From:	Craig Ziady
To:	Casey, Carolyn
Cc:	Wainberg, Daniel; Zucker, Audrey; Murphy, Jim; Miano, John (DEP); Lombardo, Ginny; Bruce Hoskins; Steve Drohosky; Gregory Flaherty
Subject:	final letters
Date:	Friday, July 20, 2018 4:27:14 PM
Attachments:	Final Elliott Landing Letter.7.20.pdf Final 171X Letter.7.20.pdf Final 158D Letter.7.20.pdf Final 149J Letter.7.20.pdf Final 135C Letter.7.20.pdf

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Hi again Carolyn – Further to our exchange of correspondence, please find enclosed the final letters. Please let me know if you have any questions.
Thank you.

Craig J. Ziady
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From: Craig Ziady
Sent: Thursday, July 19, 2018 4:04 PM
To: Casey, Carolyn
Cc: Wainberg, Daniel; Zucker, Audrey; Murphy, Jim; Miano, John (DEP); Lombardo, Ginny; Bruce Hoskins; Steve Drohosky; Gregory Flaherty; Dennis Clarke
Subject: RE: July 2 submittals

Hi Carolyn – Thank you for understanding and for your practical proposed resolution. We can agree to the requested changes and will re-format the letters for distribution. I should have them to you tomorrow in final form.

Given the foregoing, we will agree to disagree on the "review and approval" point, as we continue to believe that the Order does not support EPA's interpretation.

Thanks again.
Craig

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From: Casey, Carolyn [mailto:Casey.Carolyn@epa.gov]
Sent: Thursday, July 19, 2018 1:36 PM
To: Craig Ziady
Cc: Wainberg, Daniel; Zucker, Audrey; Murphy, Jim; Miano, John (DEP); Lombardo, Ginny; Bruce Hoskins; Steve Drohosky; Gregory Flaherty; Dennis Clarke
Subject: RE: July 2 submittals

Craig,

We have reviewed your suggested revisions to these five letters. Although we disagree with a number of your suggested edits, we are willing to agree to most of them in order to avoid further delays.

With respect to the letter concerning the Elliot Street Landing parcel, we accept your revised letter as submitted. With respect to the other four letters, you should delete the following language in the 5th paragraph: *"even though our comparison of indoor air and soil gas data did not yield an obvious correlation to vapor intrusion."* We are willing to accept the remainder of your changes to these four letters.

Please re-submit the revised letters to EPA by close of business today, or at the latest tomorrow July 20, for EPA approval. Within one day of your receipt of EPA approval, you should mail or deliver the final signed letters to their recipients. You should also let the letter recipients know that EPA and Cummings are available for a follow-up discussion concerning these letters.

Finally, contrary to a statement in your transmittal email, please be reminded that these letters to tenants concerning sampling results are all subject to EPA review and approval under the AOC. Paragraph 17.j. of the AOC states:

> j. Submission of Documents and Approvals: With the exception of progress reports and the HASP, **all** written documents prepared by Respondents pursuant to this Order shall be submitted according the procedures set forth in Section XIV (Reporting and Document Certification) and will be reviewed and approved by EPA in accordance with Section XV (Agency Approvals/Additional Work/Modifications).

See also Paragraph 17.f. of the AOC, which requires public outreach subject to EPA review and approval requirements, and specifically reserves EPA and MassDEP's right to conduct their own public outreach.

If you have any questions, please let me know.
Carolyn

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casey.carolyn@epa.gov

From: Craig Ziady [mailto:craig@cummings.com]
Sent: Wednesday, July 18, 2018 4:56 PM
To: Casey, Carolyn <Casey.Carolyn@epa.gov>
Cc: Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Zucker, Audrey <Zucker.Audrey@epa.gov>; Murphy, Jim <Murphy.Jim@epa.gov>; Miano, John (DEP) <john.miano@state.ma.us>; Lombardo, Ginny <Lombardo.Ginny@epa.gov>; Bruce Hoskins <BHoskins@FslAssociates.com>; Steve Drohosky <sjd@cummings.com>; Gregory Flaherty <gxf@cummings.com>; Dennis Clarke <dac@cummings.com>
Subject: RE: July 2 submittals

Hi Carolyn – Thanks for following up and thank you again for authorizing the work to proceed this week, without requiring 21-days notice.

