APPENDIX H

Risk-Based Disposal Application

Appendix H Risk-Based Disposal Application

Since the T-117 EAA contamination includes PCBs, cleanup and disposal of PCB-contaminated waste will follow the substantive requirements of TSCA regulations (40CFR761.61) as an ARAR. Due to the complexity of this site, removal of PCB contaminated soil and sediment in the T-117 EAA NTCRA is best suited for Risk-Based Disposal (40CFR761.61(c)), the intent of which is met by providing the information outlined in 40CFR761.61(a)(3). The Risk-Based Disposal process is intended to demonstrate that the removal action will not pose an unreasonable risk to human health or the environment.

This section reviews the information needed for a Risk-Based Disposal Application and either provides the required information or providing reference to the appropriate section of this EE/CA or to a previously published document.

As described in 40CFR761.61(a)(3)(i), the following information is needed:

(A) The nature of the contamination, including kinds of materials contaminated.

The nature of the contamination is described in Section 2.4.

(B) A summary of the procedures used to sample contaminated areas and a table or figure showing PCB concentrations measured in all pre-cleanup characterization samples. The summary would include sample collection and analysis dates. Sample results are summarized on tables and figures.

(C) The location and extent of the identified contaminated area including topographic maps with sample locations

Detailed descriptions of the sampling procedures for all work conducted under EPA oversight are provided in the Quality Assurance Project Plans (ENSR 2008; Integral 2008; Windward 2008a, b; Windward and DOF 2006b; Windward et al. 2003a, 2004b, c, d, 2005b) and data reports (AECOM 2009a, b, c, d; ENSR|AECOM 2008a, b, c; Integral 2006a, b, 2009; Windward and DOF 2006a; Windward et al. 2003b, 2004a, e, f, 2005a, c, d, e; Windward and Integral 2009) for each investigation. Analytical data summary tables are provided in Appendices B and E and figures showing PCB concentrations in pre-cleanup characterization samples are presented in Section 2.4.

(D) A cleanup plan for T-117 including schedule, disposal technology, and approach. The plan also contains options and a contingency plan for unanticipated discoveries.

The cleanup or removal action plan identifying the removal action approach, disposal technology, schedule, and contingency for unanticipated discoveries is provided in Sections 7 10.

(E) Written certification from the Owner of the property that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and

instrument/chemical analysis procedures used to assess the PCB contamination are on file and available for EPA inspection.

The written certification, signed by the Port, is provided in Appendix A. The Port also recognizes that 40CFR761.61(c), Risk-Based Disposal Approval, allows EPA to request other information that it believes necessary to evaluate the application.

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