MONTROSE CHEMICAL CORPORATION OF CALIFORNIA

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February 13, 2015

U.S. Environmental Protection Agency
ATTN: Yarissa Martinez
600 Wilshire Blvd., Suite 1460
Los Angeles, CA 90017

Re: Comments on DNAPL Proposed Cleanup Plan

Dear Ms. Martinez:

Montrose Chemical Corporation of California ("Montrose") is pleased to provide these comments on the U.S. Environmental Protection Agency's ("EPA") Dense Non-Aqueous Phase Liquid ("DNAPL") Proposed Cleanup Plan. Montrose appreciates EPA's efforts in developing the DNAPL Proposed Cleanup Plan, and supports the Plan along with EPA's preferred alternative, Alternative 6A (Electrical Resistance Heating in a Focused Treatment Area).

The National Contingency Plan requires EPA to select remedies based on overall protection of human health and the environment, and compliance with Applicable and Relevant or Appropriate Requirements. Remedies that satisfy these threshold criteria are evaluated based on the following factors: long-term effectiveness; reduction of toxicity, mobility, or volume; short-term effectiveness; implementability; and cost.

Montrose believes that the only technologies that satisfy these threshold criteria are focused electrical resistance heating ("ERH") and hydraulic displacement. Both would be highly effective at removing DNAPL and preventing migration, protective of the environment and the community, and more easily implemented than other technologies. Although Montrose believes that hydraulic displacement is the best remedy for this site, focused ERH is a reasonable alternative that meets NCP criteria.

By contrast, steam injection, such as described in Alternatives 5A and 5B, would create significant risks by promoting DNAPL mobility through increased saturation. Montrose believes that there is greater potential for downward migration of DNAPL with steam as compared to the other remedial alternatives. Furthermore, the extreme temperatures produced by steam injection create risks of fugitive emissions and explosions. Steam injection also involves significantly higher greenhouse gas emissions and implementation costs than hydraulic displacement.

Full-scale ERH treatment (as opposed to the focused ERH treatment preferred by EPA) would pose somewhat diminished safety risks compared to steam injection, but would still require enormous amounts of energy, contributing to excessive emissions and operating costs.

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Montrose, however, believes that the Preferred Alternative avoids the majority of the drawbacks common to steam injection and full-scale ERH. As such, and because Alternative 6A reasonably balances the remedy selection factors established by the National Contingency Plan, as discussed in detail in the attachment, Montrose supports the selection of Alternative 6A as the preferred DNAPL remedy at the Montrose site.

Sincerely,

Joseph C. Kelly /KER

Joseph C. Kelly
President

Encl.

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