

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

RCRA FINAL DECISION
AND RESPONSE TO COMMENTS FOR
REMEDY SELECTION FOR SOIL AND GROUNDWATER CONTAMINATION

FOR

DANA COMPANIES, LLC
5253 McCurry Road
Roscoe, Illinois
ILD 006 114 169

May 2011

FINAL DECISION AND RESPONSE TO COMMENTS FOR
REMEDY SELECTION FOR SOIL AND GROUNDWATER CONTAMINATION

FOR

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I. INTRODUCTION

The United States Environmental Protection Agency (EPA) presents this Resource Conservation and Recovery Act (RCRA) *Final Decision and Response to Comments* to select the Remedy for Soil and Groundwater Contamination at the Dana Facility, in Roscoe, Illinois. EPA issued a decision on the remediation of the Dana Facility in 1991, and that chosen remedy was implemented. The current *Statement of Basis* outlined proposed changes to the remedial alternatives implemented at the facility, and identified EPA's new proposed remedy. The public was notified about the public comment period on the *Statement of Basis* in the local newspapers and on the local radio station. The *Statement of Basis* was made available to the public for review and comment from September 1, 2010 to September 30, 2010. A public hearing was held on September 15, 2010 at the North Suburban Library, Roscoe Branch, to explain the proposed remedy and receive public comments and questions on the proposed remedy. Other comments were received by mail and e-mail in addition to those received at the public hearing. EPA recorded the public hearing comments in a Transcript of Proceedings, and is herein responding to the comments in writing. After considering all the comments, EPA is selecting the proposed remedy and adding additional detail to the remedy in response to the public concerns.

II. FACILITY CONDITIONS, RISKS POSED, AND PREVIOUS MEASURES TAKEN

The Dana facility is located at 5253 McCurry Road in Roscoe, Illinois. The facility is bounded by residential property to the north of McCurry Road, by a gravel pit and agricultural land west of State Route 251, by a railroad to the east, and by agricultural land and some commercial /industrial properties to the south. The Rock River is located approximately 1.1 miles to the south/south west (see Figure 1, Attachment 2).

Land use surrounding the Dana facility is mixed agricultural, commercial, industrial, and residential. Residents are located 500 feet to the north along McCurry Road, and this area is upgradient of groundwater flow. The residential areas south of Hononegah Road are connected to an alternative water source.

The Dana facility began operations in 1957. The Facility (formerly known as "Warner Electric Division" and "Dana Corporation") fabricated metal parts for automotive brakes and clutches. As

part of the manufacturing process, metal parts were machined and degreased using trichloroethene (TCE); 1,1,1 trichloroethane (1,1,1TCA); and methylene chloride. The Dana facility ceased operations in 2004.

EPA's new proposed remedy calls for corrective measures necessary to address contamination present in groundwater and soil, and potentially indoor air, at the Dana facility, as well as groundwater contamination downgradient of the facility and potential contamination to the Rock River.

On December 28, 1989, EPA and Dana entered into a RCRA Administrative Order on Consent (AOC) for Corrective Action. That AOC requires Dana to implement interim measures (IMs) by performing the following activities: (1) to provide an alternative water supply to area residents impacted by Dana's contamination; (2) complete a corrective measure to reduce contaminant levels in the groundwater; and (3) meet groundwater standards at the plane of performance wells.

Dana has implemented these IMs by funding the installation of a deep water supply well that offers drinking water to residents impacted by Dana's contamination. In addition, a pump-and-treat system was installed in 1991 in the south end of the Moore Haven Subdivision on Edgemere Terrace near the Rock River. The 1989 Order provided a 30 day period for public review and comment on the corrective measures listed above, and comments were received during these 30 days. The documents concerning the remedy were made available in the Roscoe Public Library. EPA responded to those comments, and selected a remedy in a letter dated February 12, 1991. Nowadays, EPA's description of the selected remedy is called a "*Final Decision and Response to Comments*", but that terminology was not used at the time. After the pump-and-treat system began operating, Dana conducted additional investigations on various aspects of the cleanup pursuant to the 1989 Order. These investigations included a 2002 Groundwater and Soil Investigation, a 2003 Indoor Vapor Intrusion Investigation, a 2005 On-Site Groundwater Sampling, a 2006 Soil-Gas Sampling Investigation, a 2006 On-Site Soil and Groundwater Investigation, and a 2008 Investigation and Pilot-Scale Remediation Test.

The system was successful in reducing the contaminants in the groundwater in the area. The initial inflow concentrations for trichloroethylene (TCE) to the extraction well in 1992 was 280 parts per billion (ppb), and by March 2010 inflow concentration to the extraction well for TCE had been reduced to 1.6 ppb. The Maximum Contaminant Limit (MCL) under the Safe Drinking Water Act for TCE is 5 ppb. The system continues to operate and treat water, within its zone of influence, with contaminant levels that are below the MCLs for all constituents. The pump-and-treat system success is measured at plane of performance wells along Hononegah Road, upgradient of the system, with the goal being the plane of performance wells reach MCLs. The contaminant concentrations in the plane of performance wells have been reduced, but have not yet met the MCLs. Given that the TCE concentrations are so low at the extraction wells, but the plane of performance wells are not going below MCLs, EPA has determined the wells along Hononegah Road are no longer the best place to monitor the success of the remedy and that additional efforts are needed to control the source of TCE.

