Message

From: Paddack, Mark [mpaddack@eaest.com]
Sent: 10/7/2019 5:30:48 PM
To: Shewmake, Kenneth [shewmake.kenneth@epa.gov]
Subject: RE: Lane Plating Rev 00 Phase 1 DSTM

I appreciate your response, Mr. Shewmake, and look forward to talking with you. I thought about the site data over the weekend ,and it may even be plausible that the background soil study may not be warranted, now that EA's risk assessors have indicated hexavalent chromium values of 30 mg/kg and 130 mg/kg for human health and ecological receptors, respectively. But we can discuss further in the upcoming days.

Thank you,

Mark Paddack
EA Project Manager

From: Shewmake, Kenneth <shewmake.kenneth@epa.gov>
Sent: Monday, October 7, 2019 11:47 AM
To: Paddack, Mark <mpaddack@eaest.com>
Subject: RE: Lane Plating Rev 00 Phase 1 DSTM

I sent this out to the team for review. I like the way you did this. It is much easier to make decisions like this before you make a draft FSP than to revise it. Let me know if you have additional questions. I will get back to you by tomorrow with answers.

Kenneth Shewmake
US EPA, Remedial Project Manager
(214) 665-3198

From: Paddack, Mark <mpaddack@eaest.com>
Sent: Friday, October 04, 2019 3:31 PM
To: Shewmake, Kenneth <shewmake.kenneth@epa.gov>
Subject: RE: Lane Plating Rev 00 Phase 1 DSTM

Mr. Shewmake:

I wanted to make you aware that as the Lane screening tables and figures have been falling into place, I've also been conferring with Dr. Dan Hinckley (EA ecological risk assessor) and Cynthia Cheatwood (EA's human health risk assessor), and they have provided the following suggestions for the Phase 2 field event based on review of the Phase 1 data:

1. Proceed with the background soil study.

2. Only conduct the background sediment study; based on their review of the Phase 1 data they do not see a need to do the background surface water study.

3. Do not conduct further nature and extent samples for sediment or surface water; neither of them think it is warranted. However, Dr. Hinckley did suggest the collection of some additional surface water parameters within the footprint of the Phase 1 sediment and surface water investigation footprint in order to derive a site-specific aluminum criterion for the aluminum detections in surface water.

4. Neither sees the need for fish sampling, and Dr. Hinckley also indicated he did not think the wetlands survey would be necessary based on the Phase 1 sediment and surface water data.

5. Regarding soil, as has been expected all along, the hexavalent chromium is the main risk driver at the site, and where it is addressed, it will address all the other metal exceedances. Versus the Residential Soil RSL of 0.3 mg/kg, Cynthia suggested using a criterion of 30 mg/kg for the Phase 2 nature and extent sampling. She indicated this relates to a residential risk level of 10^{-4} and an industrial risk below 10^{-5}, and is also a level below a non-cancer concern.

6. I received a response from Dr. Hinckley earlier today regarding screening criterion for ecological risks associated with the hexavalent chromium. He indicated the only solid ecological screening level for hexavalent chromium is 130 mg/kg from EcoSSL for protection of mammals (the shrew). As such he recommends using the EcoSSL of 130 mg/kg, versus use of the 0.4 mg/kg screening level that was originally used to screen historical data used to prepare the site's Conceptual Site Model Technical Memorandum.

7. I also spoke with Jay Snyder (EA's Chief Geologist), and he agreed that at least one well (with surface casing) should be installed into the Austin Chalk to complete vertical delineation.

Just to make you aware under each section that describes the data summary for surface soil, subsurface soil, surface water, sediment, and groundwater, I added the following language *"These exceedances are based on use of default EPA and/or TCEQ screening values. The distribution of exceedances may change once background conditions have been evaluated, and formal, site-specific Human Health and Ecological Risk Assessments have been completed.* I also included "preliminary" in all of the screening figure titles. I did this because I knew you wanted to make this information public , but also know that things can change from the time the data is initially screened against default screening levels and when the formal risk assessments have been completed.

Based on the above feedback, its looking like we should be able to scale back the Phase 2 field event (versus what was initially envisioned at the time of scoping). Per the above recommendations, I'm going to develop an approach for the Phase 2 field event the first part of this next week, and was wondering if you and I could have a meeting in the upcoming days to discuss the approach moving forward once you have had time to look through the Phase 1 Data Summary Technical Memorandum. I will then prepare the Sampling and Analysis Addendum, and should be able to have it to you by 21 October 2019, as mentioned a few days back.

Thank You,
Mark Paddack
EA Project Manager

From: Paddack, Mark
Sent: Friday, October 4, 2019 2:13 PM
To: Shewmake, Kenneth <shewmake.kenneth@epa.gov>
Cc: Rebecca Storms <Rebecca.Storms@Tceq.Texas.Gov>
Subject: Lane Plating Rev 00 Phase 1 DSTM

Mr. Shewmake:

Please find attached a copy of the Revision 00 Phase 1 Data Summary Technical Memorandum for the Lane Plating Works, Inc. Superfund Site. EA is also producing and distributing one hard copy and two electronic copies on compact disc (CD) of this deliverable to your attention. As requested, one electronic copy (on CD) is also being distributed to Ms. Rebecca Storms, Texas Commission on Environmental Quality (TCEQ) Project Manager.

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

Thank You,
Mark Paddack
EA Project Manager