

# Public Comment of Proposed Cleanup of CCI

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The CCI Citizen's Advisory Group met on August 2, 2005 and a core group of area residents from around CCI attended a subsequent meeting on August 8. The proposed cleanup plans for CCI were discussed in detail and input from KDHE on these issues was solicited. After the discussions, those at the meeting voted unanimously to support the comments delineated below regarding the cleanup plans for the CCI superfund site. Overall, we are very pleased with the proposed plans and we appreciate the efforts of the EPA, Boeing and KDHE in this process.

With regard to soil and water cleanup scenarios developed by the EPA and Boeing, the CAG is supportive of Preferred Alternative S3D-plus Option B, which involves the aggressive evacuation and offsite disposal of contaminated soils and *in situ* chemical oxidation to treat groundwater.

Regarding the removal of onsite soils, a concern of the community is that the proposed number of large diameter borings is precisely defined at six, but it appears from the TCE contamination profiles that a few additional large diameter boring points could result in a significant increase in the VOC removal. This was discussed at a meeting earlier this summer that was attended by representatives from the EPA, Boeing, KHDE, TOSC and CAG. We imagine that the cost of additional borings would be minimal given that the equipment is on site already. Thus, we request that the plan be modified to allow for additional large diameter borings.

Furthermore, we concur with KDHE's preference that the soils be removed from each large diameter boring instead of being mixed with permanganate, and that injection points be installed in large diameter boring locations to allow for additional permanganate treatments in the future. Given the low hydraulic conductivity of the clays on site, a significant collapse problem for the open holes would seem unlikely, and these holes could be backfilled with gravel and/or soils that are permeable to allow facile access to the groundwater. This modification to the plan will put in place a system that could be invaluable in the future should additional permanganate treatments be needed. However, the residents around the CCI site want to be ensured that once the remediation is completed that an aesthetically pleasing site remains. Therefore, the access to injection points should be flush mounted or placed in vaults below grade so that they are not visible.

The proposal for installation of chemical delivery trenches and prolonged *in situ* chemical oxidation of groundwater (option G2) remains much appreciated. A concern of the community is the possibility that the groundwater plume will

continue to move even after remediation on-site. Therefore, we request that the ROD include plans to continually monitor VOC concentrations in the groundwater and if evidence is obtained indicating continued spread of the plume, to install additional chemical delivery trenches to intercept further spread of the plume under the neighborhood.

Finally, as mentioned in our comments last year, methods to treat groundwater are not well-developed at this point in history. Thus, groundwater cleanup at this site should also evolve as newer and better methods become available. Such a stipulation should be written into the ROD.

In summary, we very much appreciate the fact that the EPA and Boeing took into account our previous concerns about the initial proposal for remediation of the CCI site and responded by developing this significantly improved plan. The community is satisfied that the conditions at the CCI site have now been thoroughly studied and that an excellent and aggressive remediation plan has been developed. We suggest only modest modifications to the proposed plan, and we trust that these suggestions can be incorporated in the final ROD.

Prepared on behalf of the CCI CAG by:  
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