November 1, 2010

Ms. Michelle Kaysen
U.S. Environmental Protection Agency Region V
77 West Jackson Boulevard
Mail Code DE-9J
Chicago, IL 60604

Dear Ms. Kaysen:

Subject: Responses to Comments on Corrective Measures Proposal, R1; May 2010
Republic Engineered Products, Inc. – Canton Plant
OHR 000 110 197
Canton, Starks County, Ohio
CEC Project 221613.0025

On behalf of Republic Engineered Products, Inc. (Republic), Civil & Environmental Consultants, Inc. (CEC) presents Republic's responses to the United States Environmental Protection Agency's (USEPA) comments on Republic's revised Corrective Measures Proposal (CMP) issued August 27, 2010. USEPA's comments are presented in italics followed by Republic's Response.

COMMENT 1 –General

There doesn't appear to be any discussion regarding future land use for the Republic property. An institutional control must be implemented as a final site-wide remedy to ensure the Republic property use remains industrial. All applicable laws must be adhered to, including the Uniform Environmental Covenant Act. As such, the environmental covenant shall be pursuant to Ohio Revised Code 5301.80 to 5301.92, shall be filed in the office of the county recorder and shall run with the land in perpetuity. A site-wide institutional control in the form of an environmental covenant should be included as a proposed remedy in the CMP. Once the final remedy has been issued with the Final Decision and Response to Comments document, the covenant can be filed. As part of the CMP, the institutional control must simply be proposed.

RESPONSE: An environmental covenant following the format specified by the Ohio Revised Code (ORC) 5301.80 through 5301.92 will be utilized to establish future use of the property as industrial use and to prohibit the use of site groundwater for potable and agricultural purposes. See revisions to Sections 3.3 and 4.1.2 of the CMP for discussions on the use of environmental covenants.

Civil & Environmental Consultants, Inc.

Pittsburgh 333 Baldwin Road
Pittsburgh, Pennsylvania 15205
Phone 412/429-2324
Fax 412/429-2114
Toll Free 800/365-2324
E-mail info@cecinc.com

Chicago 877/963-6026
Cincinnati 800/759-5614
Cleveland 866/507-2324
Columbus 888/598-6808
Detroit 866/380-2324

Export 800/899-3610
Indianapolis 877/746-0749
Nashville 800/763-2326
Phoenix 877/231-2324
St. Louis 866/250-3679

Corporate Web Site http://www.cecinc.com

COMMENT 2 –General

Republic should also add a section to the CMP which covers financial assurance. EPA will require Republic to demonstrate that adequate funds will be available to complete the construction as well as the operation and maintenance of all remedies. Any of the following financial mechanisms may be used to make this demonstration: financial trust, surety bonds, letters of credit, insurance, or qualification as a self insurer by means of a financial test. Although the exact nature of financial assurance needs will be unknown until the selection of the final remedies, Republic may outline their proposed mechanism as well as the value necessary to cover the proposed remedies.

RESPONSE: Because the Order does not include a provision requiring financial assurance, Republic does not believe that it is appropriate for the company to include financial assurance requirements in the CMP itself. However, Republic recognizes that USEPA believes a commitment to financial assurance is necessary and that the agency intends to include that requirement as part of the final decision. Accordingly, Republic is moving forward with an evaluation of the alternative financial assurance mechanisms set forth in the hazardous waste regulations (which includes those listed in USEPA's comment, plus corporate guarantee). Having only recently initiated this evaluation, Republic is not in a position to outline the proposed mechanism as suggested in USEPA's comment. For purposes of the eventual final decision by USEPA, Republic requests the following schedule: submit cost estimate to USEPA within 30 days of the final remedy selection decision, and establish (with documentation to USEPA) financial assurance using one or more of the alternative mechanisms permitted in the hazardous waste regulations within 60 days of USEPA's approval of the cost estimate.

COMMENT 3 – Executive Summary

Revise the first sentence in the fourth paragraph (bottom of p.1) to include, in general, the elimination of on-going sources to the environment where interim measures have not already done so.

