



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

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Reply to  
Attn of: ECL-110

MEMORANDUM

From: Sean Sheldrake, Remedial Project Manager 

Thru: Lori Houck-Cora, Assistant Regional Counsel   
Deb Yamamoto, Manager   
Site Cleanup Unit #2

To: Daniel D. Opalski, Director  
Office of Environmental Cleanup  
USEPA Region 10

Date: April 16, 2008

Subject: Arkema EE/CA Workplan Dispute

This memo responds to the questions posed in your April 7, 2008 e-mail to Deb Yamamoto and Doug Loutzenhiser, Legacy Site Services (LSS) from your review of dispute statements and supporting documentation provided by both parties for the Arkema EE/CA Workplan. In addition, a summary of the discourse between EPA and LSS concerning lindane as a Chemical of Interest (COI) is presented at the end of this memo.

**Confined Disposal Facility Questions**

*1. In terms of what we know now about site conditions (e.g. physical environment, waste characteristics including contaminant profile), how does the Arkema site compare to other sites regionally and nationally where CDFs have been employed?*

A search for confined disposal facilities (CDFs) constructed at EPA managed sediment cleanups identified four sites; however, none have similar site conditions to the Arkema site or are comparable to Arkema's proposal. The major site conditions for Arkema's proposal is DDx Principal Threat Material (PTM) placed in a freshwater river environment. Another relevant site circumstance is that this action is a removal action.

**Waukegan Harbor/Outboard Marine Corp. (Region 5)**

The Waukegan Harbor site is located on Lake Michigan north of Chicago. This sediment remedial action is the closest match to the Arkema site conditions since it included a CDF containing principal threat material (PTM, in this case PCB), and is located in a freshwater setting. However, this is a final remedy selected and implemented under a ROD. An