**To:** Green, Holly[Green.Holly@epa.gov]; Bergman, Ronald[Bergman.Ronald@epa.gov]
**From:** Burneson, Eric
**Sent:** Mon 1/27/2014 3:38:41 PM
**Subject:** FW: WV Freedom Spill - Looking forward
SWP rev.docx

Spoke to Bill Arguto just now. Ex. 5 - Deliberative
Ex. 5 - Deliberative
Ex. 5 - Deliberative Unless you have something to Bill thought the next step would be to review responses once OCIR sends them around for comment.

**From:** Burneson, Eric
**Sent:** Monday, January 27, 2014 8:55 AM
**To:** Green, Holly; Bergman, Ronald
**Subject:** FW: WV Freedom Spill - Looking forward
**Importance:** High

Holly and Ron:

Just wanted to see if there is anything you need from SRMD on this assistance requested by Region 3. I double checked with David to be certain that Critical Zones of Concern is not a term used in vulnerability assessments (in which case we are prohibited by law from divulging any info). He confirmed that this is not something that is a part of the VA but it is used in the context of Source Water Assessments. Let me know if you think there is something we can do to help respond.

Eric

**From:** Arguto, William
**Sent:** Saturday, January 25, 2014 1:32 PM
**To:** Burneson, Eric; Green, Holly; Travers, David
**Cc:** binetti, victoria; Kanetsky, Charles
**Subject:** WV Freedom Spill - Looking forward
**Importance:** High

Eric, Holly

You might have seen the request from Senator Rockefeller's office re the WV Freedom spill. I have copied the complete request below. It's being coordinated through OICR. I have been responding to several of these questions with the great help of Dan and Steve. I have copied below a question on SWP that may be more national in scope for the SWP program, if I am reading it right. It's the "looking forward question" We do have the Source Water Assessment that was done by the State for the facility and a response from the facility on their activities on the SWAP. I had forwarded these Peter the other day. We also put together a white paper on the issue with generic SWP info– see attached

Also Patty Kay provided some initial thoughts on improvements in response to these events.

Need to identify most vulnerable (basis could be population, surface water sources) water systems and consider upstream dischargers and storage facilities as well as location of any monitoring stations

Based on above, strongly encourage states to look at watersheds for source water protection and other emergency preparedness efforts

Condition of water system raises questions on infrastructure repair, operational capacities, backup sources, emergency interconnects

Should EPA have a process in place to quickly evaluate chemicals for which there are no standards or health advisories, and their end points (infants, sensitive populations, etc.), to be able to play a more active role vs. reliance on ATSRD values? Or for use to confirm values developed by others?

Regional laboratory capabilities and how to quickly ramp up to provide services

I don't know if you had an OW meeting to discuss the programmatic issues. If you have any thought regarding the moving forward question that would be great.

Thanks

Bill

Looking Forward:

3. Was EPA supplied a copy of the 2002 study (as part of the Safe Drinking Water Act) that identified Critical Zones of Concern? And do you have any recommendations for protections?

Complete email request

We have been asked to work with ocir on a coordinated response to questions below as quickly as possible. Would you please reply To all with any answers you have previously provided. If there are any regional answers we are still working on would you please provide an estimate of timeframe for response. I apologize for the weekend request - please see below Thanks. LInda.

Senator R office understands that we have responded to several WV spill questions via conference call, but below are questions that they would like responses to in writing ASAP. Several of these have been responded to verbally, and several contain expanded Qs from those initially asked. We need to respond again.

In addition, there may be Qs that we have/need to consult with other agencies to respond to. For those Qs, please note the response if we have one, and also note if another agency is the lead and/or if we need to consult with another agency for the response. The staff believe that they have directed questions to various agencies appropriately, so we need to id those that we are not the lead for the response.

Here are the Qs we need to address. There will need to be coordination with HQ/OEM but I want the region to coordinate based on the call yesterday. Please keep me posted on the status of responses. Thank you!!

Chemical information (other than health effects):

1. What has EPA been able to determine about the composition of Crude MCHM? 2. What can EPA tell us about the latest development that a substance known as PPH was also held in the tank in addition to MCHM?

3. Your office stated that EPA will be independently testing the contents of the remaining tanks at Freedom Industries that. How quickly will these tests be shared with other agencies working to protect public health and environment?

4. What is the difference between PPH and PPH, stripped?

5. What is the water solubility of MCHM and PPH / PPH, stripped? We have seen conflicting reports on hydrophobic vs. hydrophilic 6. If the carbon filters at WV-American Water were compromised, would they have been sufficient to filter PPH?

7. As people try to flush their systems they want to know how these two chemicals behave. Do they cling to materials like glass or metal? Do they permeate plastic/PVC?

8. Many constituents are still experiencing a strong MCHM odor and others have been seeing a residue (sometimes oily). Could you help to address the smell and residue issues that are affecting customers at the end of the water lines?

9. Could MCHM contain a long-chain polymer that might obscure the ability to detect other substances?

Remediation:

1. We are hearing of new reports of spikes in MCHM levels in recent days. Have you heard these reports? Could this happening as a result of runoff from the contaminated site? If so, what is being done to prevent this other than the lined trenches?

2. What timeline is appropriate for remediation of this type?

3. Are there any prior or ongoing concerns with the remediation that would cause EPA to exercise primacy? How/When would EPA determine that they should step in to managing this event?

Looking Forward:

1. Following Senator Rockefeller's request to begin a long-term study on the health effects of

these chemicals, in conjunction with the CDC, what are your next steps?

2. It is our understanding that EPA, along with OSHA, Department of Labor and others, will be looking at bulk chemical storage and transport on a national level. Has this process begun?

3. Was EPA supplied a copy of the 2002 study (as part of the Safe Drinking Water Act) that identified Critical Zones of Concern? And do you have any recommendations for protections?