

COPA
Coalition Opposed to PCB Ash In Monroe County Inc.
2545 Curry Pike
Bloomington, Indiana 47404
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Comments on EPA Lemon Lane Proposed Plan

Since PCBs were first detected leaving the Lemon Lane Landfill the general public of Bloomington has been pleading to collect and treat all water leaving Lemon Lane. EPA's building of the Illinois Central Water Treatment facility has greatly reduced the amount of PCBs escaping into the environment.

COPA also agrees that the "hot spot" excavation at Lemon Lane also greatly reduce the total volume of PCBs at the site. Although EPA readily admits that it was virtually impossible to do a 100% total excavation of PCBs due to the fact the PCBs have migrated below bedrock at the site, all subsequent testing by EPA and CBS strengthen the position that additional excavation and water treatment are necessary. Not only has further testing by CBS demonstrated that there are still heavily contaminated areas within Lemon Lane, like along and under the rail road tracks adjacent to the site, the testing has also proven that understanding the geology under and surrounding the site is limited at best. (See Attached Davies comments)

The continued release of PCBs from the site, the less than 100% effectiveness of the Illinois Central Sprint Water Treatment facility, the less than exact understanding of the karst geology beneath the site, and the fact that Lemon Lane contains significant amounts of PCBs, all support EPA selected remedy of additional excavation, increase capacity of treating all the water and continual monitoring of the site.

The water treatment facility has a proven track record of effectively treating 80% of water released from the site. The facility has a proven track record of operating effectively and all testing by EPA and CBS at Lemon Lane support the need for the treatment facility to be expanded. Even the total cost of the proposed remedy is low compared to all the expense incurred by all parties in trying to understand the site better.

CBS argues there is no risk and EPA argues there is sufficient risk to address. Both EPA and CBS will have supporting documentation to support their side of the debate but even the most optimistic conclusion related to risk would acknowledge the fact that PCBs are not a good thing to continually be released into an environment where people fish, play, or live. The proposed remedy addresses the environmental risks with a proven method of treatment at a reasonable cost.

The cost to the Bloomington community debating the risk of continued releases for over 20 years is beyond calculation. The delay by CBS in wanting to easily eliminate the risk from future releases is mind boggling to say the least. The patience of the government parties over the last six years in continual testing by CBS, and the continual delay of addressing the releases is also difficult to understand.

So now after 20 years of debate on how to deal with Lemon Lane, after 20 additional years of releases from the site, after millions of dollars have been spent by all parties in better understanding the site how could this proposed remedy not be completed.

It would be false to assume COPA or the majority of the Bloomington community would not favor total excavation of the site if it were physically possible or financially acceptable to all parties, especially CBS which has a proven record of spending money to block doing anything when the same amount of money would satisfy most of the general public and all the governmental parties.

Years and yeas of debate and testing, monitoring, drilling, excavating at Lemon Lane has proven one thing for sure, there is still significant PCBs at the site and escaping from the site and the public should not accept this to continue any longer than it already has.

The proposed EPA selected remedial actions should be implemented as soon as possible. And continual monitoring at the site and at the treatment facility should continue until all water leaving the site is tested to contain below acceptable limits of PCBs.

Sincerely,

Michael R Baker
COPA