Missouri Department of NATURAL RESOURCES
dnr.mo.gov
Michael L. Parson, Governor
Carol S. Comer, Director

September 9, 2019

Ms. Christine Jump, Project Manager
Superfund Division
United States Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

RE: Review of Draft OU-1 Remedial Design Work Plan and Design Criteria Report, West Lake Landfill Operable Unit 1, Bridgeton Missouri, dated August 2019

Dear Ms. Jump:

The Missouri Department of Natural Resources' (Department) Federal Facilities Section in coordination with the Department's Waste Management Program has reviewed the above referenced documents.

As previously noted, the responsible parties have attempted to defer all groundwater monitoring requirements and activities to OU-3. The OU-1 amended remedy does not provide for delegating performance objectives of the remedy to the OU-3 remedial investigation.

During review of the above referenced documents, we were disappointed to learn that the ninety-day development period for the work plan and design criteria report did not yield a submittal that reflects approximately ten percent design of the remedy. Critical to this early design phase is the detailed evaluation of the remedial components, remedial objectives, goals, and Applicable or Relevant and Appropriate Requirements (ARARs) to establish a basis of design that forms the foundation for the engineering design components necessary to successfully implement the ROD remedy. This groundwork was not developed in these submittals, as there was minimum effort in this draft to further develop requirements of the ROD and statement of work into design elements. Further, the ARAR analysis was insufficient to notice that entire portions of the ROD ARAR tables were missing from the draft document. If this submittal is intended to represent a ten percent design, then there is an extensive amount of work needed to reach fifty percent design within the remaining time in the schedule.

Thank you for giving us the opportunity to review and provide feedback on this material. If you have any questions or need further clarification, please contact me by phone at (573) 751-8628, or by written correspondence at P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

ENVIRONMENTAL REMEDIATION PROGRAM

Ryan Seabaugh

Ryan Seabaugh, P.E.
Federal Facilities Section

RS:rl

c: Ms. Christine Jump, Remedial Project Manager, EPA Region 7 (Email)
Mr. Tom Mahler, Remedial Project Manager, EPA Region 7 (Email)
Mr. Chris Nagel, Director, Waste Management Program (Email)

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COMMENTS ON REMEDIAL DESIGN DRAFT WORK PLAN
OPERABLE UNIT 1, WEST LAKE LANDFILL SUPERFUND SITE
DATED AUGUST 2019

General Comments

1. General, Groundwater performance monitoring and OU-3: According to Section 12.2.6 of the ROD Amendment, *"A long-term groundwater monitoring program will be developed in the RD. The groundwater monitoring program will provide data to evaluate the performance of the Amended Remedy and to demonstrate that the engineered cover functions as intended and minimizes the potential for precipitation or surface water to infiltrate the waste materials. Additionally, Operable Unit 3 will further investigate groundwater conditions at the Site and determine the nature and extent of groundwater contamination, and establish appropriate groundwater remedial actions as necessary to protect groundwater resources. Data from the groundwater monitoring program will also inform the OU-3 investigation."* This statement describes OU-1 groundwater monitoring activities designed for OU-1 performance monitoring where data collected may also inform the OU-3 investigation. It does not provide allowance for a remedy requirement to be delegated to an OU-3 investigation.

   Comment: Address OU-1 groundwater performance monitoring in OU-1 remedial design documents in accordance with the ROD amendment, ARARs, and remedial design statement of work.

2. General, Content: There is little information contained in this draft document and design criteria report beyond what is cited or modified from the amended record of decision and statement of work documents. It is unclear what design elements have been developed toward the 10% design stage.

   Comment: Adequately develop the work plan documents so planned activities and actions can be referenced and compared to objectives.

3. General, Interaction with state permits: There are state-permitted areas within OU-1 Areas 1 and 2 such as Permits #218903, 118906, and potentially 118912.

   Comment: This document should include a discussion on how the OU-1 Remedial Design (RD) will conform to the permit requirements for these areas and/or indicate which permit requirements will be waived.

4. General, Leachate Management: Leachate Management, an RAO for the OU-1 remedy, appears to be absent from design development.

   Comment: Add sufficient planning for the remedial action objective for leachate management.

Specific Comments

1. Executive Summary, fourth bullet of first bulleted list, page ES-1: *"Design, installation, and management of maintenance/monitoring systems for surface water, groundwater (through OU-3) and gas;"* Groundwater performance monitoring is part of the OU-1 remedy.

