



Proposed Plan – North Sanitary Landfill (Valleycrest)

August 2012

United States Environmental Protection
Agency



What is a Proposed Plan?

- EPA's preferred alternative for the Site
- Summarizes site investigations
Invitation for public comment – August 9 to September 10



Valleycrest Site information

- Approximately 100 acres
- Located northeast of the City of Dayton on Brandt Pike
- Located in mixed industrial/commercial/residential area



Site History

- Sand and gravel quarry
- Accepted municipal and industrial waste from 1960s to 1980s
- Five onsite disposal areas



Progress towards Site Cleanup

- State lead investigations 1994-2009
- EPA Removal cleanup order 1998
- EPA drum removal Area 1 and Area 5
 - over 40,000 drums removed
 - over 65,000 cubic yards soil treated
- RI approval by Ohio EPA in 2007
- FS approval by Ohio EPA in 2009



Remedial Investigation Summary

- Numerous samples of soils, sediment, surface water, groundwater collected during RI from each investigative area
- Samples show contamination with a variety of organic and inorganic constituents



Remedial Investigation Summary

- RCRA and TSCA regulated waste present onsite
- NAPL identified for removal in Area 1
- Perimeter landfill gas collection system installed as part of EPA removal action



Risk Summary

- Unacceptable risks to trespassers
- Unacceptable risks for commercial/utility worker use
- Risks from contact to organics, inorganics, and PCBs in onsite soils
- No ecological risks



Feasibility Study Addendum

- Prepared by EPA to further evaluate data (July 2012)
- Evaluated for RCRA (organics and inorganics) and TSCA (PCBs)
- Additional targeted soil excavation for offsite disposal required



Common Elements for All Alternatives

- Area 4 relocation to other onsite areas
- Consolidation of waste on property
- NAPL recovery and off-site disposal
- Collection and treatment of landfill gas
- Removal and offsite disposal of soil from targeted areas - see FS Addendum
- Storm water management
- Institutional Controls
- Groundwater monitoring



Description of cleanup alternatives

- Alternative 1 No Action
- Alternative 2A Solid Waste Cap with perimeter leachate collection
- Alternative 2B Solid Waste cap with perimeter leachate and groundwater extraction
- Alternative 3A Alternate Cap (non compliant) with perimeter leachate collection
- Alternative 3B Alternate Cap (non compliant) with leachate and groundwater collection



EPA's Nine Evaluation Criteria

- **Threshold criteria**

Overall protection of human health and the environment

Compliance with applicable or relevant and appropriate requirements (ARARs)



EPA's Nine Evaluation Criteria

- **Balancing Criteria**

Long term protection and permanence

Reduction of toxicity, mobility or volume through treatment

Short term effectiveness

Implementability

Cost



EPA's Nine Evaluation Criteria

- **Modifying Criteria**
 - State acceptance
 - Community acceptance



Comparative Analysis

- Overall protection of human health and the environment
2A & 2B provide requisite protection by covering waste and collecting contaminated water, in disposal areas or at perimeter or both
3A & 3B do not provide requisite protection (non ARAR compliant)



Comparative analysis

- Compliance with ARARs
 - 2A & 2B alternatives comply with State solid waste landfill regulations with regulated waste removed
 - 3A & 3B alternatives do not comply with State solid waste landfill regulations



Comparative Analysis

- Long term protection and permanence
2A & 2B alternatives are more protective in the long term – less leachate to manage, more protection from punctures or tears
3A & 3B not protective due to non compliance with ARARs – significantly more leachate to manage, less protection from punctures or tears



Comparative Analysis

- Reduction of Toxicity, Mobility or Volume through Treatment
 - Removal of drums was major reduction for all alternatives
 - All alternatives remove NAPL for offsite disposal
 - All alternatives remove regulated waste above water table for offsite disposal



Comparative Analysis

- Short Term Effectiveness

Risks to workers controlled by health and safety plan during construction for all alternatives

Construction period – approximately 2 years for 2A & 2B and 1.5 years for 3A & 3B alternatives

Timeframe for offsite groundwater cleanup – A Series 3.5 years, B series 4 years



Comparative Analysis

- Implementability

All alternatives are implementable with materials needed for construction readily available

A series alternatives more implementable than B series – less water to manage and dispose

Potential issue with capacity at Dayton treatment plan under B series alternatives



Comparative Analysis

- Cost

Alternative 1	\$0
Alternative 2A	\$36.8M
Alternative 2B	\$41.5M
Alternative 3A	\$29.9M
Alternative 3B	\$34.6M



Comparative Analysis

- State Acceptance

The State of Ohio supports the Preferred Alternative 2A

Have been intimately involved throughout process and a valuable partner



Comparative Analysis

- Community Acceptance
Offering preferred alternative for public comment - August 9-September 10
Please provide comments on all alternatives in proposed plan



EPA Preferred Alternative

- Includes all common elements listed previously and in proposed plan
- Alternative 2A—Solid Waste Cap with perimeter leachate collection and discharge to Dayton wastewater treatment plant



EPA Preferred Alternative

- Institutional controls to maintain remedy
- Table in fact sheet summarizes EPA analysis
- Complies with regulations and minimizes water to manage in similar cleanup timeframe

Best balance of EPA's Remedy Selection
Criteria



Public Comment Period

- August 9, 2012 to September 10, 2012
- Ways to comment—fax, email, hard copy mail
- Orally or in writing tonight



What's next?

Record of Decision (ROD)

EPA's selected remedy for site

Includes Responsiveness Summary - EPA's response to comments during the comment period

Selected remedy may change based on information received during comment period



Post Decision Activities

- Negotiations –with Site PRPs on consent decree to design and implement selected remedy
- Consent Decree - legal requirement to implement remedy
- Remedial Design - engineering design of remedy



Post Decision activities

- Remedial Action - Construction of selected remedy
- Operation and Maintenance - long term activities to maintain remedy and ensure protectiveness



Schedule

- ROD completed by end of calendar year
- Remedy negotiations begin spring 2013
- Remedial design begin fall 2013 (6-12 months to complete)
- Remedy construction follows (2 years)



Site Repositories

Ohio EPA

401 E. 5th St
Dayton, Ohio

USEPA Region 5

77 W. Jackson – 7th Floor
Chicago, IL



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Questions?