

From: [Miller.Scott@epamail.epa.gov](mailto:Miller.Scott@epamail.epa.gov)  
To: [John Mousa](#)  
Subject: ROD Clarification Onsite Soils Outside of Containment Area  
Date: Tuesday, February 22, 2011 3:27:07 PM

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John,

Per our conversation this afternoon, I was in error when I advised you

last week related to your question #2:

"1. In Section 7.1.5 Clean-up Goals--- 3rd paragraph in section

states;

“ Table 7 and Table8 include the both the numeric direct contact and default leachability SCTL criteria. The more stringent of the two criteria apply to the vadose zone soils.”

2. On page 118 of Appendix A: Responsiveness Summary-  
In

Response to the following FDEP Comment- DEP recommends that the

AROD identify both the numeric direct contact and default leachability SCTL criteria and state that the more stringent

of the two criteria will apply to the vadose zone soils.

EPA gave the following response: “ EPA agrees with this

approach and will include it in the ROD”.

Can you explain this issue please and how these statements apply to the

onsite soils outside the consolidation area.

By operation of State regulation at 62-780, a responsible party is allowed to either accept default leachability criteria or determine Site-specific leachability criteria will be evaluated during remedial

design. Onsite soils outside of the consolidation area will be required

to meet either the more stringent of the direct contact number for commercial standards or the default leachability/Site-specific leachability criteria in the top 2 feet of soil. Leachability criteria

must be met throughout the vadose zone. I think that you may trying to

envision the "how" this physically gets done.

The way it would work is that the soils outside of the consolidation area that don't meet the more stringent of the criteria will be excavated and brought back in the onsite soil consolidation area where

they will be placed and an engineered cap will be constructed over them.

Then clean fill that meets the default residential standards will be brought onsite and placed over both the engineered cap (containment area) and outside the containment area at a minimum depth of two feet.

Obviously, it may require more fill in areas where there was excavation."

The ROD states at page 118 (PDF page 130) 11.2.1.3. Surface Grading

and

Covers that the selected remedial alternative will require soil that exceeds leachability criteria to be excavated and placed in the onsite

soil containment area. Then clean fill will be placed across the entire

Site so that residential standards will be met in the top two feet.

While this difference will not protect remedy effectiveness and the Site

cleanup will remain effectively a "residential" cleanup in the top two

feet of onsite soil outside the onsite soil containment area, I wanted

to clarify this approach.

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