   Comment: Delete "(through OU-3)."

2. Section 1.1. Site History, page 1-2: *"The results of these evaluations were summarized in the Remedial Investigation (EMSI 2000 and Herst, 2006), Baseline Risk Assessment (Auxier 2000 and 2018), and Feasibility Study (EMSI 2006 and Herst 2006) reports. Based on these reports, the USEPA issued a proposed plan for OU-1 (and OU-2) in June 2006, and in May 2008 selected a remedial action (RA) for OU-1 in a ROD (USEPA 2008)."* The paragraph describes actions selected in 2006-2008 as a result of referenced documents, but refers to a document published in 2018, nearly ten years after the ROD was signed.

   Comment: Clarify the context or delete the incompatible timeline reference.

3. Section 1.2. Remedy of Record..., page 1-2: *"The Amended Remedy selected in the RODA (USEPA 2018) addresses portions of the Site that have been identified as impacted (as discussed below) through partial excavation of impacted materials and placement of an engineered cover."* This statement is too ambiguous as to what impact the RODA is addressing.

   Comment: Insert "radiologically" before "impacted."

4. Section 1.2. Remedy of Record – 2018 Selected Amended Remedy, second bullet, page 1-2: *"Optimization of RIM removal above and below the 12-foot target depth (excavation as deep as 20 feet or as shallow as 8 feet) will be performed during the RD based on criteria set forth in Section 12.0 of this RDWP"* Section 12 of the work plan could not be located.

   Comment: Cite existing references.

5. Section 1.2. Remedy of Record – 2018 Selected Amended Remedy, 8th bullet, page 1-2: *"Groundwater monitoring, which is addressed under OU-3;"*

   Comment: Delete "which is addressed under OU-3."

6. Section 1.3.1. Updated RAOs for Areas 1 and 2 of OU-1, page 1-3:

   Comment: Describe or cite the location where substantive discussion exists for how each of the listed RAOs will be met.

7. Section 1.3.2. Updated RAOs for Buffer Zone..., page 1-3: *"Historic erosion of the landfill berm along the north side of Area 2 resulted in deposition of radiologically impacted soil on the surface of the Buffer Zone and Lot 2A2 of the Crossroads Industrial Park (also known as the former Ford Property)."*

   Comment: Insert "Presumed" prior to "Historic."

8. Section 2.2.1. RIM Investigations, page 2-1: There is no discussion of geostatistical methods and calculations as described in Section 12.2.1 of the OU-1 ROD Amendment.

   Comment: Provide discussion on geostatistical model and calculations as described in Section 12.2.1 of the ROD.

9. Section 2.2.1. RIM Investigations, page 2-1: There is no discussion on sampling to further characterize RIM extent for cover design, including boundary and sediment sampling.

   Comment: Provide discussion on investigations to refine the RIM boundary with additional soil and sediment sampling.

10. Section 2.2.1. RIM Investigations, page 2-1: *"We also intend to collect sufficient additional samples to provide the confirmation sampling required in the RODA using the precision sampling techniques available during the RD phase to eliminate the need to collect additional confirmation samples during or after excavation of the RIM during the RA."* Sections 12.2.1, 12.2.2, and 12.2.4 of the ROD amendment, along with the attached memorandum to the National Remedy Review Board (Appendix C) all indicate the use of confirmation sampling procedures in the RA to verify that the remedial action is achieving the objectives of the ROD selected remedy.

    Comment: Discuss how confirmation sampling will achieve the objective of confirming equivalent RIM removal as proposed in the proposed plan.

11. Section 2.2.1. RIM Investigations, page 2-1: *"The off-site RIM investigations will likely require negotiated access agreements for both the Lot 2A2 and background investigations."*

    Comment: Replace "site" with "property."

12. Section 2.2.2. Geotechnical Investigation, page 2-2: *"The regrading and cover construction are expected to require substantial imported fill and so geotechnical investigation may also be performed if a source is identified for borrow soils for use in closure of OU-1, otherwise such investigations will need to be performed during RA."* The investigation and selection criteria should be approved in the RD.

    Comment: Include discussion on the geotechnical investigation and selection criteria that meets or exceeds ARARs for borrow soils being used for closure of OU-1.

13. Section 3.1.2.10. Wildlife Hazard Mitigation Plan, Page 3-7:

    Comment: Since EPA will not be approving the plan, the section needs to develop details on entities that will be making determinations and how coordination with those entities will proceed.

