To: Strauss, Alexis[Strauss.Alexis@epa.gov]; Manzanilla, Enrique[Manzanilla.Enrique@epa.gov]
From: Greg Lovato
Sent: Thur 1/18/2018 8:17:05 PM
Subject: FW: Anaconda OU3 HHRA Follow-Up
Carson River 6.3.4 Traditional Tribal Exposures.pdf
Carson River HHRA CSM.pdf

Alexis and Enrique,

I am writing to let you know that EPA work on Anaconda (OU-3 in particular) this close to deferral is not being coordinated well with NDEP, and NDEP does not believe its expressed concerns and comments are being given adequate consideration by EPA. With the below communication, EPA is taking positions without adequately addressing NDEP concerns on issues that will affect decision-making and work schedule on the site post-deferral.

I request that EPA refrain from sending out any new communications on positions without first circulating drafts to NDEP for review and comment.

Respectfully,

Greg

Greg Lovato, Administrator

NV Division of Environmental Protection

P: 775-687-9373

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NEVADA DIVISION OF
ENVIRONMENTAL
PROTECTION

From: Jeryl Gardner
Sent: Thursday, January 18, 2018 12:03 PM
To: Greg Lovato <glovato@ndep.nv.gov>
Subject: FW: Anaconda OU3 HHRA Follow-Up

Jeryl R. Gardner, P.E., C.E.M.

Supervisor, Abandoned Mine Lands Branch

Bureau of Corrective Actions, NDEP
901 S. Stewart St., Ste 4001
Carson City, NV 89701
775-687-9484
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From: Seter, David [mailto:Seter.David@epa.gov]
Sent: Tuesday, January 16, 2018 2:04 PM
To: Jack.Oman@bp.com; jbatchelder@envirosolve.com; ghatch.ypt-nsn.gov <ghatch@ypt-nsn.gov>; Dietrick McGinnis <dmcginnis@mcginnisandassociates.com>; speters@mcginnisandassociates.com; Jeryl Gardner <JGARDNER@ndep.nv.gov>; Jonathan Zittel <jzittel@ndep.nv.gov>; Angela Stevens <a.stevens@ndep.nv.gov>; afeldpausch@ramboll.com; Ken.Greene@CH2M.com; Bedan, Mike/DEN <Mike.Bedan@CH2M.com>; Serda, Sophia <Serda.Sophia@epa.gov>
Cc: Davis, David <drdavis@blm.gov>; Rodriguez, Dante <Rodriguez.Dante@epa.gov>
Subject: Anaconda OU3 HHRA Follow-Up

Dear Anaconda OU3 HHRA Technical Stakeholder Group,

EPA thanks its consultant CH2M, ARC and its consultant Ramboll Environ, NDEP, and YPT and its consultant McGinnis and Associates, for participating in the Anaconda OU3 HHRA Work Plan discussion on January 11, 2018.

EPA is suspending the previous deadline of February 5, 2018 for ARC submittal of a revised HHRA Work Plan (see EPA correspondence dated 12/7/17). The reason is to enable scoping of a tribal exposure scenario: EPA thanks the YPT Environmental Director for volunteering the participation of YPT staff and consultant to assist ARC in preparing the scenario to include in the Revised HHRA Work Plan. EPA will work to schedule that call or face-to-face meeting soon. In the interim, please see the attached excerpts from the Carson River OU2 Final HHRA Report (April 2017) which demonstrate how a tribal exposure scenario was included for the Carson River Site. For reference, EPA has uploaded the entire Carson River OU2 Final HHRA Report to the Anaconda Public Document Repository under the OU-3 Process Areas folder.

EPA is also suspending the previous deadline of March 6, 2018 for submittal of a Draft Screening Level Ecological Risk Assessment (SLERA) Work Plan. The reason is to prioritize scoping of the tribal exposure scenario and to allow for follow-on scoping of the SLERA Work Plan, if necessary. EPA refers ARC and stakeholders to the OU8 SLERA as a starting point. The OU8 SLERA may be found as Section 7 in the Final Remedial Investigation Report, Arimetco Facilities OU8 (September 2011) on the Anaconda Public Document Repository under the OU-8 Arimetco Facilities folder.

Also, EPA is providing its position on the five agenda items discussed on January 11, as follows:

1) Trespasser Scenario / EPA position: appropriate exposed individual is a child age 6.

2) Tribal Exposure Scenario / EPA position: ARC and stakeholder group should review relevant sections of the Carson River HHRA including tribal exposure scenario (acknowledging the Anaconda Site is different but also acknowledging the "template" provided by the Carson River Site represents a helpful starting point). Scoping session to be scheduled.

3) VLT / EPA position: EPA requests that ARC provide consultant's evaluation of surface weighted average versus depth weighted average approaches for VLT. Where OU6 VLT data is proposed to be used in risk assessment then EPA requests ARC provide consultant's risk calculations using 95% UCL values for CPOCs with uncertainty analysis to address delta

between 95% UCL, mean, and max values.

4) Residential scenario / EPA position: carry through risk calculation for residential exposure (as proposed in the work plan). Even with LURs in place (which EPA promises to review) material may find its way offsite either through use as fill in residential development or through workers bringing dust home to the residential family environment.

5) Worker exposure scenarios / EPA position: it may be reasonable for the "Construction / Excavation Worker Scenario," to use the 1-year exposure duration proposed in the work plan as a CTE value with the addition of a 5-year exposure duration as a RME value.

Please contact me with any questions or concerns.

David A. Seter, P.E.

Remedial Project Manager

USEPA Region 9

Superfund Division (SFD-8-2)

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