Yes, we are confirmed for indoor air sampling tomorrow. I enclose an annotated plan reflecting the approximate locations of the air canisters.

As for the letters, however; no, they were not distributable in the form proposed. While we may end up with data sufficient to require a communication like the one you proposed, we are not there yet. We do not believe that such a open-ended and alarmist correspondence at this point is justified by the data. Without clarification, more information, and context, EPA's proposed letters are likely to leave recipients with an incorrect impression that there is a major problem at Cummings Center. There would be no way to un-ring that bell – not just for the day care owners, but for all 2,000+ clients at the facility.

We enclose further revised letters (the Suite 135-C letter is representative of the changes required to the remaining day care letters), which we are prepared to distribute, as well as redlined versions of the Elliott Landing letter and the Suite 135-C letter that track the changes. (If the attachments are too large to go through collectively, I will send a second email presently). Although no requirement exists in the Consent Order for formal EPA review/approval of these letters, we continue to believe that we should endeavor to reach a consensus with EPA – both as to the work to be conducted and the manner in which the approach and the results are communicated to parties-in-interest. We hope that the enclosed revisions will allow us to reach such a consensus on this particular outreach. If you believe that a call might be helpful to push these over the finish line, we will make ourselves available in short order.

Thank you in advance. Please contact me if you have any questions.

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From: Casey, Carolyn [mailto:Casey.Carolyn@epa.gov]
Sent: Wednesday, July 18, 2018 9:45 AM
To: Craig Ziady; bhoskins@fslassociates.com; Steve Drohosky
Cc: Wainberg, Daniel; Zucker, Audrey; Murphy, Jim; Miano, John (DEP); Lombardo, Ginny
Subject: RE: July 2 submittals

Craig, did the letters go out of Monday as requested in my email below? Will there be indoor air sampling this week as you stated?
Thank you,
Carolyn

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From: Casey, Carolyn
Sent: Thursday, July 12, 2018 1:12 PM
To: 'craig@cummings.com' <craig@cummings.com>; 'bhoskins@fslassociates.com' <bhoskins@fslassociates.com>; 'Steve Drohosky' <sjd@cummings.com>
Cc: Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Zucker, Audrey <Zucker.Audrey@epa.gov>; Murphy, Jim <Murphy.Jim@epa.gov>; 'Miano, John (DEP)' <john.miano@state.ma.us>
Subject: RE: July 2 submittals

Craig and all,

Please see the attached letters with our revisions. In addition, we included a letter for Elliot Landing. Consistent with Section XV, Paragraph 30.a.(2) of the Administrative Consent Order, we greatly simplified the letters, added language about mitigation, and reduced the attachments to include indoor air results only.

The letters submitted to EPA contained too much information (soil gas data, MassDEP Shortfoms, and details of the data evaluation) in the body of the letters; our earlier request had been that the data be included with the letters. Although we asked for this additional evaluation (Shortforms, comparison of indoor air and soil gas data) the intent was not to provide it to the suite managers. The request was made so that we had supporting documentation on file of your evaluation and the conclusions that would be included in a cover letter that went out with the data.

It's apparent, that even after our conference call on June 19th, that we still have some disagreements about the data evaluation and conclusions. We believe that these revised letters allow for dissemination of the indoor air information while we continue to work through any disagreements and you can move forward with the pathway elimination/mitigation.

The following should be reviewed and corrected as appropriate.

- Delete the red highlights in the indoor air data summary tables. The purpose of the highlight is not defined in the notes.
- Update figures 1 and 2 to also reflect the current name for suite 158-D. The former name and suite number should also be retained to maintain the history.
- Verify the figure is correct for suite S 149-J. Add the play yard to the figure and verify the direction of the north arrow (should it be rotated 180 degrees?).

We are requesting that you send the final letters, with copies to EPA, by close of business Monday July 16.

