Response USEPA Modifications to
Phase IA Remedial Investigation Report, Allied Chemical & Ironton Coke
Honeywell Coal Tar Facility, Ironton, Ohio
January 26, 2007

Specific comments:

1. **Page iv**: The table of contents needs a complete list of tables and figures. Additionally, the hard copy of the January 26 2007 version of the RI does not have a complete set of figures and tables. For example Tables 1.1 through 3.1 are referred to in the RI, yet the hard copy does not have those tables included. The missing tables and figures were on the CD-ROM version of the document so U.S. EPA was able to review these during this final review. Please insure that the final paper and electronic versions of the RI sent to U.S. EPA and Ohio EPA have all tables and figures included.

Response: The table of contents was revised to include a complete list of tables and figures. Hard copies of missing tables (i.e., Tables 1.1 through 3.1) are enclosed.

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2. **Page xx, first bullet and associated text in the document**: U.S. EPA does not agree that clean up based on human health concerns will necessarily address risks to ecological assessment endpoints of terrestrial invertebrates, vermivorous birds and predatory birds. Note, in the screening ecological risk assessment (SERA) performed as part of this RI, calculated risks to these three assessment endpoints were above acceptable levels. Additionally, Honeywell drafted 3 remedial action objectives (RAOs), dealing specifically with these assessment endpoints. Preliminary remedial action objectives (PRGs) must be developed for the three RAOs in the feasibility study. At that time, it will be determined if the soil remedial actions will be based on human health or ecological risk (or both). Please delete the text here and in other sections of the RI that state that since clean up will be done for human health, no further eco risk work will be done.

Response: This statement was deleted as requested.

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3. **Page xxi, second bullet**: typo – it should be possible, not "possbile".

Response: This typographical error was corrected.

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4. **Page 5-13, 5-14**: U.S. EPA agrees that the extent of VOCs and PAHs in soil are not fully defined to the south. Further, this data gap must be investigated fully prior to completing the final design of the selected response action for this Site. No changes to the RI are necessary.

Response: Acknowledged.

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5. **Table 7-6:** Our comment on the draft version of the RI noted that Table 7.6 is presented on 4

identical pages. The response to our comment indicates that the extra pages would be removed. The revised Phase IA RI still has the identical four pages. Please remove the redundant pages.

Response: This typographical error was corrected and a hard copy of the revised Table 7-6 is included.

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6. **Section 8.2.1, Pages 8-9 and 8-10**. Our comment on the draft version of the RI noted that receptors at the Site had not been cataloged. The response to our comment stated that the text in Section 4.1.5 will be revised. However, in the revised Phase IA RI, section 4.1.5 provides a simple overview of the types of habitats at the site. Thus, there is little foundation for the selection of terrestrial and aquatic upper trophic levels assessment endpoints and receptors chosen to represent the assessment endpoints. However, U.S. EPA agrees with the selected assessment endpoints and their associated receptors despite the lack of justification for their selection, given the highly disturbed and degraded habitats present at the Site. No revision is necessary at this time.

Response: Acknowledged.

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7. **Section 8.4.7, Page 8-24**: The incremental hazard for benzo(a)pyrene is greater than 1.0 under the NOAEL scenario. Therefore, U.S. EPA can not agree that adverse effects to herbivorous waterfowl are unlikely. Please develop an RAO and PRG for this assessment endpoint in the feasibility study.

Response: The incremental hazard to herbivorous waterfowl from benzo(a)pyrene is greater than 1.0 under the RME-based NOAEL scenario, but less than 1.0 under the RME-based LOAEL scenario (see Table 8.25). The incremental hazard for benzo(a)pyrene (and all other COPCs) is less than 1.0 under the CTE-based NOAEL and LOAEL scenarios (see Table 8.26). Given the CTE-based scenarios are considered most relevant for inferring risk to populations of receptors, it was concluded that adverse effects to herbivorous waterfowl such as the mallard are unlikely, and therefore an RAO and PRGs for this assessment endpoint are not needed.

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8. **Section 8.5.3, sediment**: U.S. EPA agrees that additional work is necessary to characterize the extent and site-specific toxicity to aquatic assessment endpoints from sediments. However, U.S. EPA suggests that Honeywell move into the feasibility study at this point and develop response alternatives to address the ecological risks indicated in the SERA (Phase I and IA). The additional work referred to in the RI could be performed prior to finalization of the response action designs.

Response: Acknowledged.