RESPONSE: The first sentence in the fourth paragraph has been revised to read: "The objective of the proposed corrective measures is to mitigate the potential threat to human health and the environment posed by exposure to Constituents of Potential Interest (COPIs) through the general elimination of on-going sources to the environment where interim measures have not already done so."

COMMENT 4 – Executive Summary

Consider expanding the term "work place controls" to "work place and institutional controls" which may also be inclusive of the groundwater and site-wide future land use. Contrary to the characterization of site-wide groundwater "not have[ing] a calculated potential risk exceeding the standard. . ." as stated in Section 5.0, groundwater does, in fact, exceed the risk standard for certain potential exposure scenarios and the proposed remedy is a deed restriction (institutional control). This also makes it clearer that engineered controls are not a part of this proposed remedial option. See additional comments below regarding site-wide groundwater.

RESPONSE: The term "work place controls" has been revised to "work place and institutional controls" throughout the CMP.

COMMENT 5 – Executive Summary

Republic states that there are no current or planned uses for the site groundwater. Provide a description of the mechanism which will be put in place to enforce this use designation or reference Section 3.3.

RESPONSE: An environmental covenant following the format specified by the Ohio Revised Code (ORC) 5301.80 through 5301.92 will be utilized to restrict future use of the property to industrial uses, to document the requirement for work place and institutional controls, and to restrict the use of site groundwater. See revisions to Sections 3.3 and 4.1.2 of the CMP for discussions on the use of environmental covenants.

COMMENT 6 – Section 2.2.1; SWMU 47 - Old Vertical Caster Treatment Plant

A discussion regarding constituent delineation and any post-excavation sampling which confirmed the removal of those constituents which exceeded risk should be included.

RESPONSE: Section 2.2.1 has been revised to state that confirmation samples were not collected at the completion of the excavation because the limits of excavation extended beyond the defined limit of surface contamination identified during the RFI. The excavation extended to boring locations 47-B9 through 47-B14, where the detected concentrations were all below the screening criteria. Documentation of the Interim Remedial Measures (IRM) will be included in the Final Remedy Construction Completion Report required by the Order, to the extent such documentation has not previously been submitted to USEPA.

COMMENT 7 – Section 2.2.2; SWMU 53 - Old Baghouse #4 Melt Shop

As a stand-alone document, the CMP should include documentation which explains the site-specific lead concentration of 1,972 mg/kg per 250 days per year.

RESPONSE: Section 2.2.2 has been revised to reference and summarize the blood lead level calculation in the Environmental Indicators (EI) report dated July 28, 2006 using USEPA's Technical Review Workgroup's Adult Lead Model (ALM). The calculated site-specific lead concentration resulting from the model that was presented in the EI Report was 1,972 mg/kg based on a 250 day per year industrial exposure, and 5,478 mg/kg based on a 90 day per year industrial exposure. However, after discussions with USEPA, the calculated site-specific lead concentration used in the RFI, including the Human Health Risk Assessment (HHRA), resulting from the model was 1,115 mg/kg. The CMP has been revised to reference the correct site-specific lead concentration. The site-specific lead calculation from the RFI is included in Appendix F to the CMP.

COMMENT 8 – Section 2.2.4; AOC 94 - Mobile Repair Shop Area

A discussion regarding delineation should be included (ie, where were the concentrations found and did "excavating the surficial materials" constitute a sufficient removal to reduce the BaP risk to an acceptable level?).

RESPONSE: Section 2.2.4 has been revised to reflect the corrective actions and removal of surface materials with detected concentrations of benzo(a)pyrene (BAP) above the screening criteria. This section has also been revised to include a discussion of how the limits of excavation were determined and why no post excavation sampling was necessary. The excavation extended to boring locations where the detected concentrations were all below the screening criteria. Clean ballast/slag materials were used to backfill the excavation to eliminate the direct contact exposure pathway to underlying soils containing BAP at concentrations above the screening criteria. Documentation of the Interim Remedial Measures (IRM) will be included in the Final Remedy Construction Completion Report required by the Order, to the extent such documentation has not previously been submitted to USEPA.

