Message

From: Sivak, Michael [Sivak.Michael@epa.gov]
Sent: 8/30/2018 2:50:00 PM
To: Vaughn, Stephanie [Vaughn.Stephanie@epa.gov]; Kaur, Supinderjit [Kaur.Supinderjit@epa.gov]; Donovan, Betsy [Donovan.Betsy@epa.gov]
Subject: FW: Rolling Knolls HHRA update
Attachments: Rolling Knolls BHHRA memorandum 06252018.docx

Michael Sivak

sivak.michael@epa.gov
212.637.4310

From: Sivak, Michael
Sent: Monday, June 25, 2018 4:17 PM
To: Donovan, Betsy <Donovan.Betsy@epa.gov>; Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>; Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>
Subject: RE: Rolling Knolls HHRA update

Betsy, Supinder and Stephanie:

Thanks for the reminder. Here's the updated memo, with the additions Stephanie suggested (toxicity updates and lead). Please let me know if you have any questions or edits. Thanks!

Michael Sivak

sivak.michael@epa.gov
212.637.4310

From: Donovan, Betsy
Sent: Friday, June 22, 2018 3:36 PM
To: Sivak, Michael <Sivak.Michael@epa.gov>; Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>; Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>
Subject: FW: Rolling Knolls HHRA update

Hi Michael, Just checking in on the HHRA memo updates. We were asked for the memo during an Appendix B call with Geosyntec today. Thank you and let us know if you need anything!

From: Sivak, Michael
Sent: Monday, June 04, 2018 7:04 PM
To: Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>; Donovan, Betsy <Donovan.Betsy@epa.gov>; Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>
Cc: Clemetson, Michael <Clemetson.Michael@epa.gov>
Subject: RE: Rolling Knolls HHRA update

Stephanie:

I will revise the memo I drafted to include the updated toxicity values. I need to think more about the lead – I don't have access to the IEUBK model, so I'll need to figure out what to add. I will try to send you all something updated to review by the end of the week.

As for the ball field and shooting range, these areas were the subject of a dispute, with the Group arguing they are not part of the site, but the dispute finding that they were included in the RI/FS order, and so they should be included in the RI/FS. I've attached Carole's decision on this, in case you don't have it. My understanding (I was the SC at the time of this dispute) was that the Group would include these areas in all documents through ROD; if no unacceptable risk was identified in these areas, that would be discussed in the ROD. I'm not sure if they can be removed from the official site definition by simply saying there was no risk, or if you'd need to do a partial deletion to remove these parcels from the Superfund site (maybe like the American Cyanamid partial deletion). Angela was involved in the dispute, as well, so you can always talk to her about this.

Michael Sivak
212.637.4310

From: Vaughn, Stephanie
Sent: Sunday, June 03, 2018 10:20 AM
To: Sivak, Michael <Sivak.Michael@epa.gov>; Donovan, Betsy <Donovan.Betsy@epa.gov>; Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>
Cc: Clemetson, Michael <Clemetson.Michael@epa.gov>
Subject: RE: Rolling Knolls HHRA update

Hi Michael S,

Thank you for preparing the memo. I don't have any comments on what you wrote, but do have a couple of questions:

1. Should the memo also address the new lead analysis?
2. I think the ARS memo also updated some toxicity values. Should this be mentioned?

I also have a bigger picture question related to the FS – the ARS memo calculates revised numbers for the Baseball Field and the Shooting Range. For each area, there is only one COC that exceeds the NJDCSRS (B(a)P) and it only exceeds at one location in each area (with a max concentration of 1 or 0.77 ppm, vs SRS of 0.5; the ARS is calculated as 1).

The BHHRA concludes that there is no unacceptable cancer risks or non-cancer hazards associated with the ball field or shooting range. We told the PRPs they don't need to calculate ARSs for these areas, but they did anyway, at NJDEP's request – which I was thinking is fine, since it strengthens our argument that no action is necessary in these areas (I think, right?).

However, I was just looking at the FS and they included PRGs for the Baseball Field and Shooting Range, and they included both B(a)P and Vanadium for the shooting range. I don't think this is appropriate. Either there's no risk in these areas and no action is warranted, or there is risk and they need to take an action. Their alternatives do not include any action in these areas.

To put things in perspective, the max human health risks associated with the shooting range and ball field were 5x10-8 and 2x10-7, with His of 0.002 for each. They developed PRGs for B(a)P and vanadium. The max concentrations of these were 1 for B(a)P and 78.4 for vanadium. The ARS they calculated for B(a)P was 1 ppm, and they didn't develop one for vanadium since the NJDCSRS is 78.

Michael Clemetson – I doubt it, but did Eco risk bring these in? I'm confused as to why they would add PRGs for these areas to the FS.

Finally, assuming no action is warranted for these areas, can we remove them from the definition of the site? Is there a way to formalize this moving forward? Through the ROD?

Thanks,
Stephanie

From: Sivak, Michael
Sent: Friday, June 01, 2018 3:57 PM
To: Donovan, Betsy <Donovan.Betsy@epa.gov>; Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>; Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>
Subject: RE: Rolling Knolls HHRA update

OK, thanks for the warning.

A brief summary of the issue in advance would be helpful.

Michael Sivak
212.637.4310

From: Donovan, Betsy
Sent: Friday, June 01, 2018 3:49 PM
To: Sivak, Michael <Sivak.Michael@epa.gov>; Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>; Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>
Subject: RE: Rolling Knolls HHRA update

Thank you! I will review it soon. Please see my "Heads Up" note:

In the meantime, CDM has reviewed the FS and we discussed any major concerns today. I think they have concerns about the residual human health risk approach presented in Appendix B. I didn't catch the exact nature of the issues, but I think it's got to do with comparing total PCBs to PCB congeners in the evaluation. They are talking about doing a relatively simple calculation to compare the proper contaminants – apples to apples v. apples to oranges. But, then at one point they asked if they would need to do a new risk assessment for the area that will not be capped – I said **"NO"**. I suggested we have a call with you and CDM risk assessors to discuss the approach and the PCB concerns as soon as we can schedule it – maybe Tuesday or Wednesday – before we get official comments. So please stay tuned for a CDM call with Christine and Kristen and others. I also asked if they could provide a brief summary of the issue in the meeting invitation. Thanks and have a great weekend!!

From: Sivak, Michael
Sent: Friday, June 01, 2018 3:12 PM
To: Donovan, Betsy <Donovan.Betsy@epa.gov>; Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>; Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>
Subject: Rolling Knolls HHRA update

Here's the memo I drafted, explaining the change to the exposure frequency. Please review and let me know what you think. Feel free to edit away!

Michael Sivak
Chief, Passaic, Hackensack and Newark Bay Remediation Branch
EPA Region 2 Superfund Program

sivak.michael@epa.gov
tel: 212.637.4310