The existing pump-and-treat system has now reached the end of its effectiveness, as evidenced by the fact that it is currently drawing groundwater with contaminant concentrations below EPA's established Maximum Contaminant Levels. EPA's new proposed remedy, summarized below, envisions phasing out operation of the pump-and-treat system and focusing on addressing the source areas near the facility as well as monitoring the groundwater and groundwater/surface water seep locations downgradient.

III. CORRECTIVE ACTION ALTERNATIVES CONSIDERED

1. No Action Alternative

The no action alternative was evaluated as a baseline for comparison to other alternatives. No action would be taken to remediate groundwater, soils, or vapors that contain constituent concentrations exceeding applicable standards at or beyond the Plane of Performance.

2. Continued Pump and Treat Alternative

The Continued Pump and Treat Alternative is to leave the Pump and Treat System in place and operating and to not address the source area contamination near the facility with an engineering solution.

3. SVE/Enhanced Bioremediation/MNA Alternative

The use of Soil Vapor Extraction (SVE) would use a vacuum system to collect and to remediate vapors from soil underneath the Dana Facility. This will also lessen the soil contamination contribution to groundwater contamination. Enhanced Bioremediation at and near the Dana facility will reduce the groundwater contamination in that area. Enhanced Bioremediation consists of injecting compounds into the groundwater to use the natural bacteria in the environment to clean the contaminants. Currently, degradation by natural bacteria of some contaminants in the groundwater is taking place and "enhancing" that process by providing food for the bacteria population will help it happen faster. In addition, lactate and zero valent iron will also be injected into the subsurface to act on the chlorinated contaminants to break them down. The long term remediation will utilize MNA to monitor the natural degradation of contamination in groundwater.

Groundwater monitoring near the Rock River and seep sampling at the Rock River will ensure no continued migration of the plume. Implementing an institutional control to limit groundwater use at the site and to restrict land use to commercial/industrial on the facility property and restriction on excavations is needed to protect workers. Finally, a financial assurance mechanism to insure Dana has the money to implement the remedy now and in the future is also important part of the proposed remedy.

IV. SELECTED REMEDY

EPA selects the following corrective measures as the remedy to address TCE in soils and groundwater at the Dana Facility. The selected remedies provide the best balance among the alternatives with respect to the evaluation criteria, including long-term reliability and effectiveness, implementability and cost.

- Installation of a soil vapor extraction (SVE) system at the former Warner Electric Facility to reduce the mass of site-related chlorinated volatile organic compounds (CVOCs) in the vadose zone beneath the facility. The goal is to clean up the remaining CVOCs to a level that presents neither an unacceptable risk of indoor air intrusion, nor an unacceptable source-loading to the groundwater flow system.
- Implementation of an enhanced bioremediation remedy to reduce the CVOC residual mass in the saturated source area near the facility, and to increase the attenuation capacity of the groundwater flow system to a level where the remaining affected groundwater does not represent an unacceptable risk to the identified receptors. The enhanced bioremediation will assist meeting risk-based cleanup criteria for non-potable groundwater use.
- Implementation of a monitored natural attenuation (MNA) approach which, in the long-term, will restore groundwater quality to potable water quality standards.
- Creation and implementation of an environmental covenant to restrict on-site groundwater use, limit site use to industrial/commercial activities, and impose controls on excavation procedures for construction workers and redevelopment workers in areas posing an unacceptable risk.
- Implementation of a modified seep sampling plan along the Rock River to ensure applicable water quality criteria are met and ecological receptors and human health are protected. The remedial objective for surface water in the Rock River is to meet applicable water quality criteria that will be protective of ecological receptors and human health.
- Provision of financial assurance to demonstrate that Dana will have adequate funding to implement the remedy as chosen by EPA.
- Cessation of the existing groundwater pump-and-treat system (inflow to the existing groundwater pump-and-treat system is below maximum contaminant levels (MCLs) for drinking water). If contaminant levels downgradient of the pump subsequently **elevate to exceed groundwater/surface water criteria**, then the pump-and-treat system will be restarted and further corrective measures addressing groundwater contamination will be assessed.

The original 1989 AOC requires Dana to implement interim measures (IMs) including providing an alternative water supply to area residents impacted by Dana's contamination. In addition to

Dana's current obligations, Dana will offer any remaining residents impacted by the contamination North Park Water District connections to their homes that currently rely on private wells for potable water. This is done in order to eliminate the potential consumption of contaminated water.

