

**APPENDIX B – BRENT SPENCE BRIDGE NFA
CORRESPONDENCE, 7/16/09**



ENERGY AND ENVIRONMENT CABINET

Steven L. Beshear
Governor

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Division of Waste Management
200 Fair Oaks Lane
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Leonard K. Peters
Secretary

July 16, 2009

Mr. Chris Cummins
Kentucky Transportation Cabinet
200 Mero Street
Frankfort, KY 40622

RE: CMI Final Approval
Brent Spence Bridge
EPA I.D. #KYD 985 081 421
Agency Interest #48294

Dear Mr. Cummins:

The public comment/public hearing period has been completed for the above referenced project without any responses from the public. KDWM is also in receipt of the fees associated with this project. Therefore, the Corrective Measures Implementation Plan is approved, no further action (NFA) is required and this project is complete.

If you have any questions regarding any of these issues, please contact Joe Wellner at (502) 564-6716 or at joseph.wellner@ky.gov.

Sincerely,

Bill Schneider

For April J. Webb, P.E., Manager
Hazardous Waste Branch

c: Karen Knight, U.S. EPA, Region 4
Bart Schaffer, HWB



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MEMORANDUM

SUBJECT: Evaluation of I-75 Brent Spence Bridge status under the RCRA Info Corrective Action Environmental Indicator Event Codes CA400 and CA550
EPA I.D. Number: KYD 985 081 421
TEMPO Agency Interest Number: 48294

TO: April J. Webb, P.E., Manager 
Hazardous Waste Branch

FROM: Bart Schaffer, P.G., Geologist Registered *BS*
Hazardous Waste Corrective Action Section

DATE: March 25, 2009

I. PURPOSE OF MEMO

The purpose of this memo is to document the status of the I-75 Brent Spence Bridge site in relation to the following corrective action event codes recently redefined in RCRA Info data management system. The I-75 Brent Spence Bridge site has successfully achieved the following for the *entire* facility.

- 1) Remedy Decision Determination (CA400)
- 2) Remedy Construction Determination (CA550)

All soil contaminated above the EPA Region 9 Residential PRGs has been removed from the site.

The I-75 Brent Spence Bridge will have a CA400 "YES" and/or a CA550 "YES" entered into RCRAINFO for 3/24/2009.

Concurrence by the Hazardous Waste Branch Manager is required prior to entering these event codes into RCRAInfo. Your concurrence with the interpretations provided in the following paragraphs and the subsequent recommendations is satisfied by initialing above.

II. REMEDY CONSTRUCTION DETERMINATION (CA550)

There are two (2) national status codes under CA550.
These status codes are:

- 1) *NR-No Remedy Constructed*
- 2) *RC-Remedy Constructed*

Note that the two national status codes for CA550 are based on the entire facility (i.e., the codes are not SWMU specific). Therefore, every area at the facility must meet the definition before a NR or RC status code can be entered for CA550.

III. FACILITY BACKGROUND/CHRONOLOGY

The Brent Spence Bridge is located on the Ohio River in Covington, Kentucky. The span extends approximately 600 yards south of the river. The Bridge was repainted in 1989-90 and as a precursor to this activity, the Bridge was sandblasted to remove existing paint. Sandblast grit was stored under the Bridge and paint flakes containing lead were dispersed throughout the area during the sandblasting. Following closure of the sandblast grit waste pile areas, KDEP personnel conducted a RCRA Facility Assessment. It was concluded that there were eleven Areas of Concern (AOCs) warranting further investigation for lead in soil.

Several rounds of soil sampling were conducted as part of the investigation to determine the extent of lead contamination. During the final phase, the property and surrounding potentially affected areas was divided into grids. A total of 256 surface soil samples were collected during this phase of the investigation. Reported lead concentrations ranged from 4 to 2,100 mg/kg (parts per million). Grids containing lead at concentrations of over 400 mg/kg were identified and targeted for soil removal in the *Site Remediation and Management Plan*. Remedial work was performed as interim measures. The *Site Remediation and Management Plan* was approved on September 28, 2007.

IV. SUPPORT FOR CONCLUSION

Excavatory activities were conducted between October-November, 2007 and April-June, 2008. Affected soils were removed with heavy equipment and trucked to a solid waste landfill for final disposal. Following excavation of contaminated soils in each grid, verification sampling was conducted. In all grids all soils containing lead at higher than a concentration of 400 mg/kg (the residential use PRG) were removed. The interim measures that were performed have resulted in the removal of all soils contaminated above allowable regulatory levels.

Groundwater monitoring was conducted as part of closure activities for the former waste pile. Lead in groundwater was not found above levels of concern. The monitoring wells were abandoned after the closure period sampling.

Document Review Summary:

- *Corrective Measures Implementation Plan*
- *Final Corrective Action Measures Report*

V. CONCLUSION FOR REMEDY DECISION (CA400)

The appropriate status code to be entered for RCRAInfo event code CA400 (Remedy Decision) is the date of approval of the remedial plan, September 28, 2007.

CONCLUSION FOR REMEDY CONSTRUCTION (CA550)

The appropriate status code to be entered for RCRAInfo event code CA550 (Remedy Construction) is "RC" – Remedy Constructed.