Thank you,
Carolyn

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From: Craig Ziady [mailto:craig@cummings.com]
Sent: Monday, July 02, 2018 4:45 PM
To: Casey, Carolyn <Casey.Carolyn@epa.gov>; bhoskins@fslassociates.com; Steve Drohosky <sjd@cummings.com>
Cc: Zucker, Audrey <Zucker.Audrey@epa.gov>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>;

Murphy, Jim <Murphy.Jim@epa.gov>
Subject: RE: July 2 submittals

Carolyn – Please find enclosed further revised versions of the letters from the LSP to the General Manager of Cummings Center. These will be forwarded by Mr. Drohosky to the individual day care owners.
We will submit a revised schedule shortly.
Thank you.

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From: Casey, Carolyn [mailto:Casey.Carolyn@epa.gov]
Sent: Friday, June 22, 2018 8:29 AM
To: Craig Ziady; bhoskins@fslassociates.com; Steve Drohosky
Cc: Zucker, Audrey; Wainberg, Daniel; Murphy, Jim
Subject: FW: disapproval, conference call follow-up and RTC

Craig and all, thank you for being on the conference call on Tuesday. As a follow-up, please see the attached disapproval letter for the schedule. Also, as a reminder, EPA needs the draft letters to the suite managers/parents by July 2, 2018. We anticipate that the letter will to ready to distribute within a week of the draft submittals to EPA. Please see the email below, as a reminder on upcoming submittals and deadlines (all extended to July 2 as the June 30th is a Saturday). Please note that one date was changed in the email below from 2019 to 2018 to correct a previously noted error.

Also attached are the response to comments on the progress report submitted in your 5/29/18 email.

Thank you,
Carolyn

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From: Casey, Carolyn
Sent: Friday, June 08, 2018 2:03 PM
To: 'Craig Ziady' <craig@cummings.com>
Cc: bhoskins@fslassociates.com; Steve Drohosky <sjd@cummings.com>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Zucker, Audrey <Zucker.Audrey@epa.gov>; Gregory Flaherty <gxf@cummings.com>
Subject: RE: clarification on submittals

Craig, I think we all agree the back and forth email is not productive. Let's schedule a call, but I don't want plans for a conference call to slow things down.

To clarify we need the following.

1. We need an evaluation of the data (which may be submitted as a revised progress report or a standalone document) similar to the attached and in accordance with the approved Written Proposal (refer to Section 8 text, cut and pasted below). This evaluation of the data needs to be completed prior to developing and distributing the individual letters to the schools/day care facilities. Refer to my email dated May 16, 2018 (attached for your convenience). At least an evaluation of the data using the Shortforms needs to be completed and submitted to EPA ASAP and no later than June 30, 2018, so that the letters to the schools/day care facilities accurately reflect the results and provide appropriate conclusions. A Critical Exposure Pathway Evaluation also needs to be completed as appropriate and in accordance with the MCP.
2. We need the draft letter to the schools/day care facilities revised and tailored for each individual school/daycare facility as requested in email dated May 30, 2018, and included in the email chain below. The revised draft should be submitted to EPA for approval on or before June 30, 2018.
3. We need a revised schedule. I will be providing a formal disapproval of the schedule submitted in email from you dated May 29, 2018, based primarily on the date for human health risk assessment completion date of February 2019. In my formal disapproval, I will be requesting your submission of a revised schedule by July 15, 2018.

8.0 RISK ASSESSMENT AND ENVIRONMENTAL INDICATORS ANALYSIS

8.1 Risk Assessment

After the completion of sampling events for each specific investigation, a risk characterization will be performed as needed using the laboratory analysis data. The risk assessment will be in accordance with the necessary provisions of the MCP (310 CMR 40.0900) and currently

accepted standards for assessments of this nature using Method 3 risk assessment protocols. Each indoor sampling building location will be evaluated separately as its own exposure point using the protocols for unrestricted use (i.e., residential or child day care).

