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Subject: RO0000411
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Ron Goloubow and Alan Gibbs (with LFR) called regarding 1) cleanup goal for PCBs and 2) letter to RPs lender.

- 1) LRF proposed three cleanup goals in their CAP for each constituent of concern, a risk-based goal, the DTSC's Schools goal, and the ESL. ACEH approved the most stringent of the three as the approved cleanup goal. Therefore, the PCB cleanup goal would default to the DTSC's Schools goal of 0.19 mg/kg and not the calculated goal of 0.39 mg/kg. Without consent from or informing ACEH, LFR contacted Federal EPA regarding the PCB contamination at the site. EPA directed LFR to adopt the DTSC cleanup goal of 0.19 mg/kg for PCBs as approved by ACEH. LFR agreed and began remediation. However, soil sample analytical results for PCBs were detected above the DTSC cleanup goal of 0.19 mg/kg but below the calculated goal of 0.39 mg/kg. Therefore, LFR requests ACEH to reconsider the approved cleanup goal stating that the EPA and DTSC's toxicologist concur with the 0.39 mg/kg cleanup goal for PCBs.

I asked if 1) DTSC and/or EPA would sent a letter to ACEH concurring with the 0.39 mg/kg cleanup goal for PCBs or 2) the cleanup goal remains at 0.19 mg/kg for PCBs, but the upper 95 percent confidence limit is compared to the cleanup goal so that a site wide representative concentration is compared to the cleanup goal.

LFR would like to set up a conference call tomorrow between ACEH, LFR, EPA, and DTSC and asked ACEH to participate. I agreed.

- 2) The RPs lender is requesting a "letter of approval" of some sort of the cleanup measure undertaken to date. I asked LFR to provide ACEH with a submittal which summarizes the remediation conducted to date, anticipated completion time, as well as identifying the lenders needs, so that we can respond accordingly. LFR said they would submit samples of letter as well as the above-mentioned submittal.