

**Responses to USEPA Comments on the
OU-1/OU-2 Remedial Design Work Plan
Anniston PCB Site, Anniston, Alabama**

COMMENTS:	Response:
General Comments	
<p>1. Section 2.1.1 Nonresidential properties within OU-1/OU-2. This section implies that those areas are only included because they were included in a 2001 Administrative Order on Consent (AOC). The area is adjacent to the facility and PCBs were found in the neighborhood during the removal assessment conducted when the Site was discovered.</p>	<p>Editorial revisions to clarify the intent of the statement were made to the revised Remedial Design Work Plan (RDWP).</p>
<p>2. Section 2.2.1 Residential Soil. Include a paragraph about the 2005 Administrative Order on Consent (AOC) the EPA entered into with 11 commercial/ industrial parties to perform a portion of the PCB-contaminated soil cleanup on residential properties at the Anniston PCB Site, as part of a de minimis settlement for their contribution to PCB contamination at the Site. Long-term monitoring/responses at residential properties cleaned up for PCB-contamination in soil under the 2005 AOC will be addressed as part of this remedy component.</p>	<p>Additional language regarding the long-term monitoring of the Lead Site properties was added to the revised RDWP.</p>
<p>3. Section 2.2.5 Nonresidential Soils, first paragraph. Subsurface soil should be included: "The selected remedy components for nonresidential soil include excavation and off-site disposal of surface and subsurface soil."</p>	<p>The requested edit was made to the revised RDWP.</p>
<p>4. Section 2.2.7.2 Creek Banks. PDI needed for creek bank stabilization was not identified in this section as it was in other sections, even though it is required in Section 4.1.1.6.</p>	<p>Section 2.2.7.2 of the RDWP was revised to reflect the inclusion of creek bank stabilization in the predesign investigation (PDI) program.</p>
<p>5. Section 3.1 Predesign Investigation Work Plan. These media are being investigated and designed by separate companies, so why is the data being described and collected in one work plan?</p>	<p>The collective RD work is being performed under the overall direction of a single Engineer of Record (EOR). While different consulting companies are generally working on different media (e.g., soil, sediment, and groundwater) under the overall direction of the EOR, there are RD work products (e.g., design drawings) that will reflect the collective engineering input of these firms. An example is the T-11 area that includes a combination of remedial work for multiple media in close proximity. Remedial work in the T-11 area will address floodplain soil, select creek bank areas, sediment, low permeability capping, and groundwater extraction/treatment/discharge.</p>

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<p>6. Section 3.1.1 Floodplain and Creek Bank Soil. The EPA does not agree that collecting one sample from 1-3 feet and 1-4 feet in depths are appropriate, if that is what is suggested in this section. The number of samples and depth interval for each sample should be described in the FSP and QAPP for the PDI.</p>	<p>Details for the proposed PDI program have been streamlined in the RDWP recognizing that they will be finalized in the Predesign Investigation Work Plan (PDIWP). P/S explicitly acknowledge that USEPA approval of the RDWP does not constitute regulatory approval of any PDI related activities that are described in the RDWP for contextual purposes.</p>
<p>7. Section 3.1.1 Floodplain and Creek Bank Soil. The PDI for dredge spoil piles is described as follows: “The surface and subsurface soil beneath the dredge spoil piles will be characterized during the RA and not during the PDI. This is because of the difficulties associated with sampling beneath the piles without first removing them. Based on this, it will be less disruptive to sample beneath the piles during remediation to evaluate whether the surface or subsurface soils require removal.” The RA surface and subsurface soil characterization associated with the dredge spoil piles should not only be conducted beneath the piles but also should extend around the piles to evaluate potential contaminant migration from surface water runoff.</p>	<p>Consistent with Response to USEPA Comment No. 6, details regarding proposed PDI activities for the dredge spoil piles have been streamlined in the RDWP recognizing that they will be finalized in the PDIWP.</p>
<p>8. Section 3.1.2.1 Soil-Leaching Assessment at the Eastside Properties and PB-RR-37 Area. Unfiltered groundwater samples need to be provided for the Eastside property groundwater investigation. Homologue data has typically been collected for groundwater, but passive sampling will be considered. A map of the proposed groundwater well location should be provided in the PDI WP prior to EPA approval of the location (location described but not provided in Figure 3-2). It is not clear what the groundwater investigation at PB-RR-37 Area includes from this description. A more complete description should be provided in the PDI WP.</p>	<p>Consistent with Response to USEPA Comment No. 6, details regarding the proposed PDI activities for the soil to groundwater pathways have been streamlined in the RDWP recognizing that they will be finalized in the PDIWP.</p>
<p>9. Section 3.1.3 Snow Creek Sediment. The sediment should be sampled regardless of whether it has moved, instead of having a Phase I and Phase II event. The previous results are over 2 decades old.</p>	<p>Consistent with Response to USEPA Comment No. 6, details regarding the proposed PDI activities for Snow Creek sediment have been streamlined in the RDWP recognizing that they will be finalized in the PDIWP.</p>