All detected compounds in the indoor air samples will be initially carried throughout the risk assessment to determine the most conservative total Site risk; however compounds may be removed from the assessment if their detection is shown not to be due to vapor intrusion. Exposure point concentrations for each compound shall be based on the maximum detected concentrations between the various seasonal sampling events. For each individual compound, the carcinogenic and noncancer
risks will be determined using the most current information available from the risk characterization databases available from the EPA and/or the MassDEP. Initial risk-based target levels are based on carcinogenic and noncancer risks (where available) for each compound from the EPA Regional Screening Level Resident Air Supporting Table (May 2016) and the MassDEP Final Vapor Intrusion Guidance, MassDEP Policy WSC# 16-435, October 2016. Compounds that have available noncancer
information but do not have carcinogenic information will be presumed to have been previously established as noncarcinogenic compounds. A compound that has no existing available information as to carcinogenic or noncancer risks will be evaluated the same as a similar compound that has available information (e.g., 1,3,5-trimethylbenzene shall be evaluated as 1,2,4-trimethylbenzene) unless it is considered to be prevalent in the environment, in which case said compound will not be carried throughout the risk characterization (e.g., ethanol and ethyl acetate). Exposure factors to be used will be those created by MassDEP in the MCP Method 3 Risk Assessment for Residents Exposed to Chemicals in Indoor Air Shortform (i.e., residential exposures will be evaluated assuming an exposure period of 24 hours per day, 365 days per year). Carcinogenic risks will be calculated for the young child (ages 1-7) and the child/adult (ages 8-30). Noncancer risks will be calculated for the young child (ages 1-7). The individual carcinogenic and noncancer risks for all compounds in each sampling location will be summed into a total risk for that particular location.

Thank you,
Carolyn

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casey.carolyn@epa.gov

From: Craig Ziady [mailto:craig@cummings.com]
Sent: Wednesday, June 06, 2018 5:37 PM
To: Casey, Carolyn <Casey.Carolyn@epa.gov>
Cc: bhoskins@fslassociates.com; Steve Drohosky <sjd@cummings.com>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Zucker, Audrey <Zucker.Audrey@epa.gov>
Subject: RE: sampling results letter

Carolyn – Thanks for your email. For obvious reasons, it is frustrating to read that EPA "did not necessarily need a response to comments" when a prior email in the very same thread notified us that EPA would not respond to our May 8 proposed letter to daycare owners *until we responded to your May 16 comments*. In that same email, we were asked specifically when EPA "can expect . . . responses" to your comments. We spent hours preparing responses to the comments because EPA expressly asked for them. It is neither productive, efficient, nor fair for us to have expended that time and money on a task EPA requested, only to have EPA, upon receipt of the responses, disavow the request.

Even more problematic is our apparent disagreement on vapor intrusion in general. Although we cannot quite discern if EPA's disagreement is grounded in the science or the text of the report, the parties' apparently contradictory opinions present as a showstopper. Would EPA prefer that we rewrite the conclusion as, "there is no evidence of significant vapor intrusion in the sampled building areas"? Such a statement is readily defensible based on the data we have collected thus far. We have successfully demonstrated that significant vapor intrusion (both from the physical aspect and in combination with risk assessment screening) is not occurring based on the evaluation process in MassDEP's vapor intrusion policy. If EPA disagrees with this conclusion, then a further discussion is warranted, so we can understand the factual bases for EPA's conclusion. Until such discussion takes place (if it is necessary) and the issue is resolved, I respectfully submit that there is no value in rewriting, revising, and resubmitting the schedule, the proposed letters, or the progress report.

If you believe that a conference call would be helpful to discuss these issues further, please let me know.
Thanks
Craig

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From: Casey, Carolyn [mailto:Casey.Carolyn@epa.gov]
Sent: Wednesday, May 30, 2018 4:43 PM
To: Craig Ziady
Cc: bhoskins@fslassociates.com; Steve Drohosky; Wainberg, Daniel; Zucker, Audrey
Subject: FW: sampling results letter

Craig, This is in response to the questions you raise in your email to Audrey below regarding the letter to school/daycare facilities.

We did not necessarily need a response to comments. What we needed were EPA's comments addressed by making the appropriate corrections, explanations and/or clarifications in a revised progress report. Although we don't typically find the need to review and comment on progress reports, we are using these reports to summarize data and provide documentation to schools/daycare-facilities and parents about vapor intrusion and any potential risk; therefore, the progress reports should contain accurate information, and the progress report and letters should provide consistent information and conclusions.