The selected remedy will be reliable and effective over the long term by reducing the inherent hazards posed by TCE in soils and groundwater. The selected remedy provides the best balance among the alternatives with respect to the evaluation criteria. The remedy is designed to be protective of human health and the environment. The long-term corrective action objective is to restore groundwater to current drinking water MCLs throughout the area of contaminated groundwater within 10 to 20 years.

Because achieving this long-term objective for groundwater will take many years, intermediate cleanup levels are set for groundwater at the facility boundary and at the Rock River. These intermediate cleanup levels have been designed to ensure that human health and the environment are protected until the long-term corrective action objective is achieved. The intermediate cleanup level for groundwater at the facility is 100 µg/L for trichloroethylene. This will be monitored at the three monitoring wells southwest of the A – A' transect. This level was derived through the use of EPA BIOCHLOR model, including both baseline and predictive models. The modeling predicts that, if the TCE concentrations were reduced to 100 µg/L at the monitoring wells installed southwest of the A – A' transect, the TCE concentrations 600 feet downgradient, at the southwest corner of the property, would reach the 5 µg/L MCL for TCE, which is the long-term cleanup level for that contaminant.

The intermediate cleanup goal at the Rock River is defined in Table 3 of the *Statement of Basis*.

TABLE 3**Intermediate Cleanup Criteria for Groundwater to Surface Water Discharge at Rock River**

Groundwater Contaminant	Highest Groundwater Result in Seeps	Intermediate Surface Water Cleanup Level (ppb)	Long Term Surface Water Cleanup Level (ppb)
TCE	2.7	25	5
1,1,1-TCA	ND	76	200
Vinyl Chloride	ND	120	2
Methylene chloride	ND	340	10
Tetrachloroethylene	ND	45	5
cis 1,2 -DCE	ND	620	70
Dichloro difluoromethane	ND	1960	7000
trans 1,2 DCE	ND	970	100
1,1 DCA	ND	47	200
1,4 Dichlorobenzene	ND	9.4	75
Toluene	ND	253	2,000
Chromium	Not Analyzed	42	50

ND = Non Detect

The plane of performance for the groundwater/surface water interface (i.e. the location where groundwater results meet water quality standards) is at the monitoring wells along Edgemere Terrace downgradient of the pumping well and upgradient of the Rock River (see Figure 8, Attachment 2).

To address potential contamination to surface water at the groundwater/surface water interface, seeps along the Rock River will be sampled annually for two years to ensure contamination levels in the surface water remain protective of ecological receptors and human health. Seep sampling will take place when Rock River levels are low enough to allow flow from seeps.

The remedy selected by the EPA for the Dana facility meets the threshold criteria that reflect the performance standards that must be achieved by including:

- Protection of Human Health and the Environment
- Attainment of Media Cleanup Standards Set by EPA
- Control the Source of Releases
- Compliance with any Applicable Standards for Management of Wastes

Detailed analysis of each can be found in the Statement of Basis

The selected remedy also considers balancing criteria that represent a combination of technical measures and management controls that helped identify the best remedy, including:

- Long Term Reliability and Effectiveness
- Short-term Effectiveness
- Reduction in the Toxicity, Mobility, or Volume of Wastes
- Implementability
- Costs

Detailed analysis of each can be found in the Statement of Basis

V. PUBLIC PARTICIPATION ACTIVITIES

A 30 day public notice period was held from September 1st to September 30th, 2010. A public hearing was held on September 15th, 2010 at the North Suburban Library District - Roscoe Branch to present the remedy and take formal oral comments. A court reporter was present to transcribe the proceedings. The public was notified of the public comment period and public hearing in the Rockford Register Star newspaper, B103 FM and WNTA 1330 AM radio stations, and through direct mailings. The September 15, 2010 hearing was attended by 16 people, including 2 representatives of EPA and 4 representatives of state and local government.

Public and regional agencies participated in a question and answer period with EPA after a brief presentation of the remedy. Additional work on connecting some parcels to city water resulted from this dialogue along with EPA facilitating dialogue between local residents and Dana on some issues including building maintenance and water billing procedures. Comments received from the local community, regional agencies, and Dana were considered and resulted in modifications to the EPA proposed remedy. The EPA final remedy, as presented in this document, addresses public comments by modifying the remedy to use the groundwater to surface water discharge criteria to discontinue the pump-and-treat system in the intermediate term, instead of using the MCLs for this purpose. The MCLs remain the long-term cleanup goals.

Provided below are written and oral comments on the remedy that EPA received. Some commenters had the same question and these responses are grouped together. Many comments and questions were received orally and recorded in a transcript of the public hearing on the Statement of Basis, other comments and questions were received by letter and e-mail. EPA received a total of 12 unique comments from these submittals. Each comment is identified in the following section below, and is accompanied by EPA's response.

