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BE SANITARY LANDFILL
ADMINISTRATIVE RECORD

BFI001 0003

BFI Sanitary Landfill NPL Site
Non-Time-Critical Removal Action
Administrative Record

Index

Compiled: July 12, 1993
Action Memorandum
Signed: September 13, 1993

Prepared for

Region I
Waste Management Division
U.S. Environmental Protection Agency

With Assistance from
AMERICAN MANAGEMENT SYSTEMS, INC.
One Bowdoin Square, 7th Floor • Boston, Massachusetts 02114 • (617) 557-2000

Introduction

This document is the Index to the Administrative Record for the Non-Time-Critical Removal Action at the BFI Sanitary Landfill National Priorities List (NPL) site. The Action Memorandum for this response was signed September 13, 1993. Section I of the Index cites site-specific documents, and Section II cites guidance documents used by EPA staff in selecting a response action at the site.

The Administrative Record is available for public review at EPA Region I's Records Center in Boston, Massachusetts (Telephone: 617-573-5729), and at the Rockingham Free Library, 65 Westminster St., Bellows Falls, Vermont. *This index also contains confidential documents that are available only for judicial review.* Supplemental/Addendum volumes may be added to this Administrative Record. Questions concerning the Administrative Record should be addressed to the EPA Region I site manager.

The Administrative Record is required by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA).

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Section I
Site-Specific Documents

ADMINISTRATIVE RECORD INDEX

for the

Non-Time-Critical Removal Action

at the

BFI Sanitary Landfill NPL Site

(Action Memorandum Signed: September 13, 1993)

2.0 Removal Response

2.1 Correspondence

1. Letter from Edward M. Hathaway, EPA Region I to Derrick D. Vallance, Browning-Ferris Industries, Inc. (January 13, 1993). Concerning transmittal of the attached:
 - A. "Engineering Evaluations/Cost Analysis (EE/CA) Guidance Outline."
 - B. Memorandum from Don R. Clay, EPA Headquarters to Waste Management Division Directors, Regions I, IV, V, VI, VII, VIII, et al. (July 7, 1992). Concerning guidance on implementation of the Superfund Accelerated Cleanup Model (SACM) under CERCLA and the NCP.
 - C. "Early Action and Long-Term Action Under SACM - Interim Guidance," EPA Headquarters (December 1992).
2. Letter from Mary Jane O'Donnell, EPA Region I to Derrick D. Vallance, Browning-Ferris Industries, Inc. (February 10, 1993). Concerning requirement to conduct an Engineering Evaluation/Cost Analysis (EE/CA) for source control measures at the site.
3. Memorandum from Edward M. Hathaway, EPA Region I to Paul G. Keough, EPA Region I (July 7, 1993). Concerning transmittal of the attached "Approval Memorandum to Perform an Engineering Evaluation/Cost Analysis for a Non-Time-Critical Removal Action at the site," Edward M. Hathaway, EPA Region I (May 14, 1993).
4. Letter from Mary Jane O'Donnell, EPA Region I to Derrick D. Vallance, Browning-Ferris Industries, Inc. (June 30, 1993). Concerning approval of the June 25, 1993 revised draft Engineering Evaluation/Cost Analysis (EE/CA) with conditions.

2.2 Removal Response Reports

1. "Engineering Evaluation/Cost Analysis - Source Area - Disposal Specialists, Inc. Site," Balsam Environmental Consultants, Inc. for Disposal Specialists, Inc. (July 1, 1993).

