



GPD GROUP

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Mr. Brian James
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May 20, 2009

**Response to Comments dated 4/30/09
Haley's Ditch Remediation/Restoration
City of Akron, Summit County, OH**

Mr. James:

Thank you for the review and comments regarding the above named project. We have addressed the comments as summarized in the following responses:

Part III.G.1. Site Description

- Provide a copy of the NPDES construction storm water general permit that is specific for this site.
 - **Response:** Attached herein, please find a copy of the cover letter for general permit number 3GC04442*AG.
- Please note that while inspection log does not need to be maintained on site, the log sheets are not generated by Summit SWCD (note 11, page SW-2A). Please contact Ohio EPA or consult their website for that information.
 - **Response:** Note 11, page SW-2A has been revised accordingly.

Part III.G.1.n Site Map Requirements

- Using callouts on the plan sheets, note areas designated for:
 - Storage and/or disposal of solid and toxic wastes:
 - **Response:** Whenever practical materials excavated for disposal will be loaded directly into trucks for off-site transport and disposal. If needed, excavated materials may be temporarily staged in the "Day Soil Stockpile Load/Haul-Off Areas" as shown on plan sheets SW-3 and SW-9. The Construction Sequence notes have been modified for clarity.
 - Vehicle Refueling
 - **Response:** A temporary, double-contained fuel tank(s) will be staged within the equipment staging areas. Fuel tanks may also be mounted in the back of pickup trucks. Fueling will occur at the staging area or within the remediation area where heavy equipment is staged. Fueling activities will be visually monitored at all times to manage accidental spillage. A spill kit containing adsorbent pads/socks will be available during fueling to contain any spilled material. Refer to Sheet SW-2A for added Project Note #20.
 - Vehicle decontamination area

- **Response:** Off-site soil transport vehicles will not be allowed to drive on impacted areas of the site. Prior to leaving the site all transport vehicles will be inspected for accumulated bulk material on the truck sides and tires, if present, accumulated material will be removed using dry methods (e.g., brooms, shovels) to prevent tracking onto public roadways. Cleaning, if needed, will be performed at the loading areas or construction exits designated on the plan. Refer to Sheet SW-2A for added Project Note #21.

Part III.G.2. Sediment and Erosion Controls

- A detail of the pump around procedure should be included with the drawings:
 - **Response:** A schematic of the by-pass pumping configuration is included on Sheet SW-13.

Part III.G.2.e Post-Construction Storm Water Management

- Because the nature of the project calls for the riparian area to be disturbed and later restored, is there a plan in place to protect the riparian area with a setback or conservation easement following completion of the project?:
 - **Response:** The Restoration Plan (see copy attached) for the project calls for full riparian restoration within all limits of disturbance. Western Reserve Land Conservancy is currently working to consolidate the various properties comprising the project limits. Once consolidated, the intent is to transfer this land to an entity for operation and maintenance of a park-like amenity for the benefit of the community. A trail element is also planned. Although a riparian setback is not required, the north and south zones of the riparian area will be restored to an average width in the range of 200'. Depending on the arrangement of the property transfer, it is unlikely that the restored riparian area would be encroached upon for future construction activity.

Part III.G.2.f Surface Water Protection

- Please provide copies of all state and federal permits pertaining to this project as these permits become available:
 - **Response:** Only two permits are anticipated for this project. Refer to the attached copy of the USEPA letter authorizing the remediation/restoration project. In addition, the project is being conducted under Nationwide Permit No.38, which is currently in review by the Army Corps of Engineers. Copy of the permit will be made available upon receipt.
 - Also note that all permit documents are posted on the Lockheed Martin web page (below) for the Haley's Ditch Project. The website is intended for public distribution and information about the project.

http://www.lockheedmartin.com/aboutus/energy_environment/community_solutions/akron-oh.html

