To: Lombardo, Ginny[Lombardo.Ginny@epa.gov]
Cc: Tisa, Kimberly[Tisa.Kimberly@epa.gov]
From: Stanley, Elaine
Sent: Thur 11/10/2016 3:33:38 PM
Subject: RE: AVX Phase III Meetings

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Ginny,

Kim and I had a call with Angela yesterday afternoon. We discussed the MIP-23 video and photos and she is aware that NAPL remains in the pit. I shared some details of concern that we have, e.g., sheens coming in from the northern sheet pile wall, different looking droplets of apparent NAPL on the excavation floor, sheens coming from the contaminated soil lens that could be seen running beyond the excavation footprint where the sheets could not be driven and the fact that this lens does in fact extend beyond the excavation boundary and will not be addressed. I said that although we are pleased that they are removing some of this material, there is likely NAPL still remaining at the site (outside of the northern NAPL area) which will not be further addressed, except of course by capping.

We did mention the concerns with air emissions and I described the details that Josh has provided us regarding the adequacy of their safety procedures. We were happy to hear that someone had decided to bring on air supplied oxygen although it hasn't been used up at least through Tuesday. I mentioned that Josh also said that while they are excavating UV-17, the three PID monitoring equipment located 30 to over 50 feet away go off several times in a day and the adequacy of the PID as a monitoring tool.

We discussed what health and safety measures we took when we excavated the shoreline there in 2008 and what monitoring equipment we used for both the 2008 event and for the 2010-2011 NTCRA. AVX is using dust monitors at perimeter locations. Marilyn said EPA approved particulate monitoring as a surrogate for PCBs during the NTCRA, although they were demolishing a building with a great potential for *dust* emissions. This work is generating air emissions but little of it is associated with dust and is likely not adequate. I said I would share VOC and PCB data with her from the 2008 event. Angela asked how did we determined real-time PCB emissions and I said that we based it on historic data as it shows that the chronic risk is acceptable (while we wait for the PCB analytical data). I said we also had site perimeter monitoring stations, including one on Belleville Ave and at the north and south abutter locations near the shore or wherever the downwind location was.

She plans to talk to Michele about this and thinks the abutters, including residents, should be made aware of these activities going on at the site. She also plans on speaking with Marilyn today on other matters but will also discuss these issues with her.

She said she may send her comments on the Phase III after Kim asked if they could send them to us with a "draft" designation but will need to touch base with Gerard and Dennis (?) first.

Elaine

From: Lombardo, Ginny
Sent: Wednesday, November 09, 2016 9:08 AM
To: Stanley, Elaine
Subject: RE: AVX Phase III Meetings

E-I won't be able to be on call or on 9:30 call but let me know how it goes. Thanks!

From: Stanley, Elaine
Sent: Wednesday, November 09, 2016 9:00 AM
To: Lombardo, Ginny <Lombardo.Ginny@epa.gov>
Subject: RE: AVX Phase III Meetings

Thank you for sending this Ginny. I plan to talk to Angela this morning with Kim at 10:15 as I have proposed but haven heard back yet from her. We tried to talk yesterday but our schedules didn't jive. Did you want to be on the call if it occurs?

The reason for the call was that Angela finally got back to me on the information I forwarded to her (Josh reporting, photos, etc.) a couple of weeks ago.

E

From: Lombardo, Ginny
Sent: Wednesday, November 09, 2016 8:48 AM
To: Gallagher, Angela (DEP) <Angela.Gallagher@MAssMail.State.MA.US>
Cc: Stanley, Elaine <stanley.elainet@epa.gov>; Catri, Cindy <Catri.Cynthia@epa.gov>; Martin, Gerard (DEP) (Gerard.Martin@MassMail.State.MA.US) <Gerard.Martin@MassMail.State.MA.US>; Tisa, Kimberly <Tisa.Kimberly@epa.gov>; Stolfi Stalenhoef, Dawn (DEP) <Dawn.Stolfi.Stalenhoef@MassMail.State.MA.US>
Subject: AVX Phase III Meetings

Angela-

Can you clarify when MassDEP will be issuing comments on the Phase III in preparation for the meetings on December 1st and December 8th? I am assuming that EPA would get an opportunity to review and discuss MassDEP's draft comments at our December 1st meeting and work through concerns at that meeting and then MassDEP would issue comments to AVX following that meeting as the basis for discussion at the meeting with AVX and City of NB at the December 8th meeting. It would be helpful to have MassDEP's draft Phase III comments by no later than COB Monday November 28th so we have a couple of days to review and consider the comments before we meet with you on the 1st. Thanks.

Ginny Lombardo, Chief

Remediation & Restoration II Branch

U.S. EPA Region 1 – New England

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