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2.9 Action Memoranda

1. Action Memorandum, Edward M. Hathaway, EPA Region I to Paul G. Keough, EPA Region I (September 9, 1993, Signed: September 13, 1993) (The Enforcement Section of the Memorandum is withheld as CONFIDENTIAL). Concerning approval of request for a Non-Time Critical Removal Action at the site. Attached are the following comments received by EPA Region I during the public comment period:
 - A. Transcript, Public Hearing on Engineering Evaluation and Cost Analysis (EE/CA) for the BFI-Rockingham Superfund Site (August 5, 1993).
 - B. Comments Dated August 11, 1993 from George Desch, State of Vermont Agency of Natural Resources on the proposed non-time-critical removal action at the BFI-Rockingham Superfund Site.
 - C. Comments Dated August 11, 1993 from Michael Veitch, Vermont Public Interest Research Group (VPIRG) regarding the BFI-Rockingham Landfill.

3.0 Remedial Investigation (RI)

3.1 Correspondence

1. Letter from Mary Jane O'Donnell, EPA Region I to Derrick D. Vallance, Browning-Ferris Industries, Inc. (April 5, 1993). Concerning approval of the draft Remedial Investigation (RI) Report with conditions.

3.2 Sampling and Analysis Data

The report cited in entry number 1 may be reviewed, by appointment only, at the EPA Region I Records Center in Boston, Massachusetts or the Rockingham Free Library in Bellows Falls, Vermont.

1. "Summary Assessment Report - Disposal Specialists, Inc. Facility - Rockingham, Vermont." Balsam Environmental Consultants, Inc. (March 1992).
2. Results of EPA Split Samples, EPA Region I (October 1992). Includes:
 - A. "CLP Inorganic Analysis, Case No. 18907 - SDG No. MAY158 - Analytical Results," EPA Region I
 - B. "Volatile Organic Compounds by EPA Method 524.2 (BY SAS) - Aqueous Analysis - Connecticut River," EPA Region I
3. Letter Report from Marcel A. Guay and Michael A. Deyling, Balsam Environmental Consultants, Inc. to Edward M. Hathaway, EPA Region I (February 2, 1993) with attached summary table of air sampling results and sampling locations map. Concerning air monitoring program results.
4. Memorandum from Edward M. Hathaway, EPA Region I to Site File (July 6, 1993) with attached Memorandum from Mark Heuberger, Arthur D. Little to Edward M. Hathaway, S. Gnewuch, and P. Rury, EPA Region I (March 8, 1993). Concerning EPA approval of data collected by BFIVT and DSL.

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3.5 Applicable or Relevant and Appropriate Requirements (ARARs)

1. Letter from Mary Jane O'Donnell, EPA Region 1 to William E. Ahearn, State of Vermont Department of Environmental Conservation (February 10, 1993). Concerning request for state identification of ARARs for the BFI-Rockingham Landfill site.
2. Letter from William E. Ahearn, State of Vermont Department of Environmental Conservation to Mary Jane O'Donnell, EPA Region 1 (March 17, 1993). Concerning identification of ARARs at the BFI-Rockingham site.

3.6 Remedial Investigation (RI) Reports

Reports

1. "Disposal Specialists, Inc. - Remedial Investigation Report - Volume 1 of 5 - Narrative, Tables, Figures," Balsam Environmental Consultants, Inc. for Disposal Specialists, Inc. (April 26, 1993).
2. "Disposal Specialists, Inc. - Remedial Investigation Report - Volume 2 of 5 - Appendices A through H," Balsam Environmental Consultants, Inc. for Disposal Specialists, Inc. (April 26, 1993).
3. "Disposal Specialists, Inc. - Remedial Investigation Report - Volume 3 of 5 - Appendix I," Balsam Environmental Consultants, Inc. for Disposal Specialists, Inc. (April 26, 1993).
4. "Disposal Specialists, Inc. - Remedial Investigation Report - Volume 4 of 5 - Appendix J," Balsam Environmental Consultants, Inc. for Disposal Specialists, Inc. (April 26, 1993).
5. "Disposal Specialists, Inc. - Remedial Investigation Report - Volume 5 of 5 - Appendix I & J," Balsam Environmental Consultants, Inc. for Disposal Specialists, Inc. (April 26, 1993).

