

From: [Scharr, Ruth](#)
To: [Gehlhaus, Martin](#)
Cc: [R3 TSB Comment Files](#); [Concepcion, Herminio](#); [Towle, Michael](#); [Wagner, Christine](#)
Subject: RE: Paint Waste Burial Site-Toxicologist Consult
Date: Thursday, March 02, 2023 11:18:00 AM

Martin, Thank you. It definitely is ultra-conservative with no attenuation factor in the equation. And, we know that groundwater was not encountered at 45 feet below the surface.

I did speak with VDEQ personnel about using an average of the concentrations of any contaminants detected in the future post-excavation samples. We are planning to return to the site to remove the remaining contaminated soil that is down to the 10 feet in the area where we collected soil boring SB-10 for xylene and MIBK. Thank you for your recommendations.

Ruth

Ruth Scharr
On-Scene Coordinator
Eastern Response Section (3SD31)
Preparedness & Response Branch
Superfund & Emergency Management Division
215-756-7897 (mobile)

From: Gehlhaus, Martin <Gehlhaus.Martin@epa.gov>
Sent: Thursday, March 02, 2023 11:06 AM
To: Scharr, Ruth <Scharr.Ruth@epa.gov>
Cc: R3 TSB Comment Files <R3_TSB_Comment_Files@epa.gov>; Concepcion, Herminio <Concepcion.Herminio@epa.gov>
Subject: Paint Waste Burial Site-Toxicologist Consult

Ruth –

After reviewing the documents that you provided (in a series of emails), the ‘EPA Protection of Groundwater Risk-Based SSL (ug/kg)’ concentrations included in the November Data Table document (column with tan shading) are applicable cleanup goals for the removal. These SSLs were based on a target cancer risk of 1E-6 and a HQ of 1 and applied a dilution attenuation factor of 1, which assumes that there is no attenuation between soil, leachate, and groundwater (this is a conservative assumption). Other target risks and dilution attenuation factors were considered, but the SSLs in the November data table appear to be the most appropriate and will protect downgradient groundwater receptors. With the application of these SSLs as cleanup goals, the results for SB-10 indicate a need for additional excavation beyond the 4-5 feet probe samples; however, due to the conservative assumptions applied in the development of the SSLs in the November Data Table document, excavating beyond 10 feet is likely not needed. Please contact me with any comments, questions, or concerns.

Martin Gehlhaus

He/him
US Environmental Protection Agency
Region III
Superfund and Emergency Management Division
Risk Assessment Section 3SD52
4 Penn Center
1600 JFK Blvd
Philadelphia, PA 19103-2029
215-814-3359