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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 28, 2019

Mr. Kenneth Shewmake, Remedial Project Manager
US Environmental Protection Agency, Region 6
Superfund Division (6SF-TR)
1445 Ross Ave., Suite 1200
Dallas, Texas 75202-2733

Re: Sampling and Analysis Plan for Remedial Investigation, Draft Final, March 15, 2019, Lane Plating Works, Inc. Federal Superfund Site (TXN000605240), Dallas, Dallas County, Texas

Dear Mr. Shewmake:

Thank you for providing the Texas Commission on Environmental Quality (TCEQ) an opportunity to review the Sampling and Analysis Plan for Remedial Investigation, Draft Final (report) for the Lane Plating Works, Inc. Superfund Site (site). The final TCEQ Superfund Section comments regarding this report are listed below. The TCEQ Division Support and Toxicology Section comments that are specific to the ecological and human health subject matter in this report are included as attachments.

1. **Original Comment No. 6: Section 2.3.1, first paragraph** - TCEQ requests clarification on whether groundwater samples collected for dissolved metals analysis will be field-filtered using a 0.45-micron disposable filter, as described for surface water samples in Section 2.3.4.1. Additionally, the report and Standard Operating Procedures (SOPs) do not indicate if water samples for total metals analysis will be field-filtered should turbidity readings remain above 10 nephelometric turbidity units (NTU).

   EA Response: This paragraph has been revised to include "*Groundwater samples collected for dissolved metals will be field-filtered using 0.45-micron disposable filters.*" To clarify, EA's Standard Operating Procedures do not include field filtering water samples undergoing total metal analyses.

   Additional TCEQ response: As a standard practice, the TCEQ recommends field-filtering water samples with high turbidity readings (above 10 NTU) using a 10-micron filter. A response to this comment is not requested at this time.

2. TCEQ Toxicology Section Memorandum, Screening Criteria for Ground Water (Tables D-2A and D-2B) Comment: The TCEQ Superfund Section notes this comment may be discussed during the development of future site documents and a response is not requested at this time.

3. TCEQ Toxicology Section Memorandum, Screening Criteria for Sediment (Tables D-3A and D-3B) Comments: Please note that the TCEQ Superfund Section requests a response to this comment in the final report.

If you have any questions regarding these comments, please contact me at (512) 239-2466 or rebecca.storms@tceq.texas.gov.

Sincerely,

Rebecca Storms

Rebecca Storms, P.G., Project Manager
Superfund Section
Remediation Division
Texas Commission on Environmental Quality

RS/dl

Enclosure

cc: Greg Zychowski, Division Support Section, Remediation Division, Texas Commission on Environmental Quality, MC-102, 12100 Park 35 Circle, Bldg. D, Austin, TX 78753

Tracie Phillips, Ph.D., Toxicology Section, Toxicology Division, Texas Commission on Environmental Quality, MC-168, 12100 Park 35 Circle, Bldg. F, Austin, TX 78753

TCEQ Interoffice Memorandum

To: Rebecca Storms, Project Manager
Superfund Section, Remediation Division

From: Greg Zychowski, Technical Program Support Team
Division Support Section, Remediation Division

Date: March 22, 2019

Subject: Response to Comments on the Sampling and Analysis Plan, Revision 00
Remedial Investigation
Lane Plating Works, Inc. Federal Superfund Site
5322 Bonnie View Road
Dallas, Dallas County, Texas
SUP179
March 15, 2019

I have reviewed the subject document (EA 2019a), with a specific focus on responses to previous comments (TCEQ 2019) concerning any ecological risk assessment (ERA) work described in the Sampling and Analysis Plan (SAP). My review is summarized below, with a few minor suggestions. **However, no responses are requested.** The TCEQ is available to meet with site representatives if necessary.

Comments

1. Soil sampling depths - Soil sampling depths have been clarified and detailed in SAP (EA 2019b) Table A-2, for assessing the nature and extent of contamination and for identifying potential source areas.
2. Soil screening values - Table D-1A ("Screening Criteria for Soil...") has been updated. However, if aluminum and iron are considered chemicals of potential concern (COPCs) by the start of an ERA, site representatives should consider soil chemistry and pH for determining site-specific ecological soil screening levels (Eco-SSLs) for those COPCs, per U.S. EPA (2003a, b). As a minor comment, the label for "trivalent" chromium in Table D-1A applies specifically to the Eco-SSL value of 26 mg/kg, while the 0.4 and 1 mg/kg values represent total chromium in the TCEQ soil benchmark table. Also note that the TCEQ soil benchmark table includes median soil background values for several metals.
3. Sediment screening values - A few ecological screening values were corrected in Table D-3A, and the table underwent further review for accuracy. In response to previous comments, the total-sediment-combined ($^{Tot}Sed_{Comb}$) protective concentration levels (PCLs) were added to Tables D-3A and D-3B as draft screening values. Comment 5 from the January 15, 2019 IOM (TCEQ 2019) had encouraged the development of ecological screening benchmarks for COPCs if such values were not already offered in the TCEQ's ecological benchmark tables (RG-263b, TCEQ 2018). The focus of the comment was on screening values specifically for ecological receptors (not just for the protection of human

Re: Response to Comments on the Sampling and Analysis Plan, Revision 00
Lane Plating Works, Inc. Federal Superfund Site; Dallas, Dallas County, Texas

health). Therefore, site representatives are encouraged to study the RG-263b text (TCEQ 2018) before beginning any in-depth ERA for the site. If ecological screening values are not proposed, the respective COPCs should be retained for further assessment in the ERA, with ecological protective concentration levels (PCLs) eventually calculated if necessary.