14. Section 3.3. Site Preparation and Controls, page 3-9:

    Comment: Include provisions for vehicle/equipment decontamination and washing.

15. Section 3.4.1. Excavation Design, 3rd bullet, page 3-10: *"The deep RIM materials are used in defining the final cover boundary in Areas 1 and 2 but that does not require a geostatistical analysis;"* The unexcavated RIM areal extent should be used to define the final cover boundary, which should require a statistically valid analysis.

    Comment: Replace the statement with adequate development of design criteria to be used to determine cover extent.

16. Section 3.4.1. Excavation Design, 6th bullet, page 3-10: *"Identifying requirements for confirmation sampling. The intent of the additional field investigations and geostatistical modeling will be to define the limits of RIM during RD such that no confirmation sampling needs to be performed during RA;"* Sections 12.2.1, 12.2.2, and 12.2.4 of the ROD amendment, along with the attached memorandum to the National Remedy Review Board (Appendix C) all indicate the use of confirmation sampling procedures in the RA to verify that the remedial action is achieving the objectives of the ROD selected remedy.

    Comment: Discuss how confirmation sampling will achieve the objective of confirming equivalent RIM removal as proposed in the proposed plan.

17. Section 3.6. Post-RA Flood Protection, page 3-13: *"The primary focus of the design will be stability of the closed slopes and the starter berm at the toe of waste slope (if used). Stability analysis will include rapid drawdown analyses. Erosion protection will be designed if the evaluations indicate it is necessary."*

    Comment: Describe where this analysis will be developed, and what document or work plan it will be included in for approval.

18. Section 3.6. Post-RA Flood Protection, page 3-13: *"The primary focus of the design will be stability of the closed slopes and the starter berm at the toe of waste slope (if used). Stability analysis will include rapid drawdown analyses. Erosion protection will be designed if the evaluations indicate it is necessary."* Erosion protection is necessary for design of a cover meeting longevity standards of 200/1000 years.

    Comment: Delete "if the evaluations indicate it is necessary."

19. Section 3.7. Environmental & Community Protection & Monitoring During RA, page 3-13: *"Groundwater will be addressed as part of OU-3."*

    Comment: Delete "as part of OU-3" and develop the design elements in the work plan.

20. Section 3.4.2. Backfilling of Excavations, page 3-11: Consideration should be given to whether different types or quality of backfill material will be used between the landfill backfill and the Buffer Zone/Lot 2A2 Backfill.

    Comment: Include a design item for evaluation of backfill criteria for all excavations.

21. Section 3.4.3. Final Cover Design, page 3-11: Design elements should specifically include consideration of integration challenges for contiguous boundaries between OU1 and OU2.

    Comment: Include remedial design elements for evaluation of cover integration for contiguous boundaries between OU1 and OU2 that includes stormwater management elements.

22. Section 3.4.4. Stormwater Management Design, page 3-12:

    Comment: Include design considerations for conveyance and storage that considers contribution or shared volume from adjacent properties and operable units.

23. Section 3.5. Materials Handling, Transportation, and Disposal, page 3-12: The fifth bullet discusses evaluation of criteria for determining whether to utilize an enclosed structure for excavated materials management.

    Comment: Also provide provisions for evaluating storage and protection of excavated materials that may not be housed in temporary enclosed structures.

24. Section 4. ARARs and Permits, page 4-1: *"While there are overlapping aspects of these regulations and guidance, they were formulated for substantially different materials, challenges, and time frames. Consequently, the final cover design will be a hybrid incorporating aspects of the various ARARs."* ARARs are requirements that must be met. The design needs to meet or exceed all requirements.

    Comment: Replace "a hybrid incorporating aspects of the various ARARs" with "will meet or exceed requirements of ARARs."

25. Section 4.1. Environmental Protection Standards for Uranium and Thorium Mill Tailings, page 4-2: *"Parsons notes that research has shown that modern landfill cover systems should generally provide at least 200 years of effective protection against precipitation infiltration if properly designed, constructed, and maintained. However, this does not necessarily extend to timeframes of 1,000 years or more. Parsons will evaluate alternative cover concepts that can be integrated with current landfill cover approaches that can provide substantially greater infiltration protection than is currently available at the site for the appropriate UMTRCA timeframes."* The term modern landfill cover systems is too general to understand what is being compared to 200-year life expectancy, and the conclusion has no supporting literature or documentation to reference. Further, a site-specific evaluation should be developed in the RD.