VI. PUBLIC COMMENTS AND EPA'S RESPONSE TO COMMENTS

LOCAL COMMUNITY COMMENTS

1. Comment: One commenter wanted to know if Dana was going to keep up the maintenance of the outside of the Pump and Treat house on Edgemere Terrace. The commenter also asked what the eventual plan for the Pump and Treat house will be. The same commenter expressed concerns that if maintenance was not conducted, it would negatively affect property values.

Response: EPA requires regular maintenance of the operating pump and treat system to insure proper groundwater withdrawal and treatment. Also, EPA expects reasonable maintenance of the exterior of the Pump and Treat building. A Dana representative attended the meeting and explained that they have a person who regularly inspects the Pump and Treat House and maintains the building. He provided a contact number to the commenter at the meeting.

The *Final Decision* includes phasing out the pump-and-treat system operation. At some point in time, its use will be discontinued and the building will no longer be used for that purpose. Dana has communicated to EPA that when the pump-and-treat system has been discontinued, it does not intend to keep the building in its current use and may seek to sell the property.

2. Comment: One commenter wanted to know if the current water bill payments provided to some residents by Dana per an agreement between residents and Dana will stop after the *Final Decision* is issued by EPA.

Response: EPA requires Dana to offer an alternate water supply to the home owners at Hononegah Country Estates and Moorehaven Subdivisions. A clean supply will continue to be available to residents per this *Final Decision*. North Park Water District currently supplies clean water to residents. Dana representatives at the meeting indicated Dana has no intentions of stopping the water payments.

3. Comment: Two commenters wanted to know if the air and water emissions produced by the pump-and-treat system are being monitored, and if so, how frequent is the monitoring.

Response: As a corrective measure, EPA has required the operation of the pump-and-treat system from 1991 to the current day. Over this time frame, air and water emissions have been monitored per the Illinois Environmental Protection Agency (IEPA) permits. The water permit under the National Pollutant Discharge Elimination System (NPDES), permit # IL0068632, permits the discharge to the Unnamed Tributary to the Rock River across the street from the Pump and Treat building. No exceedances have been noted during the system operation. The air emissions from the treatment system are permitted by the IEPA and oversight is provided by their Bureau of Air.

4. Comment: Two commenters wanted to know if they have had elevated groundwater readings in their wells in the past, why they were not included in the 2003 study of Soil Vapor Intrusion.

Response: EPA reviewed the workplan and oversaw implementation of the Soil Vapor Investigation. The study first conducted additional groundwater sampling to define the width and depth of the groundwater plume in the Hononegah Country Estates and Moorehaven Subdivisions. Using this information, the current region of highest concentration of groundwater contamination was determined. Then homeowners in this area were invited to participate in the investigation. A representative number of homes were chosen (not all), and indoor air samples were taken in these homes. The results indicated that no vapor concentrations were above EPA risk based levels. EPA believes that data from these homes adequately characterize the soil vapor risk in Hononegah Country Estates and Moorehaven Subdivisions.

5. Comment: The commenters also wanted to know if they have had elevated groundwater readings in their wells in the past, what are the current groundwater results and have the contaminant levels been reduced.

Response: The contaminated groundwater was significantly reduced through groundwater pump and treatment efforts since 1991. Areas that were previously elevated have been greatly reduced, and the plume also has shrunk in size. EPA believes that data from groundwater wells and seep samples along the Rock River indicate significant reductions, and adequately characterize the groundwater in Hononegah Country Estates and Moorehaven Subdivisions. Maps of the groundwater plume can be found at the EPA Website for this cleanup <http://www.epa.gov/reg5rcra/wptdiv/permits/actions.htm#2010>.

6. Comment: One commenter asked how people were notified about the meeting, because some received a mailing and others did not. Some heard about it through word of mouth.

Response: EPA developed the mailing list based on the historical contact list on file. That list included people who had sampling done for the seeps, people who had indoor air sampling, and people who just called EPA with a question. In addition, EPA ran an ad in the Rockford Register Star newspaper, and two different radio stations made multiple announcements. We also appreciate the efforts of those residents who told their friends and neighbors about the meeting.

7. Comment: One commenter from the North Park Public Water District read the following written comment:

The district is the supplier of potable public water for most of the residents affected by the VOC contamination resulting from the Dana Corporation manufacturing process. And the

district applauds the efforts of the agency to mitigate this contamination and generally does not oppose the proposed action plan, with one exception. Within the body of the notice of the proposed changes to the cleanup plan under the health risks from the site section, they state that groundwater that starts in the site and flows underneath residential areas on its way to the Rock River remains contaminated with volatile organic chemicals. But residents of Hononegah and Moorehaven subdivisions and businesses in the area get their drinking water from the North Park Public Water District, which is not affected by the Dana pollutants, so people are not exposed to health risks.