4. Surface water screening values – Tables D-4A and D-4B have been updated to clarify whether the surface water screening levels are based on dissolved or total concentrations. Cadmium, copper, chromium, lead, nickel, and zinc screening values were said to be calculated assuming a hardness of 100 mg/L $CaCO_3$. As the values in Table D-4A and D-4B appear to match those in the TCEQ benchmark tables, which assume a hardness of 50 mg/L $CaCO_3$, it seems that the "100" mg/L may be a typo. If representatives are interested in developing more site- or segment-specific screening values based on hardness, TCEQ (2010) should provide valuable guidance.

References

EA. 2019a. Response to Comments on the Sampling and Analysis Plan, Revision 00. Lane Plating Works, Inc. Superfund Site. Dallas, Dallas County, Texas. March 15, 2019.

EA. 2019b. Sampling and Analysis Plan for Remedial Investigation, Draft Final. Lane Plating Works, Inc. Superfund Site. Dallas, Dallas County, Texas. March 15, 2019.

TCEQ. 2010. RG-194. Procedures to Implement the Texas Surface Water Quality Standards. June 2010. Online at https://www.tceq.texas.gov/assets/public/permitting/waterquality/standards/docs/june_2010_ip.pdf. Accessed March 20, 2019.

TCEQ. 2018. RG-263b. Supporting Documentation for the TCEQ's Ecological Benchmark Tables. Guidance and benchmark tables online at https://www.tceq.texas.gov/remediation/eco/eco.html. Accessed January 7, 2019.

TCEQ. 2019. Interoffice Memorandum. January 15, 2019. To: Rebecca Storms, Project Manager (Superfund Section). From: Greg Zychowski (Division Support Section). Subject: Sampling and Analysis Plan for Remedial Investigation, Revision 00. Lane Plating Works Federal Superfund Site. Dallas, Texas. SUP179.

U.S. EPA. 2003a. Ecological Soil Screening Level (Eco-SSL) for Aluminum. Interim Final. OSWER Directive 9285.7-60. Office of Solid Waste and Emergency Response. Online at https://www.epa.gov/sites/production/files/2015-09/documents/eco-ssl_aluminum.pdf. Accessed March 20, 2019.

U.S. EPA. 2003b. Ecological Soil Screening Level (Eco-SSL) for Iron. Interim Final. OSWER Directive 9285.7-69. Office of Solid Waste and Emergency Response. Online at https://www.epa.gov/sites/production/files/2015-09/documents/eco-ssl_iron.pdf. Accessed March 20, 2019.

TCEQ Interoffice Memorandum

To: Rebecca Storms
Superfund Section
Remediation Division

From: Tracie Phillips, Ph.D. TP
Toxicology Division

Date: March 26, 2019

Subject: Toxicology Division Review of the Revised Sampling and Analysis Plan for the Remedial Investigation for the Lane Plating Works Federal Superfund Site, Dallas County, Texas.

Staff of the Toxicology Division (TD) reviewed the March 15, 2019 Revised Sampling and Analysis Plan for the Remedial Investigation for the Lane Plating Works Federal Superfund Site located in Dallas County, Texas. To the extent possible, the TD reviewed the proposed human health screening levels to ensure compliance with the Texas Risk Reduction Program (TRRP; 30 TAC §350) rule. TD's review focused on the tables in Appendix D of the document that deal with human health screening levels for site-related contaminants. Other issues discussed in the document (e.g., ecological screening levels) were not reviewed.

Screening Criteria for Ground Water (Tables D-2A and D-2B)

Previous comments from TD indicated that two analytes, bromodichloromethane and dibromochloromethane, have ${}^{GW}GW_{Ing}$ PCLs that are approximately 5 times lower than the proposed EPA MCL. However, the overall project screening level is still the EPA MCL, which is for total trihalomethanes (the sum of the concentrations of bromodichloromethane, bromoform, chloroform, and dibromochloromethane) rather than individual compounds.

Screening Criteria for Sediment (Tables D-3A and D-3B)

On Table D-3A, benzo(a)anthracene and benzo(b)fluoranthene, which are listed under SVOCs and again under PAHs, do not have the correct draft ${}^{Tot}Sed_{Comb}$ PCLs listed either in one section or the other. Tables should be checked to make sure screening levels listed in multiple places are the same to avoid incorrect screening of these compounds.

The hexavalent chromium draft residential ${}^{Tot}Sed_{Comb}$ PCL has been included in Table D-3B under the column header "Protection of Benthic Invertebrates Screening Level," this should be corrected to be under the column header "TCEQ TRRP Tier I ${}^{Tot}Sed_{Comb}$ PCLs."

If you have any questions regarding this evaluation, please call me at (512) 239-2269.

cc: Toxicology Division (via e-mail), Remediation File