

US EPA ARCHIVE DOCUMENT

			USEPA Review of IEPA Notices of Deficiency sent July-Aug. 2008								
Note: all issues have been resolved, SMJ 2010						by S.M. Johnson, USEPA 11/21/08					
Notice	Reason#	Issue	Action	Relevant?	Resolved	Explain					
1) Engineering											
	1	Rail Dock, traffic & receipt	PCB Container use	yes/concur	no						
	2	Asbestos disposal	Co-disposal TSCA?	no/no concur	NA						
		unknown Leak det. Slope	disclose	IEPA	TBD	IEPA lead					
		low elevation leak detector system	evaluate potential effect on monitoring	yes	yes	No water table					
	4	Chem waste characterization	is App A.2 Table 1 OK	unknown		Cannot locate					
	5	Seperation berm	runoff water control	yes/concur	no	effectiveness questioned					
	6	Data located wrong	move data	no	NA						
	7	Waste ID not provided	Provide info in App.	yes/no concur	ignore	IEPA pro forma issue					
		Waste compatibility testing	Provide info in App.	yes/concur	no	Concerns about Drywall H2S					
	8	Earthquake liquefaction	study potential	yes	yes	EPA notes on lack of clastic dikes....share with applicant					
		* note EPA comment on stability analysis	re averaging of Berry Clay								
	9	liner floor & wall slope stab.	conduct study	yes	no	EPA to check for interior slope stability work					
	10	details missing for cleanouts	post cleanout/manway D8,9	yes	no	Concur with IEPA					
	11	leachate storage tanks	Provide info in App.	yes	?	Mentioned in App. Details not sure					
	12	POTW discharge pmt	secure permits	yes	no	Concur with IEPA					
	13	stability analysis defects	re-analyze stability in MSW	no	NA	Issue is in MSW subcell, not sure about TSCA					
			btw memb. And geocompos								
	14	stability analysis defects	include Geo Syn Clay	yes	no	may concur					
		* note similar to EPA comment regarding Berry Clay									
	15	stabilization of PCBs	list reagents to be used	yes	?	check					
	notes:										
	a	PCB article/containers	Describe items in App.	no	ignore	not usually a TSCA issue					
	b	select waste liner cover	describe "select waste"	maybe	TBD	not usually a TSCA issue					
2) Groundwater											
	1	site geology data in wrong app	provide same data in new app.	no	ignore	IEPA issue					
	2	modelling of upper radnor	removal dwg's P-Ex 1,2, modelling missing	no	ignore	not in CW cell (check)					
	3	gradient calculation issues	change data, do not change results	yes	yes	due diligence reveals insignificant issue					
	4	gradient calculation issues	change wells for upper rad.	no	ignore	U.Rad. Not in CW cell (ck)					
	5	gradient calculation issues	change wells for Org. soil	yes	no	IEPA issue					
	6	calculation of effective LF length	L. Rad. GW flow direction off by 30deg.	maybe	no	IEPA issue					
	7	thickness calculation issues	provide calc's from Att. 13 on volume	yes	no	IEPA issue, valid, no elev. Data on Calc's					
	8	Lower Radnor, Org. soil data miss	previous app. Data to be re-submitted	no	no	IEPA issue					
	9	Soil porosity data missing	provide soil porosity data	yes	no	IEPA issue					
	10	use of total versus effective poros.	recalculate using effective poros.	not certain	TBD	open issue					
	11	questions about L. Rad. Porosity	change numbers used, result in slower V	yes	no	open issue					
	12	inconsistency in material spec's	resolve questions re geocomposite/net	yes	no	IEPA issue, due diligence on conformity to plan					
	13	worst case head estimate	use 70 year constant recharge model	yes	no	IEPA issue, concur. With IEPA 0.26m est.					
			dry tomb model NA, fill LD net at								
			defect to match leachate water table								
			Action: factor in effect of TSCA Memb.		yes	TSCA membrane ignored in GIA calc for simplification.					
	14	dispute darcy velocities	decide which porosity to use for eff. V	yes	no	iepa open issue					
	15	questions regarding attenuation	determine dispersion, diffusion constants	unknown							
	16	recalculate hydrodynam. Disp.	agree upon gradient, porosity in LR and ORG	yes	no	iepa open issues that may not be important					
	17	non concur with vertical disp.	recalculate vertical velocities	yes	no	iepa open issue of unknown significance					
	18	dispute PCB conc. Of liq. In model	compare 100ppb model and 500 ppm	yes	no	IEPA worst case modelling issue					
	19	dispute on vertical velocity in LR	recalculate GIA with vertical vel. In LR	yes	no	IEPA issue that seems hydrologically dubious					
	20	Well spacing is too much?	change level of effectiveness of detection	yes	no	IEPA problem, well spacing seems based					
						on unrealistically hi dispersion in L. Rad. Sand. Till?					
	21	monitoring list misses PNA's	Add PNAs	not sure	no						
	22	Inadequate detection array	add wells G52 and 53	yes	no	concur with IEPA's request, but little reduction in risk					
	23	Closure modelling inadequate	modify input to GIA model	yes	no	IEPA open issue only					
	24	missing documents on 70 yr HELP	supply missing copies	yes	no	IEPA issue, documents not part of USEPA review package,					
						recommend rely on GIA assumptions, re-pooling					
	25	Questions on 70 Yr HELP model	Lateral drainage layer input to model	yes	no	IEPA issue, documents not part of USEPA review package,					
						recommend rely on GIA assumptions, re-pooling					