Message

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Sent: 7/10/2020 10:22:48 PM
To: Krall, Scott M [skrall@ppg.com]
CC: Ken Bird [kbird@woodardcurran.com]; Sivak, Michael [Sivak.Michael@epa.gov]
Subject: EPA response for FS
Attachments: FS Report Figures (EPA comments dated 070820).pdf; Table 6-2 and 6-3 _070820.xlsx; Appendix B Revised Cost Tables 070820.xlsx; Appendix B Riverside_Basis of Cost_070820.docx; Table 3-6 GW Wells Only ARAR_070820.xlsx; Table 3-1 - Summary of COPC_070820.xlsx; Table 5-1 and 6-1_071020.xlsx; Riverside Feasibility Study Text Revised by EPA July 10 .docx

Hi Scott,

We completed our review of the FS however we have not completed our formal response to PPG's letter. In the interest of time, I am forwarding our redline and comments on the FS so that PPG can begin reviewing. The letter will provide more detail and should be sent Monday but, generally, EPA believes that lead is a site-related contaminant and is impacting the groundwater. Due to this determination, the proposed groundwater alternative 5 would not meet groundwater ARARs and is screened out (additional concerns are mentioned in the FS). Table 5-1 and Table 6-1 need to be restored to EPA's June 22 version (attached).

Furthermore, it was brought to our attention that guidance on institutional control states that ICs "shall not substitute for active response measures…as the sole remedy unless such active measures are determined not to be practicable, based on the balancing of trade-offs among alternatives that is conducted during the selection of remedy." https://www.epa.gov/sites/production/files/documents/final_pime_guidance_december_2012.pdf This affects soil/fill alternative 2. ICs along with a fence is not a permanent or enduring engineering control for contaminated soils and the NAPL removal does not address the soil contamination across the site. In the interest of time, we only changed the comparative analysis to state that soil/fill alternative 2 does not meet ARARs.

Below are a few items that need to be updated:

1. TEXT – Please review edits and comments in the word document
2. FIGURES – There are a few figures that need edits. Please see attached file.
3. COSTS – Some cost estimates needed to be adjusted due to the reduced cap acreage; Attached is the corrected Appendix B and Table 6-2.
4. TABLE 3-1 – Please see attached.
    a. We accepted edits to move the sentence on vapor intrusion from Section 3.1.2 to Section 3.4.2. To be consistent with the text, the title of Table 3-1 was updated (see attachment).
    b. Footnote 2 was deleted and has been restored (see attachment).
5. TABLE 3-6 - Nickel needs to be removed from Table 3-6 (since nickel has no ARAR exceedances). See attachment

Let me know if you have any questions. Please review and let us know your response by Friday 7/17. Also, please raise any concerns as soon as possible because we do not have any time for week long reviews after this point.

Thanks,

Josh

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