3.10 Endangerment Assessments

1. "Final Baseline Human Health Risk Assessment," Arthur D. Little, Inc. (July 7, 1993).

9.0 State Coordination

9.1 Correspondence

1. Letter from Merrill S. Hohman, EPA Region 1 to Elizabeth McLain, State of Vermont Department of Environmental Conservation (March 11, 1992). Concerning notification of upcoming negotiations with potentially responsible parties.
2. Cross-Reference: Letter from Mary Jane O'Donnell, EPA Region 1 to William E. Ahearn, State of Vermont Department of Environmental Conservation (February 10, 1993). Concerning request for state identification of ARARs for the BFI-Rockingham Landfill site [Filed and cited as entry number 1 in 3.5 Applicable or Relevant and Appropriate Requirements (ARARs)].

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9.1 Correspondence (cont'd.)

3. Cross-Reference: Letter from William E. Ahearn, State of Vermont Department of Environmental Conservation to Mary Jane O'Donnell, EPA Region I (March 17, 1993). Concerning identification of ARARs at BFI-Rockingham site [Filed and cited as entry number 2 in 3.5 Applicable or Relevant and Appropriate Requirements (ARARs)].

10.0 Enforcement

10.7 EPA Administrative Orders

1. Administrative Order by Consent for Remedial Investigation/Feasibility Study, *In the Matter of BFI-Rockingham Landfill Site*, Disposal Specialists, Inc., Browning-Ferris Industries of Vermont, Inc., Docket No. 1-92-1053 with attached Statement of Work (SOW) for the Remedial Investigation and Feasibility Study for the BFI-Rockingham Superfund Site (July 24, 1992).

11.0 Potentially Responsible Party (PRP)

11.9 PRP-Specific Correspondence

1. Letter from Merrill S. Hohman, EPA Region I to Gerald K. Burger, Browning-Ferris Industries of Vermont, Inc. (May 15, 1992). Concerning notice of potential liability and request for participation in cleanup activities.
2. Letter from Merrill S. Hohman, EPA Region I to Gerald K. Burger, Disposal Specialists, Inc. (May 15, 1992). Concerning notice of potential liability and request for participation in cleanup activities.
3. Cross-Reference: Letter from Edward M. Hathaway, EPA Region I to Derrick D. Vallance, Browning-Ferris Industries, Inc. (January 13, 1993). Concerning transmittal of the attached:
 - A. "Engineering Evaluations/Cost Analysis ("E/CA) Guidance Outline."
 - B. Memorandum from Don R. Clay, EPA Headquarters to Waste Management Division Directors, Regions I, IV, V, VI, VII, VIII, et al. (July 7, 1992). Concerning guidance on implementation of the Superfund Accelerated Cleanup Model (SACM) under CERCLA and the NCP.
 - C. "Early Action and Long-Term Action Under SACM - Interim Guidance," EPA Headquarters (December 1992).
[Filed and cited as entry number 1 in 2.1 Correspondence].

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13.0 Community Relations

13.3 News Clippings/Press Releases

1. "Environmental News - EPA Meeting to Discuss Cleanup Action Proposal for BFI-Rockingham Landfill Superfund Site," EPA Region I (June 25, 1993).
2. "The United States Environmental Protection Agency Invites Public Comment on the Preferred Alternative for Non-Time-Critical Removal Action at the BFI-Rockingham Landfill Site, Rockingham, Vermont," Bellows Falls Town Crier - Bellows Falls, VT (June 30, 1993).
3. "Notice of Availability of the Administrative Record and Request for Public Comment on a CERCLA Non-Time-Critical Removal Action: BFI-Rockingham Landfill Superfund Site, Rockingham, VT," 58 FR 135 pp. 38376-38377 (July 16, 1993).
4. "Environmental News - EPA Has Selected Cleanup Action for BFI-Rockingham Landfill Superfund Site," EPA Region I (September 13, 1993).

