

CENTRE COUNTY KEPONE
ADMINISTRATIVE RECORD FILE * **
INDEX OF DOCUMENTS

I. SITE IDENTIFICATION

- 1. Potential Hazardous Waste Site, Site Inspection Report, prepared by U.S. EPA, 2/6/80. P. 100001-100010.
- 2. Report: Hazard Ranking System Model of Nease Chemical Co., prepared by Ecology and Environment, Inc., 8/3/82. P. 100011-100045.
- 3. Report: Final Report on Ruetgers - Nease Chemical Company, Inc., prepared by Ecology and Environment, Inc., (undated). P. 100046-100097.

* Administrative Record File available 9/10/90, updated 6/26/91, 8/13/91, 10/4/91, 4/21/92, 10/3/94, 1/27/95, 4/25/95.

** Historical and Raw data is located at U.S. EPA Region III, Philadelphia, PA.

II. REMEDIAL ENFORCEMENT PLANNING

1. Administrative Order by Consent In The Matter Of:
Centre County Kepone Site, 11/7/88. P. 200001-200021.
2. Letter to Mr. Thomas Lechner, College Township
Industrial Development Authority, from Mr. Larry S.
Miller, U.S. EPA, re: Request for information on the
past and present ownership of the site and operators of
the site, 4/5/94. P. 200022-200028.
3. Letter to Mr. Wilhelm J. Kogelmann, Alpine Equipment
Corporation, from Mr. Larry S. Miller, U.S. EPA, re:
Request for information on the past and present
ownership of the site and operators of the site,
4/5/94. P. 200029-200034.
4. Letter to Mr. S. Paul Mazza, Allmetal Equipment
Corporation, from Mr. Larry S. Miller, U.S. EPA, re:
Request for information on the past and present
ownership of the site and operators of the site,
4/5/94. P. 200035-200040.
5. Letter to Mr. Wilhelm J. Kogelmann, Excavating and
Tunneling Equipment Corporation, from Mr. Larry S.
Miller, U.S. EPA, re: Request for information on the
past and present ownership of the site and operators of
the site, 4/5/94. P. 200041-200046.
6. Letter to Mr. S. Paul Mazza, Polymetal Manufacturing
Corporation, from Mr. Larry S. Miller, U.S. EPA, re:
Request for information on the past and present
ownership of the site and operators of the site,
4/5/94. P. 200047-200052.
7. Letter to Mr. Galen E. Dreibelbis, Tussey Realty
Company, Inc., from Mr. Larry S. Miller, U.S. EPA, re:
Request for information on the past and present
ownership of the site and operators of the site,
4/5/94. P. 200053-200058.

8. Letter to Mr. Wilhelm J. Kogelmann, Alpine Equipment Corporation, from Mr. Larry S. Miller, U.S. EPA, re: Overdue response to the letter requiring submission of information, 5/23/94. P. 200059-200065. A certified mail receipt and a 104(e) letter dated April 5, 1994 are attached.
9. Letter to Mr. S. Paul Mazza, Allmetal Equipment Corporation, from Mr. Larry S. Miller, U.S. EPA, re: Overdue response to the letter requiring submission of information, 5/23/94. P. 200066-200072. A certified mail receipt and a 104(e) letter dated April 5, 1994 are attached.
10. Letter to Mr. S. Paul Mazza, Polymetal Manufacturing Corporation, from Mr. Larry S. Miller, U.S. EPA, re: Overdue response to the letter requiring submission of information, 5/23/94. P. 200073-200079. A certified mail receipt and a 104(e) letter dated April 5, 1994 are attached.
11. Letter to Mr. Thomas Lechner, College Township Industrial Development Authority, from Mr. Larry S. Miller, U.S. EPA, re: Overdue response to the letter requiring submission of information, 5/23/94. P. 200080-200087. A certified mail receipt and a 104(e) letter dated April 5, 1994 are attached.
12. Letter to Mr. Ray R. Irani, Occidental Chemical Corporation, from Mr. Larry S. Miller, U.S. EPA, re: 104(e) request for information, 6/10/94. P. 200088-200100. A letter dated January 5, 1973 regarding confirmation of the custom manufacture of C₁₀Cl₁₂ agreement and a Chronology of Documents on Mirex are attached.
13. Letter to Mr. Lawrence A. Bossidy, Allied Signal Inc., from Mr. Larry S. Miller, U.S. EPA, re: 104(e) request for information, 6/10/94. P. 200101-200114. A Chronology of Documents on Mirex are attached.

14. Letter to Mr. Howard Greenberg, Ruetgers Nease Corporation, from Mr. Larry S. Miller, U.S. EPA, re: 104(e) request for information, 8/19/94. P. 200115-200126. A letter dated July 25, 1994 regarding the response to a U.S. EPA request for information letter dated June 10, 1994 is attached.
15. Letter to Mr. Phil Specht, Excavation and Tunneling Equipment Corporation, from Mr. Larry S. Miller, U.S. EPA, re: 104(e) request for information, 9/27/94. P. 200127-200133. A letter dated April 25, 1994 responding to a request for information is attached.
16. Letter to Mr. Wilhelm J. Kogelmann, Alpine Equipment Corporation, from Mr. Larry S. Miller, U.S. EPA, re: 104(e) request for information, 9/27/94. P. 200134-200139. A letter dated April 21, 1994 responding to a request for information is attached.
17. Letter to Mr. Ray R. Irani, Occidental Chemical Corporation, from Mr. Abraham Ferdas, U.S. EPA, re: General notice letter, 1/3/95. P. 200140-200146. A Centre County Kepone List of Potentially Responsible Parties is attached.
18. Letter to Mr. S. Paul Mazza, Polymetal Manufacturing Corporation, from Mr. Larry S. Miller, U.S. EPA, re: 104(e) request for information, 1/13/95. P. 200147-200150.
19. Letter to Mr. Phil Specht, Excavation and Tunneling Equipment Corporation, from Mr. Larry S. Miller, U.S. EPA, re: 104(e) request for information, 1/13/95. P. 200151-200154.

III. REMEDIAL RESPONSE PLANNING

1. Report: Preliminary Health Assessment for Centre County Kepone, State College, Centre County, Pennsylvania, prepared by the Office of Health Assessment, Agency for Toxic Substances and Disease Registry, 12/2/88. P. 300001-300005.
2. Letter to Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., from Ms. Ann DeLong, U.S. EPA, re: Presentation of the findings of the draft Work Plan for the Remedial Investigation/Feasibility Study (RI/FS), 6/19/89. P. 300006-300015. General comments are attached.
3. Report: Remedial Investigation Site Operations Plan, Field Sampling Plan for Remedial Investigation/Feasibility Study, prepared by SMC Environmental Services Group, 10/20/89. P. 300016-300585.
4. Report: Draft Work Plan for Remedial Investigation/Feasibility Study, Volume I, prepared by SMC Martin Inc., 3/7/89. P. 300586-301056.
5. Report: Draft Work Plan for Remedial Investigation/Feasibility Study, Volume II, prepared by SMC Martin, Inc., 3/7/89. P. 301057-301670.
6. Letter to Mr. Steven W. Foard, Ruetgers-Nease Chemical Co., Inc., from Ms. Ann E. DeLong, U.S. EPA, re: Comments on the final revised Remedial Investigation Site Operations Plan, 8/23/90. P. 301671-301672.
7. Report: Final Remedial Investigation Site Operations Plan for Remedial Investigation/Feasibility Study, prepared by SMC Environmental Services Group, Inc., 7/26/90. P. 301673-302406.
8. Report: Seismic Refraction Survey Ruetgers-Nease Site, State College, Pennsylvania, prepared by Hager-Richter Geoscience, Inc., 10/90. P. 302407-302426.

9. Letter to Ms. Ann E. DeLong, U.S. EPA, and Mr. Jack Wagner, Pennsylvania Department of Environmental Resources (PADER), from Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., re: September 1990 Monthly Progress Report, 10/12/90. P. 302427-302429. The progress report is attached.
10. Letter to Ms. Ann DeLong, U.S. EPA, from Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., re: Proposed change in scope for the RI/FS, 10/12/90. P. 302430-302431.
11. Memorandum to Mr. Thomas Schmick, Commonwealth of Pennsylvania Bureau of Water Quality Management, from Mr. Ronald E. Hughey, Commonwealth of Pennsylvania Bureau of Water Quality Management, re: Fish tissue samples from Spring Creek, 10/31/90. P. 302432-302442. The following are attached:
 - a) a map of primary sampling station locations;
 - b) Table I - Sampling Station Location;
 - c) bar charts of mirex concentrations;
 - d) Table 2- Spring Creek Brown Trout Fish Tissue Samples;
 - e) Bureau of Water Quality Management Water Quality Assessment Summary;
 - f) PADER Bureau of Laboratories Special Analyses Report for sample number 0930046;
 - g) PADER Special Analyses Report for sample number 093047;
 - h) PADER Special Analyses Report for sample number 0930048.

12. Letter to Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., from Mr. Richard L. Bittle, Bureau of Waste Management, re: Written notice that the drainage basin area is not to be disturbed until after the Remedial Investigation is complete, 11/5/90. P. 302443-302443.
13. Letter to Ms. Ann Delong, U.S. EPA, and Mr. Jack Wagner, PADER, from Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., re: October 1990 Monthly Progress Report, 11/14/90. P. 302444-302447. The progress report is attached.
14. Facsimile transmittal form to Ms. Ann Delong, Mr. Jack Wagner, and Mr. Tad Yancheski, from Mr. Bryan Smith, SMC Environmental Services Group, re: Resistivity survey methodology, 11/29/90. P. 302448-302469.
15. Letter to Ms. Ann E. Delong, U.S. EPA, and Mr. Jack Wagner, PADER, from Mr. Steven Foard, Ruetgers-Nease Chemical Company, Inc., re: November 1990 Monthly Progress Report, 12/10/90. P. 302470-302473. The progress report is attached.
16. Letter to Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., from Ms. Ann Delong, U.S. EPA, re: Summary of agreements from a November 30, 1990 meeting, 12/10/90. P. 302474-302475.
17. Letter to Ms. Ann E. Delong, U.S. EPA, and Mr. Jack Wagner, PADER, from Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., re: December 1990 Monthly Progress Report, 1/10/91. P. 302476-302481. The progress report is attached.
18. Handwritten notes, re: Monitoring well installation, 1/18/91. P. 302482-302483.
19. Letter of transmittal to Ms. Ann Delong, U.S. EPA, from Mr. Bryan Smith, SMC Environmental Services Group, re: Transmittal of a soil sample location map and a ground water contour map, 1/18/91. P. 302484-302487.