COMMENT 9 – Section 3.2.9; SWMU 32 - Waste Pickle Liquor Sumps

Please clarify the language in this section as it is titled "Waste Pickle Liquor Sumps", however, the text states that remedial actions took place at the "Former Bar and Coil Pickling Areas." Provide a clear explanation of the disposition of this SWMU (as this will be a public document

and should be transparent for anyone reading it) and provide documentation of the "clean-closure" activities conducted in accordance with OEPA.

RESPONSE: Section 3.2.9 has been revised to provide further clarification of the remedial actions that transpired at the Former Bar and Coil Pickling Areas. Additional text has been added to reflect that the Waste Pickle Liquor Sumps are a part of the Former Bar and Coil Pickling Areas. Documentation of the Interim Remedial Measures (IRM) will be included in the Final Remedy Construction Completion Report required by the Order, to the extent such documentation has not previously been submitted to USEPA.

COMMENT 10 – Section 3.2.17; SWMU 44 - Heat Treatment Waste Oil Decanter Tank & Storage Tank

Again, as a stand-alone document, additional information and documentation of the "prior cleanup" at this SWMU should be included.

RESPONSE: The decommissioning of SWMU 44 occurred prior to the submittal of the Environmental Indicators report issued in August of 2006. Section 3.2.17 has been revised to include additional explanation of these remedial activities Documentation of the Interim Remedial Measures (IRM) will be included in the Final Remedy Construction Completion Report required by the Order, to the extent such documentation has not previously been submitted to USEPA.

COMMENT 11 – Section 3.2.18; SWMU 45 - Machine Shop Waste Oil Storage Tank

Provide any documentation you have regarding the Voluntary Remedial Measure conducted at this SWMU.

RESPONSE: RTI performed a Voluntary Remedial Measure (VRM) at SWMU 45 in 2000, in conjunction with the VRM for AOC 99. Documentation of the VRMs for SWMU 45 and AOC 99 will be included in the Final Remedy Construction Completion Report required by the Order, to the extent such documentation has not previously been submitted to USEPA.

COMMENT 12 – Section 3.2.20; SWMU 47 - Old Vertical Caster Treatment Plant

See comment 2.2.1(A discussion regarding constituent delineation and any post-excavation sampling which confirmed the removal of those constituents which exceeded risk should be included.)

RESPONSE: Section 3.2.20 references Section 2.2.1 for the discussion on the interim measures performed at SWMU 47. Section 2.2.1 has been revised to discuss constituent delineation.

COMMENT 13 – Section 3.2.27; SWMU 58 - Pickling Operations Mist Suppression System

See comment 3.2.9 (Please clarify the language in this section as it is titled "Waste Pickle Liquor Sumps", however, the text states that remedial actions took place at the "Former Bar and Coil Pickling Areas." Provide a clear explanation of the disposition of this SWMU (as this will be a public document and should be transparent for anyone reading it) and provide documentation of the "clean-closure" activities conducted in accordance with OEPA.)

RESPONSE: Section 3.2.27 has been revised to explain that decontamination of the concrete surfaces in the area of the former Pickling Operations Mist Suppression System was conducted by Republic as part of the Former Pickle Area remedial actions (i.e. AOC 112). Documentation of the closure activities performed for this SWMU will be included in the Final Remedy Construction Completion Report required by the Order, to the extent such documentation has not previously been submitted to USEPA.

COMMENT 14 – Section 3.2.31; SWMU 62 - Metallurgical Lab Hood Exhaust System

Provide some explanation as to why subsurface soil samples were not collected at this SWMU (based upon access, delineation, etc?).

RESPONSE: Section 3.2.31 has been revised to reflect that a surface soil sample was collected during the Phase I investigation. No COPIs were detected at a concentration above their respective screening criteria. The Metallurgical Lab Hood Exhaust System is located above grade on the external wall of the Metallurgical Lab and the surrounding ground surface is paved. Because any potential releases would have occurred above grade, the fact that no COPIs were detected at a concentration above their respective screening criteria in surface soils just below the pavement justified not sampling subsurface soils.

