To: Robert Law[rlaw@demaximis.com]; Nace, Charles[Nace.Charles@epa.gov]
Cc: Willard Potter[otto@demaximis.com]; William Hyatt[william.hyatt@klgates.com]; Flanagan, Sarah[Flanagan.Sarah@epa.gov]
From: Vaughn, Stephanie
Sent: Tue 7/28/2015 12:15:42 PM
Subject: RE: Outstanding BERA items....
Reference and SQT Methodology_Revised 072715.pdf

My apologies…the cover email is correct. Attached is the corrected methodology.

From: Robert Law [mailto:rlaw@demaximis.com]
Sent: Monday, July 27, 2015 8:05 PM
To: Nace, Charles; Vaughn, Stephanie
Cc: Willard Potter; William Hyatt; Flanagan, Sarah
Subject: Re: Outstanding BERA items....

Stephanie:

Please clarify the conflicting statements regarding the use of the UOP Mullica River data.

1. Region 2's July 27 cover email states:

(2) Mullica Freshwater data
Upon further review of the Mullica data, it was determined that there is not a dataset associated with the freshwater p
Mullica River. Therefore, EPA withdraws the comment to include a comparison to the freshwater portion of the Mullica

2. Region 2's July 27 attachment states:

concentrations. Each of the four reference data sets -- Above Dundee Dam (all data collected, not jus the area closest to the dam), Jamaica Bay, Mullica River (include freshwater data collected as part of Berry's Creek investigation), Mullica River/Great Bay -- should have the following two methods employed to censor the dataset:

Thank you.

R/

Rob

Robert Law, Ph.D.
de maximis, inc.
rlaw@demaximis.com
Voice: 908-735-9315
Fax: 908-735-2132

>>> "Vaughn, Stephanie" <Vaughn.Stephanie@epa.gov> 7/27/2015 4:55 PM >>>

Hi Rob,

Below are responses to the outstanding items related to the draft BERA. Please let me know if there is any other information/feedback you are looking for from us. We are available to discuss this with you from 3:30 to 5 tomorrow, or Wednesday afternoon.

(1) OC-normalized language (this was sent to you on 7/22):

Initial chemical screening should be performed using data that are not normalized for total organic carbon (TOC). Subsequent steps of the ERA process, Step 3 and Step 6, should use carbon-normalized data for applicable chemicals (e.g., PAHs, dieldrin, endrin, nonionic organics) and associated TRVs/ESLs. Additionally, the risk characterization section should discuss the comparison of results based on both carbon-normalized and non-normalized effects data and/or values.

(2) Mullica Freshwater data

Upon further review of the Mullica data, it was determined that there is not a dataset associated with the freshwater portion of the Mullica River. Therefore, EPA withdraws the comment to include a comparison to the freshwater portion of the Mullica River.

(3) Censoring of Above Dundee Dam data

Based upon our review of the data collected above Dundee Dam, and applying the freshwater criteria provided previously, we have found there are six stations (UPRT18H, URPT18J, URPT18K, UPRT20C, UPRT20D, UPRT21F) that meet the survival criteria for chironomids and the PECq criteria of 0.5. EPA supports using the six stations identified above for use as the freshwater reference above the Dundee Dam for all of the SQT parameters.

(4) Reference and SQT Methodology Approach

The criterion associated with conducting an outlier test for both the estuarine and freshwater reference data sets is being withdrawn based on concerns raised by the CPG during our previous discussions of the SQT evaluation. Other modifications were also made to the SQT approach. Please see the attached final revised Reference and SQT Methodology approach.

Thanks,
Stephanie