To: Flanagan, Sarah[Flanagan.Sarah@epa.gov]
Cc: Arnold, Adam C.[AArnold@gibbonslaw.com]
From: Hatfield, William S.
Sent: Mon 6/27/2016 11:00:54 PM
Subject: RE: Diamond Alkali - Lower 8.3 Miles
2378-TCDF Co-Elution with 2348-TCDF_22Jun2016.pdf
Pages from A8069_f_OPR_DF_Amended.pdf
2378-TCDF 02OCT08.pdf
Dioxin Investigation - Final Presentation (6-22-16).pdf

Dear Sarah:

In follow up to our call with EPA's team on June 13, 2016, on behalf of Givaudan Fragrances Corporation ("Givaudan"), we provide the following information in response to EPA's recent questions to Givaudan on this matter.

EPA question on co-eluting congeners:

In follow up to EPA's inquiry on this issue, the lab reviewed the data and did not identify any 2,3,7,8-TCDF peaks that had any interference or other quantitative anomalies that would preclude accurate quantitation of 2,3,7,8-TCDF. Attached is a memo explaining the issue, confirming that there was adequate GC column resolution within the guidelines allowed for the test method. Also attached is a detailed explanation about the GC column resolution and requirements written by Yves Tondeur, one of the authors of method 8290 and founder of Analytical Perspectives (purchased by SGS in 2012-2013).

EPA questions on Slide Deck (Slides 4 and 12):

In response to EPA's questions on the changes from the 3/10/16 version in Slides 4 and 12, we provide the attached updated Slide Deck, dated June 22, 2016. We have made the following minor updates to the Slides, which do not substantively change the analysis or conclusions set forth in the 3/10/16 presentation.

- Please note that Slide 4 was updated and reflects the histogram pattern in the

original 3/10/16 version. The histogram was checked and it accurately reflects the data obtained from EPA on the Lister Site.

- Please note that Slide 6 has been updated to remove the two (2) samples from above Dundee Dam (the DD samples) from the histogram and analysis – as those samples are not from the RM 10.9 area of interest. In the last bullet, the symbol "<1%" was changed to "approximately 1% or less", as the average of one dioxin compound is just over 1%. This last change was made after further review of the data and was not requested by EPA.

- Please note that Slide 8 was updated to explain that the (n=20) includes the 5 EPA samples collected in 2015 from the Clifton Containment within the average curve for the Clifton Containment Cell data. That data was added to the 15 samples that Givaudan collected in 2009 and 2015, for a total of 20 samples. The remainder of the Slide is unchanged. This clarification was made after further review of the slides and was not requested by EPA.

- Please note that Slide 12 was updated to correct the yellow curve for the Lister 1990's Upland Soil and Waste samples as set forth in Slide 4, which now reflects the pattern in the original 3/10/16 version. This slide now matches the yellow curve on Slide 9. Note that Slide 12 also was updated to reduce the thickness of the curves to better distinguish the patterns for the different data sets and more clearly depict the underlying histograms. EPA had noted that the thicker curves were hard to distinguish and did not show all of the differences in the data points. Finally, Slide 12 also was updated after the plots were rerun, which resulted in a slight change to the Lister Phase 1 Removal Area data (Black Line) for one reference curve point for the average 1,2,3,4,6,7,8-HpCDF contribution. That compound increased from approx. 17% to approx. 21% on the plot.

We trust the foregoing and attached material fully responds to EPA's inquiry. After EPA reviews this information, please let us know when your team is free to meet to with us to discuss its analysis of the sampling data.

Thank you.

Regards,

Bill

William S. Hatfield

Director Real Property & Environmental

Gibbons P.C.

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From: Flanagan, Sarah [mailto:Flanagan.Sarah@epa.gov]
Sent: Friday, June 10, 2016 5:57 PM
To: Hatfield, William S.
Cc: Arnold, Adam C.
Subject: RE: Diamond Alkali - Lower 8.3 Miles

Here is the call in number and passcode for Monday, noon. Could you pass it on to Rick?

(866) 299-3188

code: 212-637-3358#

Thank you - you have a good weekend too.

From: Hatfield, William S. [mailto:WHatfield@gibbonslaw.com]
Sent: Friday, June 10, 2016 5:32 PM
To: Flanagan, Sarah <Flanagan.Sarah@epa.gov>
Cc: Arnold, Adam C. <AArnold@gibbonslaw.com>
Subject: RE: Diamond Alkali - Lower 8.3 Miles

Sarah:

Thanks for the prompt response.

Yes – let's plan on that time slot. We will talk with you and your team on Monday at noon.

Have a good weekend.

Regards,

Bill

William S. Hatfield

Director Real Property & Environmental

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From: Flanagan, Sarah [mailto:Flanagan.Sarah@epa.gov]
Sent: Friday, June 10, 2016 5:29 PM
To: Arnold, Adam C.
Cc: Hatfield, William S.
Subject: RE: Diamond Alkali - Lower 8.3 Miles

Adam –Could we do the call at noon?

-Sarah

Sarah P. Flanagan
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From: Arnold, Adam C. [mailto:AArnold@gibbonslaw.com]
Sent: Friday, June 10, 2016 2:11 PM
To: Flanagan, Sarah <Flanagan.Sarah@epa.gov>
Cc: Hatfield, William S. <WHatfield@gibbonslaw.com>
Subject: RE: Diamond Alkali - Lower 8.3 Miles
Importance: High

Hi Sarah. Following up on your email below, we have confirmed that Rick Wroblewski is available on Monday afternoon (June 13th) for a call between Gibbons, Rick, Eugenia and Hydroqual. Does that date still work on your end? If so, please let us know what times would work for you. Thank you.

Regards,

Adam

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From: Flanagan, Sarah [mailto:Flanagan.Sarah@epa.gov]
Sent: Wednesday, June 01, 2016 9:07 PM
To: Hatfield, William S.
Cc: Arnold, Adam C.
Subject: Diamond Alkali - Lower 8.3 Miles

Bill,

1. Here is the letter you asked about.

2. Would Rick Wroblewski be free for a call with Eugenia and Hydroqual at any of these dates and times: Thursday June 9 either in the morning, or afternoon after 2 pm; Monday June 13 after 1 pm; Tuesday June 14 after 1 pm; Thursday June 16 between 1 and 3:30 pm.

-Sarah

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