COMMENT 15 – Section 3.2.39; AOC 81 - Diesel/Fuel Oil UST at Heckett Building

Provide documentation of the clean closure activities at this AOC.

RESPONSE: The closure report was included in Appendix I.B.2.c.5-2 of the Description of Current Conditions Report submitted August 11, 1999. As stated in the Current Conditions Report submitted September 29, 2004, the documentation provided on AOC 81 was

determined by USEPA to be adequate to demonstrate a release had not occurred and therefore investigations at AOC 81 during the performance of the RFI was not required.

COMMENT 16 – Section 3.2.40; AOC 83 - Diesel/Fuel Oil UST at Southeast Corner of #4 Melt Shop

Provide an explanation as to why surface soil samples were not obtained. What TA is this AOC part of, if any, and did surface soil samples at those other TA SWMUs/AOCs exceed risk?

RESPONSE: Section 3.2.40 has been revised to state that surface soil samples were not obtained at the AOC because the intent of the investigation at this AOC was to evaluate whether a release had occurred from the underground storage tank (UST). The previous location of the dispensers is unknown and; therefore, it was not possible to locate any borings specifically to evaluate releases from the former dispensers or near-grade piping. However, any significant release from the former dispensers or near-grade piping would have been detected in the shallow subsurface samples that were collected. Additionally, numerous surface soil samples were obtained that were assigned to nearby SWMUs and AOCs and none of those samples had COPIs that would be associated with the Diesel/Fuel Oil UST detected above their respective screening levels.

COMMENT 17 – Section 3.2.42; AOC 88 - Heckett Maintenance Garage Area

Provide details regarding the "operational controls" which are in place to control worker exposures (PPE?).

RESPONSE: Section 3.2.42 has been revised to state that the operational controls in place to control worker exposure include equipment with enclosed cabs, regular water suppression to prevent airborne dust, and the use of appropriate PPE.

COMMENT 18 – Section 3.2.49; AOC 99 - Machine Shop Trench

See comment 3.2.18 (Provide any documentation you have regarding the Voluntary Remedial Measure conducted at this SWMU.)

RESPONSE: RTI undertook a Voluntary Remedial Measure (VRM) at AOC 99 in 2000, in conjunction with also addressing SWMU 45. Documentation of the VRMs for AOC 99 and SWMU 45 will be submitted in the Final Remedy Construction Completion Report required by the Order, to the extent such documentation has not previously been submitted to USEPA.

COMMENT 19 – Section 3.2.51; SWMU 102 - Canton Bloom Cast Facility Caster Scale Pit Area

Provide an explanation as to why subsurface soil samples were not collected.

RESPONSE: Section 3.2.51 has been revised to explain that this SWMU consists of an at-grade concrete lined structure used to stage scale. Potential routes of release would be through the concrete containment and drag out from the scale being removed from the area. The integrity of the concrete was inspected and no cracks were observed that could have resulted in a release below the concrete structure. A surface soil sample was collected during the Phase I investigation to evaluate the potential for a release due to drag out. No COPIs were detected in the surface sample at concentrations above their respective criteria. Therefore, subsurface soil sampling was not warranted based on the results of the Phase I sampling event.

COMMENT 20 – Section 3.2.55; AOC 107 - Former UST Locations Adjacent to Former Plant Truck Scales

There appears to be a typo; "subsurface" soil should be "surface" soil under the respective risk discussion. Also, an explanation should be provided as to why surface soil samples were not collected.

RESPONSE: Section 3.2.55 has been revised to change the word subsurface to surface. Additionally, Section 3.2.55 has been revised to state that the intent of the investigation at this AOC was to evaluate whether a release had occurred from the UST. Surface soil samples encountered during drilling were screened with a photoionization detector (PID) for the presence of organic vapors. The PID did not detect any concentrations of any organic vapors. Therefore, no surface soil samples were submitted to the laboratory for analysis.

