

D. SCOPE AND ROLE OF THE 12th St.-OU4 WITHIN THE SITE STRATEGY

The purpose of this ROD is to select the Remedial Action (RA) for the 12th St. - OU4. The selection of remedies for the other OUs, including Portage Creek and the Kalamazoo River, will be addressed in RODs specific to those areas.

The selected remedy for 12th St.-OU4 is a source control remedy that relocates residual material from the areas outside the landfill back into the landfill, and contains the PCB-contaminated material within the landfill by constructing a cap and containment system. The RA will include wetland mitigation and restoration of all excavated areas or areas otherwise affected by the RA activities. The cap and containment system of the landfill will be considered a final action. Post excavation sampling will be conducted in the excavated areas outside the landfill in accordance with an approved workplan. A final decision on whether additional response actions are necessary for the areas outside the landfill that are part of this RA will be made as part of the ROD for the Phase I portion of the Kalamazoo River (Morrow Pond Dam downstream to Lake Allegan, including Portage Creek). The remedy for the landfill proper will prevent the future release of PCBs to surface water, sediments, and the area surrounding the landfill.

The remedy does not include treatment that would reduce toxicity, mobility, or volume as a principal element. A highly significant reduction in the mobility of PCB-contaminated material will be achieved, however, by means of source containment. Although incineration was evaluated as a treatment option for these types of wastes as part of the King Highway Landfill Operable Unit 3 (KHL-OU3) remedy selection, the volume of the waste, implementation time, technical and administrative difficulties associated with implementation and cost made such a remedial approach prohibitive. Available information on landfill operations at the Site indicate, moreover, that it would not be feasible to locate and separately address concentrated areas of PCBs (hot spots) within the landfill because PCBs appear to be widespread throughout the landfill. Therefore, alternatives were not formally evaluated for identification and treatment or removal of hot spots. As required by the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), a periodic (five-year) review of the remedy effectiveness will be performed.