20. Letter to Ms. Ann E. Delong, U.S. EPA, and Mr. Jack Wagner, PADER, from Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., re: January 1991 Monthly Progress Report, 2/8/91. P. 302488-302492. The progress report is attached.
21. Letter to Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., from Ms. Ann E. Delong, U.S. EPA, re: Change in the Remedial Project Manager to Mr. David Byro, 2/27/91. P. 302493-302493.
22. Letter to Mr. David Byro, U.S. EPA, from Mr. Bryan D. Smith, SMC Environmental Service Group, re: Proposed changes to the ground water monitoring program, 3/7/91. P. 302494-302497. Table 1 - Ground Water Sampling Identification is attached.
23. Letter to Mr. David Byro, U.S. EPA, and Mr. Jack Wagner, PADER, from Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., re: February 1991 Monthly Progress Report, 3/15/91. P. 302498-302501. The progress report is attached.
24. Letter to Mr. David Byro, U.S. EPA, from Mr. Bryan Smith, SMC Environmental Services Group, re: Transmittal of a monitoring well location map and new monitoring well specifications, 3/18/91. P. 302502-302506. The map and well specifications are attached.
25. Letter to Mr. David Byro, U.S. EPA, and Mr. Jack Wagner, PADER, from Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., re: March 1991 Monthly Progress Report, 4/11/91. P. 302507-302510. The progress report is attached.

26. Letter to Mr. David Byro, U.S. EPA, from Mr. Bryan D. Smith and Mr. Kevin Reinert, SMC Environmental Services Group, re: Proposed changes to the air sampling program, 4/18/91. P. 302511-302522. The following are attached:
 - a) Revised Air Sampling Methodology;
 - b) Table 1 - Revised Air Sample Identification;
 - c) a revised air sampling location map;
 - d) a facsimile transmittal entitled, "The Determination of Volatile Organic Compounds in Ambient air by CC/MS - Scan Mode."
27. Letter to David Byro, U.S. EPA, and Jack Wagner, PADER, from Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., re: RI/FS data validation report, 4/19/91. P. 302523-302542. The data validation report is attached.
28. Memorandum to Samuel D. Heitzenrater, PADER, from Mr. Jack Wagner, PADER, re: Results of the Lemont public water wells, 5/1/91. P. 302543-302552. PADER Special Analyses Report for sample numbers 2426038 to 2426043.
29. Letter of transmittal to Mr. David Byro, U.S. EPA, from SMC Environmental Services Group, re: Transmittal of the quality assurance review and data packages for surface water and depth discrete soil samples, 5/2/91. P. 302553-302595. The quality assurance review is attached.
30. Report: Quality Assurance Review of the Ruetgers-Nease Chemical Company, Inc., prepared by Environmental Standards, Inc., 5/3/91. P. 302596-302615.
31. Letter to Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., from Mr. David G. Byro, U.S. EPA, re: Approval of the revised air sampling program, 5/13/91. P. 302616-302616.

32. Letter to Mr. David G. Byro, U.S. EPA, and Mr. Jack Wagner, PADER, from Mr. Steven Foard, Ruetgers-Nease Chemical Company, Inc., re: April 1991 Monthly Progress Report, 5/14/91. P. 302617-302622. The following are attached.
- a) the progress report;
 - b) a project activity summary;
 - c) Table 1 - Summary of Off-Site RI/FS Sampling Locations;
 - d) Figure 1 - Depth Discrete and Surface Soil Sample Location Map.
33. Letter of transmittal to Mr. David Byro, U.S. EPA, from Mr. Bryan Smith, SMC Environmental Services Group, re: Transmittal of quality assurance packages and data packages, 5/21/91. P. 302623-302660. A quality assurance review is attached.
34. Letter to Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., from Mr. David G. Byro, U.S. EPA, re: Potential data gaps in the Remedial Investigation, 5/29/91. P. 302661-302662.
35. Letter to Mr. David Byro, U.S. EPA, and Mr. Jack Wagner, PADER, from Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., re: May 1991 Monthly Progress Report, 6/14/91. P. 302663-302667. The progress report and a facsimile cover sheet are attached.
36. Letter to Mr. Phil Edwards, U.S. Fish and Wildlife Service, from Mr. David Byro, U.S. EPA, re: Request for determination of endangered species existing near the site, 6/4/91. P. 302668-302669.
37. Letter to Mr. David Byro, U.S. EPA, from Mr. Stephen W. Foard, Ruetgers-Nease Chemical Company, Inc., re: The May 1991 Monthly Progress Report, 6/14/91. P. 302670-302673. The progress report is attached.

38. Letter to Mr. David Byro, U.S. EPA, from Ms. Melody S. Fleck, re: Technical Assistance Grant (TAG) for Centre County, 6/14/91. P. 302674-302690. Three letters and a memorandum regarding site action are attached.
39. Letter to Mr. David G. Byro, U.S. EPA, from Mr. Edward T. Dix, PADER, re: Concerns of Pennsylvania Natural Diversity Inventory (PNDI) for endangered and threatened species, 6/18/91. P. 302691-302694. A list of contacts is attached.
40. Letter to Mr. David G. Byro, U.S. EPA, from Ms. Cynthia L. Rice, U.S. Fish and Wildlife Service, re: Federally listed endangered or threatened species, 6/20/91. P. 302695-302697.
41. Letter to Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., from Mr. David G. Byro, U.S. EPA, re: Procurement of a laboratory, 6/24/91. P. 302698-302700. A certified mail receipt is attached.
42. Letter to Ms. Melody S. Fleck, from Mr. David G. Byro, U.S. EPA, re: Comments on remedial response, 7/5/91. P. 302701-302702.
43. Letter to Mr. David G. Byro, U.S. EPA, and Mr. Jack Wagner, PADER, from Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., re: June 1991 Monthly Progress Report, 7/11/91. P. 302703-302706. The progress report is attached.
44. Report: Remedial Investigation Progress Report, Ruetgers-Nease Chemical Company, prepared by SMC Environmental Services Group, 7/19/91. P. 302707-303183.

45. Letter to Ms. Melody S. Fleck, from Mr. David G. Byro, U.S. EPA, re: Comments on the remedial investigation, 8/6/91. P. 303184-303327. The following are attached:
- a) a memorandum regarding aquatic biological investigation at Spring Creek;
 - b) a memorandum regarding aquatic biological investigation at Slab Cabin Run;
 - c) a memorandum regarding fish kill investigation at Spring Creek;
 - d) a letter regarding benthos data from Spring Creek;
 - e) a letter regarding aquatic biological investigation at Slab Cabin Run Watershed;
 - f) a report entitled, Step-Drawdown Test on Well #0 at R-N Chemical Company;
 - g) an article entitled "Complexities of Contaminant Dispersal in a Karst Geological System";
 - h) two site maps from the RI/FS Report;
 - i) letter regarding comments on the Remedial Investigation/Feasibility Study;
 - j) an attendance list of 7/12/89;
 - k) a letter regarding the final RI/FS;
 - l) a memorandum regarding kepone and mirex levels;
 - m) a memorandum regarding Spring Creek Reservoir;
 - n) groundwater treatment system yearly averages, a facsimile cover sheet is attached.

46. Letter to Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., from Mr. David G. Byro, U.S. EPA, re: Review of the Remedial Investigation Progress Report, 8/9/91. P. 303328-303349. The following are attached:
- a) a letter to Mr. David Byro from Mr. Jack W. Wagner;
 - b) a letter to Mr. David Byro from Mr Tad B. Yancheski;
 - c) a table of well and spring data sampling analyses;
 - d) a map for additional well data;
 - e) a proposed activities schedule;
 - f) a guidance document on handling chemical concentration data.
47. Letter to Mr. David Byro, U.S. EPA, and Mr. Jack Wagner, PADER, from Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., re: July 1991 Monthly Progress Report, 8/13/91. P. 303350-303353. The progress report is attached.
48. Letter to Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., from Mr. David G. Byro, U.S. EPA, re: Comments on the toxicological investigation of Spring Creek, 8/29/91. P. 303354-303355.
49. Letter to Mr. David Byro U.S. EPA, from Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., re: August 1991 Monthly Progress Report, 9/17/91. P. 303356-303359. The progress report is attached.

50. Letter to Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., from Mr. David G. Byro, U.S. EPA, re: Approval of the Phase 2 Remedial Investigation activities, 9/20/91. P. 303360-303395. The following are attached:
- a) a letter of transmittal;
 - b) Final Remedial Investigation report;
 - c) a letter of transmittal;
 - d) Draft Remedial Investigation report;
51. Letter to Mr. David Byro, U.S. EPA and, Mr. Jack Wagner, PADER, from Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., re: Progress report, 9/2/91. P. 303396-303397.
52. Letter to Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., from Mr. David G. Byro, U.S. EPA, re: Transmittal of a letter, 10/8/91. P. 303398-303400. The letter is attached.
53. Letter to Mr. Dave Byro [sic], U.S. EPA, from Mr. Steven S. Brown, and Mr. William J. March, SMC Environmental Services Corporation, re: Review of a letter, 10/9/91. P. 303401-303408.
54. Letter to Mr. David Byro, U.S. EPA, and Mr. Jack Wagner, PADER, from Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., re: September 1991 Monthly Progress Report, 10/10/91. P. 303409-303412. The progress report is attached.
55. Letter to Mr. David Byro, U.S. EPA, and Mr. Jack Wagner, PADER, from Mr. Steven W. Foard, Ruetgers-Nease Chemical Company, Inc., re: Designation of a project coordinator, 10/25/91. P. 303413-303413.
56. Letter to Mr. David Byro, U.S. EPA from Mr. Bryan D. Smith, SMC Environmental Service Corporation, re: Weekly notice of Remedial Investigation activities, 11/8/91. P. 303414-303414.

