UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
SUPERFUND DIVISION
1445 Ross Avenue
Dallas, Texas 75202-2733

November 22, 2019

Sent via Electronic Mail

Mr. Mark Paddack
Project Manager
EA Engineering, Science, and Technology, Inc., PBC
405 State Highway 121 (Bypass)
Building C, Suite 100
Lewisville, Texas 75067

Re: Comments on the Addendum 01 Sampling and Analysis Plan for Remedial Investigation, Revision 00, October 21, 2019 for the Lane Plating Superfund Site, Dallas, Texas

Cerclis ID TXN000605240.

Dear Mr. Paddack:

The U.S. Environmental Protection Agency (EPA), and the Texas Commission on Environmental Quality (TCEQ) have reviewed the Addendum 01 Sampling and Analysis Plan for Remedial Investigation, Revision 00, for the Lane Plating Superfund Site in Dallas, Texas dated October 21, 2019. Comments from TCEQ are attached to this letter. The EPA has the following comments.

Should you have any questions or concerns, please call me at 214-665-3198.

Sincerely,

Signed November 22, 2019

Kenneth Shewmake
Remedial Project Manager

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General Comments:

1. A draft schedule for the rest of the RI should be included with this plan.

2. Consider moving the soil background sample locations further from the site. The school would work well.

3. We need soil samples in residential areas bordering site. I think 6, 0-6 inch samples would be sufficient.

4. We need to do more to evaluate the groundwater to surface water pathway. Consider using innovative methods like using a thermal FLIR camera to look for seeps. Look in possible sediment hotspot locations.

5. We need to determine if we have sediment hotspots that need to be remediated. For example, near LSW 06 and LSW 08 looks like a hotspot.

6. We need additional surface water and sediment sampling in ponds that contain fish of edible size.

7. Surface water background sampling currently lists 1 sample (BLSW-3) to include field parameters of Hardness, Total Dissolved Solids (TDS), Total Suspended Solids (TSS), Alkalinity, Total Organic Carbon (TOC) and Dissolved Organic Carbon (DOC). It is recommended to include 1 additional sample for these parameters from the unnamed stream to the east of the site to account for differences in location, habitat type, topography, and proximity to the site.

8. PFAS were prevalent in both groundwater and surface water results from the Phase 1 Data Summary Technical Memorandum (DSTM). Currently Phase II recommends only sampling PFAS for groundwater. The Conceptual Site Model (CSM) states that "groundwater may emanate as surface water at various points (e.g., gaining streams) around the site" (EA, 2019). With the potential for groundwater to surface water flow, I would recommend including surface water sampling of PFAS for the Phase II sampling and analysis plan (SAP).

9. PFAS should also be considered for background study. Background information would be useful in analyzing results from groundwater, as well as surface water if included. Although metals are the main risk driver for the site, the potential risk of PFAS to ecological receptors should be evaluated.

The following comments are from the Texas Department of State health Services.

10. We recommend that additional surface soil samples from locations closer to the baseball field to the south of the site be added. A sample near the tree line as well as a sample from the third-base outfield would be sufficient to allow us to gain a

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better understanding of potentially completed exposure pathways. We recommend that these soil samples be analyzed for all potential site-related contaminants.

11. We recommend that surface soil samples from residential areas west of the site be collected to evaluate the possibility of off-site contaminant migration. We recommend that these soil samples be analyzed for all potential site-related contaminants.

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Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 14, 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: Addendum 01 Sampling and Analysis Plan for Remedial Investigation, Revision 00, October 21, 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 Addendum 01 Sampling and Analysis Plan for Remedial Investigation, Revision 00, (plan) for the Lane Plating Works, Inc. Federal Superfund Site (site). The final TCEQ Superfund Section comments regarding this plan are listed below. The TCEQ Division Support comments that are specific to the ecological subject matter in this plan are included as attachments.

1. In order to better characterize and assess the groundwater contamination that is present near the on-site water wells, the TCEQ recommends the installation of a perched zone monitor well and an Austin Chalk monitor well in the vicinity of WW-1/WW-2. Since the water wells are hand dug and there is no information regarding the depth or construction of these wells, a perched zone well and an Austin Chalk well in this location could be helpful in providing representative groundwater data for these zones.

2. In order to assist in horizontal delineation, the TCEQ recommends the installation of additional Austin Chalk monitoring wells to the north of WW-1/WW-2 and along the western property boundary. An additional Austin Chalk monitoring well could also be helpful in the vicinity of DSB-2 or MW-05 in order to provide delineation to the south if groundwater contamination is discovered at ACMW-01.

3. The well construction of the two onsite water wells is currently unknown. The TCEQ recommends performing further investigation of these wells to determine their depth and construction in order to better understand the hydrogeologic conditions at the site.

4. The TCEQ recommends performing additional subsurface investigations to better characterize the site geology and hydrogeology. Specifically, additional investigations to evaluate the interconnectivity of the groundwater between the shallow perched zone and the underlying Austin Chalk would be helpful in determining if these two zones should be evaluated independently or as one unit.

