- D. **Can US EPA explain how the groundwater in this area will not leave the plant site and why the document is referencing areas the plant site border?**
- E. **There are still unanswered questions concerning this area, before EPA choose a ROD, can US EPA explain the concept of Natural Attenuation in this area?**

EPA should define natural attenuation processes occurring without intervention. The key question, for responsible parties, regulators, and the public is, to what degree those processes are likely to contribute to the achievement of remedial action goals.

In considering monitored natural attenuation as a remedy, it is necessary to evaluate the potential for biodegradation, chemical degradation, dispersion, dilution, sorption, and volatilization, Strauss, 1998. The community does not understand the natural attenuation process. Neither do they understand how EPA can leave compounds in the ground for 25 years nor will it supposedly vanish. If that is the case, why are the PCBs that have been buried in the landfills, not gone away? The landfills have been there for over 50 years. EPA should provide a discussion regarding natural attenuation before a ROD is decided.

2. Page 20, Ph 4, The PCBs concentrations ranged from non-detect to 21 mg/kg. The higher concentrations were measured along the fence line...

Ph 5, although no additional capping of this area was completed as part of the interim measures, Alabama Power maintains a substantial gravel cover over the area and restrict access to the switchyard to its employees only.

F. In the Preferred Alternative Option 2 there is no statement addressing the West Landfill gravel cover. Was there not a meeting between Solutia and US EPA that stated that gravel is not a sufficient cover for PCBs? Will US EPA explain what will happen in this area over the coming years?

Looking at the Alternatives that US EPA has presented to the community, did US EPA take into account any economic solutions that may aid in helping the Community and Solutia on a short and long range basis? For example:

Paving the land fill and developing a solar farm. The energy from the farm could offset energy cost for the Plant. Using local Contractors would lower construction cost and help the community. By doing this, the stakeholders of the community (i.e. vendors, laborers, households, etc.) could benefit significantly.

G. What other alternatives were considered?

H. Although there were no problems with air emission, the community would like for US EPA to include an air monitoring program as part of the ROD. This program would be part of the five year review and the results would be reported in the communication sector around the Anniston area. Will US EPA consider this request as part of the ROD?