57. Letter to Mr. David Byro, U.S. EPA, and Mr. Jack Wagner, PADER, from Mr. Ian Bell, Ruetgers-Nease Chemical Company, Inc., re: October 1991 Monthly Progress Report, 11/11/91. P. 303415-303418. The progress report is attached.
58. Letter to Mr. David Byro, U.S. EPA, from Mr. Bryan D. Smith, SMC Environmental Services Corporation, re: Anticipated field activities, 11/21/91. P. 303419-303421. Two proposed sampling schedules are attached.
59. Letter to Mr. David Byro, U.S. EPA from Mr. Bryan D. Smith and Mr. William J. March, SMC Environmental Services Corporation, re: Confirmation of meeting results, 11/21/91. P. 303422-303424.
60. Letter to Mr. David Byro, U.S. EPA, from Mr. Bryan D. Smith, SMC Environmental Services Corporation, re: Anticipated field activities, 12/2/91. P. 303425-303425.
61. Letter to Dr. Ian Bell, Ruetgers-Nease Chemical Company, Inc., from Mr. David G. Byro, U.S. EPA, re: Confirmation of a meeting, 12/5/91. P. 303426-303429. A certified mail receipt is attached.
62. Letter to Mr. David Byro, U.S. EPA, from Mr. Bryan D. Smith, SMC Environmental Services Corporation, re: Anticipated field activities, 12/6/91. P. 303430-303430.
63. Letter to Mr. Dave Byro, U.S. EPA, and Mr. Jack Wagner, PADER, from Mr. Ralph E. Pearce and Mr. Ian Bell, Ruetgers-Nease Chemical Company, Inc., re: Modifications to Mirex and Kepone Standard Operating Procedures (SOPs), 11/14/91. P. 303431-303434. The proposed changes for analysis of Mirex and Kepone are attached.

64. Letter to Mr. David Byro, U.S. EPA, and Mr. Jack Wagner, PADER, from Mr. Ian Bell, Ruetgers-Nease Chemical Company, Inc., re: November 1991 Monthly Progress Report, 12/6/91. P. 303435-303438. The progress report is attached.
65. Letter to Mr. Dave Byro, U.S. EPA, and Mr. Jack Wagner, PADER, from Mr. Ralph E. Pearce and Mr. Ian Bell, Ruetgers-Nease Chemical Company, Inc., re: Project delay due to monitoring well replacement, 12/13/91. P. 303439-303440.
66. Letter to Mr. David Byro, U.S. EPA, from Mr. Tad B. Yancheski, Tetra Tech, Inc., re: Phase I Remedial Investigation data comparison, 12/23/91. P. 303441-303442.
67. Letter to Mr. David Byro, U.S. EPA, and Mr. Jack Wagner, PADER, from Mr. Ian Bell, Ruetgers-Nease Chemical Company, Inc., re: December 1991 Monthly Progress Report, 1/7/92. P. 303443-303446. The progress report is attached.
68. Letter to Mr. Dave Byro, U.S. EPA, and Mr. Jack Wagner, PADER, from Mr. Ralph E. Pearce and Mr. Ian Bell, Ruetgers-Nease Chemical Company, Inc., re: Revised Mirex and Kepone SOPs, 1/13/92. P. 303447-303450. The proposed changes for analysis of Mirex and Kepone are attached.
69. Letter to Mr. David Byro, U.S. EPA, from Mr. Bryan D. Smith, SMC Environmental Services Group, re: Ground water sampling results for MW-39D, 1/15/92. P. 303451-303456. A Chain of Custody Record and Analysis Request, an analysis report for water, and an analysis report on additional target compounds are attached.
70. Letter to Mr. David Byro, U.S. EPA, from Mr. Bryan D. Smith, SMC Environmental Services Group, re: Construction details for monitoring well MW-33S, 1/28/92. P. 303457-303464. A drilling log is attached.

71. Report: Quality Assurance Review of the Ruetgers-Nease Chemical Company, Inc., State College, PA Site, prepared by Environmental Standards, Inc., 2/5/92. P. 303465-303489.
72. Letter to Mr. David Byro, U.S. EPA, and Mr. Jack Wagner, PADER, from Mr. Ian Bell, Ruetgers-Nease Chemical Company, Inc., re: January 1992 Monthly Progress Report, 2/10/92. P. 303490-303493. The progress report is attached.
73. Letter to Mr. David Byro, U.S. EPA, from Mr. Brian Smith, SMC Environmental Services Group, re: Explanation of ground water sampling methodologies, 2/10/92. P. 303494-303496.
74. Report: Quality Assurance Review of the Ruetgers-Nease Chemical Company, Inc., State College, PA Site, prepared by Environmental Standards, Inc., 2/13/92. P. 303497-303510.
75. Letter to Mr. David G. Byro, U.S. EPA, from Mr. Bryan D. Smith, SMC Environmental Services Group, re: Interim remedial enhancements related to the existing ground water recovery/treatment system, 2/19/92. P. 303511-303516. Information on the Remedial Enhancement Program and a Remedial Enhancement Plan location map are attached.
76. Letter to Mr. David Byro, U.S. EPA, from Mr. Bryan D. Smith, SMC Environmental Services Group, re: Field activities anticipated for the week of February 24 to 28, 1992 for the Phase 2 Remedial Investigation, 2/20/92. P. 303517-303517.
77. Letter to Mr. Ralph Pearce, Ruetgers-Nease Chemical, Inc., from Mr. W. Henry Camp, Enseco, re: Redraft of the changes to the SOP for the analysis of Mirex and Kepone, 2/24/92. P. 303518-303521. The changes to the SOP are attached.

78. Memorandum to Mr. David Byro, U.S. EPA, from Stevie Wilding, re: Review of modifications to Mirex and Kepone, 2/25/92. P. 303522-303523.
79. Letter to Mr. David Byro, U.S. EPA, from Mr. Tad B. Yancheski, Tetra Tech, Inc., re: Comments and observations on the analytical data reports and data validation reports specifically relating to samples collected from MW-20, 3/3/92. P. 303524-303526.
80. Letter of transmittal to Mr. David Byro, U.S. EPA, from Mr. Bryan Smith, SMC Environmental Services Group, re: The Quality Assurance Review and relevant analytical data, 3/4/92. P. 303527-303543. A partial report, entitled Quality Assurance Review of the Ruetgers-Nease Chemical Company, Inc., State College, PA Site, is attached.
81. Letter to Mr. David Byro, U.S. EPA, from Mr. Bryan D. Smith, SMC Environmental Services Group, re: Addendum to February 10, 1992 letter on ground water sampling methodologies for the RI/FS, 3/4/92. P. 303544-303544.
82. Letter to Mr. David Byro, U.S. EPA, and Mr. Jack Wagner, PADER, from Mr. Ian Bell, Ruetgers-Nease Chemical Company, Inc., re: February 1992 Monthly Progress Report, 3/10/92. P. 303545-303548. The progress report is attached.
83. Letter to Mr. Ralph Pearce, Ruetgers-Nease Chemical Company, Inc., from Mr. W. Henry Camp, Enseco, re: Amendment to the proposed changes to the SOP for the analysis of Mirex and Kepone, 3/10/92. P. 303549-303552. Changes to the SOP are attached.
84. Letter to Dr. Ian Bell, Ruetgers-Nease Chemical Company, Inc., from Mr. David G. Byro, U.S. EPA, re: Receipt of Enseco's letter of March 10, 1992, 3/10/92. P. 303553-303555. Two certified mail receipts are attached.

85. Letter to Mr. David Byro, U.S. EPA, and Mr. Dennis Overdorff, PADER, from Mr. Ian Bell, Ruetgers-Nease Chemical Company, Inc., re: March 1992 Monthly Progress Report, 4/13/92. P. 303556-303559. The progress report is attached.
86. U.S. EPA ECO Update entitled "The Role Of Natural Resource Trustees In The Superfund Process," 3/92. P. 303560-303570.
87. Letter to Dr. Ian Bell, Ruetgers-Nease Chemical Company, Inc., from Mr. David G. Byro, U.S. EPA, re: Concerns about the presence of photomirex, 3/27/92. P. 303571-303574. Two certified mail receipts are attached.
88. Letter to Mr. David Byro, U.S. EPA, from Mr. Ian Bell, Ruetgers-Nease Chemical Company, Inc., re: April 1992 Monthly Progress Report, 5/11/92. P. 303575-303578. The progress report is attached.
89. Letter to Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., from Mr. David G. Byro, U.S. EPA, re: Review comments on the Spring Creek Sediment Testing Plan, 6/3/92. P. 303579-303596. The following are attached:
 - a) two certified mail receipts;
 - b) EPA'S comments on the Spring Creek Sediment Testing Plan;
 - c) a letter regarding Tetra Tech's review comments on the Spring Creek Sediment Testing Plan, dated May 1, 1992;
 - d) a letter regarding PADER's comments on the Spring Creek Sediment Testing Plan, dated April 21, 1992;
 - e) a memorandum regarding the need for additional toxicity testing, dated February 21, 1992;

- f) Figure 1, Sampling Locations, State College Quadrangle;
 - g) a table of Spring Creek Macroinvertebrates per square foot;
 - h) Surface Waste and Sediment Characterizations.
90. Letter to Mr. David Byro, U.S. EPA, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: May 1992 Monthly Progress Report, 6/11/92. P. 303597-303600. The progress report is attached.
91. Memorandum to Mr. Roy Smith, U.S. EPA, from Ms. Joan S. Dollarhide, U.S. EPA, re: Carcinogenic information for trichloroethylene, 6/12/92. P. 303601-303602. The information is attached.
92. Letter to Mr. David Byro, U.S. EPA, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: Plan of action for evaluating photomirex data, 6/23/92. P. 303603-303607. Sampling results are attached.
93. Letter to Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: Approval of the use of photomirex data, 6/30/92. P. 303608-303610. Two certified mail receipts are attached.
94. Letter to Mr. David Byro, U.S. EPA, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: June 1992 Monthly Progress Report, 7/10/92. P. 303611-303614. The progress report is attached.
95. Letter to Mr. David Byro, U.S. EPA, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., Mr. Steven S. Brown and Mr. William J. March, SMC Environmental Service Group, re: Response to the proposed sediment toxicity testing program for Spring Creek as outlined by EPA, 7/17/92. P. 303615-303619.

