To: Seter, David[Seter.David@epa.gov]
Cc: 'Davis, David' (drdavis@blm.gov)[drdavis@blm.gov]; Jeryl Gardner[JGARDNER@ndep.nv.gov]; John Batchelder[jbatchelder@envirosolve.com]; Alma Feldpausch (afeldpausch@ramboll.com)[afeldpausch@ramboll.com]
From: Oman, Jack
Sent: Tue 12/12/2017 5:37:02 PM
Subject: FW: EPA Review Anaconda OU3 Draft HHRA Work Plan
EPA Comments_Anaconda OU3 TM1 Meeting Notes.pdf
OU-3 Memo 1_27Jan2016 Meeting Summary.pdf
Yerington OU-3 TM 2 Meeting Summary_2Jun2016.pdf
Yerington OU-3 TM 3 Meeting Summary_9Nov2016.pdf

Dave,

As we discussed on the call today, we would like to schedule a call to discuss your comments. Please advise as to your availability to get together to discuss.

Thanks,

-jack

From: Alma Feldpausch [mailto:afeldpausch@ramboll.com]
Sent: Monday, December 11, 2017 4:20 PM
To: Oman, Jack; Tull, James (James.Tull@arcadis.com)
Cc: 'Randy Miller'; John Batchelder; Stilwell, Chuck T; Johnson, Brian S; Cohen, Adam
Subject: RE: EPA Review Anaconda OU3 Draft HHRA Work Plan

Jack,

As we discussed, it would be helpful for us to have the opportunity to review and clarify some comments of the comments provided by EPA before revising the draft HHRA work plan. EPA stated in their comments that they are open to further discussion on several topics and in these instances, it would be helpful to gain a clearer understanding of EPA's intent as well as specificity in the requested revision. Due to the request for a revised work plan by February 5, 2018, it will be ideal to schedule a teleconference with EPA as early as next week.

Topics requiring clarification include:

- Confirm that EPA reviewed meeting notes documenting verbal decisions made between ARC and EPA (Chris Dirscherl), as several of EPA's recent comments conflict with agreements made during calls with EPA. In particular, meeting notes following discussion of Tech Memo #2 memorialize decisions made that would appear to conflict with EPA's initial written comments.

Examples include the resolution of comments related to identification of COPCs, consideration of an industrial exposure scenario instead of a residential scenario if/when an environmental covenant/access agreement were signed between SPS and NDEP, use treatment of VLT data, and assumption that 45% of indoor dust is derived from outdoor soil.

- There are several comments made by YPT/EPA that may be the result of misinterpreting the work plan text, or lack of clarity in the work plan text. Ensuring that EPA/YPT and ARC teams are clear on the intent of the comments and existing work plan text before revising would be helpful to avoid further confusion. Examples relate to consideration of hot spots, treatment of duplicate samples, and use of VLT data.

- During the work planning stage, EPA had agreed that a residential scenario would not be relevant if an environmental covenant/access agreement was recorded for SPS-owned property. Since the work plan was submitted last December, deed restrictions were implemented for OU-3, thereby supporting a focus on industrial rather than residential exposure scenarios. This should be confirmed with EPA prior to revising the work plan.

Alma

Alma Feldpausch

MS, DABT

Senior Managing Consultant

D +1 206 3361666

M +1 206 6600156

afeldpausch@ramboll.com

Ramboll Environ

901 Fifth Avenue
Suite 2820
Seattle, WA 98164
USA

www.ramboll-environ.com

RAMBOLL ENVIRON

** Please note that my work week is generally Monday, Tuesday, Thursday, Friday, with some availability on Wednesdays until 2 pm PST. **

Ramboll Environ will begin using the Ramboll name in all markets on 1 January 2018. As Ramboll's Environment & Health division, we are one of its largest global practices. To learn more, visit ramboll.com/environment-and-health and follow Ramboll on LinkedIn. My personal contact information remains unchanged.