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Memo to File: 11/28/94

Fr: Randy Sturgeon

Re: South landfill remedy status

On 11/28/94, DuPont presented a proposal for a new remedy @ the south landfill involving a horse-shaped slurry wall and a RCRA style cap. On 2/8/94 I briefed Tom V, Abe F, Kathy A, + Peter L about the DuPont proposal, a DelDOT proposal and the current remedy. Tom said we could change the remedy to DuPont's proposal (ie, remove treatment) if it withstood a more detailed review.

The PP (draft) went through several drafts and DuPont proposal was reviewed in detail by many including EPA's Ada lab. All tech concerns were worked out and a final draft PP was prepared and management review was initiated. During a briefing of TV, AF KH, + PJL on 10/25/94 Tom questioned why we would remove treatment from the remedy. He felt it would set a bad precedent. On 11/4/94, I met with Tom V to discuss the fact that we had been communicating support to DuPont about the remedy change (although always recognizing to DuPont that nothing is final unless or until the RA signs the ROD amendment.

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Tom said he would discuss further with people at the division directors meeting the following week (including Elliot Laws). On ~~10/17~~ 10/14/94, Tom mentioned that they agreed at DD mtg that we should keep treatment as a major component of the remedy.

This leaves us with the possibility of choosing the DelDOT alternative which would only require an ESD since it would not involve a fundamental change to the remedy.

On 10/23/94 I told Joel Karmazyn verbally that DuPont would receive a letter from Tom V stating that EPA would not remove treatment from the remedy. This was necessary b/c of an upcoming seminar ~~EPA~~ DuPont is putting on for EPA on 12/8 that this decision may have impacted.

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