96. Letter to Mr. David Byro, U.S. EPA, from Mr. Steven S. Brown and Mr. William J. March, SMC Environmental Services Group, re: Response to EPA's comments on the sediment testing program, 8/4/92. P. 303620-303623.
97. Letter to Mr. David Byro, U.S. EPA, from Mr. Douglas L. Overdorff, PADER, re: Comments on the Baseline Risk Assessment, 8/4/92. P. 303624-303625.
98. Letter to Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, from Mr. David G. Byro, U.S. EPA, re: Approval of the summary plan for toxicity testing, 8/6/92. P. 303626-303629.
99. Letter to Mr. David Byro, U.S. EPA, from Mr. Steven S. Brown and Mr. William J. March, SMC Environmental Services Group, re: Transmittal of the revised Spring Creek Sediment Testing Plan, 8/10/92. P. 303630-303789. Figure 1, Sediment Toxicity Sampling Location Map; Appendix A, Protocol 5.020-Conducting 10 Day Whole-Sediment Toxicity Tests with *Hyalella azteca* Saussure; and Appendix B, University of Mississippi Reference Sediment, are attached.
100. Letter to Mr. David Byro, U.S. EPA, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: July 1992 Monthly Progress Report, 8/13/92. P. 303790-303793. The progress report is attached.
101. Letter to Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc. from Mr. David G. Byro, U.S. EPA, re: Approval of the sediment testing plan, 8/19/92. P. 303794-303795.
102. Letter to Mr. David Byro, U.S. EPA, from Mr. Jeffrey K. Walsh, SMC Environmental Services Group, re: Results of the photomirex data retrieval, 8/25/92. P. 303796-303820. The results and a transmittal sheet are attached.

103. Letter to Mr. David Byro, U.S. EPA, from Mr. Douglas L. Overdorff, PADER, re: Comments on Chapter 4 of the 90% draft Remedial Investigation Report, 9/8/92. P. 303821-303822.
104. Letter to Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., from Mr. David G. Byro, U.S. EPA, re: Review comments on the 90% draft Remedial Investigation Report, 9/15/92. P. 303823-303845. The following are attached:
- a) two certified mail receipts;
 - b) EPA's comments on the 90% draft Remedial Investigation;
 - c) a letter regarding PADER's comments on Appendix K, Baseline Risk Assessment, dated August 4, 1992;
 - d) a letter regarding PADER's comments on Chapter 4 of the 90% draft Remedial Investigation, dated September 8, 1992;
 - e) a letter regarding areas of concern to be addressed in the Remedial Investigation, dated May 20, 1991.
105. Letter to Mr. David Byro, U.S. EPA, and Mr. David Overdorff, PADER, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: August 1992 Monthly Progress Report, 9/15/92. P. 303846-303849. The progress report is attached.
106. Letter to Mr. David Byro, U.S. EPA, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: Study of the former drum repackaging area, 9/19/92. P. 303850-303850.

107. Letter to Mr. David G. Byro, U.S. EPA, from Mr. Gregory P. Smoot and Mr. William J. March, SMC Environmental Services Group, re: Schedule for completion of the revised Spring Creek Sediment Testing Plan, 10/8/92. P. 303851-303853. The schedule is attached.
108. Letter to Mr. David Byro, U.S. EPA, and Mr. Douglas Overdorff, PADER, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: September 1992 Monthly Progress Report, 10/15/92. P. 303854-303857. The progress report is attached.
109. Letter to Ms. Tammy Royer, Ruetgers-Nease Chemical Company, Inc., from Mr. Gil Radolovich, Midwest Research Institute, re: Difficulties with the reporting of kepone for sediment samples, 10/21/92. P. 303858-303861.
110. Letter to Mr. David Byro, U.S. EPA, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: Response to comments on the draft Remedial Investigation, 11/2/92. P. 303862-303891. The response is attached.
111. Letter to Mr. David Byro, U.S. EPA, and Mr. Douglas Overdorff, PADER, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: October 1992 Monthly Progress Report, 11/13/92. P. 303892-303895. The progress report is attached.
112. Letter to Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., from Mr. David G. Byro, U.S. EPA, re: Comments on and concerns about the draft Remedial Investigation, 11/24/92. P. 303896-303902. The comments are attached.
113. Letter to Mr. David Byro, U.S. EPA, from Mr. Douglas Overdorff, PADER, re: Comments on the Feasibility Study and site Applicable and Relevant or Appropriate Requirements (ARARs), 12/8/92. P. 303903-303912.

114. Letter to Mr. David Byro, U.S. EPA, and Mr. Douglas Overdorff, PADER, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: November 1992 Monthly Progress Report, 12/15/92. P. 303913-303916. The progress report is attached.
115. Report: Ruetgers-Nease Chemical Company, Inc., State College, PA, Final Remedial Investigation Report, prepared by SMC Environmental Service Group, 12/23/92. P. 303917-304486.
116. Report: Ruetgers-Nease Chemical Company, Inc., State College, PA, Final Remedial Investigation Report, Appendices, Volume I of II, prepared by SMC Environmental Service Group, 12/23/92. P. 304487-305115.
117. Report: Ruetgers-Nease Chemical Company, Inc., State College, PA, Final Remedial Investigation Report, Appendices, Volume II of II, prepared by SMC Environmental Service Group, 12/23/92. P. 305116-305769.
118. Report: Ruetgers-Nease Chemical Company, Inc., State College, PA, Final Remedial Investigation Report, Appendices, Volume II of II (continued, Appendix K attachments), prepared by SMC Environmental Service Group, 12/23/92. P. 305770-306362.
119. Letter to Mr. Michael C. Lowe, Weinberg Consulting Group, Inc., from Ms. Jaqueline Patterson, U.S. EPA, re: Submittal of mirex and kepone information to the IRIS Information Submission Desk, 12/31/92. P. 306363-306364.

120. Letter to Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., from Mr. David G. Byro, U.S. EPA, re: Review comments on the ARARs and Remedial Action Objectives (RAOs) Report, 12/31/92. P. 306365-306465. The following are attached:

- a) two certified mail receipts;
- b) EPA's comments on the report;
- c) ARARs for Cleanup Response and Removal Actions in Pennsylvania;
- d) Protective Levels and Criteria for the Excavation, Treatment, Cleanup, and Disposal of Virgin Fuel Contaminated Soil;
- e) Ground Water Protection Criteria for Virgin Fuel Contaminated Soil;
- f) a letter regarding ARARs determinations for ground water, dated June 15, 1990;
- g) a letter regarding ARARs determinations for soils, dated July 2, 1990;
- h) information on Waste Management Facilities;
- i) a list of references.

121. Letter to Mr. David Byro, U.S. EPA, and Mr. Douglas Overdorff, PADER, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: December 1992 Monthly Progress Report, 1/15/93. P. 306466-306470. The progress report is attached.

122. Letter to Mr. David Byro, U.S. EPA, from Mr. Douglas Overdorff, PADER, re: Review comments on the final Remedial Investigation Report, 1/25/93. P. 306471-306473.

123. Letter to Mr. David Byro, U.S. EPA, and Mr. Douglas Overdorff, PADER, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: January 1993 Monthly Progress Report, 2/12/93. P. 306474-306476. The progress report is attached.
124. Letter to Mr. David Byro, U.S. EPA, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: Summary of major historical study conclusions to be incorporated into the Remedial Investigation, 3/5/93. P. 306477-306477.
125. Letter to Mr. David Byro, U.S. EPA, from Mr. Gregory P. Smoot and Mr. William J. March, SMC Environmental Services Group, re: Submittal of the final Spring Creek Sediment Testing Program, 3/9/93. P. 306478-306478.
126. Letter to Mr. David Byro, U.S. EPA, and Mr. Douglas Overdorff, PADER, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: February 1993 Monthly Progress Report, 3/16/93. P. 306479-306481. The progress report is attached.
127. Letter to Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., from Mr. David C. Byro, U.S. EPA, re: Review comments on the final Remedial Investigation Report and of the recommendations for kepone submitted to the IRIS Information Submittal Desk, 3/26/93. P. 306482-306517. The comments are attached.
128. Letter to Mr. David Byro, U.S. EPA, from Mr. Douglas L. Overdorff, PADER, re: Comments on the final Spring Creek Sediment Testing Plan, 4/5/93. P. 306518-306519.
129. Letter to Mr. David Byro, U.S. EPA and Mr. Douglas Overdorff, PADER, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: March 1993 Monthly Progress Report, 4/15/93. P. 306520-306523. The progress report is attached.

130. Letter to Mr. David Byro, U.S. EPA, from Mr. Tad B. Yancheski, Tetra Tech, Inc., re: Review of the final Sediment Toxicity Testing Report, 4/12/93. P. 306524-306527.
131. Memorandum to Mr. David Byro, U.S. EPA, from Mr. Robert S. Davis, U.S. EPA, re: Comments on the bioassay studies, 4/19/93. P. 306528-306542. The following are attached:
- a) a letter regarding review of the final Sediment Toxicity Testing Report, dated April 12, 1993;
 - b) a letter regarding comments on the sediment toxicity tests, dated April 14, 1993;
 - c) a telephone conversation record regarding toxicity of samples;
 - d) a telephone conversation record regarding sampling results.
132. Letter to Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., from Mr. David G. Byro, U.S. EPA, re: Review comments on the final Spring Creek Sediment Toxicity Testing Program Report, 4/29/93. P. 306543-306548. Two certified mail receipts and the comments are attached.
133. Letter to Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., from Mr. Frank Klanchar, U.S. EPA, re: Summary and clarification of issues discussed in an April 28, 1993 RI/FS project meeting, 5/7/93. P. 306549-306552. A letter dated April 28, 1993 regarding a summary of the RI/FS project meeting is attached.
134. Letter to Mr. Frank Klanchar, U.S. EPA, and Mr. Douglas Overdorff, PADER, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: April 1993 Monthly Progress Report, 5/14/93. P. 306553-306554. The progress report is attached.

