

The Community's Five-Point Cleanup Plan for the Hilton Davis Site

Pleasant Ridge Community Council Citizens Concerned about Hilton Davis

We want a real cleanup, not a cover-up – a cleanup that will encourage the site's redevelopment as a valuable asset to our community. The Kodak-Ohio EPA proposal is not the answer. Hilton Davis used the Bloody Run Creek and its Ravine as a convenient way to dispose of its industrial and highly toxic hazardous wastes for some 50 years. Yet, Ohio EPA's proposal would leave every bit of the Ravine's waste and contamination in place. Instead it adopts Kodak's plan to use a thin layer of soil to contain the landfill's toxic wastes and vapors. *Ohio EPA's plan may save money for Kodak but would harm our community's future.* The final plan for the Hilton Davis Site must meet the following standards:

- 1. The cleanup must comply with the Consent Decree.** This proposal fails to comply with critical mandates contained in the 1986 Consent Decree (CD). The CD instructs Ohio EPA to give top priority to remedies *(a) that minimize or eliminate the potential for release of hazardous wastes and constituents into the environment and (b) that provide the greatest improvement to public health, welfare and environment.*

The Kodak-Ohio EPA proposal offers at best scant, short-term protection. The thin layer of soil does not comply with regulatory guidance for landfill covers and will be subject to cracking, fractures, and erosion virtually guaranteeing that toxics will leak into the environment.

- 2. The cleanup must be developed in a way that benefits the community.** Ohio EPA's proposal adopts Kodak's rigid deed restriction that would restrict the site's future solely to industrial use *despite strong opposition from the public and public institutions including the Pleasant Ridge Community Council and the Cincinnati City Council.* The plan would eliminate the opportunity for residential development and many commercial uses of value to the community. Satellite views clearly show that the site's surroundings are overwhelmingly residential and recreational – not industrial.

Ohio EPA's proposal based on rigid deed restrictions and substandard "cleanup" will clearly discourage developers. Thus, when the chemical plant finally closes, the 80-acre site is likely to wind up as a dangerous abandoned lot in the heart of the City of Cincinnati.

- 3. The plan should prevent the release of toxic fumes.** Hilton Davis disposed of volatile organic compounds (VOCs) in the Ravine Landfill and other parts of the site over many decades. These VOCs include *cancer causing agents* (carcinogens) such as benzene and tetrachloroethylene. Volatile liquids such as solvents readily evaporate into air spaces in soil. They can infiltrate into buildings through cracks in

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basement floors and slabs in a process known as *vapor intrusion*. If uncontrolled such vapors could expose building occupants to toxic VOCs and may restrict or increase the costs of constructing new buildings on the site.

To address this problem, Ohio EPA should take several steps before it makes its final decision for the site's remediation: (a) conduct a thorough soil vapor investigation to determine the extent of the problem; and (b) conduct a feasibility study and pilot test for soil vapor extraction (SVE), a technology that extracts toxic vapors from the ground and that is U.S. EPA's preferred remedy for sites with VOC problems.

Although the Agency finally acknowledges the need for soil gas monitoring, the testing it requires as part of its proposed remedy is inadequate: (a) the soil vapor survey is restricted to areas of existing buildings but would not cover potential future building sites; and (b) the requirement comes too late to affect the choice of remedies for the Ravine and other parts of the site.

The Consent Decree requires Ohio EPA to give first preference to "source reduction" technologies such as SVE that can prevent releases and exposure. The Agency should revise its remedy selection accordingly.

- 4. The plan should improve the groundwater cleanup.** Hilton Davis dumped large quantities of toxic chemicals into the Ravine and other areas that had no bottom liners. These chemicals seeped into the groundwater. The VOCs that offgas from groundwater contribute to the vapor intrusion problem discussed above.

Ohio EPA's proposal accepts Kodak's plan to use its current pump and treat systems as the final remedy for the site's contaminated groundwater. Designed to prevent offsite migration, these systems are highly ineffective at reducing the burden of toxics in groundwater and the problem of vapor intrusion on the site. Secondly, the Agency's plan does not specifically require that Kodak install offsite monitoring wells to determine whether contamination is moving into residential neighborhoods beyond the fence lines.

While pump and treat systems can take many decades to reduce concentrations of volatile organic compounds in groundwater, dual phase systems attack VOCs at their source. This technology will reduce VOC levels in groundwater far more rapidly than Kodak systems and reduce the risks associated with offgassing and vapor intrusion. The Consent Decree requires that Ohio EPA give this approach first preference. *For these reasons we urge OEPA to (a) conduct a thorough feasibility / pilot study for Dual Phase Vacuum Extraction and (b) require Kodak to install a network of offsite monitoring wells.*

- 5. Ohio EPA should require that Kodak set up a financial assurance fund that would be sufficient to pay the costs of unforeseen, future cleanup costs;** this fund would also provide funding for all required remedial costs in the event that Kodak files for bankruptcy.