    Comment: Delete the paragraph, and provide provisions for longevity evaluation for components of the cover design.

26. Section 4.4. Missouri Solid Waste Rules for Sanitary Landfills, page 4-3: Leachate management ARAR could not be found.

    Comment: Include substantive discussion on leachate management ARAR and how it will be addressed in the design.

27. Section 4.4. Missouri Solid Waste Rules for Sanitary Landfills, page 4-3:

    Comment: Include the coefficient of permeability requirement, and all other specific Missouri Solid Waste ARARs as they pertain to remedial design.

28. Section 4.4. Missouri Solid Waste Rules for Sanitary Landfills, page 4-3: *"The optimal minimal slope for the remedy will be further evaluated during the RD. The maximum sloping requirements will be met at elevations above perimeter or starter toe berms."* The ROD did not provide any caveats. Any deviation should be discussed in the RD.

    Comment: Delete "at elevations above perimeter or starter toe berms" or describe it in terms of potential option for development in the RD.

29. Section 4.4. Missouri Solid Waste Rules for Sanitary Landfills, page 4-3: *"Because landfilling of Areas 1 and 2 was completed many years ago, much of the compaction of the refuse has already taken place and differential settlement may no longer be a significant concern. Therefore, the 5% minimum sloping requirement may be greater than necessary and may not be optimal for the Amended Remedy."* Given this assumption, evaluation should be made to ensure the assumption will still be valid in areas of disturbance and excavation/backfill.

    Comment: Evaluate excavation backfill and compaction requirements to ensure valid assumptions on differential settlement.

30. Section 4.6. page 4-4: *"As discussed above, groundwater will be addressed through OU-3"*

    Comment: Delete.

31. Table 2. Anticipated Drawings:

    Comment: Include drawings for gas collection and control systems, in addition to gas monitoring networks.

32. Table 2. Cover System Details:

    Comment: Include drawings specific to joining of cover systems of adjoining operable units.

33. Table 3. Anticipated Specifications:

    Comment: Include specifications for gas collection and control systems.

34. Table 3. Anticipated Specifications:

    Comment: Include specifications for vegetation.

35. Table 3. Anticipated Specifications, seeding:

    Comment: Ensure specifications include mulch, fertilizer and seed types to be used.

36. Table 5. Chemical Specific ARARs: Chemical-specific ARARs from the ROD are missing from this table.

    Comment: Develop complete and appropriate ARAR tables.

37. Table 5. To Be Considered, page 13 of 15: Technical Guidance for Final Covers on Hazardous Waste Landfills has an incorrect Citation.

    Comment: Correct the citation.

COMMENTS ON DRAFT DESIGN CRITERIA REPORT
OPERABLE UNIT 1, WEST LAKE LANDFILL SUPERFUND SITE
DATED AUGUST 2019

GENERAL COMMENTS

38. General, Groundwater performance monitoring and OU-3: According to Section 12.2.6 of the ROD Amendment, *"A long-term groundwater monitoring program will be developed in the RD. The groundwater monitoring program will provide data to evaluate the performance of the Amended Remedy and to demonstrate that the engineered cover functions as intended and minimizes the potential for precipitation or surface water to infiltrate the waste materials. Additionally, Operable Unit 3 will further investigate groundwater conditions at the Site and determine the nature and extent of groundwater contamination, and establish appropriate groundwater remedial actions as necessary to protect groundwater resources. Data from the groundwater monitoring program will also inform the OU-3 investigation."* This statement describes OU-1 groundwater monitoring activities designed for OU-1 performance monitoring where data collected may also inform the OU-3 investigation. It does not provide allowance for a remedy requirement to be delegated to an OU-3 investigation.

    Comment: Address OU-1 groundwater performance monitoring in OU-1 remedial design documents in accordance with the ROD amendment and remedial design statement of work.

39. General, ARARs: Many of the specific comments for the RD work plan are applicable to the draft design criteria report. ARAR discussion should be clear, specific, and with intent to meet or exceed requirements of ARARs and TBCs.

    Comment: Provide complete, accurate, clear, and specific discussion that relates planned activities to ARARs, TBCs, and RAOs that meets or exceeds all requirements.

40. General, Relationship among planned activities and objectives/ARARs: In general, there is insufficient connection of activities described in this document to remedial action objectives or in many cases ARARs and TBCs.

    Comment: Produce a document that sufficiently relates all planned activities to remedial action objectives and ARARs/TBCs.

