

Douglas L. Fisher
Environmental Affairs and Safety Manager
Vernay Laboratories, Inc.
875 Dayton Street
Yellow Springs, Ohio 45387-2619

RE: RFI Approval with Comments
Yellow Springs, Ohio
OHD 004 243 002

Dear Mr. Fisher:

The United States Environmental Protection Agency (U.S. EPA) has completed a review of the RCRA Facility Investigation (RFI) Phase I Report, dated June 29, 2004, which is required by the September 27, 2002, Administrative Order on Consent (Consent Order), Docket No. RCRA-05-2002-0016. The RFI Phase I Report was required to document the completion of the Cedarville aquifer and storm sewer investigation.

The U.S. EPA approves the RFI Phase I Report with the enclosed comments. The RFI Phase I Report addresses the nature and extent of contamination for surface water including the storm sewer, sediment, saturated sand seams, sewer backfill, and groundwater of the Cedarville Aquifer.

In addition, Vernay Laboratories, Inc., will be completing a RFI Phase II Report that addresses the determination of the nature and extent of contamination in soil on and off the facility, an assessment of the fate and transport of contamination from the facility, quarterly monitoring, continued monitoring of effectiveness of the groundwater capture zone and completion of the human health and ecological baseline risk assessment. Based on the RFI Phase I Report, it appears an investigation of the deeper aquifer (Brassfield Aquifer) will not be required at this time. The RFI Phase II Report will be due December 31, 2004. Vernay Laboratories, Inc., will also be submitting the Environmental Indicator Report for groundwater. This report must show that the migration of contaminated groundwater at or from the Facility is stabilized. Vernay will need to collect sufficient monitoring and measurement data to verify that migration of any contaminated groundwater is stabilized.

I am enclosing comments to the RFI Phase I Report. If you have any comments or questions, please call me at (312) 886-8093.

Sincerely,

Patricia J. Polston
Project Manager

Enclosure

cc: J. Morris, ORC (w/encl)
D. Contant, Payne Firm (w/encl)
T. Matheson, (w/encl)

bcc: Polston (w/encl)

ENCLOSURE

Comments to the RFI Phase I Report Vernay Laboratories, Inc. OHD 004 243 002

1. The RFI Phase I Report includes multiple references to a study of the lower Brassfield Aquifer that was conducted by a nearby facility. The RFI Phase Report does not state why or when the study was submitted. In addition, the RFI Phase I Report does not include or reference any review or approval that this lower Brassfield Aquifer study received. At this time, we can make no interpretations regarding this referenced lower Brassfield Aquifer study.
2. The results of the capture zone of the interim measure extraction wells need to be more completely demonstrated. It appears the control and containment of the plume is more effective for the upper portions of the Cedarville Aquifer than the middle of the Cedarville Aquifer. The system may prevent additional contamination to the upper portions of the groundwater, but not completely addressing what is already existing.
3. The Environmental Indicator (EI) Reports are measures of interim work and not considered final remedy demonstrations. The RFI Phase II Report will include the continued monitoring of the existing groundwater extraction well interim measure efficacy to support the EI regarding groundwater migration under control. After the EI report is completed, a Final Corrective Measures Proposal will be due to discuss and explain proposed final corrective measures.