5. The plan proposes the collection of subsurface soil samples at various locations near MW-02 and MW-03. Based on the data obtained from previous sampling events, it does not appear that these samples are necessary to delineate contamination in subsurface soil. The TCEQ requests clarification on the purpose and intent of collecting these subsurface soil samples. Please note that the TCEQ does not have any objection to the collection of surface soil samples at these locations, as they may be helpful in delineating exceedances of ecological screening levels.

6. Based on the data obtained during the Phase 1 Remedial Investigation, the highest concentrations of chromium, hexavalent chromium, and lead in surface soil was detected at MW-01, JSB-2, and DSB-8. Additionally, the highest concentration of hexavalent chromium in subsurface soil was detected at JSB-2. However, the proposed Phase 2 soil investigation does not appear to include a sufficient number of surface soil samples to further assess the horizontal and vertical extent of these metals in soil. The TCEQ recommends the collection of additional surface and subsurface soil samples in this area to better define the extent of soil contamination.

7. The TCEQ recommends the collection of additional surface and subsurface soil samples in the vicinity of JSB-4 to delineate the extent of hexavalent chromium and lead in soil.

8. The TCEQ recommends the addition of perfluorinated compounds (PFCs) to the analysis of soil samples collected from any unsaturated soils encountered at depths below 10 ft. below ground surface (bgs) during installation of the Austin Chalk monitor wells.

9. The plan proposes to collect background soil samples at eight locations. However, these eight soil sample locations are on property owned by the Responsible Party and are clustered within an area no greater than 75 ft. x 75 ft. The TCEQ recommends the collection of background samples from a much larger area in order to account for the heterogeneity of soil across the site. Additionally, where possible, it might be helpful to collect background soil samples from property not owned or operated by the Responsible Party, such as from public right-of-ways, etc,

10. The plan proposes to collect background soil samples up to a depth of 5 feet bgs. However, the results of the Phase 1 Remedial Investigation indicated that the highest concentrations of arsenic in soil were detected at depths up to 15 feet bgs. The TCEQ recommends the collection of additional background soil samples at depth intervals that correlate to the same lithology and/or depth intervals as those from the Phase 1 Remedial Investigation in order to evaluate the naturally occurring concentrations of arsenic throughout the soil column. It may be necessary to calculate separate site-specific background values for arsenic in shallow soil and in deeper soil, especially if those depth intervals represent different lithological soil types or other subsurface conditions.

If you have any questions regarding these comments, please contact me at (512) 239-3429 or scott.settemeyer@tceq.texas.gov.

Sincerely,

Scott Settemeyer

Scott Settemeyer, P.G., Project Manager
Superfund Section
Remediation Division
Texas Commission on Environmental Quality

SS/cw

Enclosures: 1) TCEQ Interoffice Memorandum dated October 31, 2019 from Greg Zychowski, Technical Program Support Team, Division Support Section, Remediation Division

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: Scott Settemeyer, Project Manager
Superfund Section, Remediation Division

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

Date: October 31, 2019

Subject: Addendum 01 Sampling and Analysis Plan (SAP) for Remedial Investigation, Revision 00
Lane Plating Works, Inc. Federal Superfund Site
5322 Bonnie View Road
Dallas, Dallas County, Texas
SUP179
October 2019

I have reviewed the subject document (EA, 2019a), with a specific focus on any ecological risk assessment (ERA) components. My review is summarized below, and **a response is requested for comment no. 3.** The TCEQ is available to meet with site representatives if necessary.

Comments

1. Surface water and sediment sampling – According to Figures A-4 and A-5, surface water and sediment sample locations will occur along the Unnamed Stream and Stream 5A2. The presence of at least two freshwater ponds is noted in the SAP and discussed further in the earlier Conceptual Site Model (CSM; EA, 2019b). Depending on the results of nearby Phase 1/historical concentrations (especially at SW-04, SW-05, LSED-1, LSED-3) and on the data from the Phase 2 assessment (especially at SW-04, SE-04, and SE-05), site representatives should consider sampling within each pond. Past and pending samples appear limited to areas adjacent to (but not within) either pond.

2. Soil background – The proposed sampling to determine soil background concentrations occurs north of the site. However, all eight locations occur within a roughly 360 square-foot area, with samples no more than 30 feet (approx. 9 meters) apart. This represents a fairly high sampling density within a very discrete area. Site representatives are encouraged to explain this decision, and to consider expanding the sampling area if possible. Also see comment 3 below.

3. Historical background – The recent CSM offers historical background data for soil, surface water, and sediment (See EA, 2019b insets for Figures 3 through 8, and corresponding results in Tables 1 through 3). Since these locations differ from those presented in the SAP Addendum, site representatives should clarify the role of each group of background samples. Are historical background data to be replaced by newer data (in different locations), or to be evaluated *with* the newer data?

Re: Addendum 01 SAP for Remedial Investigation, Rev. 00
Lane Plating Works, Inc. Federal Superfund Site; Dallas, Dallas County, Texas

References

EA. 2019a. 2019. Addendum 01 Sampling and Analysis Plan for Remedial Investigation, Revision 00. Lane Plating Works, Inc. Superfund Site. Dallas, Dallas County, Texas. October 2019.

EA. 2019b. 2019. Conceptual Site Model Technical Memorandum, Revision 01. Lane Plating Works, Inc. Superfund Site. Dallas, Dallas County, Texas. February 2019.