



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

August 17, 2010

Re: CAG Response to Phase I Data Evaluation Report (Prepared by CAG RR&M Group)

To the Members of the CAG:

Thank you for your letter dated August 6, 2010, regarding the CAG's concerns and comments of the Phase I Data Evaluation Report. EPA will consider the comments and recommendations that were provided. Furthermore, some clarifications were requested, which EPA addresses below.

F & J Flags

It is my understanding that approximately 2 years ago, EPA's toxicologist, Dawn Ioven, attended a CAG meeting with Eduardo Rovira, the On-Scene Coordinator (OSC) for the BoRit Site. She provided an explanation regarding J-qualified data during the meeting and also informally discussed the issue with several CAG members during a break. However, to provide further clarification and document EPA's response to the CAG's concerns, EPA will explain J flags (or qualifiers) below.

J qualifiers are the most commonly encountered data qualifiers in Superfund data packages. The presence of a J qualifier attached to an analytical result indicates that the chemical was positively identified, but the associated concentration is estimated. There are several possible reasons for this. One common reason, which appears to be the most likely for the Phase I report J-qualified data, is when a chemical is observed at a level between the detection limit (DL) and the quantitation limit (QL). The DL represents the lowest amount that can be distinguished from the normal noise of an analytical instrument or method; the QL is usually 3 to five times higher, and represents the lowest level that can be accurately quantified and reproduced. J-qualified data are typically considered reliable, and, therefore, generally included in risk calculations (per Risk Assessment Guidance for Superfund (RAGS) – Part A). The guidance is to use the J-qualified data the same way as positive data that do not have this qualifier.

EPA is unsure as to what "F" flags are being referred to in the August 6, 2010 letter.

Detail on Asbestos Types and Volatile Contaminants Detected on the Site

The Phase I Report provides numerous tables and figures which provide detail on the types of asbestos and volatile organic compounds (VOCs).

For Figures identifying VOCs and semi-volatile organic compounds (SVOCs) found above screening levels, please see Figures 18, 20, 22, 24, 26, 28, 30, 32, 34, 36, 40, 42, 44, 46, 48, 50,



55, 57-1, 57-2, 59, 61. For Tables identifying VOCs and SVOCs detected, please see Tables 30, 31, 35, 36, 40, 41, 46-47, 51-52, 56-57, 62-63, 68-69, 73-74, 79-80, 85-86, 91-92, 96-97, 100-101.

For Figures and Tables identifying types of asbestos found above screening levels, please see Figures 19, 21, 23, 25, 27, 29, 31, 35, 37-39, 41, 45, 47, 49, 51, 52, 54, 58-1, 58-2, 62. For Tables identifying types of asbestos detected, please see Tables 29, 34, 39, 45, 50, 55, 61, 67, 72, 78, 84, 90, 95, 105.

RSLs

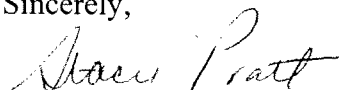
Regional Screening Levels (RSLs) are used as part of the the risk assessment process. After the completion the Phase II field work and as we progress into the human health and ecological risk assessment processes, EPA will provide a presentation to the CAG on risk assessment, which will include a discussion on RSLs.

Lastly, EPA would like to reiterate that the Remedial Investigation/Feasibility Study (RI/FS) is an ongoing, iterative process. The Phase I fieldwork for the Remedial Investigation was completed in January 2010, and EPA is currently still reviewing the Phase I sampling data. Phase II field work is planned to begin in September 2010, and EPA will likely need to conduct additional field work activities after a complete review of the Phase I and Phase II sampling data. As necessary, EPA will continue to conduct field activities and review the collected data in order to perform a thorough assessment of the nature and extent of contamination and the associated health and environmental risks at the BoRit Site.

At the conclusion of the RI/FS, EPA will identify its preferred alternative for the Site based on the criteria identified in the National Oil and Hazardous Substances Pollution Contingency Plan. At that point, EPA will solicit public comment during an official comment period which will last at least 30 days. Only after consideration of the comments received on our proposed alternative will EPA select a final remedy for the Site.

Thank you for your cooperation with the on-going environmental cleanup of the Site. If you have any questions, please contact me at (215) 814-5173 or at pratt.stacie@epa.gov.

Sincerely,



Stacie Pratt,
Remedial Project Manager