The district takes no position regarding the statement other than to advise the agency that all the residents in the affected area have not been connected to the public water supply. According to district records, between five and ten residential private wells are still being used for potable purposes depending on where the plume line is drawn. Should the agency continue with its proposed plan to discontinue operation of the water treatment system that has been effectively mitigating the VOC contamination, it's possible elevated levels of VOCs could return to these remaining residential wells and potentially increase the health risk to those users. In order to continue with the proposed changes to the cleanup plan, the district suggests the agency consider working with these remaining residents to require them to connect to the public water supply which is currently adjacent to their home and properly seal and abandon their private wells. This action will guarantee none of the residents in the affected area are using water that could be impacted by the agency's decision to modify its cleanup plan.

Response: The EPA has been working with residents, the North Park Water District and Dana to address the homes that lack public water supply. The North Park Water District identified ten parcels in the Hononegah Country Estates and Moorehaven Subdivisions that lack public water supply connections. Two of these parcels are outside the historic and current groundwater plumes and therefore are not in need of North Park Water District service. The remaining eight parcels are within the historic groundwater plume but outside the current groundwater plume, although one of the parcels is adjacent to the current plume. Six of these eight parcels are currently contracted to have North Park Water District service installed in the early summer this year including the parcel adjacent to the current plume. The remaining two parcels declined the North Park Water District service.

8. Comment: One commenter asked to have his well water tested, and if it has exceedances of the safe drinking water standards that his five parcels be connected to the North Park Water District at no cost. In addition the commenter wanted his water bills to be paid in perpetuity.

Response: EPA has contacted this commenter by telephone, and found he does have a well that he uses for showering and laundry. He uses bottled water for drinking water and cooking. EPA spoke with the North Park Water District, and the District plans to connect the parcel that has his residence and the other parcels that the commenter owns will also be

connected. Dana has agreed to pay the water bill for the commenter's residence for the first year of connection.

DANA COMMENTS

9. Comment: Dana commented on the *Statement of Basis* (SB) page 3 that says in part "...if contaminant levels downgradient of the pump subsequently elevate to exceed MCLs, the pump-and-treat system will be restarted...". Dana does not agree that the MCL's (drinking water standards) are the appropriate trigger standards by which the potential restart of the pump and treat system should be evaluated. The purpose of the existing system is to prevent groundwater discharging to the Rock River from adversely affecting the river. The system is not in place to prevent the direct human contact with affected groundwater. As such, the appropriate standards for protecting the river are the intermediate clean-up criteria (groundwater/surface water interface) rather than the long term clean up criteria (MCLs).

Residents in the area of affected groundwater are on a community water supply and there is no potential exposure via the drinking water pathway. EPA's statement that the influent concentrations to the remediation system are below MCLs is true, and this fact certainly provides ample proof that Dana's and EPA's mutual conclusion that the system should be shut down is appropriate. However, the MCLs are not the appropriate standard for evaluating the continued operation of the groundwater treatment system. In recognition of this RMT, Dana's consultant, in conjunction with EPA developed groundwater to surface water discharge intermediate criteria as a basis for system shutdown. Those criteria should be utilized to determine whether restart is appropriate. As noted in the *Statement of Basis*, long term goals of MCLs will be achieved through the use of monitored natural attenuation (MNA), not active pump and treat remediation.

Response: EPA believes the final remedy should include the discontinued use of the pump-and treat system. It has been shown the current inflow to the pump-and-treat system is below the safe drinking water standards (MCLs). Also residents are connected to the North Park Public Water District for drinking water supply. The groundwater impacts in groundwater sampling locations downgradient from the pump and treat well exceed the MCLs and are below the groundwater to surface water discharge intermediate criteria. These well locations will be sampled to determine whether to shut down the pump and treat system and the criteria to be used are the groundwater to surface water discharge intermediate criteria. EPA is modifying the remedy to include the use of the groundwater to surface water discharge intermediate criteria instead of the MCLs to discontinue the pump-and-treat system and it is incorporated into this *Final Decision*.

10. Comment: Dana believes there is no indication 1,1,1 -TCA was used as a solvent at the Warner Facility and limited detections and low concentrations of 1,1,1-TCA in groundwater suggest, that to the extent it is associated with the Warner facility, it occurred as a minor

component/contaminant in the TCE solvent stock used at the Warner facility.

Response: EPA has duly noted the comment.

11. Comment: Dana commented on the SB page 4 that says “Dana has implemented these IMs (intermediate measures) by installing a deep water supply well that offers drinking water to residents impacted by Dana’s contamination.” Dana’s comment on this portion of the SB is that Dana funded-but did not install- a water supply system that includes two high capacity wells.

Response: EPA has duly noted this comment.

12. Comment: Dana commented on the SB page 9 that says in part “Because the area downgradient of the site is on public water supply, intermediate groundwater cleanup goals must be protective of potable groundwater exposures...” Is it possible the SB should have read intermediate groundwater goals must be protective of **non-potable** groundwater exposures?

Response: EPA notes the comment and recognizes the inconsistency. Non-potable groundwater was the intended use of groundwater for the purpose of setting the intermediate groundwater cleanup goals.

