UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

MAY 29 2014

Mr. Mark R. Snyder, P.E.
Waste Management
425 Perinton Parkway
Fairport, NY 14450

Re: OU4 Operation, Maintenance and Monitoring Plan, Cortese Landfill Site

Dear Mr. Snyder:

The Environmental Protection Agency (EPA) has completed a review of the document entitled *Operation, Maintenance and Monitoring Plan, Operable Unit 4, Source Areas, Cortese Landfill Site, Narrowsburg, New York,* dated October 2013 by Geosyntec Consultants (OM&M Plan). Per the Consent Decree (CD) between the EPA and AlliedSignal, Inc. *et al* (Civil Action No. 96 Civ. 1513) and the 2012 CD Amendment, following are EPA's comments on this document:

§1.1, Page 1 – Please replace the sentence concerning the **Consent Decree** with the following: "The OU4 Remedy is being conducted in accordance with the 1996 Consent Decree, Civil Action No. 96-CV-1513, for the Cortese Landfill Site in Narrowsburg, New York as modified by the Amendment to the Consent Decree dated August 3, 2012."

§3.1, Page 5 – The bullet list should include a bullet for other **amendment additions** that could occur without air sparging (as is correctly described in §3.1.3, ¶3).

§3.2.1, Page 9, Top ¶ – Since the **stepped startup** of the air-sparge system is in monthly increments, consideration should be given to groundwater monitoring at select wells that tracks conditions during start up. The "groundwater performance monitoring data" cited in the last paragraph of this section as the basis for decision making in this regard appears to be the triannual Stage B (Table 12: "During Source Area Transitions"), which may not be of a frequency that would avoid surprises.

§3.2.4, Page 11 – For consistency, a brief discussion of the possibility of the **addition of other amendments** (as is included in §s 3.1.3 and 3.3.2) should be included here and the title of the section modified accordingly. (Modification should also be made to the TOC.)

§3.3.1, Page 13, Last ¶, First Sentence – Per §5.4.1, ¶1, **midpoint monitoring** should be included along with the "prior to and after treatment" points cited here.

§4., Page 16 – It should be made clear at the end of this paragraph how "operating procedures" will be developed for "**subsequent remedy components**".

§4.3, Page 17 – Procedures for starting up and shutting down are accorded a sufficient level of detail in this section. The "**normal operation**" of the system is, however, not discussed.

§4.3.1.1, Sub§ C.4.h. to i., Page 19 – The timing of "**repeat steps** (a) to (g)" should be specified. (See also *§4.3.1.1, Sub§ D.4.h. to i., Page 20; §4.3.1.2, Sub§ C.2., Page 22; §4.3.2.2, Sub§ C.2., Page 27.*) The text states that it will be 30 days for the air-sparging component.

§4.3.1.1, Sub§ E., Page 20 – In addition to collecting data after "50 cfm has been achieved", provisions for collecting data **from startup through 50 cfm** would be helpful in establishing system operating conditions. It may be helpful to specify the expected frequency of this data-collection effort as well.

§4.4, Page 31 – EPA should be included in **Project Communication**. EPA should be notified within 72 hours of situations relative to §4.4.1 (Emergency Communication). EPA should be informed of situations relative to §4.4.2 (Alarm Condition Shutdown and Notification) in the progress report following the event(s).

§5.4.1, Page 34, Last ¶, Last Sentence – While the concept of substituting **PID data** for lab data may be acceptable, EPA approval would be necessary before foregoing the lab analysis.

§5.4.2, Page 35, First ¶ – The **off-gas treatment** discussion presented here is unclear. A flow-diagram should be provided that lays out the proposed approach for VGAC change outs. VGAC change-out triggering criteria (*i.e.*, AGCs), how they are measured and at what frequency, and where they are to be applied should also be included in the flow diagram. The text here should be modified to reflect the clarified approach. Note that it appears that SGCs are not applicable for this AS/SVE system.

§5.6, Page 36, ¶s 3 & 4 – Consideration should be given to characterization sampling for the **condensate** and **recovered LNAPL** in order to track the masses removed via these media.

§6., Page 37 – See comment for *§3.2.1, Page 9, Top ¶* related to groundwater monitoring during **stepped startup** of the AS/SVE system.