41. General, Interaction with OU-2: There are state-permitted areas within OU-1 Areas 1 and 2 such as Permits #218903, 118906, and potentially 118912.

    Comment: This document should include a discussion on how the OU-1 Remedial Design (RD) will conform to the permit requirements for these areas and/or indicate which permit requirements will be waived.

SPECIFIC COMMENTS

42. Section 3.1. Dust Control: *"As noted above, the inspection and maintenance program presented in the NCC Installation Work Plan will be superseded by the revised program presented in the forthcoming NCC construction completion report."* Planned transition of activities between different EPA orders should be preceded by a specific and formal EPA approval prior to inclusion in the work plan.

    Comment: Delete.

43. Section 3.1. Dust Control, Page 3-1, first paragraph: This section discusses potential sources of air impacts from vegetation removal only. Discussion should include all activities with the potential to generate dust such as truck and equipment movement.

    Comment: Include additional potential sources of dust generation.

44. Section 3.2. Perimeter Air Monitoring:

    Comment: Describe the purpose and goals of the Perimeter Air Monitoring Program along with any specific ARARs, TBCs, ROD requirements, and RAOs

45. Section 3.3. Stormwater Off-site Discharge:

    Comment: Describe the purpose and goals of stormwater off-site discharge monitoring along with any specific ARARs, TBCs, ROD requirements, and RAOs.

46. Section 5.1. Definition of Area 1 and Area 2 Excavation Boundaries, page 5-1: A substantial number of significant unresolved comments exist from multiple sources for the geostatistical model as it was presented in the feasibility study for use in the proposed plan.

    Comment: As previously requested, since the model is fundamental to the design moving forward, the details of modeling assumptions and development activities should be provided early and often in order to ensure previous concerns are addressed, and that model development does not become an impediment to timely development of the remedial design.

47. Section 5.1. Definition of Area 1 and Area 2 Excavation Boundaries, page 5-1: Substantial concerns and unresolved comments exist related to the use of "soft" data used for characterization and decision-making.

    Comment: Any "soft" data for characterization or decision-making should come with a quality assurance plan adequate for specifically identified objectives.

48. Section 5.2. Definition of Buffer Zone/ Lot 2A2 Excavation Boundaries: *"The mean of the background samples plus three standard deviations is expected to be used to define the background range."* Without knowing any other specifics on the planned statistical analysis or sample analysis criteria, the expectation is that three standard deviations from the mean is unacceptable.

    Comment: Adequately describe a statistical investigation plan or delete the statement.

49. Section 5.5. Contact Water and Leachate Management, page 5-3: *"Contact water and leachate removed from the excavation will be conveyed to the on-site construction water treatment plant for treatment prior to approved discharge."* This statement appears to conflict with a similar statement in Section 2.4 which states that a temporary water treatment plant will be built "if necessary." Moreover, if it is not specifically required by the ROD, the need and specifications for on-site pretreatment should be evaluated in the overall design.

    Comment: Replace the statement with one that discusses evaluation of pre-treatment needs and appropriate disposal of contact water and leachate.

50. Section 5.6. Air Quality and Odor, Page 5-3: *"These measures are anticipated to be quickly implemented as flexible responses and may include a variety of techniques including misting, odor suppressant foams, masking agents, and temporary covers."*

    Comment: Add a referral in the statement to Section 5.8 discussing development of criteria for temporary cover. Any other useful cross-references should be included.

51. Section 5.8. Daily and Intermediate Covers, Page 5-4: *"Daily and intermediate covers may be required during the RA to reduce precipitation contacting exposed waste, odors and other emissions, and attractiveness to birds and vectors."* In addition to these controls, the daily and intermediate cover should also reduce oxygen infiltration to prevent fires and also prevent blowing litter.

    Comment: Include design criteria for reducing oxygen infiltration and blowing litter prevention, and any other appropriate design criteria for temporary cover.

52. Section 6.8. Structures and Mechanical/Electrical Systems, page 6-3:

    Comment: Include design provisions for monitoring landfill gas within any occupied temporary structures or confined areas.

53. Section 6.8. Structures and Mechanical/Electrical Systems, page 6-3:

    Comment: Include design considerations for gas monitoring along preferential pathways such as utility lines.