VII. ADMINISTRATIVE RECORD

A copy of the Administrative Record for the selected remedy in this Final Decision/Response to Comments (FD/RC) is available for review at the North Suburban Library District, Roscoe Branch, 5562 Clayton Circle, Roscoe, IL 61073 (815-623-6266) and the 7th Floor Records Center at EPA Region 5, 77 West Jackson Blvd., Chicago, IL 60604 (312-886-0900).

An Index to the Administrative Record is provided at Attachment 1. The Administrative Record for this FD/RC includes: (1) the Statement of Basis, (2) The December 28, 1989, RCRA Administrative Order on Consent (AOC) for Corrective Action the facility, and all work plans and reports provided for by Dana including the April 2009 Revised Workplan to Administrative Order on Consent, and (3) all relevant correspondence and reports from or submitted to EPA relating to the contamination at the Facility.

VIII. FUTURE ACTIONS

U.S. EPA will implement and oversee this Final Decision through either a new administrative order on consent, a modification to the existing Administrative Order on Consent with Dana Corporation, or otherwise through the exercise of its enforcement authorities under RCRA. Upon the effective date of any new administrative order, the requirements of the December 28,

1989, Administrative Order on Consent with Dana Corporation will be terminated.

IX. CORRECTIVE ACTION COMPLETE DETERMINATION

Once Dana believes it has met its corrective measures obligations, it may submit a request with supporting information to EPA Region 5 for a Corrective Action Complete Determination (CACD). Once EPA Region 5 receives this request for a CACD, EPA may issue a CACD based on the content and completeness of information provided by the Dana facility, EPA guidance, and the terms of this FD/RC. The facility's request should include a written explanation and supporting documentation demonstrating that the facility satisfies the criteria for the CACD, based on information outlined in the February 23, 2005, EPA guidance on CACD; the selected measures, contaminant cleanup goals and criteria, and other conditions specified in this FD/RC; and all additional measures, criteria and conditions specified in the permit, order or consent decree implementing this FD/RC. At a minimum, the facility's CACD request must: (1) demonstrate that construction activities are complete, (2) demonstrate that all required institutional controls have been implemented, (3) demonstrate that the cleanup goals and objectives have been achieved for obtaining a CACD and, (4) where the FD/RC provides for any post-CACD remedial activities such as continuing a pump and treat system or groundwater monitoring, (i) identify criteria and standards that would either confirm that these long-term remedial activities are functioning as intended, or would be the basis for additional work, and (ii) identify the criteria for satisfaction and termination of these post-CACD activities.

X. DECLARATION

Based on the information in this FD/RC and the Administrative Record compiled for this corrective action at the Dana Facility in Roscoe, IL, EPA has determined that the selected remedy for the Dana Facility is appropriate and is protective of human health and the environment.