Part III.G.2.g Non Sediment Pollutant Controls

- Polychlorinated biphenyls (PCBs) are the focus of the remediation effort on this site. Include a narrative protocol of the handling and disposal of contaminated soils. This protocol needs to be evident to all workers on site at all times throughout the course of this project.
 - **Response:** A detailed Remediation Plan (see copy attached) has been prepared to establish the project protocol. ARCADIS prepared the Remediation Plan and will be the responsible contractor for the remediation construction activity. The ARCADIS crew is a specialized contractor experienced in PCB remediation activity along riverine corridors. Therefore, all on-site remediation crew members will have knowledge of the project remediation protocol. Furthermore, the soil removal protocols will be reviewed with the project team at the project kickoff meeting and the remediation plan will be available to all workers throughout the project in the on-site construction trailer. The protocol will be reviewed with new personnel throughout the project as necessary.
 - To summarize the Remediation Plan: All soil containing PCBs above the cleanup objective of 1 mg/kg of total PCBs will be excavated using conventional construction equipment (e.g., excavators) and transported off-site for proper disposal. Soil will be excavated in 25'x25' grids to pre-determined depths of approximately 1 – 3 feet below ground surface based on characterization sampling. Soil removal will commence in the southern (upstream) project area and proceed north (downstream). Soil will either be directly loaded into offsite transportation vehicles or be loaded into haul vehicles (e.g., dump trucks or off-road dump trucks) and transferred to a designated temporary loading area where the soils will subsequently be loaded into trucks for offsite transportation and disposal. Following excavation, verification sampling and analysis will be conducted to document that targeted soils have been removed; additional excavation will be conducted, if needed, to meet the clean up objective. As soon as practical following excavation, the areas will be backfilled with soil containing less than 1 mg/kg PCBs to meet the restoration grades.

- Note any other hazardous compounds that have been identified at the site.
 - **Response:** No other hazardous compounds have been identified at the site.

- Provide a narrative as to how equipment and vehicles exposed to contaminated soils will be prepared for leaving the site. Provide a call-out at each construction entrance regarding restrictions and vehicle decontamination.
 - **Response:** Only construction equipment (e.g., excavators, dozers, off-road dump trucks) will be allowed within the impacted area. Off-site soil transport vehicles will not be allowed to drive on impacted areas of the

site. Prior to leaving the site all transport vehicles will be inspected for accumulated bulk material on the truck sides and tires, if present, accumulated material will be removed using dry methods (e.g., brooms, shovels) to prevent tracking onto public roadways. Signage will be posted at the construction exits indicating that all trucks must be inspected by a Lockheed Martin representative prior to exiting.

- Construction equipment that has been used to handle impacted materials will be cleaned as follows:
 1. An equipment cleaning area will be constructed near the work area and will generally consist of an impermeable barrier that is sloped to a collection sump. Decontamination fluids (water) will be collected using temporary systems (e.g., drums, tanks, and pumps). Equipment cleaning will be performed by dry cleaning methods (shovels, brushes) to remove bulk material, followed by high-pressure, low-volume, power washing (as needed) to remove residual material. Decontamination fluids will be collected and containerized for subsequent treatment and disposal in the on-site water treatment system.
 2. Wipe sampling of heavy equipment (e.g., excavators, loaders, water storage tanks) will be performed following final equipment cleaning for any equipment that has worked in PCB-impacted areas. If wipe sampling indicates PCB levels greater than $10 \mu\text{g}/100 \text{ cm}^2$, the equipment will be re-cleaned and re-sampled until a PCB level less than $10 \mu\text{g}/100 \text{ cm}^2$ is achieved. Wipe sampling will not be required for equipment that has only worked in non PCB-impacted areas.
- Indicate the practical sequence of movement of excavated contaminated soil. Will a storage area be provided should the need arise to store excavated material for a brief time? How will this area be secured to prevent off-site movement?
 - **Response:** Diversion of surface water from the ditch will be performed via bypass pumping to facilitate efficient removal of sediments and adjacent bank soils containing PCBs. Bypass water will be conveyed around the work area and discharged downstream back into Haley's Ditch. Hay bales or riprap will be utilized for energy dissipation at the discharge point to control potential scour within the channel.
 - Remediation activities are expected to progress from upstream to downstream. Site soils will be remediated first, followed by bank soils and ditch sediment. This sequencing will minimize actual by-pass pumping as well as maintaining the channel for directing stream flow during rain events.
 - The soils along Haley's Ditch will be excavated to achieve a PCB cleanup level of 1 mg/kg. Soils will be removed using conventional construction equipment (e.g., track-mounted excavators and dump trucks). Dust control

procedures (e.g., water misting) will be implemented, as necessary, based on field conditions.

