

## McClanahan, Kathy N LRN

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**From:** Humphreys, Lisa A LRH  
**Sent:** Tuesday, August 11, 2009 2:49 PM  
**To:** McClanahan, Kathy N LRN  
**Cc:** Meadows, Richard L LRH  
**Subject:** Fw: risk comments

**Attachments:** aa1\_FinBHHRARev.doc



aa1\_FinBHHRARev.  
doc (43 KB)

Fyi and use and please see Pauls last paragraph

----- Original Message -----

**From:** Paul Jayko <Paul.Jayko@epa.state.oh.us>  
**To:** Humphreys, Lisa A LRH  
**Sent:** Tue Aug 11 12:05:50 2009  
**Subject:** risk comments

Lisa,

Attached are Janusz's risk comments on Acid Area 1. Please distribute as appropriate.

Also, please bare-in-mind that he conducts his review according to Federal and State guidance; so if he touches on an issue which would otherwise be covered by prior agreements between USACE and OEPA, please feel free to disregard our comments on that issue in favor of the agreement. (Just trying to head off the confusion that was experienced last time).

Paul



## inter-office communication

To:	Paul Jayko, NWDO-DERR	Date: 31 July 2009
From:	Janusz Z. Byczkowski, DERR, CO	
Subject:	<b>Final Baseline Human Health and Ecological Risk Assessments, Work Plans, Acid Area 1, Former Plum Brook Ordnance Works Sandusky, Ohio, April 2009.</b> Site: US NASA PLUM BROOK, TAYLOR & COLUMBUS Rds., SANDUSKY, OH 44870; ERIE Cnt.; OHID# 322-0552.	

The following memo is regarding the responses (dated July 29, 2009) to OEPA comments on "**Final Baseline Human Health Risk Assessment, and Ecological Risk Assessment, Work Plans, Acid Area 1", Former Plum Brook Ordnance Works Sandusky, Ohio**, dated April, 2009.

If you have any questions or need further technical support, please call me at: 614-644-3070 or e-mail at [jbyczkowski@epa.state.oh.us](mailto:jbyczkowski@epa.state.oh.us).

Typically, the "*work plan*" provides an opportunity for the Lead Agency and its contractors to present and justify in detail the future (planned) actions and activities which will be needed to accomplish risk assessment for the specific Site and area. To be scientifically defensible and to reflect adequately the specific area, current conditions and applicable regulations, the work plan also needs to be specific, timely and prepared according to current guidelines.

In its "**General Response**" to OEPA comments, the USACE invoked the 2001 risk assessment work plan ("*Final April 2001*") as the standard for the work to be conducted at PBOW. Similarly, in response to the comment #3, the USACE refers to 2001 completed background study for Plum Brook. These statements make an impression that all the necessary details have been planned and measured already in 2001 – raising the question about the purpose for the 2009 work plan. If it is "planning" past (2001) actions and activities, perhaps, it is not needed.

Paradoxically, in the response to OEPA **comment #2**, the USACE emphasized that the "*Work Plans*" are dated 2009, and (thus) U.S. EPA Region 9 PRGs from 2004 are *obsolete*.

It seems that there is no disagreement about the use of Regional Screening Levels (RSLs) instead of Region 9 PRGs (but not Region 3 RBCs).

The OEPA-DERR Recommendation stated that either ones can be used: "...*either the Region 9 PRGs [...], or [...] U.S. EPA Regional Screening Levels (RSLs are available on-line at <http://www.epa.gov/region09/superfund/prg/index.html>)...*"

The link provided leads to the web site, where both the archived PRG table and a set of current (as of April 2009) RSL tables are posted. However, please note, that if some of

the screening levels are changed in the RI, this should be also reflected in the data quality objectives (DQOs), to assure that reporting limits (RLs) will not exceed the new adjusted screening levels.

Regarding the OEPA **comment #3**, the USACE response is somehow ambiguous. The deletion of the S. 2.2.3 "*paragraph 2*" is acceptable, but the use of "*95% UTL or the maximum detected background*" is currently not recommended by OEPA-DERR.

Obviously, the *PBOW Team Meeting* predated the OEPA-DERR (2004c and d) guidelines, perhaps, making the "*May 2000 PBOW Team Meeting Minutes*" - obsolete.

It is suggested, that the background levels used for screening should be recalculated from original data to realistically characterize cut-off values for point-by-point comparison with similar geological formations and sampling horizons (depth).

The USACE response to **comment # 4** is acceptable.

The USACE response to **comment # 5** is acceptable provided that the appropriate explanatory footnote will be provided in the table.

Regarding the USACE responses to **comment # 6 and #7**, please change exposure parameters to those from RAGS Part E. This (2004) guidance supersedes earlier defaults, making the U.S. EPA (1992b) obsolete. If due to site-specific conditions some of exposure parameters need to be modified, it should be explained and justified – just like it is in the USACE response to comment #6.