COMMENT 21 – Section 3.2.61; AOC 112 - Former Process Impacts at Bar/Coil Pickle Areas

See comment 3.2.9; which reads, Please clarify the language in this section as it is titled "Waste Pickle Liquor Sumps", however, the text states that remedial actions took place at the "Former Bar and Coil Pickling Areas." Provide a clear explanation of the disposition of this SWMU (as this will be a public document and should be transparent for anyone reading it) and provide documentation of the "clean-closure" activities conducted in accordance with OEPA.

RESPONSE: Section 3.2.61 has been revised to reference the performance of the corrective measures in conjunction with remedial activities at SWMU 32. Documentation of the

closure activities performed for this AOC will be submitted in the Final Remedy Construction Completion Report required by the Order, to the extent such documentation has not previously been submitted to USEPA.

COMMENT 22 – Section 3.2.63; SWMU 114 - "Old" N&T Repair Shop

The exclusion of samples from this SWMU should be elaborated upon and justified.

RESPONSE: Section 3.2.63 has been revised to elaborate upon the reason why samples collected in this area were not associated with SWMU 114. Soil samples collected in the vicinity of the Repair Shop were assigned to AOC 94 and SWMU 43.

COMMENT 23 – Section 3.3; Sitewide Groundwater

EPA's groundwater cleanup policies focus on a tiered strategy in which to protect and restore groundwater to its maximum beneficial use: short-term protection, intermediate performance goals and final cleanup goals. Republic has addressed the first two tiers through practicable source control, either through interim measures or proposed final remedies, and the proposed groundwater deed restriction with work place controls in order to control exposure risk. However, final cleanup goals for the purpose of restoring groundwater to its maximum beneficial use has not been adequately addressed.

EPA recognizes that groundwater serves a variety of uses and purposes and the maximum beneficial use exists within a range of reasonably expected uses and exposures. Republic should first determine and document within the CMP if the State of Ohio has a particular groundwater designation assigned to the groundwater in the area of the site. Next, long term cleanup goals and points of compliance should be established for those plumes which exceed the particular groundwater designation (industrial, non-potable, etc). Further, proposing monitored natural attenuation (MNA) in accordance with the applicable groundwater use designation would be appropriate.

Republic must also clarify in this section of the CMP that all sources of groundwater contamination have been or will be addressed in order to rely upon a final remedy of institutional controls and MNA. Last, in addition to the proposed deed restriction, Republic should discuss potential governmental controls prohibiting well drilling and the applicability of the Uniform Environmental Covenant to groundwater use restriction. The deed restriction alone, as proposed, is not sufficient to ensure human health and the environment is protected well into the future.

RESPONSE: The various sections of the CMP that discuss proposed corrective measures for sitewide groundwater have been revised to clarify how the proposed corrective measures meet the third tier (final cleanup goal) of USEPA's groundwater cleanup policies to protect and restore groundwater to its maximum beneficial use. The final cleanup goal is to ensure that offsite groundwater and surface water in the EBNC can be used for its maximum beneficial use within the range of reasonably expected uses and exposures. OEPA does not have default designations for aquifers. Only sites going through the Voluntary Action Program (VAP) program are given a site-specific designation. Also, some urban areas (Cleveland for example) have Urban Setting Designations (USD). The aquifer beneath the Republic Canton site has a sustainable yield of greater than 0.1 gal/min and would be considered to have potential future use according to OEPA regulations, but has not been given one of the specific designations assigned through the VAP program.

The Conclusions portion of Section 3.3 has been revised to read as follows: The migration of site groundwater has been shown to be under control in the Environmental Indicators (EI) report dated July 28, 2006. Potential future risks will be mitigated by the implementation of the Environmental Covenant limiting the use of the property to industrial, prohibiting potable and agricultural use of the groundwater, and memorializing workplace control measures that are triggered upon subsurface excavation activities when groundwater might be encountered. These restrictions will eliminate potential exposure pathways for ingestion and dermal contact. With regard to off-site considerations, Republic proposes to verify that the previous conclusions (i.e. groundwater is not impacting surface water or sediments) remain valid following implementation of the on-site corrective measures through additional groundwater sampling at select locations over a period of up to 5 years.