135. Letter to Mr. Frank Klanchar, U.S. EPA, and Mr. Douglas Overdorff, PADER, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: May 1993 Monthly Progress Report, 6/16/93. P. 306555-306556. The progress report is attached.
136. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. P. Stephen Finn, Golder Associates, Inc., re: Scope of work for the soil boring program, 7/7/93. P. 306557-306559. A boring location map is attached.
137. Letter to Mr. Frank Klanchar, U.S. EPA, and Mr. Douglas Overdorff, PADER, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: June 1993 Monthly Progress Report, 7/8/93. P. 306560-306561. The progress report is attached.
138. Letter to Mr. Frank Klanchar, U.S. EPA, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: Summary of items discussed in a June 21, 1993 meeting concerning the Feasibility Study, 7/12/93. P. 306562-306566. A table of issues is attached.
139. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Tad B. Yancheski, Tetra Tech, Inc., re: Review comments on the soil boring program, 7/14/93. P. 306567-306568.
140. Letter to Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., from Mr. Frank Klanchar, U.S. EPA, re: Comments on the soil boring program, 7/15/93. P. 306569-306571. The comments are attached.
141. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Douglas L. Overdorff, PADER, re: Review comments on the soil vapor extraction boring program, 7/21/93. P. 306572-306574.
142. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. P. Stephen Finn, Golder Associates, Inc., re: Response to comments on the soil boring program, 7/26/93. P. 306575-306576.

143. Letter to Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., from Mr. Frank Klanchar, U.S. EPA, re: Approval of the scope for the soil boring program, 7/29/93. P. 306577-306578.
144. Information packet supplied by Dr. Sharon Thomas, Tetra Tech, Inc., 8/2/93. P. 306579-306663. The following are included:
- a) Support for EPA's Comments on the Final Report of the Spring Creek Sediment Toxicity Testing Program;
 - b) Toxicity of Sediments from Western Lake Erie and the Maumee River at Toledo, Ohio, 1987: Implications for Current Dredged Material Disposal Practices;
 - c) Benthic Invertebrate Bioassays with Toxic Sediment and Pore Water;
 - d) Bioassessment of the toxicity of freshwater sediment;
 - e) Toxicity of Detroit River Sediment Interstitial Water to the Bacterium *Photobacterium Phosphoeum*;
 - f) Comparison of Three Sediment Bioassay Methods Using Detroit River Sediment;
 - g) Toxicity of Vertical Sediments in the Trenton Channel, Detroit River, Michigan, to *Chironomus Tentans* (Insecta: Chironomidae).
145. Memorandum to Mr. Frank Klanchar, U.S. EPA, from Mr. Robert S. Davis, U.S. EPA, re: Response to discussions regarding Spring Creek and the meeting at the Rutgers [sic] - Nease plant in State College, 8/11/93. P. 306664-306668.

146. Letter to Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., from Mr. Frank Klanchar, U.S. EPA, re: Clarifications on the summary of the Feasibility Study project meeting, 8/13/93. P. 306669-306670. A certified mail receipt is attached.
147. Letter to Mr. Frank Klanchar, U.S. EPA, from Ms. Sharon R. Thomas, re: Summary of the August 2, 1993 Centre County Kepone meeting including meeting highlights, key conclusion, and action items, 8/19/93. P. 306671-306680. Attachment I, Supporting Information, and an Urgent Telefacsimile sheet are attached.
148. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. P. Stephen Finn, Golder Associates Inc., re: An approach and schedule for completing the RI/FS for the site, 8/19/93. P. 306681-306684.
149. Letter to Mr. Frank Klanchar, U.S. EPA, and Mr. Doug Overdorff, PADER, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: July 1993 Monthly Progress Report, 8/23/93. P. 306685-306686. The progress report is attached.
150. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. P. Stephen Finn, Golder Associates Inc., re: Further clarification of the scope of the Feasibility Study Report, 9/1/93. P. 306687-306688.
151. Letter to Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., from Mr. Frank Klanchar, U.S. EPA, re: Additional concerns and clarifications on issues regarding the Spring Creek offered by the Biological Technical Assessment Group (BTAG), 9/8/94. P. 306689-306695. The concerns and clarifications are attached.
152. Letter to Mr. Frank Klanchar, U.S. EPA, and Mr. Douglas Overdorff, PADER, from Ms. Tamara C. Royer, re: August 1993 Monthly Progress Report, 9/15/93. P. 306696-306697. The progress report is attached.

153. Report: Final Remedial Investigation Report, Reutgers-Nease Chemical Company, Inc., State College, PA, prepared by Weinberg Consulting Group, Inc., 10/8/93. P. 306698-306771. A transmittal letter is attached.
154. Report: Final Remedial Investigation Report, Appendix M, Sediment Testing Program, Ruetgers-Nease Chemical Company, Inc., State College, PA, prepared by Weinberg Consulting Group, Inc., 10/8/93. P. 306772-307282.
155. Letter to Mr. Frank Klanchar, U.S. EPA, and Mr. Douglas Overdorff, PADER, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: September 1993 Monthly Progress Report, 10/15/93. P. 307283-307284. The progress report is attached.
156. Letter to Mr. Frank Klanchar, U.S. EPA, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: Transmittal of the Feasibility Study, 10/5/93. P. 307285-307286.
157. Letter to Mr. Frank Klanchar, U.S. EPA, and Mr. Douglas Overdorff, PADER, from Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., re: October 1993 Monthly Progress Report, 11/11/93. P. 307287-307288. The progress report is attached.
158. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Douglas Overdorff, PADER, re: Review comments on the draft Feasibility Study, 11/17/93. P. 307289-307292.
159. Memorandum to Mr. Frank Klanchar, U.S. EPA, from Mr. Robert S. Davis, U.S. EPA, re: Review comments on the Feasibility Study, 11/22/93. P. 307293-307298. A memorandum dated November 15, 1993 regarding the Department of the Interior's comments on the Feasibility Study is attached.
160. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Mark A. Hartle, Pennsylvania Fish and Boat Commission, re: Comments on the revisions to the Remedial Investigation Report and on the Feasibility Study Reports, 11/22/93. P. 207299-307306. The comments are attached.

161. Letter to Mr. Frank Klanchar, U.S. EPA, and Mr. Douglas Overdorff, PADER, from Ms. Tamara C. Roger, Ruetgers-Nease Chemical Company, Inc., re: November 1993 Monthly Progress Report, 12/10/93. P. 307307-307308. The progress report is attached.
162. EPA Comments on the Final Remedial Investigation Revisions Report of October 8, 1993, Centre County Kepone Site, 1/1/94. P. 307309-307316.
163. Letter to Mr. Frank Klanchar, U.S. EPA, and Mr. Douglas Overdorff, PADER, from Ms. Tamara C. Royer, Ruetgers-Nease Corporation, re: December 1993 Monthly Progress Report, 1/13/94. P. 307317-307318. The progress report is attached.
164. Report: RI/FS Field Oversight Summary Report, Centre County Kepone Site, State College, Pennsylvania, prepared by Tetra Tech, Inc., 2/94. P. 307319-307622. A transmittal letter dated February 23, 1994 is attached.
165. Letter to Mr. Frank Klanchar, U.S. EPA, and Mr. Douglas Overdorff, PADER, from Ms. Tamara C. Royer, Ruetgers-Nease Corporation, re: January 1994 Monthly Progress Report, 2/14/94. P. 307623-307624. The progress report is attached.
166. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. P. Stephen Finn, Golder Associates Inc., re: Changes made to the Environmental Risk Assessment, 3/7/94. P. 307625-307748. The Environmental Risk Assessment is attached.
167. Memorandum to Mr. Frank Klanchar, U.S. EPA, from Mr. Robert S. Davis, U.S. EPA, re: Comments on the revised Sediment Toxicity Summary Report, 3/9/94. P. 307749-307759. Additional comments on the report in letters dated February 28, 1994 and August 13, 1993, and sediment toxicity data are attached.

168. Letter to Mr. Frank Klanchar, U.S. EPA, and Mr. Douglas Overdorff, PADER, from Ms. Tamara C. Royer, Ruetgers-Nease Corporation, re: February 1994 Monthly Progress Report, 3/10/94. P. 307760-307761. The progress report is attached.
169. Letter to Ms. Tamara C. Royer, Ruetgers-Nease, from Mr. Frank Klanchar, U.S. EPA, re: Review comments on the revised Sediment Toxicity Summary Report from the BTAG, 3/17/94. P. 307762-307774. Comments from BTAG, comments from the U.S. Fish and Wildlife Service, and a certified mail receipt are attached.
170. Report: Revised Final Report to the Spring Creek Sediment Testing Program, Centre County Kepone Site, State College, Pennsylvania, prepared by Weinberg Consulting Group Inc., 4/4/94. P. 307775-307807. A transmittal cover letter dated April 12, 1994 is attached.
171. Letter to Mr. Frank Klanchar, U.S. EPA, and Mr. Douglas Overdorff, PADER, from Ms. Tamara C. Royer, Ruetgers-Nease Corporation, re: March 1994 Monthly Progress Report, 4/14/94. P. 307808-307809. The progress report is attached.
172. Memorandum to Mr. Frank Klanchar, U.S. EPA, from Mr. Robert S. Davis, U.S. EPA, re: Comments on the Redline Ecological Risk Assessment, 4/18/94. P. 307810-307818.

