See attached.

-Dante comments not responded.doc
April 6, 2007

Erich –
I went through the revised RI sections, with the exception of the NAPL section, and identified the EPA comments that appear to have been missed. According to my records, these were that we had reached agreement on. Please make these changes as indicated below. I did not yet complete my review of your revised NAPL section, so I will have to do that when I return from vacation.

-Dante

I. From October 30, 2006 “technical comments”:

1. Section 1.2.3, 5th paragraph, 1st sentence: Insert reference as follows, “Aerial photographs from 1927 through 1941 (see Figure 9) show . . .”

20. Section 5.1, 2nd paragraph: Edit the first sentence as follows, “The “threshold levels” screening criteria indicated the compound concentrations at which a potential for unacceptable exposure may have existed within . . .”

[Figures and Appendices comments will be reviewed upon receipt of those revised components.]

II. From February 2, 2007 “ORC comments”:

10. Section 4.1, Investigative Approach: (4th and 5th paragraphs)

Add a new paragraph after the fourth paragraph as follows, “The NAPL investigation strategy began with investigating an area of known NAPL existence – well #MW20 and vicinity, where floating NAPL product was found. The NAPL investigation then examined groundwater chemical data from the water table zone, and soil and soil gas data from shallow soil (and some deep soil locations), to identify areas of potential NAPL existence. Further sampling and testing was then performed in the areas with the highest potential for NAPL existence, to characterize the properties of the NAPL.”

With the edits above, the section would then read smoother if you move the last three paragraphs of the section and place them after the fifth paragraph. [The last three paragraphs start with the sentences “Multiple lines of evidence . . .”, “The ‘bottom-up’ process started . . .” and “Using this combined top-down and bottom-up approach . . .” The fifth paragraph starts with “While the location of former facilities . . .”]

11. Section 6.1.3, Areas of Vadose Zone Contamination, last paragraph: Add the following sentence to the end of the paragraph, “The preceding analysis and conclusions represent the views of Shell and not of US EPA. EPA’s investigation of chlorinated solvent use at the Site is ongoing and continuing.” [We had negotiated wording changes for comment 2.3.3.5 that also applied to this comment (6.1.3) and comment 7.2.1. The
agreed upon wording is: "The preceding analysis and conclusions represent the best of the Respondents' knowledge to date. EPA has not yet finalized its analysis and conclusions, as EPA's investigation of chlorinated solvent use at the former plant site is still ongoing. EPA may issue future amendments or addenda to this RI report in the event that new information becomes available."

12. Section 7.2.1, VOCs, last paragraph: Add the following sentence to the end of the paragraph, "However, the preceding analysis and conclusions represent the views of Shell and not of US EPA. EPA's investigation of chlorinated solvent use at the Site is ongoing and continuing." [We had negotiated wording changes for comment 2.3.3.5 that also applied to this comment (7.2.1) and comment 6.1.3. The agreed upon wording is: "The preceding analysis and conclusions represent the best of the Respondents' knowledge to date. EPA has not yet finalized its analysis and conclusions, as EPA's investigation of chlorinated solvent use at the former plant site is still ongoing. EPA may issue future amendments or addenda to this RI report in the event that new information becomes available."

13. There were two comments that related to Section 8.1.2, 5th paragraph: this one (#13) and one from Dante's 10/30/06 comments, #35. Putting the comments together, we have Comment #35 directed you to delete most of paragraph 5, and Comment #13 having you revise the wording of the last sentence, like this:

There is no documentation indicating the use of TCE or similar chlorinated solvents at the plant site. It is unclear whether the elevated concentrations of TCE are associated with the pits and trenches feature since the maximum detected TCE concentration occurs outside of the pits and trenches footprint. Additionally, there are known, offsite TCE source areas immediately west and southwest of the pits and trenches features that are unrelated to the former rubber plant. Data supporting the presence of these offsite source areas was provided to USEPA via email in a November 20, 2003 memorandum (URS, 2003b). The Respondents believe that the elevated concentrations of TCE are not believed to be associated with the pits and trenches feature or the former rubber plant for the following reasons:

(1) There is no documentation indicating the use of TCE or similar chlorinated solvents at the rubber plant;

(2) The maximum detected TCE concentration occurs outside of the pits and trenches footprint; and

(3) There are known, TCE source areas immediately west and southwest of the pits and trenches feature that are unrelated to the former rubber plant. Data supporting the presence of these source areas was provided to EPA via email in a November 20, 2003 memorandum (URS, 2003b).
15. You changed the revised wording of the last sentence in such a way that you changed the message I was trying to convey. I wanted to say that the groundwater data were used in the BRA. Revise the last sentence to make it like I had indicated in this comment.

Section 10.0, *Groundwater Table VOC Data*, 1st paragraph: Edit as follows, “While soil and NAPL are the primary subjects of this RI, a limited discussion of groundwater conditions at the water table is appropriate to the extent that since the data can assisted in evaluating the potential for surface exposure from upward migration of vapor and in identification of groundwater contamination source areas and NAPL areas. A comprehensive presentation of groundwater conditions through 1995 is available in the *Groundwater RI Report* (D&M, 1998a) and in USEPA’s *groundwater ROD* (USEPA, 1999). This data was used to assist in identifying the potential groundwater contamination source areas and NAPL areas. Groundwater data from the 2000 monitoring event are presented in this report, as this data was used in the BRA. [Insert Paragraph Break]

[Figures and Appendices comments will be reviewed upon receipt of those revised components.]