Message

From: Joe Bianchi [jbian@amphenol-aao.com]
Sent: 8/30/2018 4:03:49 PM
To: Bury, Carolyn [bury.carolyn@epa.gov]
CC: Brad Gentry (bgentry@iwmconsult.com) [bgentry@iwmconsult.com]; Sundar, Bhooma [sundar.bhooma@epa.gov]; Neal, Conor [Neal.Conor@epa.gov]
Subject: RE: EPA Conditional Approval VI Work Plan for Residence

Thank you for your quick response and consideration of our concerns.

1. That was our understanding but the letter seemed to point to the agency changing its stance on this. Testing within the bathroom is part of our work plan. As far as other living space areas, we have discussed this in the past and feel that the presence of sub slab and above slab concentrations are sufficient to determine if a mitigation system is required due to possible off-site migration of constituents. Living space testing is difficult and very intrusive to the home owner/tenant and the results do not always provide evidence of contamination source. Rather than impose on the residents, we prefer to follow the state and EPA guidelines as they pertain to sub and above slab (as well as crawl space) concentrations in making determinations for next steps.

2. My point was not to dispute the agency's authority on the matter of 1, 4 dioxane. We are currently working with Region 2 to sample sites in NYS during our quarterly monitoring program, and have already sampled several NYS lead sites under a similar request. My concern was tying this into the current investigation which could lead to further confusion over site issues, in particular as they affect off site locations. If they agency would like to request that we sample for 1, 4 dioxane during our normal monitoring regimen, we will gladly consider it and provide that information.

From: Bury, Carolyn [mailto:bury.carolyn@epa.gov]
Sent: Thursday, August 30, 2018 11:46 AM
To: Joe Bianchi
Cc: Brad Gentry (bgentry@iwmconsult.com); Sundar, Bhooma; Neal, Conor
Subject: RE: EPA Conditional Approval VI Work Plan for Residence

Hi Joe,

1. Comment One - Yes, EPA wants you to sample bathrooms as described in the WP.

IDEM reviewed the WP and asked why there were no samples in the living space besides the bathrooms.

I was trying to address their concern in the comment, to make the approved approach more transparent, without requesting a work plan revision. IDEM was looking for the next VI investigation step in the WP of sampling in the ground floor after sub slab soil gas and basement and crawlspace indoor air were collected (in evaluating the "standard" vapor intrusion pathway). At our meeting, Amphenol stated its choice to omit the living space measurement and base a conclusion about a complete pathway (and the corresponding evaluation re need for mitigation) using data from the basement and crawlspace indoor air results. Since the workplan did not describe this approach clearly, I added the comment.

The bathroom samples correspond to the sewer preferential pathway (vs the "standard" VI pathway).

We will ask that this approach be clearly discussed in the Resident VI investigation report.

The re-issued conditional approval letter will expand the comment to make it more clear.

2. Condition Three - adding 1,4-dioxane analysis. We will drop this condition as it is not a risk-driver when compared to other volatiles such as TCE, PCE and vinyl chloride and based on your information re the cannister prep from the lab.

As the facility used 1,1,1 -TCA as a solvent and 1,4 dioxane was historically used as a stabilizer in this solvent, it is considered a constituent of interest and should be included as an analyte in additional investigations to evaluate human health risk. However, measurement of 1,4 dioxane in indoor air can wait to see whether it is detected in groundwater. (Based on its high affinity for water, 1,4 dioxane travels much faster in groundwater than the other constituents of concern).

EPA has a Fact Sheet explaining that 1,4-dioxane is a likely contaminant at many sites contaminated with certain chlorinated solvents (particularly 1,1,1-trichloroethane [TCA]) because of its widespread use as a stabilizer for chlorinated solvents (EPA 2013a; Mohr 2001). See https://www.epa.gov/sites/production/files/2014-03/documents/ffrro_factsheet_contaminant_14-dioxane_january2014_final.pdf.

If you disagree about our authority to require analysis for this COC in general, I can discuss the topic with our attorney. However, I believe that the order covers newly discovered releases or potential releases and therefore covers new information that old releases may include additional chemicals (and daughter products) of concern.

Thanks.

Carolyn

Carolyn Bury
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From: Joe Bianchi [mailto:jbian@amphenol-aao.com]
Sent: Wednesday, August 29, 2018 3:46 PM
To: Bury, Carolyn <bury.carolyn@epa.gov>
Cc: Brad Gentry (bgentry@iwmconsult.com) <bgentry@iwmconsult.com>; Sundar, Bhooma <sundar.bhooma@epa.gov>; Neal, Conor <Neal.Conor@epa.gov>
Subject: RE: EPA Conditional Approval VI Work Plan for Residence

Carolyn - thank you for the conditional approval. A couple of items of concern. First, in comment (1) it appears that you do not want us to sample the bathrooms. These were added at EPA request during our discussion and will be taken out of the work plan if not required. Second, in condition (3), although I am aware that the EPA has an interest in identifying the presence of 1, 4 dioxane in remediation programs, I do not agree that sampling for it should be a "condition" of approval as it is not listed in the order or a contaminant of concern. If you want to request that we sample for this analyte in conjunction with the ongoing investigation, we will consider performing the work and providing the results in a separate report. Additionally, we do not know if the equipment provided to us by the lab is certified for 1, 4 dioxane or if the lab can perform the analysis.

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From: Bury, Carolyn [mailto:bury.carolyn@epa.gov]
Sent: Wednesday, August 29, 2018 4:27 PM
To: Joe Bianchi
Cc: Brad Gentry (bgentry@iwmconsult.com); Sundar, Bhooma; Neal, Conor
Subject: EPA Conditional Approval VI Work Plan for Residence

Hi Joe,
Please give me a call if you have questions.
IDEM has assigned someone to do the field oversight. I need to speak with him but he is out until tomorrow.
Carolyn

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