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<p>10. Section 3.2 Predesign Investigation Evaluation Report. To the extent that the activities for soil, sediment, and groundwater are independent, separate investigations and reports should be prepared so that data can be considered and evaluated for completeness. These media are being collected and designed by separate companies according to the work plan, so it should be possible to review them separately to some extent, depending on the contracting strategy.</p>	<p>To streamline overall project schedule including implementation and reporting of the PDI activities, a unified approach is being implemented. For example, geotechnical borings at the T-11 area are necessary to design the low permeability cap and assess creek bank stability approaches. The geotechnical borings should be implemented along with the installation of groundwater wells in the T-11 area as part of designing the groundwater extraction and treatment system.</p> <p>To the extent that property access is problematic, P/S will engage USEPA for assistance early-on in the effort and will not unduly delay implementation of the PDI program or remedy implementation when adequate work-around approaches are available.</p>
<p>11. Section 4.1 Remedial Design Process for OU-1/OU-2 Components. Requiring that the RD be one unified package seems unnecessary and destined to delay parts of the work where access may be granted or easily obtained. The work plan did not provide a reason why the groundwater remedy should be dependent on the sediment remedy or access to the various non-residential properties. Why should work on P/S owned property be held up?</p>	<p>The goal is to issue a single package for remedial construction purposes to the extent that the approach does not delay implementation. The connected nature for many of the remedial activities supports a unified project implementation strategy recognizing that the approach will also lessen construction-related impacts to the community.</p>
<p>12. Section 4.1 Remedial Design Process for OU1/OU2 Components. Installation, monitoring, and maintenance of erosion control best management practices (BMPs) should be included in the subsections of Section 4.1 that include land disturbance. The Alabama Handbook for Erosion Control, Sediment Control and Stormwater Management on Construction Sites and Urban Areas (June 2003 and Revised March 2009) should be referenced as the guidance document for BMPs.</p>	<p>The Third Edition of the <i>The Alabama Handbook for Erosion Control, Sediment Control and Stormwater Management on Construction Sites and Urban Areas, December 2018</i>, has been included as a reference document in the revised RDWP.</p>
<p>13. Section 4.1.1.4 Removal and Off-Site Disposal of Dredge Spoil Piles. EPA assumes that the reference to the three upland dredge spoil piles includes SC-1, SC-2, and SC-7. For clarity, these should be listed following the first reference to upland dredge spoil piles.</p>	<p>Updated language was included in the revised RDWP to address this comment.</p>

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<p>14. Section 4.1.1.8 Low-Permeability Cap for T-11 Area. The cross reference to Section 4.1.1.6 in the first paragraph should instead be Section 4.1.1.7.</p>	<p>The reference to Section 4.1.1.7 was included in the revised RDWP.</p>
<p>15. Section 4.1.2.2 Treatment. The described groundwater treatment system will likely also need to be equipped with particulate filtration (bag or cartridge filters) with differential pressure monitoring and control. The EPA assumes that particulate filtration will be included in the RD. No revision is necessary for the RDWP.</p>	<p>The comment is noted and Section 4.1.2.2. of the revised RDWP was updated to include the anticipated use of particulate filters as part of the treatment processes for groundwater extracted from T-11.</p>
<p>16. Section 4.1.1.6 Removal and Off-Site Disposal or Stabilization of Creek Bank Soil. Similar to the need for the sediment evaluation in Section 3.1.3, the creek bank areas should be evaluated to determine if additional areas need to be considered, not just what was identified in the ROD.</p>	<p>The revised RDWP has been updated to reflect that the potential to evaluate additional creek bank areas along Snow Creek for stability related concerns will be considered in the PDIWP.</p>
<p>17. Section 4.1.2 Groundwater. On page 91 of the ROD it states an “NPDES permit will be required to discharge treated surface water to Snow Creek” not NPDES permit equivalency.</p>	<p>The ARARs from the OU-1/OU-2 have been added to the RDWP as Appendix C. The requirements associated with permit equivalency are specified in Section 300.400 (e) (1) of the National Contingency Plan (NCP) and directly apply to this situation as the discharge location will be within the confines of the Site. While the discharge will enter a flowing waterbody, there are 40 plus miles of downstream waterbody from the discharge point including Snow Creek and Choccolocco Creek that are also part of the Site. This approach is consistent with the permit equivalency used on other CERCLA sites.</p>
<p>18. Section 4.1.3.1 Sediment Removal. The reference to Section 2.2.3 in the second paragraph was likely meant to be Section 2.2.4. However, Section 2.2.4 doesn’t specify that Dredge Spoil Pile Area SC-8 will be excavated concurrently with the sediment removal activities, as is indicated in the section reference. The correct section cross reference for this information is 4.1.1.4.</p>	<p>The reference to Section 2.2.3 was revised to Section 4.1.1.4 in the revised RDWP to reflect dredge spoil pile SC-8 being addressed as part of the sediment removal activities. The Section 4.1.1.4 reference is appropriate as the materials presented in Section 2.2.4 describe the OU-1/OU-2 ROD requirements for the dredge spoil piles.</p>

