Message

From: Shewmake, Kenneth [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5031C1ABFE8847809A448EF4899DE65C-SHEWMAKE, KENNETH]
Sent: 3/21/2019 3:28:58 PM
To: Paddack, Mark [mpaddack@eaest.com]
Subject: RE: Urgent: Final Lane Plating CSM - Figure 7 and Table 3 revisions

Yes, I think the soil and the sediment figures need to be revised in the CSM and the SAP. I do not want something marked as yellow or red just because of detections limits. I talked to Rebecca Storms and she said that is not what TCEQ intended. I'll look at the figures and give you more specific figure numbers in a little bit. We always have detecton limit issues, and we do need to note them, but we do not need to mark this as an exceedance. Let's change this back to the way it was.

I just got this comment from Rebecca.

> Figure 7:
> If intent is to only show the site COPCs, then manganese does not need to be added to table and associated sample SW-13 would not show an exceedance.
>
> Figure 8:
>
> SW-01 and SW-11 should show no exceedances (not detected).
>
> Cyanide should be removed from COPC table (all ND results).
>
> General comment: tables are still showing not detect results in exceedance of screening values, FYI.

Also, we need to discuss making reservations with the lab. Please give me a call after your meeting or tomorrow so we can discuss this and the schedule for field work.

Kenneth Shewmake
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From: Paddack, Mark <mpaddack@eaest.com>
Sent: Thursday, March 21, 2019 9:38 AM
To: Shewmake, Kenneth <shewmake.kenneth@epa.gov>
Subject: RE: Urgent: Final Lane Plating CSM - Figure 7 and Table 3 revisions

Mr. Shewmake:

I have forwarded the below comments to those working on the SCM TM, and have asked them to get on this ASAP. When you called, I had not yet received your e-mail, and thought you were talking about the soil sample location

map (Figure A-2, Appendix A) in the SAP, which was adjusted per TCEQ comments to treat detection limits above residential screening values as exceedances.

In addition to the below TCEQ comments for the CSMTM, did you want Figure A-2 in the SAP to be revised as I thought were discussing on the phone call?

Thank You,
Mark Paddack
EA Project Manager

From: Shewmake, Kenneth [mailto:shewmake.kenneth@epa.gov]
Sent: Thursday, March 21, 2019 9:06 AM
To: Paddack, Mark
Subject: FW: Urgent: Final Lane Plating CSM - Figure 7 and Table 3 revisions
Importance: High

Mark,

I will try to call this morning to talk about this. Please call me if you see this before I call. We need to talk about this soon. This could be a big problem.

Kenneth Shewmake
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From: Rebecca Storms <Rebecca.Storms@Tceq.Texas.Gov>
Sent: Thursday, March 21, 2019 8:30 AM
To: Shewmake, Kenneth <shewmake.kenneth@epa.gov>
Cc: Sharon Barker <Sharon.Barker@tceq.texas.gov>
Subject: Urgent: Final Lane Plating CSM - Figure 7 and Table 3 revisions
Importance: High

Kenneth,

Figure 7 of the Final CSM incorrectly shows COPCs exceedances of TCEQ human health values. Please see the below changes that should be made to this figure and Table 3 and let me know if you have any questions.

1. Sample results that are reported as not detected are shown as exceeding human health screening values if their reporting limits are higher than the screening values (this was an original comment provided by TCEQ on 3/15/19). This is occurring primarily for cyanide, lead, and mercury. These are shown as exceedances of the RBEL for Fish Only/Incidental Fishery values in Figure 7 and in Table 3. When revised, only samples SW-04 and SW-13 should show exceedances of the Fish Only/Incidental Fishery values (see attached markup).

2. When screened against the Water and Fish RBELs, all other sample locations exceed this value and are below the Fish Only/Incidental Fishery values. However, the water and fish RBELs apply to surface water bodies used as a drinking water supply. As this is not the case for the streams and Trinity River near the site, I suggest not screening these values at all on this figure. This would remove the Water and Fish RBELs and associated COPC exceedance note from Figure 7.

3. With these changes, the figure should only show exceedances of the Fish Only/Incidental Fishery RBELs in samples SW-04 and SW-13. The Water and Fish RBELs will be removed from the figure. Additionally, the COPC list will change to only show lead, mercury, and manganese (see attached markup).

4. If you plan to keep the Water and Fish RBELs on Table 3, I suggest not screening the data against it and adding a note that states the following: "*Water and Fish RBELs are not applicable to current data because they are protective of surface water used as a drinking water supply, and the site streams and Trinity River are not used or dedicated as a public supply of drinking water*."

Please call me if any clarification is needed.

Thanks,

Rebecca Storms, P.G.
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