Message

From: Paddack, Mark [mpaddack@eaest.com]
Sent: 12/18/2018 8:31:59 PM
To: Shewmake, Kenneth [shewmake.kenneth@epa.gov]
CC: Kiehl-Simpson, Caryn [ckiehlsimpson@eaest.com]; Klassen, Julia [jklassen@eaest.com]
Subject: Lane Plating Comments Status

Mr. Shewmake:

EA completed an internal meeting regarding comments provided for the Lane Plating Works Conceptual Site Model Technical Memorandum (CSMTM). As indicated below, it appears that the original Texas Commission on Environmental Quality (TCEQ) Site inspection data that was available at the time the Revision 00 CSMTM was completed (22 October 208) has since been updated and provided to EPA on 28 November 2018. As part of this submittal, it also appears that TCEQ provided additional surface water and sediment human health benchmarks for consideration (Please see below TCEQ comments). Could EA be provided a copy of this TCEQ data?

List from TCEQ comments:

12. Tables, general comment -

..."The final data review qualifiers are included in References 34 and 35 of the HRS and were delivered to the EPA via email by TCEQ on November 28, 2018. Please use these references to update report tables with the correct data review qualifiers."

13. Table 1, Soil Sample Results –

a. *..."Aluminum, barium, beryllium, cobalt, iron, manganese, selenium, silver, thallium, and vanadium data are available for Site Inspection samples but are not tabulated in Table I. These data are included in References 33 and 56 of the HRS and were delivered to the EPA in electronic format via email by TCEQ on November 28, 2018."*

14. Table 2, Sediment Sample Results –

a. *..."The TCEQ suggests adding the following analytes to Table 2 to be consistent with significant concentrations detected in the source or surface water, or to show detections of analytes in sediment that were detected above the RSLs in soil: aluminum, antimony, arsenic, barium, iron, manganese, nickel, vanadium, and zinc. These data are included in References 33 and 56 of the HRS and were delivered to the EPA in electronic format via email by TCEQ on November 28, 2018."*

f. *"The TCEQ recommends that EPA consider adding the TCEQ human health benchmarks for sediment based on incidental ingestion and dermal contact. These exposure routes are indicated in Section 7.5, Potentially Complete Exposure Pathways. These benchmarks were delivered to the EPA in electronic format via email by TCEQ on November 28, 2018".*

15. Table 3, Surface Water Sample Results –

a. *..."The TCEQ suggests adding the following analytes to Table 3 to be consistent with significant concentrations detected in the source or sediment, or to show detections of analytes in surface water that were detected above the RSLs in soil: antimony, beryllium, and cadmium. These data are included in References 33 and 56 of the HRS and were delivered to the EPA in electronic format via email by TCEQ on November 28, 2018".*

f. "The TCEQ recommends that EPA consider adding the TCEQ human health benchmarks for surface water based on incidental ingestion, dermal contact, and an incidental or sustainable fishery based on stream size. These exposure routes are indicated in Section 7.S, Potentially Complete Exposure Pathways. These benchmarks were delivered to the EPA in electronic format via email by TCEQ on November 28, 2018."

In talking with the work group, if a copy of the 28 November 2018 TCEQ submittal can be provided, EA feels that a teleconference will not be necessary, and we can proceed with finalizing the CSMTM per EPA and TCEQ comments.

Please let me know if you have additional questions and/or comments concerning this matter.

Thank You,
Mark Paddack
EA Project Manager