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Project name:
Celanese Acetate - Celco Facility

Project ref:
60440219

From:
Everett W. Glover, Jr.

Date:
October 6, 2016

Via email

To:
Ms. Diane Schott
Office of Remediation (3 LC20)
Land and Chemicals Division
EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Ryan Kelly
Virginia Department of Envronmental Quality,
Office of Hazardous Waste
PO Box 1105
Richmond, VA 23218

CC:
Steve Simpson, Celanese
Eric Gates, Celanese
John King, Celanese

Memo

Subject: Partial Response to Comments on September 29, 2016 Teleconference
Pond A Closure Approach
Celanese Narrows RCRA Corrective Action Facility
EPA Identification No. VAD 005 007 679

This memo provides partial responses to the questions/comments contained in your email dated September 29, 2016, providing draft tentative comments to the Celanese/AECOM submittal of September 20, 2016. We appreciate you providing these comments to assist in keeping the project moving. Likewise, this response addresses comments related to the sampling and analysis proposed for providing data relevant to closure of ash Pond A while responses to the broader comments/requests are being developed.

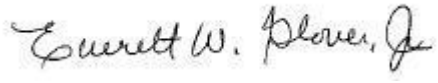
- Celanese is committed to closing Pond A to meet the requirement of the Virginia Department of Conservation and Recreation (DCR) who administer the dam safety program, and the Virginia Division of Land Protection and Revitalization who administer the solid waste program. As such, Celanese is working with both organizations in developing the closure plan for Pond A. The plans include leaving the existing ash in place within the footprint of Pond A, leaving the existing liner in place, to the degree practical, based on the final closure configuration, and incorporating a geomembrane layer in the closure cap placed over the footprint of the pond. The construction drawings will be provided to the EPA upon completion and approval by the relevant portions of the Virginia Department of Environmental Quality (VDEQ).
- To provide groundwater quality information relevant to Pond A closure, Celanese is committed to sampling piezometers PZ-A-1, PZ-A-2, PZ-A-3, PZ-A-8, PZ-A-9, PZ-A-11, and PZ-A-12 for the analytes requested in the previous comments from EPA (see the attached Table 1). PCBs, PFOA/PFOS, and dioxins/dibenzofurans will be added to the routine analytical suite in piezometers PZ-A-8, PZ-A-9, and PZ-A-11. The sampling locations are shown on the attached Figure 1. To facilitate the sampling, Celanese will utilize the Data Collection Quality Assurance Project Plan

(DCQAPP) and the Data Management Plan approved as part of the Phase I RCRA Facility Investigation (RFI) Work Plan submitted in August 2011 by Arcadis. The DCQAPP will be updated as needed to incorporate the laboratory-specific items such as detection levels, standard operating procedures, etc. required from changing the analytical laboratory from TestAmerica to Pace Analytical. The updates to these plans will be submitted to EPA upon completion of the modifications.

- The well requested east of and adjacent to the seep area associated with Waste Disposal Area (WDA) 3 is not included as part of this program since it is not part of Pond A and the area will not be impacted by the planned closure activity. Closure of the WDA 3 area will be addressed in conjunction with other areas of the site at a future date.

Celanese would like to proceed with the sampling before the weather deteriorates in the fall. Therefore, a prompt review and approval of the sampling portion of the project is requested so Celanese can begin securing approval of the $80,000 budget for this phase of the project. Please provide your approval to proceed. If further discussion is required, we are available for a teleconference the week of October 10 or October 17, Please let me know how you would like to proceed.

Sincerely,



Everett W. Glover, Jr. PE
Project Manager
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Table 1
Proposed Analytical Program

All wells

Appendix IX VOCs
Appendix IX SVOCs
low level PAHs
pesticides
herbicides
VOC TICs
SVOC TICs
cyclohexane
hexane (as n-hexane)
carbon disulfide
cis 1-2 DCE
1,2,4-trimethylbenzene;
1,3,5-trimethylbenzene;
1,1,2-trichlorotrifluoro ethane (Freon 113)
bis(2-ethylhexyl)phthalate (BEHP)
phenol
1,4 dioxane (low level)
mesityl oxide (as TIC)
2-heptanone (as TIC)
aluminum
antimony
arsenic
barium
beryllium
cadmium
chromium
hexavalent chromium
cobalt
copper
iron
lithium
manganese
mercury
nickel
lead
silver
strontium
thallium
vanadium
zinc
chlorides
TPH
ammonia nitrogen
nitrate
nitrite
sulfate
sulfide
cyanide
ethylene glycol
dipropylene glycol methyl ether (DPGME)

Additional analyses for PZ-A-8, PZ-A-9, and PZ-A-11

dioxins/furans
PFOA/PFOS
PCBs (method 1668A)

AECOM

FIGURE 1

LOCATION MAP
MONITORING WELL/PIEZOMETER LOCATIONS

Celanese Celco Facility
Narrows, VA
Project No.: 60442157

POND A
POND B
POND C
POND 2

PZ-A-1
PZ-A-2
PZ-A-3
PZ-A-8
PZ-A-9
PZ-A-11
PZ-A-12

Operating Water Level
Limits of Pond A
Gravel Drive
7' Chain Link Fence
Dock
Post
Shelter
6" & 14" Concrete Wells
Pipe Rack
Pipe Rack Empty
Windsock
Gravel

LEGEND

- MONITORING WELL/PIEZOMETER
- LIMITS OF POND A
- EDGE OF WATER (ACTIVE PONDS)
- PROPOSED SAMPLING LOCATION

N

50 25 0 50 100 150
SCALE IN FEET