From:	Robert Law
To:	LaPoma, Jennifer
Cc:	Willard Potter; Flanagan, Sarah; William Hyatt
Subject:	Re: Request Re contaminant partitioning assumptions
Date:	Wednesday, February 24, 2016 3:46:49 PM

Jennifer:
The CPG did not use the sediment PCB partitioning study to adjust the CFT model's input partition coefficients for tetra-CBs. Rather, the Region's FFS model input value was maintained in the model, and was applied in the evaluation of water column sorption dynamics using the hv-CWCM data (as documented in the draft 17-mile RI Appendix O, Section 3.4). Thus, these data should not further impede Region 2's review of the February 2015 draft 17-mile RI Report or the LPRSA CFT model. Moreover, the study does not provide a direct measurement of sediment bed partitioning for the modeled compounds, in that it included only 7 of the tetra-chlorinated PCB congeners and did not include 2,3,7,8-TCDD.

If the Region's draft 17-mile RI comments include further consideration of these data, then the CPG will evaluate whether the study can be used to augment the evaluations of LPR partitioning behavior that are presented in the draft RI. In addition, these study data were not used in the bioaccumulation model development.

I am also confirming with AECOM whether these data were delivered in raw format, R2 EDD format and/or as another other deliverable to the Region several years ago pursuant to the AOC; the CPG requests that the Region verify with CDM and LBG that these data are not all ready in the Region's possession.

Please contact me with any additional questions.

Thank you.

R/
Rob

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>>> "LaPoma, Jennifer" <LaPoma.Jennifer@epa.gov> 2/17/2016 1:20 PM >>>
Rob and Bill,

EPA is currently reviewing the contaminant partitioning assumptions made by the CPG and presented in Section 7 and related modeling Appendices of the Draft RI. To this end, EPA requests the following experimental and analytical information from the CPG's "Assessment of PCB Aqueous Partitioning and Availability in Lower Passaic River Sediments."

- measured COC concentration in extracted water samples following mixing and settling
- measured COC concentration on POM strips
- mass of individual POM strips
- measured COC concentrations in sediment samples
- measured organic carbon (including TOC, black carbon, DOC [if measured], and any other

carbon analyses) and underlying assumptions pertaining to determining the foc value used in partitioning equations
- measured moisture content of sediment samples
- measured volumes/masses of sediment samples and water added for each batch partitioning test
- any additional analytical data collected in support of the partitioning study

The above information would allow EPA to independently calculate, and potentially verify, the CPG's assumptions regarding contaminant partitioning coefficients at the site. Could you please forward the information in the Region 2 EDD format (if available). If for some reason these data cannot be delivered in the Region 2 format, then an excel compatible spreadsheet would work.

Could you please also indicate the status of the following statement from the July 2011, technical update on the partitioning study "The CPG will continue to evaluate and examine the results presented in this technical update and will provide EPA with a presentation of the study results as part of the upcoming RI Report."