Margaret M. Guerriero
Director
Land and Chemicals Division

6/23/11
Date

ATTACHMENT I

ADMINISTRATIVE RECORD INDEX

DANA
ROSCOE, IL
ILD 006 114 169

ADMINISTRATIVE RECORD INDEX

DANA
 ROSCOE, IL
 ILD 006 114 169

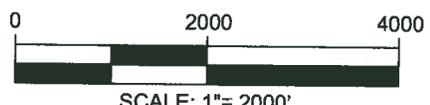
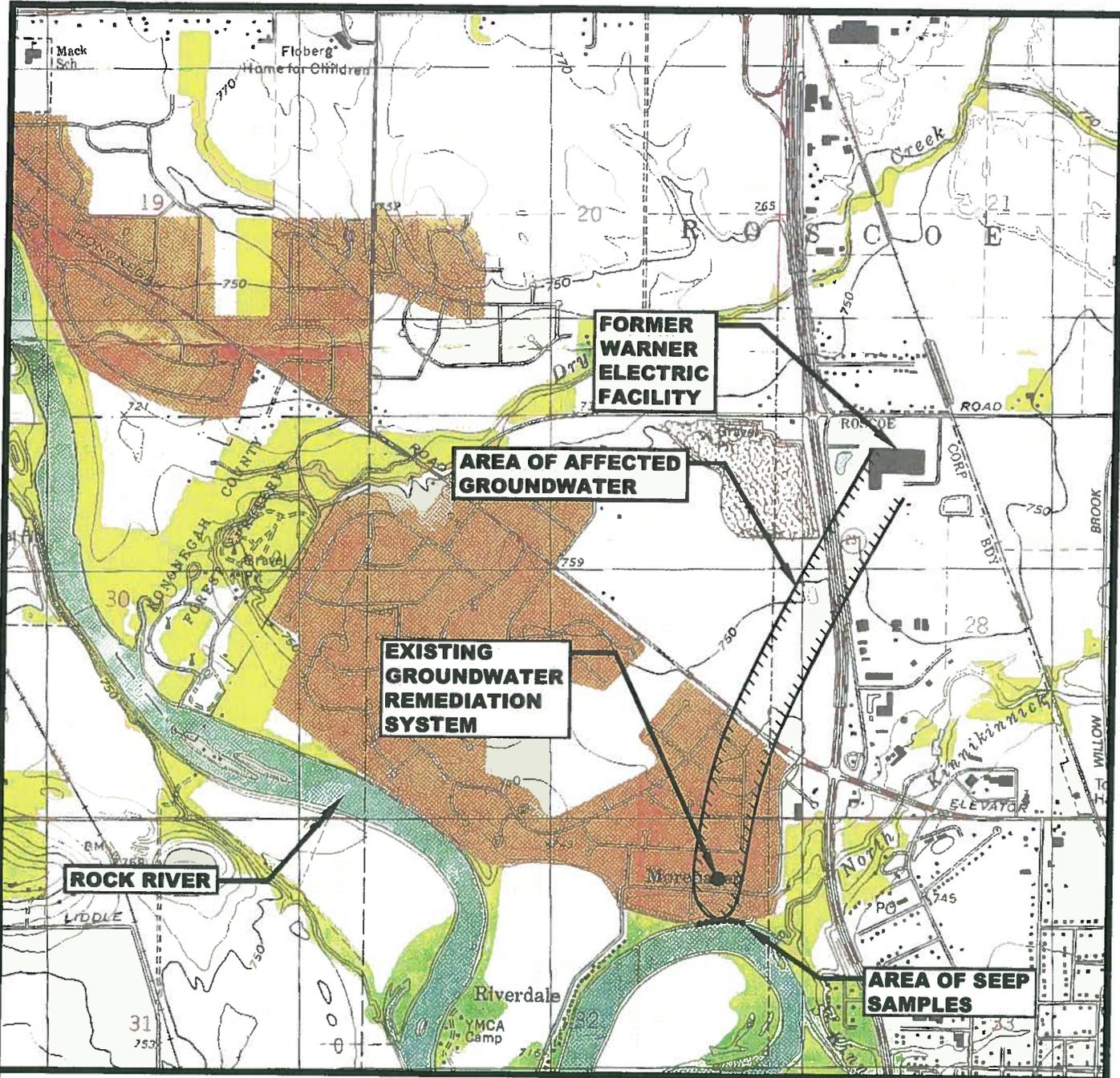
	Date:	To:	From:	Format:	Subject:
1	September 29, 2010	US EPA	Dana Companies, LLC	Letter	Comments on the Statement of Basis
2	September 23, 2010	US EPA	James D. Schumacher	Letter	Comments on Statement of Basis
3	September 15, 2010	US EPA	Laura Kolnik Court Reporter	Report	Transcript of Proceedings, Public meeting on Proposed Cleanup Plan Changes for Dana Corporation Facility, September 15, 2010 North Suburban Library District, Roscoe Branch, Roscoe, IL
4	September 1, 2010	Public	USEPA	Report	Statement of Basis for Proposed Changes to the Remedy for Soil and Groundwater Contamination at Dana Companies LLC, 5253 Mc Curry Road, Roscoe, IL
5	April 2009	US EPA	RMT	Report	Revised Workplan to Administrative Order on Consent
6	September 19, 2008	US EPA	RMT	Technical Memorandum	Groundwater Screening Results, Former Warner Electric, Roscoe, IL
7	August 8, 2006	US EPA	RMT	Technical Memorandum	On-Site Soil and Groundwater Investigation Results at the Warner Electric Brake and Clutch Division Property, Roscoe, IL
8	August 9 2006	US EPA	RMT	Technical Memorandum	Passive Soil-Gas Survey at the Warner Electric Brake and Clutch Division Property, Roscoe, IL
9	April 21, 2004	US EPA	MACTEC	Report	Residential Indoor/Outdoor Air Characterization Report, Warner Electric Facility, Roscoe, IL
10	February 4, 2003	US EPA	RMT	Technical Memorandum	Conclusions from Temporary Well Sampling Program, Warner Electric, Roscoe, IL
11	September , 2002	US EPA	RMT	Technical Memorandum	Data Summary from Monitoring Well Sampling, Warner Electric, Roscoe, IL
12	December 28, 1989	Dana Corp.	US EPA	Administrative Order on Consent	Administrative Order on Consent under RCRA 3008(h) between U.S. EPA and Dana Corporation, Warner Electric Division. Docket #V-W 90 R-06

ATTACHMENT II

FIGURES

PLOT DATA

Drawing Name: J:\02541\25\25412505.dwg
 Operator Name: fitzgere Scale: 1"=2000'



SOURCE: SOUTH BELOIT, ILLINOIS
 U.S.G.S. 7.5 MINUTE QUADRANGLE

LOCATION: NW1/4, NW1/4, SECTION 28,
 RANGE 12E, TOWNSHIP 46N.

