



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:
DW-8J

December 13, 2005

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

RE: RFI Phase II Approval with Comments
Vernay Laboratories, Inc.
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) revised Phase II Report, dated October 13, 2005. The RFI Phase II Report was required to document 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 ground water capture zone and completion of the human health and ecological risk assessment.

The U.S. EPA approves the revised RFI Phase II Report with the enclosed comments. The enclosure includes a list of wells that should be monitored quarterly. This is in addition to the monitoring plan outlined in Section 7, Post RFI Ground Water Monitoring, in the revised RFI Phase II Report.

In addition, Vernay Laboratories, Inc., will also be submitting the Environmental Indicator Report for ground water. This report is due 180 days from this approval of the revised RFI Phase II Report. This report must show that the migration of contaminated ground water at or from the Facility is stabilized. Vernay will need to collect sufficient monitoring and measurement data to verify that migration of any contaminated ground water is stabilized.

I am enclosing comments to the revised RFI Phase II 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)
B. Bill, OPA (w/encl)
D. Contant, The Payne Firm

ENCLOSURE

Comments to the revised RFI Phase II Report
Vernay Laboratories, Inc.
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The Agency advocates using collected data as the basis for corrective action decisions. In addition to the plan outlined in the revised RFI Phase II Report, Section 7, Post RFI Ground Water Monitoring, the following list of wells should be monitored quarterly. These wells were selected with time-dependency and area coverage in mind and are given below.

The data from the first set of wells (listed immediately below) should be used to construct hydrogeologic cross-sections depicting contaminant-concentration contours perpendicular to the plume (further information on this is provided below). Like the monitoring, these cross-sections should be prepared quarterly.

MW02-08
MW02-08CD
MW02-08SE
MW02-13
MW02-03
MW02-03CD
MW02-03SE
MW02-11
MW02-11CD

The data from the next set of wells should be used to construct hydrogeologic cross-sections depicting the contaminant concentrations parallel to the direction of the plume migration. These cross sections should also be prepared quarterly.

MW01-02
RW01-05
MW01-04
MW01-04CD
MW02-08*
MW02-08CD*
MW02-08SE*
MW02-06
MW02-06CD
MW02-09
MW02-10
MW01-10

*data from these wells to be used in constructing both sets of cross-sections.

MW01-13 is selected for time-dependency backfill monitoring well.

There is a total of 19 wells that will need to be monitored quarterly. The separate perpendicular

and parallel contaminant-concentration cross sections should be prepared depicting; total chlorinated compounds, total parent compounds and total daughter compounds.