To: Stanley, Elaine[stanley.elainet@epa.gov]
From: Gallagher, Angela (DEP)
Sent: Tue 1/10/2017 2:19:20 PM
Subject: RE: AVX Phase III Letter

Hi Elaine,

Thanks so much for your comments. I am incorporating them for discussion this morning and I just want to clarify one comment below. Regarding Comment 3 – which paragraph was EPA interested in seeing the provided text?

Thanks,

Angela Gallagher

Bureau of Waste Site Cleanup
Massachusetts Department of Environmental Protection
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From: Stanley, Elaine [mailto:stanley.elainet@epa.gov]
Sent: Monday, January 09, 2017 3:58 PM
To: Gallagher, Angela (DEP)
Cc: Catri, Cindy; Lombardo, Ginny
Subject: RE: AVX Phase III Letter

Hi Angela,

Thank you for the opportunity to review MassDEP's letter to AVX regarding its comments on the former Aerovox site Phase III RAP prior to sending it to AVX. EPA is in general agreement with the detailed comments provided in the letter and does not want to hold up the issuance of the letter. There are a few additional comments we would like to share with you and are included below for your consideration:

1. EPA recommends that the MassDEP provide AVX thirty (30) days to submit a Phase III modification since somewhat in-depth discussions on MassDEP's concerns have already taken place with AVX and its contractor at the December 8, 2016 meeting.

2. In the Table presented on Pages 4 and 5 of the letter, should the MassDEP Determination for OU2-1 be Conditional Approval instead of Approved as discussed specifically on Page 6 where it is "Conditionally Approved?

3. Please consider adding the following text to this paragraph: "Further, the Phase III RAP presents no specific information on the required integration of remedial efforts along the boundary between Aerovox and the river. Given that the highest contaminant concentrations are found immediately landward of the existing sheet pile wall, containment needs to be provided directly along the existing boundary."

4. On Page 9 under OU3A, Comment No. 12, EPA suggests including a more explicit requirement that the Phase III Modification should include a comprehensive summary of all of the lines of evidence regarding DNAPL at the site – e.g. direct observations, MALM, concentrations in soil above threshold DNAPL saturation/partitioning, elevated groundwater concentrations relative to solubility, concentration trends with depth and over time, site use history. A tabular presentation provides an efficient summary of the lines of evidence at various areas of the site. The culmination should be site maps presenting "confirmed" and "probable" DNAPL source zones following accepted characterization guidelines which can be found for instance in the 2009 Kueper Davies guidance document.

Please let me know if you have any questions regarding these comments and thank you again for the opportunity to review your letter.

Elaine

From: Gallagher, Angela (DEP) [mailto:angela.gallagher@state.ma.us]

Sent: Thursday, January 05, 2017 10:17 AM
To: Lombardo, Ginny <Lombardo.Ginny@epa.gov>
Cc: Stanley, Elaine <stanley.elainet@epa.gov>; Catri, Cindy <Catri.Cynthia@epa.gov>
Subject: AVX Phase III Letter

Hi Ginny,

I am attaching the draft of the Phase III letter. We recognize that there are some stylistic issues, typos, format issues, and other technical questions we need to iron out, but for the sake of time, we wanted to make sure EPA has a chance to review. We don't expect that additional future changes to this letter will result in drastic changes to the version you are receiving.

I am attaching the Word version of the document, so please feel free to use the Review tool. It will make it easier for us to review EPA's comments.

Thanks,

Angela Gallagher

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