- To the extent possible, excavation activities will be initiated at the outermost edge (or higher elevation) of the excavation area and progress toward Haley's Ditch (i.e., upgradient to downgradient). Soil will either be directly loaded into offsite transportation vehicles or be loaded into haul vehicles (e.g., dump trucks or off-road dump trucks) and transferred to a designated temporary loading area where the soils will subsequently be loaded into trucks for offsite transportation and disposal. Following completion of excavation activities in a grid area, confirmation soil samples will be collected for analysis. Sub-grids that achieve the cleanup level will be backfilled to planned restoration grades as soon as practical.
 - To minimize the potential for the release of PCBs to the environment during soil and sediment removal and handling activities, it is desirable to minimize the number of times that the materials are handled. Therefore, where possible, the excavated soil and sediment will be directly loaded into waste hauling trucks to achieve "real time" removal from the site. In instances where direct-loading of the materials into offsite hauling vehicles is not practical the soils and sediments will be transferred in hauling vehicles along designated haul roads to a temporary loading area. The temporary loading area(s) will function as the soil and sediment load-out area for waste transport vehicles upon their arrival at the site.
 - Staging piles will be located within the remediation footprint on soil areas targeted for subsequent excavation; soil containing total PCBs greater than 1 mg/kg will be removed for disposal as the remediation progresses. The location of a staging area will consider site topography and avoid (to the extent possible) significant rainfall drainage ways. The staging piles will be located within the remediation area; thus, the erosion and sediment control measures presented in the SWPPP will provide control of off-site movement of these materials.
 - Although not expected, short-term storage of excavated materials outside of the targeted remediation area may be required. If required, lined (HDPE or equivalent) and bermed staging areas will be constructed within/near the equipment staging areas. Following completion of the project, these staging areas will be removed for off-site disposal. The staging piles will be located within the project area; thus, the erosion and sediment control measures presented in the SWPP will provide control of off-site movement of these materials.
- Indicate the protocol for the event of a small release (<25 gallons) of petroleum product on the site. This protocol must be evident to workers on site. This information is at the request of Ohio EPA as part of the SWPPP review process.
 - **Response:** Refer to Sheet SW-2A for added project note #20. Any spill or release of petroleum will be immediately cleaned up upon discovery. Any impacted soil will be excavated manually or with equipment available on-site and

placed on heavy plastic and covered, or placed into approved containers to prevent contact with storm water or surface water. Any liquid waste will be contained through the use of soil berms and/or absorbent pads/socks. Free liquid will be pumped or bailed into an appropriate container for off-site disposal. All impacted materials and collected free liquids will be transported off-site for appropriate disposal.

- Indicate the protocol for the event of a larger release (25 gallons or more) of petroleum product on the site. *Note: You must contact Ohio EPA at 1-800-282-9378, the local fire department, and the local emergency planning committee within 30 minutes of a spill of 25 gallons or more of petroleum product.* This protocol must be evident to all workers on site.
 - **Response:** Refer to Sheet SW-2A for added project note #20. Any spill or release of petroleum will be immediately cleaned up upon discovery. Any impacted soil will be excavated manually or with equipment available on-site and placed on heavy plastic and covered, or placed into approved containers to prevent contact with storm water or surface water. Any liquid waste will be contained through the use of soil berms and/or absorbent pads/socks. Free liquid will be pumped or bailed into an appropriate container for off-site disposal. All impacted materials and collected free liquids will be transported off-site for appropriate disposal.
 - Petroleum spills of 25 gallons or more will be reported to Ohio EPA at 1-800-282-9378, the City of Akron fire department, and the City of Akron Environmental Health Division within 30 minutes of spill identification.

- Provide information on anticipated air quality during the project. Will air pollution permits need to be obtained?
 - **Response:** Air pollution permits are not required for this project.
 - PCBs are not considered a volatile compound; the presence in PCBs in air would be associated with dust. During all removal activities that involve the handling, movement or disturbance of soil and all excavation activities, it is anticipated that there is a potential for generation of airborne particulate (dust) that can potentially contain concentrations of PCBs. In an effort to determine that work practices and control measures maintain airborne emissions below the applicable regulatory and community air monitoring thresholds, an air emission status program will be implemented that includes daily dust monitoring and periodic airborne PCB sampling and analysis. Dust control measures will be implemented throughout soil disturbing activities, as needed, to manage the generation and migration of dust.

- Please add the following comment to the plan:

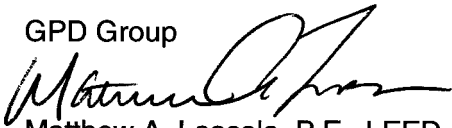
A site is not considered to be stable until the following items are complete:

- A perennial, vegetative cover (or other permanent stabilization practice) has grown to 75% density throughout the entire disturbed area.
- All temporary erosion and sediment controls have been removed and disposed of properly.
- All trapped sediment has been permanently stabilized to prevent further erosion or re-suspension.
- All construction activities have ceased.
- **Response:** Refer to Sheet SW-2A for added project note #22.

We believe all comments have been appropriately addressed and incorporated into the SWP3. Please find an updated set of plans attached for your follow-up review. If there are any remaining questions, please contact me direct at 440.572.2121 so that I can immediately respond. Your expediency on this review is much appreciated.

Respectfully,

GPD Group



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Project Manager

cc: Steve Vardavas, Lockheed Martin
Jamie Krejsa, RiverWorks
Mark Hurban, ARCADIS