

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

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VIA EMAIL AND OVERNIGHT MAIL

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RE: In the Matter of Cotter Corporation (NSL), and Laidlaw Waste Systems (Bridgeton),
Inc. and Rock Road Industries, Inc. and the U.S. Department of Energy
Administrative Order on Consent, EPA Docket No. VII-93-F-0005

Dear Counsel:

The U.S. Environmental Protection Agency (EPA) has reviewed the Bridgeton Landfill Thermal Isolation Barrier Investigation Phase I Report (December 2014) submitted to the EPA on December 19, 2014. This report documents the results of the Phase I investigation of the potential location of a thermal isolation barrier in the area between the North Quarry of the Bridgeton Landfill and the West Lake Landfill Superfund Site, Area 1. The investigation was conducted pursuant to the following the EPA-approved work plans: (1) Gamma Cone Penetration Test (GCPT) Work Plan, Revision 2,



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September 27, 2013; and (2) Core Sampling (Phase 1B, 1C, and 2) Work Plan, Revision 1, January 8, 2014. As stated in the report, the Phase I investigation was proposed to collect additional data to supplement the remedial investigation level data in order to identify a proposed alignment and develop design criteria for a thermal isolation barrier. The EPA has shared this report with the U.S. Army Corps of Engineers, and we will provide any comments we have on this report to you in the near future.

Additional Work

Because the results of the Phase 1 investigation indicate radiologically-impacted material (RIM) located outside of the previously defined boundaries of Operable Unit 1, Area 1, EPA requests, pursuant to paragraph 51 of the Administrative Order on Consent captioned above, that the potentially responsible parties perform additional GCPT sampling with confirmation sonic coring investigation necessary to fully delineate the nature and extent of RIM contamination south and west of the previously-defined boundaries of Operable Unit 1, Area 1. This additional investigation includes the following:

- 1) Develop and perform a statistically derived sampling plan for proposed additional RIM characterization activities. This work is needed to complete the efforts performed during the Phase 1, 1B, 1C GCPT of the identified RIM adjacent to the existing transfer station and along the former North Quarry surface ledge/boundary. The EPA would expect sampling locations to be in the area of the former North Quarry wall and base to determine the presence or absence of RIM that may have been transported via surface runoff over the exposed daily cover at the time of placement.
- 2) Submit to the EPA for review and approval an addendum to the previously approved "Bridgeton Landfill – West Lake Landfill Core Sampling" work plans that describes how and where this additional geotechnical and RIM delineation sampling will be performed, and includes a schedule for all expanded Phase 2 activities.

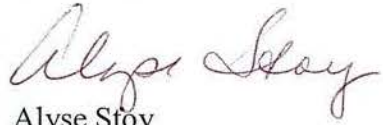
The EPA would be available to meet in person or by conference call during the week of Jan. 20th to discuss the scope of this additional work and necessary modifications to the previous work plans to accomplish the objectives of the investigation. Please confirm your willingness to perform this additional work within seven days of your receipt of this request, as set forth in paragraph 51 of the Administrative Order on Consent.

GCPT Phase I Corings

In addition to the request for additional work, the EPA would like to discuss collection of samples of corings retained by the parties or your contractors during the Phase 1 investigatory work. The EPA's purpose in obtaining such samples would be to test a representative sample of RIM under normal and anticipated simulated Subsurface Smoldering Event (SSE) conditions. This will assist the EPA in its ongoing evaluation of any potential exposures and risks associated with the RIM coming into contact with a SSE. The EPA is currently working with the EPA's Office of Research and Development and the United States Army Corps of Engineers to define the sampling methods and will coordinate with the parties over the next several weeks. The EPA expects to perform this testing concurrently with the RIM characterization activities described above.

The EPA appreciates your cooperation, and feel free to contact me at 913-551-7826 with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Alyse Stoy".

Alyse Stoy
Associate Deputy Regional Counsel