Section 4.1.2.3 has been revised to include a discussion of the EC that will be used to ensure human health and the environment are protected.

Section 4.1.7 Confirmatory Groundwater Monitoring has been added as follows: Republic has selected the proposed corrective measures to meet the third tier (final cleanup goal) of USEPA's groundwater cleanup policies to protect and restore groundwater to its maximum beneficial use. As documented in the RFI, groundwater monitoring has shown that there is no groundwater migrating offsite containing COPIs at concentrations exceeding their respective Maximum Contaminant Levels (MCLs) and Secondary MCLs (SMCLs). Additionally, the groundwater migration modeling discussed above showed that no groundwater migrating into the East Branch of Nimishillen Creek (EBNC) contains COPIs at concentrations exceeding the appropriate OEPA water quality standards. Therefore, the site has not prevented offsite groundwater quality from meeting its beneficial use.

Sampling events at MW-26 detected total chromium above the MCL during four out of five sampling events and detected antimony above the MCL during the February 2006 sampling event. Sampling events at MW-40 detected either total and/or dissolved arsenic during four out of five sampling events. These are the only exceedances of the MCLs at Republic's downgradient property boundary that are not clearly attributable to offsite sources. As documented in the Environmental Indicators (EI) Report, Republic has achieved attainment of the "Migration of Contaminated Groundwater Under Control" Environmental Indicator for current human exposures. As discussed in Section 3.3 above, modeling of groundwater fate and transport in the vicinity of MW-26 and MW-40 indicated that groundwater discharging to EBNC from the Site will not exceed the respective USEPA Region V Ecological Screening Levels. Therefore, it is reasonable to conclude that groundwater discharging from the Site to EBNC is not currently impacting surface water and sediments in EBNC.

The proposed confirmatory groundwater monitoring program will not address areas where groundwater contamination has been shown to be migrating onto the Republic site. Specifically, those areas are:

- Chlorinated VOCs exceedances detected at MW-46 and MW-57 located at the western end of the Site. and
- VOC, metals, and cyanide exceedance detected at MW-58, which is located along the property boundary between the boiler house and the dam.

Republic proposes to perform a confirmatory groundwater monitoring program to reaffirm that the soil and groundwater remedies will continue to be protective of human health and ecological receptors after the remedies are completed. In general, Republic proposes annual monitoring of those perimeter monitoring wells for COPIs that have exceeded the risk based human health and ecological criteria in or upgradient of the perimeter well. The annual monitoring will be performed for up to 5 years after the proposed corrective measures are implemented with annual reports submitted to USEPA containing the information presented in previous groundwater monitoring reports for the site. Republic may request an earlier termination of this confirmatory groundwater monitoring program. The same sampling and analytical procedures and methods as used in the previous monitoring at the site will be used, with the exception that Level II laboratory reports will be provided instead of Level IV reports. The goal of the program will be to demonstrate that no exceedances of risk based human health and ecological criteria are present. The specific wells and analytes proposed for inclusion in the confirmatory monitoring program are:

Monitoring Well	Proposed Analyses	Rationale
MW- 26	T&D RCRA Metals and Antimony	Previous exceedance at well
MW- 29	T&D RCRA Metals and TCL-SVOCs	Previous exceedance at well
MW- 40	T&D RCRA Metals and TCL-VOCs	Previous arsenic exceedance at well; Previous VOC Exceedance at upgradient well MW-32
MW- 41	T&D RCRA Metals and TCL-VOCs	Previous Metals and VOC Exceedances in upgradient soils.
MW- 45R	T&D RCRA Metals and TCL-VOCs	Previous Metals and VOC Exceedances in upgradient soils.
MW- 52	T&D RCRA Metals	Previous metals exceedances at upgradient wells.
MW- 53	T&D RCRA Metals and TCL-VOCs	Previous Metals and VOC Exceedances in upgradient soils.
MW- 54	T&D RCRA Metals	Previous arsenic exceedance at well.
MW- 61	T&D RCRA Metals	Previous metals exceedances at upgradient wells.

