From: Miano, John (DEP)
To: Casey, Carolyn
Subject: Beverly, USM risk comments
Date: Monday, September 24, 2018 4:22:32 PM

Hi Carolyn,

A couple of thoughts on your draft letter:

1. COCs related to vapor intrusion could be limited to contaminants found in sub-slab soil vapor.
2. It is most useful if outdoor air samples are collected at the same time as indoor air samples, and in close proximity.

Also, as we discussed a couple of weeks ago, here is the MCP language about data sets where average values are acceptable. Note that, section "b" is not exclusive in that, it would also be acceptable to use an average of a data set with reasonable variability and good statistical power where the result is an average that is greater than the applicable standard.

310 CMR 40.0926(3)
(b) For chronic and subchronic exposures (other than for screening evaluations), the arithmetic average of site data is acceptable as an Exposure Point Concentration, provided either of the following criteria are met:
1. for discrete or composite samples, the arithmetic average is less than or equal to the applicable standard or risk-based concentration limit, 75% of the data points used in the averaging procedure are equal to or less than the applicable standard or risk-based concentration limit, and no data point used in the averaging is ten times greater than the applicable standard or risk-based concentration limit;
2. a valid justification is provided indicating that the sample mean is unlikely to substantially underestimate the true mean of the concentration of oil or hazardous material at the Exposure Point. Such a demonstration should include, but need not be limited to, consideration of the observed distribution of the data, sampling strategy (including frequency, density, and potential biases), graphical representation of analytical results, and/or statistical analyses.

Regards,
Jack

From: Casey, Carolyn [mailto:Casey.Carolyn@epa.gov]
Sent: Thursday, September 13, 2018 1:20 PM
To: Miano, John (DEP)
Subject: USM risk comments

Attached are the draft comments on their risk assessment. Do you want to take a look before I send them out? As far as our risk range and if we would ask for anything different than the DEP, I think that will ultimately be a risk management decision that I just can't answer right now. Based on what we have told them about following the DEP guidance and the MCP, I don't think we should be asking for anything different.

Looks like American Schoen may have been at 100 Cummings since at least 2008 (see attached

MSDS from on line).

I thought I had sent the following before but apparently not.
I did find some info from the assessor's office. The property is 98% IG but I could not find a definition. Assuming it stands for Industrial- General. I wonder how this fits in with the AUL and the actual use as commercial/residential/schools/day care.

Thanks
Carolyn

From: Miano, John (DEP) [mailto:john.miano@state.ma.us]
Sent: Thursday, September 06, 2018 11:36 AM
To: Casey, Carolyn <Casey.Carolyn@epa.gov>
Subject: RE: July 2018 Progress Report

Yes, it is odd that it took this long for the consultants to find this apparently obvious source of petroleum vapors in the building. But the outcome will be good if indoor petroleum vapors can be reduced in the schools and daycares.

From: Casey, Carolyn [mailto:Casey.Carolyn@epa.gov]
Sent: Thursday, September 06, 2018 10:18 AM
To: Miano, John (DEP)
Subject: RE: July 2018 Progress Report

Well it looks like they may have found the lawn mower in the closet! It seems odd that at this commercial/residential facility that they would have manufacturing. I would assume this American Schoen Machinery is actually considered an industrial or light industrial facility. Just took a quick look for zoning maps but could not find anything online.
https://www.asm-schoen.com/

From: Craig Ziady [mailto:craig@cummings.com]
Sent: Wednesday, August 29, 2018 5:05 PM
To: Casey, Carolyn <Casey.Carolyn@epa.gov>; Zucker, Audrey <Zucker.Audrey@epa.gov>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Murphy, Jim <Murphy.Jim@epa.gov>; Miano, John (DEP) <john.miano@state.ma.us>
Cc: Bruce Hoskins <BHoskins@FslAssociates.com>; Steve Drohosky <sjd@cummings.com>
Subject: July 2018 Progress Report

Hi Carolyn - Please find enclosed the Progress Report dated August 29, 2018 for the former United Shoe Machinery Division parcel in Beverly.

Please let me know if you have any questions.

Thank you.
Craig

Craig J. Ziady
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