



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JUL 19 2012

REPLY TO THE ATTENTION OF:

S-6J

**MEMORANDUM**

**SUBJECT:** Risk-based Disposal of PCB-contaminated Material at the North Sanitary (a.k.a. Valleycrest) Landfill Site in North Dayton, Ohio

**FROM:** Richard C. Karl, Director *R. Karl*  
Superfund Division

**TO:** Margaret Guerriero, Director  
Land Chemicals Division

The purpose of this memorandum is to request your consultation on the proposed risk-based disposal of polychlorinated biphenyl (PCB)-contaminated material at the North Sanitary Landfill located in North Dayton, Ohio. Pursuant to Region 5 Delegation 12-5, I am requesting that you, the Director of the Land and Chemicals Division, provide my office with any comments, questions or concerns you may have regarding disposal of PCB material at the North Sanitary Landfill Site.

For this site, the requisite elements on which the U.S. Environmental Protection Agency can base its decision that on-site disposal of PCB material "will not pose an unreasonable risk of injury to health or the environment" (40 C.F.R. § 761.61(c) (2)), are found in the Feasibility Study (FS) Report, the FS Addendum and the proposed plan, which are attached here for your review.

Site sampling indicates six locations that contain PCBs at concentrations above 50 parts per million (ppm). One sample (FLUT-72) contained PCB-1242 at a concentration of 950 ppm and is found above the water table. Sampling at the other 5 locations showed the following concentrations, which also exceed 50 ppm: FLUT-70 (PCB-1248 at 69 ppm); FLUT-78 (PCB-1260 at 78 ppm); FLUT-96 (PCB-1254 at 190 ppm); FLUT-110 (PCB-1242 at 100 ppm) and FLUT-116 (PCB-1248 at 69 ppm). Samples at FLUT-70, FLUT-110 and FLUT-116 are located above the water table. The other two locations, FLUT-78 and FLUT-96, are located at depths near or below the water table.

The proposed remedial alternative provides for excavation and off-site disposal at a Toxic Substances Control Act (TSCA)-approved landfill of PCB-contaminated material that is found at levels greater than 50 ppm and located above the water table. For the two sampling locations at depths near or below the water table, the proposed remedial alternative allows the material to remain in place. The landfill design calls for a Subtitle D landfill cap and a perimeter leachate collection system.

Because a more impermeable cap will not improve conditions for PCB waste beneath the water table, EPA concludes that a Subtitle D landfill cap combined with perimeter leachate extraction to contain groundwater contamination associated with waste beneath the water table will satisfy the TSCA risk-based disposal requirements as it will not pose an unreasonable risk of injury to health or the environment.

In keeping with Region 5's policy of informing the public of 40 C.F.R. § 761 approvals, the Region 5 Superfund Division proposes to place this memorandum and your response to this memorandum in the administrative record for this site and make them available for public comment and review along with proposed plan for this site.

If you have any questions, comments or concerns regarding this matter, please contact Dion Novak of my staff at (312) 886-5122 or [novak.dion@epa.gov](mailto:novak.dion@epa.gov).

Attachments