Notes:

T&D = Total and Dissolved. The RCRA(Resource Conservation and Recovery Act) list of metals include: Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium & Silver.
TCL-SVOCs = Target Compound List - Semivolatile Organic Compounds
TCL-VOCs = Target Compound List - Volatile Organic Compounds

COMMENT 24 – Section 3.4; Sediments in EBNC

Provide a citation to or documentation of the OEPA studies referred to on p. 55.

RESPONSE: Section 3.4 has been revised to include the citation for the OEPA Division of Surface Water documents entitled, *Ohio 2004 Integrated Water Quality Monitoring and Assessment Report* dated March 30, 2004 and *Ohio 2006 Integrated Water Quality Monitoring and Assessment Report* Approved by USEPA on May 1, 2006.

COMMENT 25 – Section 3.4.2; History of Sediments in EBNC

Elaborate on the human health risk associated with the EBNC sediment (provide a summary of the risk assessment results).

RESPONSE: Section 3.4.2 has been revised to include the following statement, "The Human Health Risk Assessment submitted as Appendix N to the RFI (March 2007) indicates that the lifetime incremental cancer risk to an adult recreator exposed to sediments of the EBNC is 4.9 x 10-5 and the noncancer risk Hazard Index (HI) is 0.03."

COMMENT 26 – Section 4.1.2; Institutional Controls

See comment two (2) in the Executive Summary section, which reads, Consider expanding the term "work place controls" to "work place and institutional controls" which may also be inclusive of the groundwater and site-wide future land use. Contrary to the characterization of site-wide groundwater "not have[ing] a calculated potential risk exceeding the standard. . ." as stated in Section 5.0, groundwater does, in fact, exceed the risk standard for certain potential exposure scenarios and the proposed remedy is a deed restriction (institutional control). This also makes it clearer that engineered controls are not a part of this proposed remedial option. See additional comments below regarding site-wide groundwater.

RESPONSE: Section 4.1.2 has been revised to include institutional controls and to further elaborate on the use of institutional controls as a corrective measure.

COMMENT 27 – Section 4.1.2.3; Groundwater

This section should reference the deed restriction proposed for groundwater as an institutional control (as well as any proposed remedy in response to Section 3.3). Republic must adhere to all applicable laws in filing the groundwater use deed restriction and provide EPA with documentation.

RESPONSE: Section 4.1.2 has been revised to reference the use of an EC and deed restriction to implement groundwater use restrictions. A copy of the environmental covenant will be negotiated with USEPA once corrective measures have been implemented, surveyed and recorded. It is anticipated that the environmental covenant will be issued subsequent to USEPA approval of the Final Remedy Construction Completion Report. The deed restriction will be filed and a copy submitted with the Final Remedy Construction Completion Report.

COMMENT 28 – Section 5.0 Evaluation and Recommendation of Final Corrective Measure Proposal

As stated above, site-wide groundwater should be removed from the list of SWMUs and AOCs which are not being carried forward in the CMP. The remedy for groundwater (despite the fact that it is not being used currently) is an institutional control in the form of a deed restriction, in addition to the revised proposed remedy elements in response to Section 3.3 comments. Certain exposure scenarios did exceed risk and the final remedy must address all current and potential future uses in accordance with aquifer management goals and/or groundwater use designations.

RESPONSE: Site-wide groundwater has been removed from the list of SWMUs and AOCs which are not being carried forward in the CMP and has been addressed in Table 12, Corrective Measure Options Overview.

COMMENT 29 – Section 5.7 SWMU 37-8" Mill Oil Storage Tank

This section appears to contradict Table 12 by stating an asphalt cap would not be protective due to the activities included for the construction work receptor. Table 12 more clearly articulates the risk reduction associated with the asphalt cap in combination with WPCs, please revise this section to include that language.