54. Section 8.2. Disposal Site Requirements and Community Acceptance, page 8-1: *"The LBSR and soil mixture that was disposed of in West Lake Landfill did not require an AEC license at the time of its disposal. The LBSR from the Latty Avenue site that was blended with soil and ultimately disposed of at West Lake Landfill constituted "unimportant quantities of source material" that were exempt from the AEC's licensing requirements, as set forth in 10 CFR § 40.13(a). In addition, the AEC had contemporaneous knowledge that the LBSR and soil mixture had been disposed of at the landfill, and still found that Cotter's source material license for the Manhattan Project residues (including the LBSR) that had been stored at Latty Avenue could be terminated (and did in fact terminate that license)."* This narrative is not relevant to remedial design and is inappropriate for inclusion into an RD work plan.

    Comment: Delete the portion quoted above and begin the following sentence with "An analysis may be required..."

55. Section 9.3. Sludge and Treatment Media Disposal, page 9-1:

    Comment: Include provisions for testing sludge and treatment media prior to disposal.

56. Section 9.4. Pumping, Treatment, Transmission, and Storage, page 9-1: Construction of a pre-treatment facility may involve additional ARARs starting at 40 CFR Part 403.

    Comment: If developing pretreatment options prior to discharge to waters of the state, consider additional ARARs.

57. Section 11.1. Final Cover Boundary Definition, page 11-1: *"Along the interior boundary of Areas 1 and 2, investigation data will be evaluated to identify the furthest extent of RIM-containing waste beyond the excavation to define the edge of the engineered cover in those areas. Additional investigation may be necessary in the DI to provide this data."* This statement is not consistent with ROD Section 12.2.2.

    Comment: Describe sampling sufficient to meet the requirements of the amended ROD to determine cover extent.

58. Section 11.3.2. UMTRCA, Page 11-2:

    Comment: Develop this section to include performance evaluation of cover design elements to achieve longevity requirements.

59. Section 11.3.3. North Quarry Overlay, Page 11-2: The term "classical" has no design meaning, and the citation refers to several designs.

    Comment: Expand the section to clearly develop the design of the cover over the North Quarry RIM.

60. Section 11.4. Seismic, Page 11-2: *"Pseudo-static slope stability analyses will be performed for the side slopes and final cover system per the procedures outlined in EPA 600-R-95-051 'RCRA Subtitle D (258) Seismic Guidance for Municipal Solid Waste Landfill Facilities."* Other ARARs may require more stringent slope stability analysis and the guidance does not consider longevity requirements for 200/1000 year cover life.

    Comment: Develop more robust slope stability analyses that meets or exceeds ARARs and considers longevity requirements.

61. Section 11.4. Seismic, Page 11-2: *"If the pseudo-static slope stability analyses have a factor of safety of 1.0 or greater, no additional analyses will be required per the guidance."* A factor of safety of 1.0 represents stress at the maximum allowable limit and less than 1.0 indicates failure. Additionally, materials used in landfill design tend to have variable engineering properties that rarely allow for design at the threshold of failure.

    Comment: Use a reasonable factor of safety for slope stability that considers material variability and longevity requirements of the cover.

62. Section 11.5. Landfill Gas, Page 11-3: *"The RD will evaluate passive gas management to address these circumstances."*

    Comment: Delete "passive" and develop the section to evaluate all types of gas management systems.

63. Section 11.7. Restoration, Page 11-3:

    Comment: Develop design elements for native prairie grassland to account for any special maintenance requirements such as the potential for controlled burns.

64. Section 12.1. Permanent Stormwater and Erosion Control, page 12-1: Given longevity requirements of UMTRCA ARARS, permanent stormwater management elements should be designed for lower frequency, higher intensity rainfall events.

    Comment: Design stormwater control to factor in longevity requirements of UMTRCA.

65. Section 12.2. Discharge and Detention Requirements, page 12-1: As stated in a number of documents developed by the responsible parties, including Section 4.12 of the Remedial Investigation Addendum, there is described large areas of OU-1 with no-discharge surface water ponding. Additional volume and discharge points should be considered, at minimum.

    Comment: Revise Section 12.2 to reflect potential for additional discharge and detention requirements.

66. Section 12.3. Erosion and Sediment Control Best Management Practices: page 12-1:

    Comment: Include guidelines for To Be Considered documents such as, *Technical Guidance Document: Final Covers on Hazardous Waste Landfills and Surface Impoundments.*

67. Section 13.0. Post-Remedial Action Flood Protection, page 13-1:

    Comment: Include substantive discussion for localized flooding.

68. Section 14.0. Post-Remedial Action Operation, Monitoring, and Maintenance:

    Comment: Adequately cover this section as it relates to ARARs and TBCs.