UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

11157

March 18, 1993

Mr. Glen A. Schultz
Project Manager
Waste Management of North America, Inc.
Environmental Management Department
1121 Bordentown Road
Morrisville, PA 19067

Re: Elizabethtown Landfill Site RI/FS
Candidate Technologies Memo

Dear Mr. Schultz:

Attached are EPA's comments on your Candidate Technologies Memorandum. As you know, EPA already conveyed many of these comments to Geof Forrest during a telephone conversation of February 5, 1993.

Each of the attached comments must be fully addressed in your Draft Feasibility Study Report - deliverable number 10a under the work plan schedule. Failure to address these comments in their entirety may result in the assessment of stipulated penalties under the terms of our consent agreement.

Please call me should you have any questions concerning EPA's requirements.

Sincerely yours,

Sherry Lee Gallagher

Sherry Lee Gallagher
Project Manager

Attachment

COMMENTS ON ELIZABETHTOWN CANDIDATE TECHNOLOGIES MEMORANDUM

§3.3 (page 6)
SCA asserts that a fenceline around the Landfill prevents exposure to contaminated waste, soils, and sediments. Additional measures designed to prevent exposure from ingestion and dermal contact (such as capping, etc.) must be included in the Feasibility Study since the fenceline does not satisy the long-term protectiveness provisions and other requirements of CERCLA and the NCP.

§5.2 (page 14)
SCA must include air monitoring in the general response actions for landfill gas and air/dust control.

§5.2.1 (page 15)
SCA must explain the nature of the proposed "upgrades" to the existing gas management system and must specify the conceptual design of such "upgrades".

§5.2.5 (page 16)
SCA must include alternatives to the open flare gas destruction technology that is currently used for landfill gas management. Such alternatives must satisfy PADER ARARs.

§5.3.4 (page 18)
SCA must include excavation of discrete hot spots from the Landfill in the Feasibility Study.

Figure 1
Re: Select Exhumation/Excavation
SCA asserts that select exhumation is not an applicable technology. However EPA feels that select exhumation/excavation is potentially applicable and the Agency will determine whether discrete areas of highly contaminated soils and/or waste exist at the Landfill based on data that are presented in the RI report. SCA must include select exhumation/excavation in the Feasibility Study Report.

Figure 3
SCA must include select exhumation/excavation in the FS Report.

Figures 5 & 6
SCA must include in the Feasibility Study, upgrades to the existing gas management/ flare system which will satisy PADER ARARs.

Figure 5
Include off-gas treatment for the air stripping process in the Feasibility Study.

Figure 7

SCA must include the following process options/actions in the Feasibility Study:

- Upgrading the existing cap to comply with PADER ARARs;
- Constructing a cap over the southern unlined portion of the landfill, which complies with PADER ARARs; and
- Select excumation/excavation of hotspots.

Figures 5,6, and 7

EPA will not select a probable or potential remedial action until the RI and FS reports have been fully reviewed and evaluated. The Agency does not endorse SCA's opinions on the "potential remedial action" that are depicted in Figures 5,6, and 7.

Comments on the Candidate Technologies Memorandum (cont.)

The following are the specific comments on the subject document:

Page 12 Further explanation must be provided on why subsurface drains would not be effective, particularly for leachate.

Page 13 It is unclear in the On-site Treatment discussion whether groundwater, leachate, and surface water are being addressed as one waste stream. Clearly, leachate will be more concentrated. The treatment evaluation must address each of these waste streams.

Page 13 Pre-treatment technologies that will almost certainly be required (e.g., filtration or Ph adjustment) do not appear to have been included. Off-gas treatment for the air stripping technology must also be included.

Page 13 There is no apparent reason for separating the chemical oxidation technologies. The FS must include chemical oxidation alternatives that use combinations of oxidants and the evaluation of this technology should be approached as broadly as possible.

App. A It is not clear how extraction wells could be effective for leachate that probably exists in a fairly thin saturated thickness. The evaluation must address this. .

Fig. 1 Bedrock conditions that preclude application of vertical barriers must be better explained.

Fig. 1 The identification and excavation of landfill hotspots must be included as a remedial technology option.

Fig. 1 The evaluation must reflect that carbon adsorption may not be applicable to some contaminants, such as vinyl chloride.