RESPONSE: The following language was included for clarity: "An asphalt cap would eliminate the potentially complete exposure pathways under normal operating conditions. However, the use of an asphalt cap as a standalone remedy would not reduce the calculated potential non-carcinogenic risk and blood lead level concentrations for a construction worker, whose assumed activities would require penetrating the cap. Under normal operating conditions, an asphalt cap would eliminate potential exposure pathways to industrial workers and reduce the potential for leaching and migration of metals in the slag aggregate."

COMMENT 30 – Section 5.8 SWMU 38-12" Mill Scale Pit

Please expand upon the text which states the recommended corrective measure for SWMU 40 will address potential COPI migration from SWMU 38; it's unclear based upon this section (process details, proximity, etc).

RESPONSE: Sections 5.8, 5.9, and 5.10 have been revised to more clearly explain the process details and proximity to each other of SWMUs 38, 39, and 40.

COMMENT 31 – Section 5.13 SWMU 49-#4 Melt Shop Baghouse

The soil or asphalt cap and soil excavation were eliminated as recommended corrective actions due, in part, to their inability to "reduce the potential for future contamination of underlying soils in the area." Republic's management practices should aim to minimize future contamination, please explain the measures taken to ensure this area is not contaminated further in the future.

RESPONSE: Section 5.13 has been revised to state that, additionally, proper work practices will be employed to prevent future contamination of the area. The work practices will include operating and maintaining the baghouse and waste loading areas in a manner that will reduce the potential for accidental releases as well as promptly cleaning up any accidental releases that may occur.

COMMENT 32 – Section 5.38 EBNC

Information regarding the vertical extent of excavation should be included in this section for clarity.

RESPONSE: Section 5.38 has been revised to reference Figure 9 of the CMP which shows the thickness of sediment present and to be removed in the area of the proposed corrective measure. Additionally, Section 5.38 has been revised to state that visual observation of the sediments being dredged will be used to determine when the removal activities have reached the natural stream bed.

Provide additional information regarding the proposed overbank hot spot removal, including delineation and confirmation samples.

RESPONSE: Section 5.38 has been revised to indicate that the excavation will continue until obviously impacted soil, as identified in the field through visual observation or aided by field

testing procedures, has been removed. One confirmation sample will then be collected from each excavation wall and the excavation floor and submitted to the laboratory for PAH analyses. Based on the results of the initial confirmation samples, the excavation will be expanded until the concentrations of PAHs detected in the confirmation samples do not result in an unacceptable risk.

COMMENT 33 – Section 6.0 Public Involvement Plan

Please clarify this section to reflect that EPA will respond to public comments via the Final Decision and Response to Comments document, not during the public participation period.

RESPONSE: Section 6.0 has been revised as requested.

COMMENT 34 – Table 11

Please revise in accordance with the comments provided. Also, cost estimates should be revised to reflect the field season year in which the work is proposed to be done.

RESPONSE: Table 11 has been revised as requested. The estimated costs presented in Table 11 illustrate the relative comparisons between alternative remedies, thus facilitating USEPA's selection process. Revised cost estimates will be developed for the selected remedial actions and submitted to USEPA in connection with establishment of the financial assurance sought by USEPA. See response to comment #2 above.

COMMENT 35 – Table 12

Revise in accordance with the comments provided, including the revised proposed groundwater remedy. Include the EBNC, overbank and outfall remedies in this table as well.

RESPONSE: Table 12 has been revised as requested.

COMMENT 36 – Table 13

Please revise "Record of Decision" to "Final Decision and Response to Comments."

RESPONSE: Table 13 has been revised as requested.

We trust the above responses and attached Revised Corrective Measures Proposal adequately address USEPA's comments. However, if you have any questions, or require additional information, please call us at (412)-429-2324.

Sincerely,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.

Thomas L. Maher, Jr., P.G.
Senior Project Manager

Daniel F. Szwed, P.E.
Vice President

Attachments

cc: Patrick Monnot, Republic Engineered Products (w/enclosures)
Wendlene Lavey, Squire, Sanders & Dempsey (w/enclosures)
Public Repository c/o Pat Monnot, Republic Engineered Products (w/enclosures)

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