173. Letter to Ms. Tamara C. Royer, Ruetgers-Nease, from Mr. Frank Klanchar, U.S. EPA, re: Transmittal of the Preliminary Natural Resources Survey, 4/20/94. P. 307819-307836. The following are attached:
- a) Preliminary Natural Resources Survey;
 - b) a Technical Analysis of the Centre County Kepone Site;
 - c) Figure 1-1, Study Area Map;
 - d) Figure 1-2, General Site Layout;
 - e) a map of downtown Philadelphia.
174. Letter to Ms. Tamara C. Royer, Ruetgers-Nease Chemical Company, Inc., from Mr. Frank Klanchar, U.S. EPA, re: Review of the draft Feasibility Study, 4/26/94. P. 307837-307857. A certified mail receipt, the comments, and a memorandum dated November 2, 1993 regarding comments on the Feasibility Study are attached.
175. Letter to Mr. Frank Klanchar, U.S. EPA, and Mr. Douglas Overdorff, PADER, from Ms. Tamara C. Royer, Ruetgers-Nease Corporation, re: April 1994 Monthly Progress Report, 5/13/94. P. 307858-307859. The progress report is attached.
176. Letter to Mr. Frank Klanchar, U.S. EPA, and Mr. Douglas Overdorff, PADER, from Ms. Tamara C. Royer, Ruetgers-Nease Corporation, re: May 1994 Monthly Progress Report, 6/15/94. P. 307860-307861. The progress report is attached.
177. Letter to Mr. Douglas L. Overdorff, PADER, from Mr. Frank Klanchar, U.S. EPA, re: Request for State ARARs for the site, 6/23/94. P. 307862-307863.

178. Report: Ruetgers-Nease Corporation, Feasibility Study Report (Draft Final), Ruetgers-Nease Site, State College, Pennsylvania, prepared by Golder Associates, Inc., 6/30/94. P. 307864-308413.
179. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Randolph S. White and Mr. P. Stephen Finn, Golder Associates, Inc., re: Response to EPA's comments on the Feasibility Study, 6/30/94. P. 308414-308455. The response is attached.
180. Report: Appendix I, Technical Impracticability Evaluation, Feasibility Study Report, Ruetgers-Nease Site, State College, Pennsylvania, prepared by Golder Associates Inc., 7/1/94. P. 308456-308484.
181. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. P. Stephen Finn, Golder Associates, Inc., re: Sampling of riparian area soils, 7/7/94. P. 308485-308485.
182. Letter to Mr. Frank Klanchar, U.S. EPA, and Mr. Douglas Overdorff, PADER, Ruetgers-Nease Corporation, re: June 1994 Monthly Progress Report, 7/11/94. P. 308486-308487. The progress report is attached.
183. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. P. Stephen Finn, Golder Associates Inc., re: Five issues requiring PRP action, 7/14/94. P. 308488-308499. A letter dated July 14, 1994 regarding potential risks to migratory birds and an Urgent Telefacsimile sheet are attached.
184. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Mark A. Hartle, Pennsylvania Fish and Boat Commission, re: Comments on the draft Proposed Plan, 7/22/94. P. 308500-308502.
185. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Douglas L. Overdorff, PADER, re: Comments on Golder Associates, Inc.'s response to EPA's comments on the Feasibility Study, 7/29/94. P. 308503-308508.

186. Memorandum to Mr. Robert Davis, U.S. EPA, from Mr. Mark Hersh, U.S. Department of the Interior, re: Comments on Golder Associates, Inc.'s response to EPA's comments on the Feasibility Study, 7/29/94. P. 308509-308512.
187. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Douglas L. Overdorff, PADER, re: Transmittal of a list of State ARARs for the site, 8/4/94. P. 308513-308673. The following are attached:
- a) a list of State ARARs for the site;
 - b) Cleanup Standards for Contaminated Soils;
 - c) Criteria Estimation Modeling System;
 - d) Pennsylvania's Surface Water Quality Monitoring Network (WQN);
 - e) Applicable or Relevant and Appropriate Requirements for Cleanup Response and Remedial Actions in Pennsylvania.
188. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Douglas L. Overdorff, PADER, re: Comments on the draft Proposed Plan, 8/5/94. P. 308674-308676.
189. Letter to Mr. Frank Klanchar, U.S. EPA, and Mr. Douglas Overdorff, PADER, from Mr. Ralph E. Pearce, Ruetgers-Nease Corporation, re: July 1994 Monthly Progress Report, 8/15/94. P. 308677-308678. The progress report is attached.
190. Letter to Mr. Ralph E. Pearce, Ruetgers-Nease Corporation, from Mr. Frank Klanchar, U.S. EPA, re: Review comments from BTAG on the redline draft of the revised Environmental Risk Assessment, 8/26/94. P. 308679-308690. The comments and two certified mail receipts are attached.

191. Letter to Mr. Ralph E. Pearce, Ruetgers-Nease Corporation, from Mr. Frank Klanchar, U.S. EPA, re: Information on the Technical Impracticability Evaluation, 8/29/94. P. 308691-308692.
192. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Mark A. Hartle, Pennsylvania Fish and Boat Commission, re: Additional response to Golder Associates Inc.'s responses to comments on the Feasibility Study, 9/8/94. P. 308693-308695.
193. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. P. Stephen Finn, Golder Associates, Inc., re: Response to comments on the Environmental Risk Assessment, 9/22/94. P. 308696-308697.
194. Letter to Mr. Ralph E. Pearce, Ruetgers-Nease Chemical Company, Inc., from Mr. Frank Klanchar, U.S. EPA, re: Comments on the draft final Feasibility Study, 9/27/94. P. 308698-308707. The comments are attached.
195. Superfund Program Proposed Plan, Centre County Kepone Site, State College, Centre County, PA, 10/94. P. 308708-308731.
196. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. P. Stephen Finn, Golder Associates Inc., re: Initial comments on the potential application of the Pennsylvania Interim Cleanup Standards for Contaminated Soils, 8/18/94. P. 308732-308735. A facsimile cover sheet dated September 26, 1994 is attached.
197. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Ralph E. Pearce, Ruetgers-Nease Corporation, re: Transmittal of the August 1994 monthly progress report in accordance with the Administrative Order by Consent, 9/12/94. P. 308736-308737. The progress report is attached.
198. Letter to Mr. Ralph E. Pearce, Ruetgers-Nease Corporation, from Mr. Frank Klanchar, U.S. EPA, re: Transmittal of the Proposed Remedial Action Plan, 10/3/94. P. 308738-308738.

199. Letter to Mr. Howard Greenberg, Ruetgers-Nease Corporation, from Mr. Frank Klanchar, U.S. EPA, re: Transmittal of the Proposed Remedial Action Plan, 10/3/94. P. 308739-308739.
200. Letter to Mr. P. Stephen Finn, Golder Associates Inc., from Mr. Frank Klanchar, U.S. EPA, re: Transmittal of the Proposed Remedial Action Plan, 10/3/94. P. 308740-308740.
201. Letter to Mr. Doug Overdorff, PADER, from Mr. Frank Klanchar, U.S. EPA, re: Transmittal of the Proposed Remedial Action Plan, 10/3/94. P. 308741-308741.
202. Letter to Mr. Donald Becker, PADER, from Mr. Frank Klanchar, U.S. EPA, re: Transmittal of the Proposed Remedial Action Plan, 10/3/94. P. 308742-308742.
203. Letter to Mr. Mark Hersh, Fish and Wildlife Service, from Mr. Frank Klanchar, U.S. EPA, re: Transmittal of the Proposed Remedial Action Plan, 10/3/94. P. 308743-308743.
204. Letter to Mr. Mark A. Hartle, Pennsylvania Fish and Boat Commission, from Mr. Frank Klanchar, U.S. EPA, re: Transmittal of the Proposed Remedial Action Plan, 10/3/94. P. 308744-308744.
205. Letter to Ms. Melody S. Fleck from Mr. Frank Klanchar, U.S. EPA, re: Transmittal of the Proposed Remedial Action Plan, 10/3/94. P. 308745-308745.
206. Letter to Mr. Mark R. Ralston from Mr. Frank Klanchar, U.S. EPA, re: Transmittal of the Proposed Remedial Action Plan, 10/3/94. P. 308746-308746.
207. Letter to Mr. Robert F. Carline, Pennsylvania Cooperative Fish and Wildlife Research Unit, from Mr. Frank Klanchar, U.S. EPA, re: Transmittal of the Proposed Remedial Action Plan, 10/3/94. P. 308747-308747.

208. Letter to Ms. Susan S. Smith, College Township Environmental Advisory Board, from Mr. Frank Klanchar, U.S. EPA, re: Transmittal of the Proposed Remedial Action Plan, 10/3/94. P. 308748-308748.
209. Letter to Mr. Don Henne, U.S. DOI, from Mr. Frank Klanchar, U.S. EPA, re: Transmittal of the Proposed Remedial Action Plan, 10/3/94. P. 308749-308749.
210. Letter to Mr. Jim Lynch from Mr. Frank Klanchar, U.S. EPA, re: Transmittal of the Proposed Remedial Action Plan, 10/3/94. P. 308750-308750.
211. Letter to Ms. Jo Ann Jodon from Mr. Frank Klanchar, U.S. EPA, re: Transmittal of the Proposed Remedial Action Plan, 10/3/94. P. 308751-308751.
212. Letter to Mr. David Nye from Mr. Frank Klanchar, U.S. EPA, re: Transmittal of the Proposed Remedial Action Plan, 10/3/94. P. 308752-308752.
213. Letter to Mr. Ron Maxwell from Mr. Frank Klanchar, U.S. EPA, re: Transmittal of the Proposed Remedial Action Plan, 10/3/94. P. 308753-308753.
214. Letter to Ms Mary Shoemaker from Mr. Frank Klanchar, U.S. EPA, re: Transmittal of the Proposed Remedial Action Plan, 10/5/94. P. 308754-308754.
215. Letter to Mr. Ralph E. Pearce, Ruetgers-Nease Corporation, from Mr. Frank Klanchar, U.S. EPA, re: EPA's review of Golder Associates' letter in reference to the Pennsylvania Interim Cleanup Standards for Contaminated Soils, 10/7/94. P. 308755-308756.
216. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Don Henne, U.S. DOI, re: Comments on the July 27, 1994 EPA correspondence and the March 30, 1994 Preliminary Natural Resources Survey, 10/11/94. P. 308757-308762. A page of references is attached.

217. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Ralph E. Pearce, Ruetgers-Nease Corporation, re: Transmittal of the September 1994 monthly progress report in accordance with the Administrative Order by Consent, 10/14/94. P. 308763-308765. The progress report is attached.
218. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Larry S. Newcomer, PADER, re: PADER's comments on EPA's Proposed Plan for the site, 10/25/94. P. 308766-308768.
219. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. P. Stephen Finn, Golder Associates, re: Request for an extension of the comment period on EPA's Proposed Remedial Action Plan, 10/27/94. P. 308769-308769.
220. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. P. Stephen Finn, Golder Associates, re: Proposed response to the review comments on the Feasibility Study provided in EPA's September 27, 1994 letter, 10/27/94. P. 308770-308772.
221. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. James A. Strauss, Trout Unlimited, re: Comments on the Proposed Remedial Action Plan, 10/28/94. P. 308773-308781. A letter dated April 12, 1991 concerned about retaining the existing Cold Water Fish designation of Spring Creek and a letter dated May 12, 1994 concerning a NPDES draft permit are attached.
222. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Don Henne, U.S. DOI, re: DOI's comments of the Proposed Remedial Action Plan, 10/31/94. P. 308782-308787.
223. Memorandum to Mr. Frank Klanchar, U.S. EPA, from Mr. Robert S. Davis, U.S. EPA, re: Transmittal of technical justification for selection of 10ppb levels for kepone and mirex in soils, 11/10/94. P. 308788-308794. The technical justification is attached.

224. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Ralph E. Pearce, Ruetgers-Nease Corporation, re: Transmittal of the October 1994 monthly progress report in accordance with the Administrative Order by Consent, 11/14/94. P. 308795-308796. The progress report is attached.
225. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. P. Stephen Finn, Golder Associates, re: Comments on the Proposed Remedial Action Plan, 11/30/94. P. 308797-308804.
226. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Ralph E. Pearce, Ruetgers-Nease Corporation, re: Transmittal of the November 1994 monthly progress report in accordance with the Administrative Order by Consent, 12/13/94. P. 308805-308806. The progress report is attached.
227. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Ralph E. Pearce, Ruetgers-Nease Corporation, re: Designating Mr. Rainer F. Domalski as the project coordinator for Ruetgers-Nease Corporation in accordance with paragraph IX of the Administrative Order by Consent, 12/16/94. P. 308807-308807.
228. Letter to Mr. Thomas C. Voltaggio, U.S. EPA, from Mr. Thomas W. Büttner, Ruetgers-Nease Corporation, re: Concerns relating to the forthcoming Record of Decision (ROD), 12/22/94. P. 308808-308809.
229. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Douglas Overdorff, PADER, re: Notice that PADER has not received a copy of the ROD for review and comments, 12/28/94. P. 308810-308810.

230. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Daniel M. Woltering, Environ, re: A summary of information in response to the environmental risk assessment issues raised in U.S. DOI's October 11, 1994 letter to EPA, 12/28/94. P. 308811-308834. A list of references, Figure 1 - Avian Toxicity Data for Kepone, and Table 1 - Summary of Avian Non-Acute Toxicity Data for Kepone, are attached.
231. Letter to Mr. Thomas C. Voltaggio, U.S. EPA, from Mr. Howard Greenberg, Ruetgers-Nease Corporation, re: Technical submission pertaining to the ecological issues raised by DOI relating to certain clean-up standards, 12/28/94. P. 308835-308840.
232. Memorandum to file from Mr. Frank Klanchar, U.S. EPA, re: MRI Laboratory and the sensitivity of instruments for Mirex and Kepone soil analysis, 12/29/94. P. 308841-308841.
233. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Ralph E. Pearce, Ruetgers-Nease Corporation, re: Transmittal of the December 1994 monthly progress report in accordance with the Administrative Order by Consent, 1/11/95. P. 308842-308843. The progress report is attached.
234. Memorandum to Administrative Record from Mr. Frank Klanchar, U.S. EPA, re: Submittal of the Revised Proposed Remedial Action Plan, 1/24/95. P. 308844-308845.
235. Revised Proposed Remedial Action Plan, Centre County Kepone Site, 1/27/95. P. 308846-308871.
236. Memorandum to Mr. Frank Klanchar, U.S. EPA, from Ms. Barbara Smith, U.S. EPA, re: Classification of the ground water underlying the site, 11/28/94. P. 308872-308876.

237. Letter to Mr. Howard Greenberg, Ruetgers-Nease Corporation, from Mr. Frank Klanchar, U.S. EPA, re: Reopening the public comment period for the Proposed Remedial Action Plan, 1/27/95. P. 308877-308877.
238. Letter to Mr. Rainer F. Domalski, Ruetgers-Nease Corporation, from Mr. Frank Klanchar, U.S. EPA, re: Reopening the public comment period for the Proposed Remedial Action Plan, 1/27/95. P. 308878-308878.
239. Letter to Mr. P. Stephen Finn, Golder Associates Inc., from Mr. Frank Klanchar, U.S. EPA, re: Reopening the public comment period for the Proposed Remedial Action Plan, 1/27/95. P. 308879-308879.
240. Letter to Mr. Ray R. Irani, Occidental Chemical Corporation, from Mr. Frank Klanchar, U.S. EPA, re: Reopening the public comment period for the Proposed Remedial Action Plan, 1/27/95. P. 308880-308880.
241. Letter to Mr. Doug Overdorff, PADER, from Mr. Frank Klanchar, U.S. EPA, re: Reopening the public comment period for the Proposed Remedial Action Plan, 1/27/95. P. 308881-308881.
242. Letter to Mr. Craig Olewiler, PADER, from Mr. Frank Klanchar, U.S. EPA, re: Reopening the public comment period for the Proposed Remedial Action Plan, 1/27/95. P. 308882-308882.
243. Letter to Mr. Pat Zaepfel, PADER, from Mr. Frank Klanchar, U.S. EPA, re: Reopening the public comment period for the Proposed Remedial Action Plan, 1/27/95. P. 308883-308883.
244. Letter to Mr. Mark Hersh, Fish and Wildlife Service, from Mr. Frank Klanchar, U.S. EPA, re: Reopening the public comment period for the Proposed Remedial Action Plan, 1/27/95. P. 308884-308884.

245. Letter to Mr. Mark A. Hartle, Pennsylvania Fish and Boat Commission, from Mr. Frank Klanchar, U.S. EPA, re: Reopening the public comment period for the Proposed Remedial Action Plan, 1/27/95. P. 308885-308885.
246. Letter to Mr. Don Henne, U.S. DOI, from Mr. Frank Klanchar, U.S. EPA, re: Reopening the public comment period for the Proposed Remedial Action Plan, 1/27/95. P. 308886-308886.
247. Letter to Mr. Jim Lynch from Mr. Frank Klanchar, U.S. EPA, re: Reopening the public comment period for the Proposed Remedial Action Plan, 1/27/95. P. 308887-308887.
248. Letter to Ms. Jo Ann Jodon from Mr. Frank Klanchar, U.S. EPA, re: Reopening the public comment period for the Proposed Remedial Action Plan, 1/27/95. P. 308888-308888.
249. Letter to Mr. David Nye from Mr. Frank Klanchar, U.S. EPA, re: Reopening the public comment period for the Proposed Remedial Action Plan, 1/27/95. P. 308889-308889.
250. Letter to Mr. Ron Maxwell from Mr. Frank Klanchar, U.S. EPA, re: Reopening the public comment period for the Proposed Remedial Action Plan, 1/27/95. P. 308890-308890.
251. Letter to Ms. Melody S. Fleck from Mr. Frank Klanchar, U.S. EPA, re: Reopening the public comment period for the Proposed Remedial Action Plan, 1/27/95. P. 308891-308891.
252. Letter to Dr. Robert F. Carline, Pennsylvania Cooperative Fish and Wildlife research Unit, from Mr. Frank Klanchar, U.S. EPA, re: Reopening the public comment period for the Proposed Remedial Action Plan, 1/27/95. P. 308892-308892.

253. Letter to Ms. Susan S. Smith, College Township Environmental Advisory Board, from Mr. Frank Klanchar, U.S. EPA, re: Reopening the public comment period for the Proposed Remedial Action Plan, 1/27/95. P. 308893-308893.
254. Letter to Mr. Thomas C. Voltaggio, U.S. EPA, from Mr. Thomas W. Büttner, Ruetgers-Nease Corporation, re: Comments on the Revised Proposed Remedial Action Plan, 2/8/95. P. 308894-308895.
255. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Daniel M. Woltering, Environ, re: Review of the Revised Proposed Remedial Action Plan, 2/8/95. P. 308896-308898.
256. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Rainer F. Domalski, Ruetgers-Nease Corporation, re: Transmittal of the January 1995 Progress Report, 2/14/95. P. 308899-308900. The progress report is attached.
257. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Thomas W. Büttner, Ruetgers-Nease Corporation, re: A supplement to Ruetgers-Nease Corporation's comments on the technical aspects of the Revised Proposed Remedial Action Plan, 2/21/95. P. 308901-308901.
258. Memorandum to Mr. Frank Klanchar, U.S. EPA, from Mr. Robert S. Davis, U.S. EPA, re: Technical justification for the use of 10 ppb as a target clean up level for the site, 2/21/95. P. 308902-308921.
259. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Larry S. Newcomer, PADER, re: Comments pertaining to EPA's preferred alternatives delineated in the Revised Proposed Remedial Action Plan, 2/23/95. P. 308922-308925.

260. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. P. Stephen Finn, Golder Associates, re: Ruetgers-Nease Corporation's comments on the Revised Proposed Remedial Action Plan, 2/24/95. P. 308926-308983. Attachment A, Summary of Technical Reviews of PADER Interim Soil Clean-up Criteria and Attachment B, six additional Ruetgers-Nease Corporation comment letters are attached.
261. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Mark A. Hartle, Pennsylvania Fish and Boat Commission, re: Comments on the Revised Proposed Remedial Action Plan, 2/24/95. P. 308984-308986.
262. Letter to Mr. Thomas C. Voltaggio, U.S. EPA, from Mr. David Hess, PADER, re: Update on recent developments within the Commonwealth in regards to the Pennsylvania Interim Soil Cleanup Standards, 2/24/95. P. 308987-308988.
263. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Don Henne, U.S. DOI, re: Comments on the Revised Proposed Remedial Action Plan, 2/27/95. P. 308989-308991.
264. Memorandum to file from Mr. Frank Klanchar, U.S. EPA, re: Record of telephone conversation between Frank Klanchar and Pam Lazos, U.S. EPA, and Howard Greenberg, Ruetgers-Nease Corporation, 2/28/95. P. 308992-308992.
265. Memorandum to Mr. Frank Klanchar, U.S. EPA, from Mr. Robert S. Davis, U.S. EPA, re: The technical basis for 10 ppb soil level for mirex and kepone, 3/8/95. P. 308993-309005. The technical justification is attached.
266. Memorandum to file from Mr. Thomas C. Voltaggio, U.S. EPA, re: Issues discussed in a meeting with Dr. Büttner, Ruetgers-Nease Corporation, 3/10/95. P. 309006-309007.

267. Memorandum to Mr. Frank Klanchar, U.S. EPA, from Mr. Robert S. Davis, U.S. EPA, re: Use of a two-foot soil removal as an alternative to the target soil/sediment level of 10 ppb removal level, 3/15/95. P. 309008-309009.
268. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Rainer F. Domalski, Ruetgers-Nease Corporation, re: Transmittal of the February 1995 Progress Report, 3/15/95. P. 309010-309011. The Progress Report is attached.
269. Memorandum to file from Mr. Frank Klanchar, U.S. EPA, re: A summary of the issues discussed at a March 20, 1995, meeting concerning the site Proposed Plan, 3/22/95. P. 309012-309018. The meeting agenda, a handwritten meeting attendance sheet, and a paper entitled "RODs for Sediment Remediation", are attached.
270. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. P. Stephen Finn, Golder Associates, re: Reaffirmation of the points discussed in the meeting, 3/27/95, P. 309019-309023. Attachment A, RODs for Sediment Remediation, and Attachment B, Excavation Cleanup Levels for Ground Water Protection, are attached.
271. Memorandum to Mr. Frank Klanchar, U.S. EPA, from Ms. Robin Burr, U.S. Fish and Wildlife Service, re: The level of mirex found in fish tissue, 3/30/95. P. 309024-309031. A memorandum dated March 16, 1995, concerning the 1993 fish tissue data is attached.
272. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Rainer F. Domalski, Ruetgers-Nease Corporation, re: Transmittal of the March 1995 Progress Report, 4/13/95. P. 309032-309033. The progress report is attached.
273. Letter to Mr. Peter H. Kostmayer, U.S. EPA, from Mr. Robert C. Yowell, PADER, re: PADER's concurrence with the Record of Decision (ROD), 4/18/95. P. 309034-309035.

274. Record of Decision, Centre County Kepone Site, 4/21/95.
P. 309036-309216. Appendix A, Figures, Appendix B,
Tables, and Appendix C, Responsiveness Summary, are
attached.

V. COMMUNITY INVOLVEMENT/CONGRESSIONAL CORRESPONDENCE/IMAGERY

1. Newspaper Article entitled "Toxic Pesticide Found in Pennsy," 8/8/76. P. 500001-500001.
2. Press Release from PADER, 1/7/77. P. 500002-500004.
3. Newspaper Article entitled "Kepone Hazard Lingers," 4/23/77. P. 500005-500005.
4. Magazine Article entitled "Trout Stocking Feasible 2-Month Study Indicates," Summer, 1977. P. 500006-500006.
5. Newspaper Article entitled "Trout Lurk, So Does Poison," 5/4/79. P. 500007-500008.
6. Newspaper Article entitled "Water Sought for Area Hit by Kepone," 6/6/79. P. 500009-500009.
7. Newspaper Article entitled "DER Cracks Down on Chemical Firm," 6/21/81. P. 500010-500010.
8. Newspaper Article entitled "Creek Pollution," 11/11/81. P. 500011-500011.
9. Newspaper Article entitled "Influx into Spring Creek Questioned," 1/25/82. P. 500012-500012.
10. Newspaper Article entitled "Pollution Problems Still Exist," 1/26/82. P. 500013-500013.
11. Newspaper Article entitled "Firm Defends Plans," 1/26/82. P. 500014-500014.
12. Newspaper Article entitled "Discharge Plan: Simply No Agreement," 1/29/82. P. 500015-500015.
13. Newspaper Article entitled "Waste Permit Explained," 1/29/82. P. 500016-500016.
14. Newspaper Article entitled "Well Water Discussed at Meeting," 2/1/82. P. 500017-500017.

15. Newspaper Article entitled "Agencies to Discuss Treatment," 2/1/82. P. 500018-500018.
16. Newspaper Article entitled "Discharge Permit Received," 2/5/82. P. 500019-500019.
17. Newspaper Article entitled "Ruetgers-Nease Gets Ground Water Permit," 2/8/82. P. 500020-500020.
18. Newspaper Article entitled "Discharge Concern to be Probed," 2/25/82. P. 500021-500021.
19. Rules and Regulations, Title 58-Recreation, Pennsylvania Bulletin, 3/27/82. P. 500022-500022.
20. Newspaper Article entitled "Chemical Cleanup," 4/15/82. P. 500023-500023.
21. Newspaper Article entitled "EPA to Test Sayers Dam for Chemicals," 2/8/83. P. 500024-500024.
22. Newspaper Article entitled "Fish 'Safe to Eat'," 8/6/84. P. 500025-500025.
23. Newspaper Article entitled "Firm Stops Production of Chemical after Plants Harmed," 8/6/86. P. 500026-500027.
24. Newspaper Article entitled "DER Plans Probe of Mountaintop Waste Dump Allegations," 5/11/88. P. 500028-500030. A routing and transmittal slip is attached.
25. Newspaper Article entitled "New Chemical Dumping Charge Leveled," 6/4/88. P. 500031-500032. A routing and transmittal slip is attached.
26. Newspaper Article entitled "DER: Nease Dumped Waste at Carlin Mines," 6/5/88. P. 500033-500034.
27. Newspaper Article entitled "EPA Set to Oversee Tests of Ruetgers-Nease Cleanup Progress," 8/5/89. P. 500035-500035.

28. Report: Final Community Relations Plan, prepared by U.S. EPA, 7/90. P. 500036-500091.
29. Newspaper Article entitled "A Public Disgrace," (undated). P. 500092-500092.
30. Newspaper Article entitled "Chemical Cleanup," (undated). P. 500093-500093.
31. Letter to Mr. Francis Bertovich, Pennsylvania Department of Health, from Mr. James A. Lynch, re: Health concerns, (undated). P. 500094-500097.
32. U.S. EPA Fact Sheet, re: Results of the Remedial Investigation, 5/92. P. 500098-500101.
33. U.S. EPA Public Notice, re: EPA's acceptance of public comments on the Proposed Remedial Action Plan for the site, 10/3/94. P. 500102-500102.
34. Transcript of Proposed Plan Public Meeting, Centre County Kepone Site, 10/19/94. P. 500103-500176.
35. Statement of the U.S. Fish and Wildlife Service on the Centre County Kepone Site Proposed Plan, 10/19/94. P. 500177-500178.
36. Testimony of the Pennsylvania Fish and Boat Commission to the U.S. EPA Regarding the Proposed Remedial Action Plan for the Centre County Kepone Site, 10/19/94. P. 500179-500182.
37. Letter to Mr. Frank Klanchar, U.S. EPA, from Ms. Kirstin V. Smith, re: Approval that EPA is now taking action on the site, 10/20/94. P. 500183-500183.
38. Letter to Ms. Felicia F. Dailey, U.S. EPA, from Ms. JoAnn L. Ohnmeis, re: Concerns over the site, 10/24/94. P. 500184-500184.

39. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. James A. Lynch, re: Concerns over actions to be taken at the site, 10/31/94. P. 500185-500187.
40. Letter to Mr. Frank Klanchar, U.S. EPA, from a concerned resident, re: Agreement with EPA's preferred alternatives for the site as presented in the Proposed Plan, 11/1/94. P. 500188-500188.
41. U.S. EPA Public Notice, Centre County Kepone Site, re: 30-day extension of the public comment period, 11/30/94. P. 500189-500189.
42. Letter to Mr. Frank Klanchar, U.S. EPA, from Mr. Adair Gilbert, re: Complimenting EPA on its efforts at the site, (undated). P. 500190-500190.
43. U.S. EPA Public Notice, Centre County Kepone Site, re: Reopening the public comment period on the Proposed Remedial Action Plan (undated). P. 500191-500191.
44. Memorandum to Mr. Frank Klanchar, U.S. EPA, from Ms. Robin Burr, U.S. Fish and Wildlife Service, re: Transmittal of press release concerning fish consumption advisories, 4/14/95. P. 500192-500198. The press release is attached.

SITE SPECIFIC GUIDANCE DOCUMENTS INCLUDED

1. Interim Final Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, prepared by OERR, 10/88.
OSWER 9355.3-01
2. User's Guide to Contract Laboratory Program, prepared by OERR, 12/88.
EPA/540/8-89/012
3. Memorandum to Waste Management Directors of Regions I, IV, V, and VII; Emergency and Remedial Response Division Director of Region II; Air and Waste Management Division Director of Region II; Hazardous Waste Management Division Directors of Regions III, VI, VIII, and IX; Hazardous Waste Division Director of Region X; and Environmental Services Division Director of Regions III, VI, and VII, from Mr. Richard J. Guimond, U.S. EPA, re: OSWER Directive 9234.2-25, Guidance for Evaluating the Technical Impracticability of Ground Water Restoration, 10/4/93.