



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

AUG 10 2012

REPLY TO THE ATTENTION OF:

L-9J

MEMORANDUM

SUBJECT: Toxic Substances Control Act (TSCA) Program Review and concurrence on Risk-Based Disposal of PCB-contaminated Material at the North Sanitary (a.k.a. Valleycrest) Landfill Site in North Dayton, Ohio.

FROM: Margaret M. Guerriero, Director 
Land & Chemicals Division

TO: Richard C. Karl, Director
Superfund Division

The purpose of this memorandum is to respond to your request for the Land and Chemicals Division consultation on the proposed risk-based disposal of polychlorinated biphenyl (PCB) contaminated material at the North Sanitary Landfill located in North Dayton, Ohio. You requested this consultation pursuant to Region 5 Delegation 12-5 which states that the authority to approve or deny applications for risk-based sampling, cleanup, storage, decontamination, or disposal of PCB or otherwise require, allow, restrict, or prohibit PCB management activities based on a finding that the activity does not present an unreasonable risk of injury to health or the environment is delegated to the Director of the Superfund Division subject to consultation with the Director of the Land and Chemicals Division. Superfund evaluated the risks posed by contaminants at the site through a baseline human health and ecological risk assessment.

The Site is located to the northeast of the City of Dayton, in Montgomery County, Ohio and was operated as a sand and gravel quarry between approximately late 1935 and the 1970s. Industrial and municipal waste was deposited in the eastern section and the eastern portion of the western part of the Site from about 1966 to 1975. Polychlorinated Biphenyls (PCB) were discovered in waste, soils, sediments, leachate, and Non-Aqueous Phase Liquids at the site.

The proposed remedial alternative includes the excavation and off-site disposal of PCB-contaminated material that is found at greater than 50 parts per million (ppm) and located above the water table at a TSCA-approved landfill that is in compliance with all state and federal regulatory requirements. Verification sampling will be conducted to confirm the removal of > 50 ppm material. The proposed alternative includes the installation of a Solid Waste Cap over remaining materials with the potential for the installation of a Subtitle C cap in an area if the excavation of wastes exceeding TCLP standards is not feasible. PCB contaminated material in excess of 50 ppm located at depths near or below the water table are proposed to remain in place with the installation of a perimeter leachate collection system to provide hydraulic control and contain groundwater contamination associated with PCB and other wastes present at the site. The proposed remedial alternative includes Non-Aqueous Phase Liquids (NAPL) monitoring, removal, and off-site disposal. The Proposed Plan

document indicates that maximum PCB concentrations detected in NAPL were found to be in excess of 50 ppm. Removed PCB impacted NAPL should be disposed of as required by 40 CFR §761.60(a). PCB impacted leachate may be decontaminated to the standards found in 40 CFR §761.79(b) or disposed of per 40 CFR §761.60(a).

Based on our review of the information you provided in your July 19, 2012 Memorandum, Addendum to the Feasibility Study Report, and the July 2012 Proposed Plan regarding the removal and disposal of PCB contaminated material from the North Sanitary Landfill (a.k.a. Valleycrest) Superfund Site (site), the LCD Toxic Substances Control Act (TSCA) PCB Remedial Program concurs that the proposed action for removal, disposal, and containment of PCB-contaminated materials will not pose an unreasonable risk of injury to health or the environment and concurs with the response action.

If you have any questions, regarding this concurrence, please do not hesitate to contact Peter Ramanauskas, of my staff, at (312) 886-7890 or ramanauskas.peter@epa.gov.