§7.2, Page 43, ¶2 – While no change to the document is necessary, note that the treatment system resides within a subset of the landfill area, so while it may be true that the AS/SVE system would "limit the ability of the waste to produce **methane**", the effect may be localized.

§7.2, Pages 43-44 – Some text changes may be appropriate in light of EPA's April 11, 2014 approval of the request to **terminate perimeter gas monitoring**.

§7.3, Page 44 – Collection of **LNAPL** at a measured thickness of less than six inches should be addressed here as well.

§8.1, Page 45 –

a. For clarity, Bullet 6 should be reworded from "Proposed modifications to the schedule and/or the OM&M Plan" to "Proposed modifications to the schedule, **monitoring program,** and/or the OM&M Plan for agency review and approval."

b. A provision should be included in this section that allows for proposing adjustments to the **frequency of progress-report submittal,** as appropriate, for agency review and approval.

§8.2, Page 45 –

a. As this section on annual reporting also includes reporting for another OU (*i.e.*, **RWE 1**), for clarity RWE 1 should be included in the title here (*e.g.*, "Source Area/RWE 1") and on any annual reports where both OUs are addressed. Similarly, if plans are such that the annual reporting for **OU 3 (MNA)** is to be included as well, this comment would similarly apply to OU 3 and a bullet should be added accordingly.

b. Regarding **Bullet 3,** the text here will likely need to be revised as a result of changes made per the comment related to *§5.4.2, Page 35, First* ¶, above.

§8.2, Page 46 – Per *§4., Page 16* (and the comment for this section, above), discussion of the need for "**subsequent remedy components**" and the "operating procedures" that may need to be developed should be included in the annual reporting, as necessary.

§8.2, Page 46, Bullet 6 – This bullet should be modified to add the following: "(*e.g.*, a recommendation that AS/SVE wells be **added to or subtracted from** the network) for agency review and approval".

§8.2, Page 46, Bullet 7 – In light of EPA's approval to **terminate perimeter gas monitoring,** this bullet may require modification.

§10., Page 49 – To retain more flexibility, the sentence "Modifications may be appropriate based on changes in Site conditions" should be revised to read simply "**Modifications may be appropriate.**"

§11., Page 50 – With respect to **references,** please add *Performance Monitoring for MNA Remedies for VOCs in Groundwater* (EPA/600/R-04/027, dated April 2004).

Figure 3 – **MW-6A/B** is historically important from both geologic and groundwater-quality perspectives. These wells should be included on the B-B' transect.

Figure 4 – The "NS" with respect to **MW-8A/B** should include a footnote that these wells have been historically ND for VOCs.

Figure 5 –

a. The "NS" with respect to **MW-5** and **MW-2A/B** should include a footnote that these wells have been historically ND for VOCs.

b. Cross section B-B' should be redrawn so that it passes through the **MW-6A/B** wells.

c. The **bottom of the MW-22 borehole** should be clarified on this figure.

d. **Cross section C-C'** from the July 2013 *Interim OU-3 Remedial Action Report* should be included in this document.

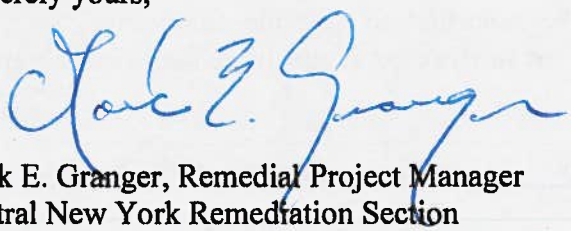
Table 8 – Any **new information available** from the 2013 sampling events should be incorporated into this table and Footnotes 3 and 4 updated.

Table 9 – Bold values and the **two types of shading** should be clarified in the footnotes.

Appendix A (Health and Safety Contingency Plan) and *Appendix E (Emergency Contact Information)* – EPA requests **copies** of these documents when they become available.

Please submit a revised version of the subject document at your earliest convenience. If there are any questions, please feel free to contact me at (212) 637-3351.

Sincerely yours,



Mark E. Granger, Remedial Project Manager
Central New York Remediation Section

cc: R. Glazier, Geosyntec