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<p>19. Section 4.1.3.1 Sediment Removal. Temporary access roads will be needed. These should be listed as one of the RD components where points of access to Snow Creek are described (second to last paragraph on Page 30). Construction details for these temporary access roads should be included in the RD.</p>	<p>Section 4.1.3.1 of the revised RDWP has been updated to include temporary access roads.</p> <p>Construction details for temporary access roads will be provided in the 30% RD.</p>
<p>20. Section 4.1.3.2 Sediment Processing/Dewatering. Clarify how the need for on-site treatment of the water that is generated during sediment dewatering will be determined. This section should state that either previous data will be used to make this determination or that new data will be collected as part of a TS.</p>	<p>Section 4.1.3.2 of the revised RDWP has been updated to clarify that the potential to collect additional data for the treatment of water generated during sediment dewatering will be assessed in the development of the PDIWP as part of the data gap evaluation. The results of this evaluation will be presented in the PDIWP and if additional data are needed, the process to collect and evaluate the data will be presented in a Treatability Study Work Plan, Field Sampling Plan and Quality Assurance Project Plan (QAPP).</p>
<p>21. Section 4.3.1 Preliminary [30%] Design Submittal. Installation, monitoring, and maintenance of erosion control BMPs should be included in the first bullet on Page 34. A cost estimate of construction and operation and maintenance activities should be one of the RD elements included in the bulleted list. The RA construction sequence should be listed as one of the RD elements included in the bulleted list.</p>	<p>The requested changes were made to the revised RDWP.</p>
<p>22. Section 4.3.4.4 Quality Assurance Project Plan. The QAPP should be in the Uniform Federal Policy (UFP) format. There should be separate plans for separate activities where it makes sense. Data needs and data quality objects will change throughout the project. The data needed in a phase I sampling event may be different than in a phase II sampling event. This section implies only one plan is needed for RD and RA.</p>	<p>The QAPP that will be submitted with the PDIWP will be consistent with the UFP format. The RDWP and QAPP will acknowledge that the QAPP is a living document that will be amended or supplemented during the RD and RA phases of the project.</p>
<p>23. Section 4.3.4.10 Operation and Maintenance Plan. The cross reference to Section 7.2 should instead be Section 7.3</p>	<p>The identified change was made to the revised RDWP.</p>

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<p>24. Section 5. ARARS and Permit Equivalency. Please identify the permits where an equivalency will be required. ADEM previously identified that an NPDES permit will be required to discharge treated surface water to Snow Creek.</p>	<p>The ARAR tables from the OU-1/OU-2 ROD are included as Appendix C to the RDWP and these ARARs will be assessed during the development of RD to identify permit equivalency requirements for the planned work.</p>
<p>25. Section 5.1 ARARs and Permit Equivalency Requirements. Recommend that the General National Pollutant Discharge Elimination System Permit (ALR100000) be listed. The permit applies to discharges associated with regulated construction activity that will result in land disturbance equal to or greater than one acre.</p>	<p>Permit equivalency requirements for NPDES permits relating to the disturbance of contiguous land areas greater than one acre in size were added to the bulleted list in Section 5.1 of the revised RDWP.</p>
<p>26. Section 6.1 RD Schedule. The cross reference to Section 7.2 in the second paragraph should instead be Section 4.3.</p>	<p>The identified change was made to the revised RDWP.</p>
<p>27. Section 7 RD and RA Sequencing The cross reference to Section 7.3 at the end of the first paragraph should instead be Section 7.4.</p>	<p>The identified change was made to the revised RDWP.</p>