Are there any plans to at least run MassDEP RA Shortforms (if appropriate for this site) for each suite so that any potential for risk, or lack thereof, can be communicated in these letters as well?

We are not in agreement with your statement in the letter to the school/daycare facilities that "there is no evidence of potential vapor intrusion in the sampled building areas." I appreciate the effort in the response to comments to provide an individual assessment for each suite. A similar and complete individual assessment should be provided in each letter to the manager of each suite.

The letters to each school/daycare facilities should include a complete laboratory report with their individual results and also include a summary table of the results. A generic letter will not suffice since the results and conclusions will differ for each suite.

Please resubmit the proposed schedule and include a date to resubmit the letters and a revised progress report. Please let me know if you would like to discuss any of the issue in this email.
Thanks,
Carolyn

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casey.carolyn@epa.gov

From: Craig Ziady [mailto:craig@cummings.com]
Sent: Tuesday, May 22, 2018 3:29 PM
To: Zucker, Audrey <Zucker.Audrey@epa.gov>; Casey, Carolyn <Casey.Carolyn@epa.gov>
Cc: Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Gregory Flaherty <gxf@cummings.com>; Bruce Hoskins <bhoskins@fslassociates.com>; Steve Drohosky <sjd@cummings.com>
Subject: RE: sampling results letter

Hi Audrey – Thanks for your note. I had not realized that Bruce was not copied on Carolyn's comments. We have just spoken about them, and we will have a response for you shortly. I'm not sure I understand, however, why the comments on the proposed letter to Mr. Drohosky need to be delayed pending a response to Carolyn's comments. We continue to believe it is important to communicate with our clients about the testing sooner rather than later. Also, the idea that Carolyn's comments are "draft" comments and that some more fulsome comments may still be forthcoming – likely after we have responded to the draft comments – does not present as terribly efficient. We are working hard to be responsive to your requests at the same time we are continuing to advance the significant field activities of the Consent Order – all while keeping our clients apprised of ongoing activities. In this regard, I am working on finalizing a proposed timetable for ecological site activities, and will have that to you today or tomorrow, I believe, under separate cover.

If you have any questions in the meantime, please let me know.
Thank you.
Craig

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From: Zucker, Audrey [mailto:Zucker.Audrey@epa.gov]
Sent: Tuesday, May 22, 2018 12:20 PM
To: Casey, Carolyn; Craig Ziady

Cc: Wainberg, Daniel; Gregory Flaherty
Subject: RE: sampling results letter

Craig – Just to be clear, with respect to the draft letter to the day care centers that you provided to us on May 8th, we will provide you with comments after you have addressed the issues in Carolyn's May 16 email below.

Please let me know when we can expect your responses to Carolyn's email. Thanks.

(fyi--Carolyn has been out of the office unexpectedly. So, I just wanted to make sure that you understood that we do plan to comment on your May 8 draft letter.)

Audrey

From: Casey, Carolyn
Sent: Wednesday, May 16, 2018 8:30 AM
To: Craig Ziady <craig@cummings.com>
Cc: Zucker, Audrey <Zucker.Audrey@epa.gov>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Gregory Flaherty <gxf@cummings.com>
Subject: RE: sampling results letter

For each suite, the sample results should be provided along with the letter and include an appropriate evaluation of the data. We are still in disagreement with the conclusion that no vapor intrusion is occurring. We should resolve this prior to providing that information to the suite managers/parents.

I also have comments on the progress report and until they are addressed, it would not be appropriate to share the data. Draft comments attached.

From: Craig Ziady [mailto:craig@cummings.com]
Sent: Tuesday, May 15, 2018 1:22 PM
To: Casey, Carolyn <Casey.Carolyn@epa.gov>
Cc: Zucker, Audrey <Zucker.Audrey@epa.gov>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Gregory Flaherty <gxf@cummings.com>
Subject: sampling results letter

Hi Carolyn – Now that the April 2018 Progress Report is complete, we would like to finalize the letter to the clients in whose premises the indoor air testing occurred. You had requested an opportunity to review this letter, and we provided a draft on May 8 during our meeting. Could you please confirm ASAP whether you have any comments.
Thank you.
Craig

Craig J. Ziady
General Counsel

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