Message

From: Rebecca Storms [Rebecca.Storms@Tceq.Texas.Gov]
Sent: 3/21/2019 3:05:29 PM
To: Shewmake, Kenneth [shewmake.kenneth@epa.gov]
Subject: RE: Urgent: Final Lane Plating CSM - Figure 7 and Table 3 revisions

I'll call to discuss – see below

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.

From: Shewmake, Kenneth <shewmake.kenneth@epa.gov>
Sent: Thursday, March 21, 2019 9:27 AM
To: Rebecca Storms <Rebecca.Storms@Tceq.Texas.Gov>
Subject: RE: Urgent: Final Lane Plating CSM - Figure 7 and Table 3 revisions

I talked to Mark Paddock and I think he can make the changes quickly. Please let me know if you see anything else. I talked to Ed and he thinks he can stop this before it gets posted. I'll call if I have more information.

Kenneth Shewmake
US Environmental Protection Agency
Environmental Scientist
RPM Lane Plating

1445 Ross Ave., Suite 1200
Dallas, TX 75202-2733
shewmake.kenneth@epa.gov
work phone- (214) 665-3198

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.
Superfund Section, MC-136
Remediation Division
Texas Commission on Environmental Quality
Phone: 512-239-2466
Email: Rebecca.Storms@tceq.texas.gov