ILLINOIS

**STATEMENT OF BASIS
 USEPA**

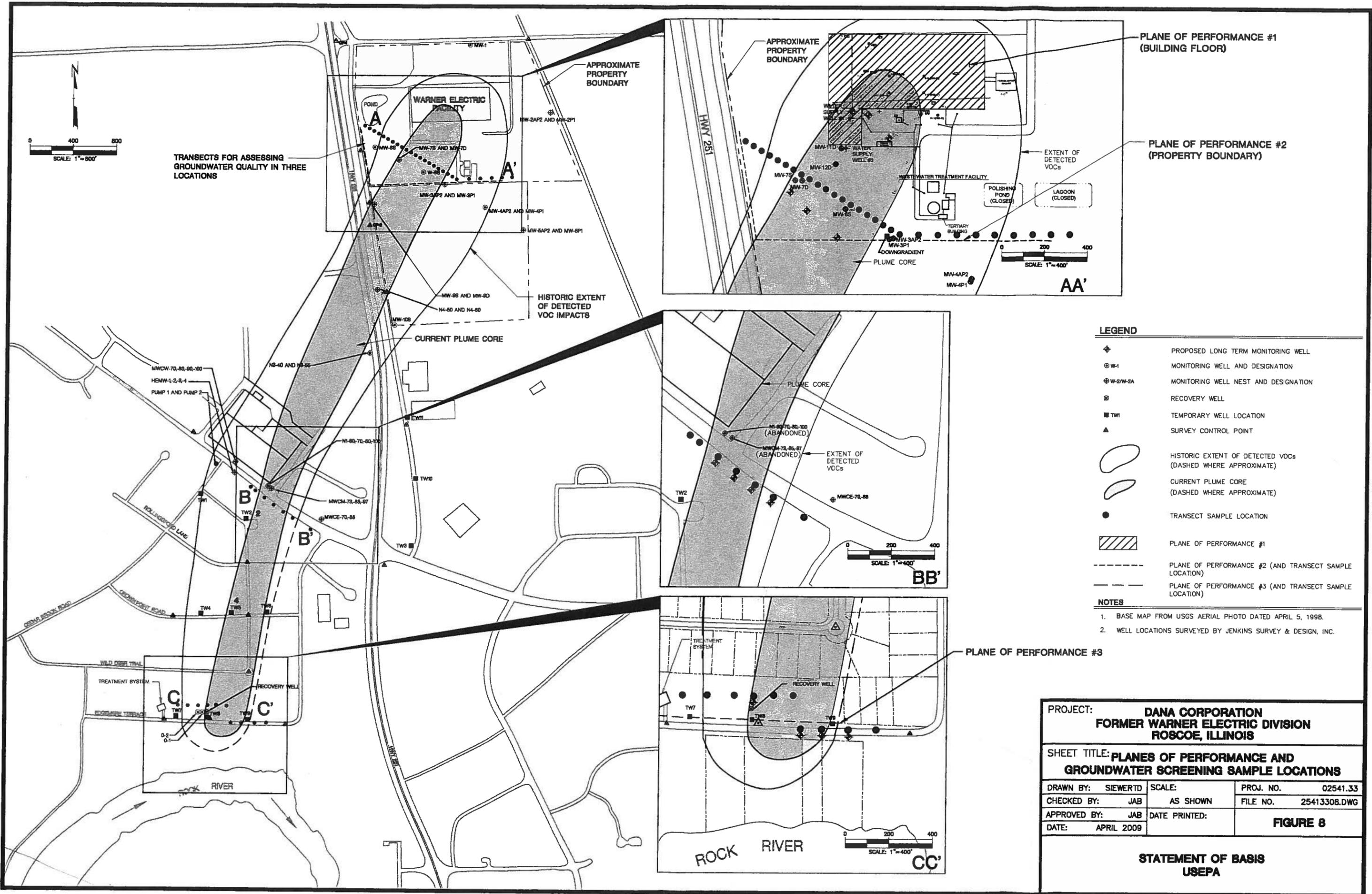
**DANA CORPORATION
 WARNER ELECTRIC
 ROSCOE, ILLINOIS**

SITE LOCATION MAP

DRAWN BY:	FITZGERALD
APPROVED BY:	JAB
PROJECT NO.	02541.33
FILE NO.	25413301.DWG
DATE:	NOVEMBER 2009

FIGURE 1

PLOT DATA
 Drawing Name: J:\02541\30\25413002.dwg
 Operator Name: siewertd
 Scale: 1"=400'



PROJECT:		DANA CORPORATION FORMER WARNER ELECTRIC DIVISION ROSCOE, ILLINOIS	
SHEET TITLE: PLANES OF PERFORMANCE AND GROUNDWATER SCREENING SAMPLE LOCATIONS			
DRAWN BY: SIEWERTD	SCALE: AS SHOWN	PROJ. NO. 02541.33	
CHECKED BY: JAB	DATE PRINTED:	FILE NO. 25413308.DWG	
APPROVED BY: JAB		FIGURE 8	
DATE: APRIL 2009			

**STATEMENT OF BASIS
USEPA**