13.4 Public Meetings

1. Cross-Reference: Transcript, Public Hearing on Engineering Evaluation and Cost Analysis (EE/CA) for the BFI-Rockingham Superfund Site (August 5, 1993) [Filed and cited as attachment A of entry number 1 in 2.9 Action Memoranda].

13.5 Fact Sheets

1. "Superfund Program Information Update #1," EPA Region I (May 1993). Concerning completion of the Remedial Investigation at the BFI-Rockingham Landfill Site.
2. "Superfund Program Fact Sheet Information Update #2," EPA Region I (July 1993). Concerning EPA announcement of proposal to cap landfill.

16.0 Natural Resource Trustee

16.4 Trustee Notification Form and Selection Guide

1. Letter from Merrill S. Hohman, EPA Region I to John Lindsay, U.S. Department of Commerce National Oceanic and Atmospheric Administration (March 11, 1992) with attached Trustee Notification Form. Concerning notification of potential natural resource damages.
2. Letter from Merrill S. Hohman, EPA Region I to William Patterson, U.S. Department of the Interior (March 11, 1992) with attached Trustee Notification Form. Concerning notification of potential natural resource damages.

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17.0 Site Management Records

17.7 Reference Documents

1. Memorandum from Timothy Fields Jr., EPA Headquarters to Superfund Branch Chiefs, Regions I - X and OHM Coordinators, Regions I - X (March 30, 1988). Concerning discussion and transmittal of the attached Engineering Evaluations/Cost Analysis (EE/CA) Guidance outline.
2. "Early Action and Long-Term Action Under SACM - Interim Guidance," EPA Headquarters (December 1992).
3. "Superfund Accelerated Cleanup Bulletin - Presumptive Remedies for Municipal Landfill Sites," EPA Headquarters (February 1993).

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Section II

Guidance Documents

GUIDANCE DOCUMENTS

EPA guidance documents may be reviewed at EPA Region I Records Center, Boston, Massachusetts.

General EPA Guidance Documents

1. U.S. Environmental Protection Agency. Draft Engineering Evaluation/Cost Analysis Guidance for Non-Time-Critical Removal Actions. March 1988.
2. U.S. Environmental Protection Agency. Revised Procedure for Planning and Implementing Off-Site Response Actions. 1987.
3. U.S. Environmental Protection Agency. Office of Research and Development and Office of Solid Waste and Emergency Response. Remedial Action Costing Procedures Manual (EPA/600/8-87/049), October 1987.
4. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. CERCLA Compliance with Other Laws (OSWER Directive 9234.1-01), 1988.
5. U.S. Environmental Protection Agency. Hydrologic Evaluation of Landfill Performance Model - Version 2.05, 1988.
6. U.S. Environmental Protection Agency. Sample Management Office. Modified by EPA Region I. Laboratory Data Validation Functional Guidelines for Evaluating Organics Analysis, 1988.
7. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. CERCLA Compliance with Other Laws Part II, (OSWER Directive 9234.1-02), August 1989.
8. U.S. Environmental Protection Agency. Final Covers for Hazardous Waste Landfills and Surface Impoundments. (EPA/530-SW-89-047), 1989.
9. U.S. Environmental Protection Agency. Sample Management Office. Modified by EPA Region I. Laboratory Data Validation Functional Guidelines for Evaluating Inorganics Analyses, 1989.
10. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. Streamlining the RI/FS for CERCLA Municipal Landfill Sites (Directive: 9335.3-11FS) September 1990.
11. U.S. Environmental Protection Agency. Removal Cost Management System: Version 3.2, 1990.
12. U.S. Environmental Protection Agency. Conducting Remedial Investigations/Feasibility Studies for CERCLA Municipal Landfill Sites. (EPA/540/P-91/001), 1991.
13. U.S. Environmental Protection Agency. Office of Solid Waste and Emergency Response. Consideration of ARARs during Removal Actions (Publication 9360.3-02), 1991.

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