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September 1, 2015

Stephanie Vaughn
17-mile LPRSA RI/FS Remedial Project Manager
U.S. Environmental Protection Agency, Region 2
290 Broadway
New York, NY 10007-1866

Via Electronic Delivery

Re: Lower Passaic River Study Area (LPRSA) Draft Baseline Human Health Risk Assessment (BHHRA) – Cooperating Parties Group (CPG) Response to USEPA Region 2 (Region 2) July 15, 2015 Supplemental Comments – May 2007 Administrative Agreement and Order on Consent for Remedial Investigation/Feasibility Study – CERCLA Docket No. 02-2007-2009 (AOC)

Dear Ms. Vaughn:

On behalf of the CPG, enclosed please find the CPG's Responses to Region 2's July 15, 2015 Supplemental Comments on the draft 17-mile BHHRA (RTCs).

The CPG plans to prepare and submit a revised 17-mile BHHRA following review and resolution of these supplement RTCs as well as the RTCs submitted on August 21, 2015. Pursuant to Region 2's letter dated July 20, 2015 and our recent discussions, the CPG understands Region 2 will conduct a quick review (within 30 days) of the RTCs and upon notice from Region 2 that the RTCs form an acceptable basis from which to revise the draft 17-mile BHHRA, the CPG will submit a revised BHHRA within 45 days. Please let us know if Region 2 will not be able to conduct the review of these and the CPG's August 21, 2015 RTCs in that timeframe.

The CPG continues to reserve its right to take other steps, such as invoking dispute resolution under Section XV of the AOC to protect its interests, after Region 2 completes its review of the RTCs and advises the CPG of the results of that review.

The CPG requests that Region 2 include this letter into the Administrative Record for the 17-mile LPRSA operable unit of the Diamond Alkali Superfund Site.

Please contact Bill Potter or me with any questions or comments.

Very truly yours,

de maximis, inc.

Robert H. Law, PhD
CPG Project Coordinator

cc: Ray Basso, EPA Region 2
Walter Mugdan, EPA Region 2
Sarah Flanagan, EPA Region 2
CPG Members
William Hyatt, CPG Coordinating Counsel
Willard Potter, CPG Project Coordinator