EPA Response to Comments
Screening Level Ecological Risk Assessment
Phase I Site Characterization Data Summary Report
Columbia Falls Aluminum Company NPL Site
Columbia Falls, Montana
Responses prepared for Columbia Falls Aluminum Company, LLC by Roux Associates, Inc.
Email Sent May 26, 2017

On May 26, 2017, Roux Associates, on behalf of CFAC, provided responses to the comments provided by EPA and DEQ on the Phase I Site Characterization Data Summary Report and the Screening Level Ecological Risk Assessment in redline format. Following are EPA's initial review of the response that will be further discussed during a June 13, 2017 conference call. No response below indicates concurrence with the Response to Comments.

SLERA RTC Comments:

General Comment 1: Refinement in the BERA should consist of using criteria that are relevant for the receptors at the site as well as other refinements to risk estimates. It is recognized that this may result in using in less conservative criteria than were used in the SLERA. However, it is not a written rule that BERA's should employ less conservative criteria. It is suggested that the last sentence in the response be removed.

Specific Comment 13: The third paragraph of the response states that "non-detected constituents with ½ of their method detection limits (MDLs) exceeding the most conservative screening were not retained as COPECs". This statement is inherently incorrect. This situation is an example of an inadequate MDL, so it is not appropriate to dismiss this chemical. That being said, these results will be re-screened after four rounds of data are available.

Phase I DSR RTC Comments:

Specific Comment 23: Rather than computing statistics using zero for non-detects, it is suggested that summary statistics be presented for the detected results or assume one-half the MDL for the concentration when a chemical is not detected in a sample.

Specific Comment 25: While it is true that CDM Smith/EPA were involved in discussion the re-sampling approach for the decision units where field processing was employed for incremental sampling methodology (ISM) samples, the following comment was provided on SAP modification #4 upon review: "Please elaborate on how this evaluation will be performed and what the acceptance criteria will be such that it is not necessary to re-sample the remaining DUs (e.g. the analytical results for each DU may not be within X% of ecological soil screening values, if they are, re-sampling should occur at all DUs)." CDM Smith did not review the final version and did not aid in the development of an adjustment strategy. Again, this is a non-issue because re-sampling is slated to occur in all DUs with field-processing.

Specific Comment 28: It is stated that the means were compared for site versus background analysis. How was variability in the datasets accounted for? Drawing conclusions without regard to sampling/analytical variability is inappropriate.

Specific Comment 33: The appropriateness of using zero for non-detected values in VISL should be demonstrated. Can a citation for this approach be provided?

Specific Comment 35: For clarification, the recommendation to only analyze for total did not come from EPA/CDM Smith. Perhaps it came from MDEQ because DEQ-7 standards are based on total, not dissolved.

Specific Comment 39: Please include in the discussion of the variability in concentrations the intention to evaluate this variability more stringently in the Groundwater Data Summary Report subsequent to four rounds of sampling.

Specific Comment 43:

- It is stated that statements regarding concentrations being higher or lower will not be bolstered with statistical evaluation. Will the text be softened to state that "In general …" or "Trends in the data indicate …" or removed? This is a global comment for this response regarding request to back up statements.

- Please include in the discussion of the variability in concentrations the intention to evaluate this variability more stringently in the Groundwater Data Summary Report subsequent to four rounds of sampling.

Specific Comment 54: It is common to screen against hexavalent chromium and later assume a smaller fraction of chromium is comprised of hexavalent chromium. For screening purposes, it is still recommended that this approach be taken.

Specific Comment 55: It has not been requested that a MCL be added for manganese (non-diet), rather the tapwater RSL should be added.

Specific Comment 56: See response to Specific Comment 35.

Specific Comment 59: It is unclear what the last sentence of the first paragraph is attempting to address. There is benefit to presented the data as recommended.

Specific Comment 63: As noted above, please ensure that the language from this response positing the hypotheses for variability in COPC concentrations be included in Section 4.0, as well as directly stating the intention to further evaluate this variability in the Groundwater Data Summary Report.

End of comments.