



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, HONOLULU
FORT SHAFTER, HAWAII 96858-5440

CEPOH

1 October 2001

Memorandum for Record

Subject: Response to the Commonwealth of the Northern Mariana Islands (CNMI) Department of Public Health comments on the Feasibility Study and Proposed Plan for Remediation of PCB contaminated soils at Tanapag Village, Saipan, CNMI.

This letter is to reiterate the position of the CNMI Department of Public Health regarding the proposed treatment methodologies for PCB-tainted soil in Tanapag Village. Of course, the Department is not in a position to critically evaluate the various engineer proposals regarding the treatment and/or shipping of the soil. Our major concern relates to the current health and well being of the Tanapag villagers. As always, our focus has been to protect the villagers from additional exposure to PCB's as well as other toxic materials present in the soil. In light of this, DPH strongly advises that any on-site treatment method must include appropriate monitoring for Dioxin, PCB's and POC's in the process emissions during the soil treatment process, as well as thorough sampling of Dioxin, PCBs, and metals in the treated soil. These sampling results must be made before any treated soil is returned to the village. These recommendations are made to avoid any additional exposure to hazardous compounds that may have been only partially treated, as well as those compounds that may have been created in the treatment process.

The Corps' preferred remedy is treatment of the 20,000 tons of PCB contaminated soil with indirect thermal desorption technology (ITD) followed by shipment of the residual filter cake (about 400 tons) off island. The Corps and its contractor ECC have been implementing federal Clean Air Act standards in preparing for the treatment process, since the unit produces process vapor. The vapor will be measured before it is emitted, and any emissions will comply with federal Clean Air Act standards or CNMI standards if they are applicable, or if not applicable, if they are technically feasible to achieve.

The ITD process will successfully remove organic carbon, PAHs, chlorobenzene and any other organic material that may be found in the stockpiled soils. The process will not remove metals such as copper, arsenic, or cadmium. However, these metals and organic compounds are not generally found in association with PCB capacitors and are not among the contaminants of concern for this remedial action. We will sample and test the treated soils for compliance with the cleanup criteria for PCB and to determine if hazardous wastes are present before placement. We will include the type of testing we propose to do in the workplan for review and discussion with DEQ and EPA.