From: Gorin, Jonathan
To: John M. Hoffman
Cc: Carrie McGowan
Subject: RE: BERA - one more thing
Date: Tuesday, August 13, 2013 1:39:00 PM

Yes, that's the full comment.

From: John M. Hoffman [mailto:jmhoffman@ashland.com]
Sent: Tuesday, August 13, 2013 12:37 PM
To: Gorin, Jonathan
Cc: Carrie McGowan
Subject: Re: BERA - one more thing

Hi Jon,

Geosyntec has reviewed this comment (I believe previously sent by you)and commented on the additional text required - I believe they were waiting on the NRRB recommendation letter to assure that the response is appropriate for the comment. Is the comment below from the NRRB letter, or what will be in the letter?

Carrie,

Can you please follow up with Geosyntec and Jon.

Thanks
John

John Hoffman
Project Manager - Remediation
302 995-3233

Ashland Inc.
Environmental Health Safety & Product Regulatory
500 Hercules Road
Wilmington, DE 19808-1599

M: 302 668-7259
F: 302 995-3485

ashland.com

From: "Gorin, Jonathan" <Gorin.Jonathan@epa.gov>
To: John M. Hoffman/RCWilm/NA/Herc@Ashland, Carrie McGowan <Carrie.McGowan@ehs-support.com>,
Date: 08/13/2013 12:14 PM
Subject: BERA - one more thing

John, Carrie, I think I mentioned this before. The NRRB had one comment on the BERA:

The Board notes that the tissue-based avian embryo effects levels for tetrachlorodibenzo-p-dioxin (TCDD) toxic equivalency quotient (TEQ) may not be protective based on recent studies (Head JA, ME Hahn and SW Kennedy. 2008. Key amino acids in the aryl hydrocarbon receptor predict dioxin sensitivity in avian species.), which describe categories of species sensitivity relative to dioxin-like compounds. Given that the ecological risk estimates are above acceptable levels based on other contaminants of concern, the Board recommends that the Region discuss this issue in the baseline ecological risk assessment in order to more accurately identify any potential uncertainties in the characterization of avian risks.

Can Geosyntec add a few paragraphs to mention these studies? Mainly as a head's up for anyone using the LCP BERA as a reference – so they know there's some new studies which weren't used by us.

Jon

- -
This e-mail contains information which may be privileged, confidential, proprietary, trade secret and/or otherwise legally protected. If you are not the intended recipient, please do not distribute this e-mail. Instead, please delete this e-mail from your system, and notify us that you received it in error. No waiver of any applicable privileges or legal protections is intended (and nothing herein shall constitute such a waiver), and all rights are reserved.