9.0 RECOMMENDATIONS

To provide decision makers with the information necessary to evaluate remedial alternatives and to reduce or eliminate potential risks to human and/or ecological receptors, it is recommended that Load Line 3 proceed to the FS phase under the RVAAP CERCLA process. It is recommended that the FS phase employ a streamlined remedial alternative evaluation process based on the most likely land use assumptions by evaluating a range of effective alternatives, technologies, and associated costs. The intent of this strategy is to accelerate site-specific analysis of remedies by focusing the FS efforts on appropriate remedies that have been evaluated for other sites with operational histories similar to Load Line 3.

The future land uses and controls envisioned for Load Line 3 should be determined prior to selection of the path forward for the site. Establishment of the most likely land use scenario(s) will equip decision makers with the initial information necessary to determine the correct remedial action, such as source removal, land use controls, and/or continued monitoring, to achieve requisite protection of human health and the environment. The envisioned future use of the AOC, or a portion of the AOC, is an important consideration in determining the extent of remediation necessary to achieve the required degree of protectiveness. For example, a residential versus a National Guard land use scenario influences how much cleanup is needed to lower the risk to protective levels. Establishment of land use will also allow streamlined evaluation of remedies and will be necessary for documentation in a remedial action.

Areas having the same projected land use within Load Line 3 (and at other melt-pour lines at RVAAP) will incorporate the same RGOs into remedial alternative development. Also, the FS should consider potential future separate actions related to surface water systems and recognize the connection of surface water exit pathways among the four major melt-pour lines (Load Lines 1 through 4), as well as Load Line 12. The FS should apply results of the ecological field truthing effort at WBG (pending agreement by Ohio EPA) to remedial goal development for Load Line 3 to the extent practicable.

Key data uncertainties have been identified in the RI to help guide any future sampling efforts. Details of additional nature and extent assessment, as needed to fill any remaining data gaps, which are necessary to evaluate remedial alternatives, are deferred to the FS planning stage. The following components may be necessary for a thorough FS evaluation or may be considered under a separate remedial action process for integrator media, such as surface water or groundwater.

- Refinement of EUs boundaries, if remedial decisions by EU are to be considered most feasible by decision makers. Such a delineation would allow

    1. Prioritization of EU or areas from highest potential risk to lowest potential risk.

    2. Selection of cleanup actions and exit strategies per EU and/or per buildings in each EU, (e.g., certain areas may be remediated by soil removal, whereas remediation of other areas, such as a process building vicinity, may require an alternate approach).

    3. Potential elimination of all or portions of certain EUs from additional investigation or further action, such as portions of the Perimeter Area Aggregate, thus reducing the footprint of the AOC.

- Assessment of shallow groundwater at Load Line 3 indicated contamination related to historical process operations. Subsurface soil data at Load Line 3 indicated the presence of explosives and metals SRCs above levels of concern. Although definitive evidence of vertical migration of contaminants does not exist, assessment of deep groundwater at the site has not been performed and

may be a potential data gap. Characterization or monitoring of deeper groundwater may be necessary to evaluate certain potential remedial actions or to support future resource use decisions.

- Sediment in the Cobb's Pond Tributary Aggregate and dry conveyances in the Western Ditches Aggregate were characterized to typical depths of 0.15 m (0.5 ft). Characterization of deeper sediment in drainage conveyances is a potential data gap and additional sampling at deeper intervals may be necessary to evaluate potential remedial actions or support future resource use decisions.

- The requirements of the Toxic Substances and Control Act should be evaluated to determine if they may be an applicable or appropriate and relevant requirement for future remedial actions involving soil or sediment containing PCBs above certain threshold criteria.