

NEBRASKA

Good Life. Great Environment.

DEPT. OF ENVIRONMENTAL QUALITY

AUG 21 2017

Ms. Mary Peterson, Director
U.S. Environmental Protection Agency Region VII
Superfund Division
11201 Renner Blvd.
Lenexa, KS 66219



Pete Ricketts, Governor

RE: West Highway 6 & Highway 281 Site
NDEQ ID: 85059
Program ID: NEN000704738
Subject: Non-Concurrence Determination for OU 2 Proposed Plan

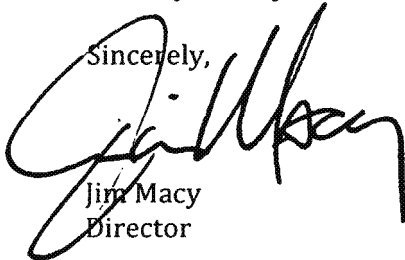
Dear Director Peterson:

The Nebraska Department of Environmental Quality (NDEQ) has reviewed the Proposed Plan, dated August 2017, for Operable Unit 2 (OU 2) of the West Highway 6 & Highway 281 Site (Site). Based on our review, the Department does not concur with the selected remedial alternative G3 (Groundwater Recovery, Treatment and Discharge at Leading Edge of Plume). This determination is based on the following reasons:

1. The selected G3 remedial alternative has an estimated restoration time frame of 30 years versus an estimated restoration time frame of 16 years for remedial alternative G4 (Groundwater Recovery, Treatment, and Discharge at Mid-plume and Leading Edge of Plume). This selection is contrary to recent EPA Headquarters' goals and objectives of accelerating the pace of cleanups, quicker restoration time frames, and the facilitation and promotion of redevelopment and reuse of on-site and downgradient properties.
2. The Department estimates that the selection of Alternative G3 would increase the State's future Operation & Maintenance obligations to approximately \$3,627,000 more than would be incurred by the selection of Alternative G4.

Should you have any questions regarding this decision, please contact Land Division Administrator David Haldeman at 402/471-4219 or Remediation Section Supervisor Mike Felix at 402/471-2938. Thank you for your consideration in this matter.

Sincerely,



Jim Macy
Director

cc: Preston Law, EPA
Brian Zurbuchen, EPA
Pam Houston, EPA
Joe Patterson, City of Hastings
David Wacker, City of Hastings

Department of Environmental Quality

P.O. Box 98922
1200 N Street, Suite 400
Lincoln, Nebraska 68509-8922

deq.ne.gov

Jim Macy, Director

OFFICE 402-471-2186 FAX 402-471-2909
ndeq.moreinfo@nebraska.gov

