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**From:** Donovan, Betsy [Donovan.Betsy@epa.gov]  
**Sent:** 3/17/2016 1:16:04 PM  
**To:** John Persico [JPersico@Geosyntec.com]  
**CC:** Fisher, Gary (Nokia - US) [gary.fisher@nokia.com]; 'Ricci, Richard F.' [RRicci@lowenstein.com]; mfaigen@issuesllc.com; Robert Workman (RWorkman@enviro-sciences.com) (RWorkman@enviro-sciences.com) [RWorkman@enviro-sciences.com]; robert.workman@novartis.com; Linda Bergsten (linda.bergsten@novartis.com) [linda.bergsten@novartis.com]; Bergeron, Brian P [pete.bergeron@chevron.com]; Vaughn, Stephanie [Vaughn.Stephanie@epa.gov]; Sivak, Michael [Sivak.Michael@epa.gov]; Fajardo, Juan [Fajardo.Juan@epa.gov]  
**Subject:** RE: Rolling Knolls - proposed schedule and contents of Data Gaps Tech Memo and RI Report

Hi John, I reviewed and discussed your proposed schedule and Data Gap Tech Memo contents with some of the Rolling Knolls EPA project team and we have the following comments:

Schedule: We reviewed the schedule and it looks okay. As we discussed during the Feb. 24<sup>th</sup> meeting and in follow-up email communications, in order to meet the BERA schedule milestones we have agreed to open communications amongst the technical project team with copies of pertinent communications provided to both the EPA and PRP's project coordinators. We also assume that you will avoid sampling analysis delays by providing advance notice and instructions to laboratories regarding sample management and analysis schedule. This schedule will be the official and enforceable schedule per the terms of the administrative settlement.

Data Gaps Tech Memo Soil Standards:

1. The site is zoned residential. As such, residential screening standards should be used. Specifically:
  - Screen the data against the NJDEP SRS for residential use for the data gap screening and the nature and extent section of the RI.
  - Screen the data against the EPA RSLs for residential human exposure for the HHRA section of the RI. Discuss areas that exceed these screening criteria so that they can be carried into the FS for possible monitoring or some other action.

Thanks and please contact me with any questions. - Betsy

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**From:** John Persico [mailto:JPersico@Geosyntec.com]  
**Sent:** Wednesday, March 09, 2016 9:04 AM  
**To:** Donovan, Betsy <Donovan.Betsy@epa.gov>  
**Cc:** Fisher, Gary (Nokia - US) <gary.fisher@nokia.com>; 'Ricci, Richard F.' <RRicci@lowenstein.com>; mfaigen@issuesllc.com; Robert Workman (RWorkman@enviro-sciences.com) (RWorkman@enviro-sciences.com) <RWorkman@enviro-sciences.com>; robert.workman@novartis.com; Linda Bergsten (linda.bergsten@novartis.com) <linda.bergsten@novartis.com>; Bergeron, Brian P <pete.bergeron@chevron.com>  
**Subject:** Rolling Knolls - proposed schedule and contents of Data Gaps Tech Memo and RI Report

Hi Betsy – following up on our discussions last week, I provide below (1) a proposed schedule for submittal of the remaining documents ending with the draft Feasibility Study; and (2) a summary of the contents for the Tech Memo on the Data Gaps sampling, and the RI Report.

1. Proposed Schedule

- BERA Interim Tech Memo to be submitted on 3/18/16, draft BERA work plan to be submitted on 3/31/16 and draft BERA report to be submitted on 8/31/16, consistent with our recent discussions with you;
- MNA evaluation work plan to be submitted on 4/13/16, followed by 2 rounds of groundwater sampling, and then submittal of a draft tech memo to USEPA on 12/14/16 (after the RI Report, and before the FS);
- Draft Data Gaps tech memo submitted to USEPA on 4/27/16;

- Presentation of Development and Screening of Remedial Alternatives (DSRA) in a meeting with USEPA on approximately 9/14/16;
- Draft DSRA to be submitted to USEPA on 10/14/16 (will include a discussion of how the USEPA's comments on the Tech Memo on Candidate Technologies were addressed);
- Draft RI Report to be submitted to USEPA on 10/28/16 (a month after the final BERA report is submitted);
- Draft Feasibility Study to be submitted to USEPA on 3/31/17.

I only included deadlines for draft reports. The schedule for final reports will depend on the timing and extent of USEPA comments. In developing the schedule, I anticipated that final reports would be submitted approximately 60 days after draft reports.

These assumptions apply to the schedule:

- USEPA comments received within 21 days from submittal of draft work products (not including draft BERA Interim Tech Memo, work plan, or report, which will be discussed with USEPA before finalizing to maintain the schedule);
- Additional data gaps sampling, if any, can be accomplished at the same time as the BERA field work (May);
- No delays caused by weather, field conditions, or access to offsite properties;
- No delays caused by sample analysis.

## 2. Contents of the Tech Memo on Data Gaps results and the RI Report

The Tech Memo on the Data Gaps results will include: a discussion of the field program including deviations from the approved scopes of work; tables of all sampling results collected during the 2014 and 2015 Data Gaps investigations; figures summarizing all soil, sediment, surface water, and groundwater collected at the site since 2005; groundwater contour maps and a discussion of groundwater flow directions at the site during 2014 and 2015; comparison of the data to applicable standards; and discussion of the need for additional sampling, if any. This submittal will also include Electronic Data Deliverables (EDDs) in both USEPA and NJDEP formats.

The RI Report will present all the investigation results and conclusions in a standalone document, consistent with the guidance for RI Reports in the October 1988 Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA. It will include: discussion of the site history, geology, topography, etc; all the site data collected since 2005 in tables and presented on figures, with a comparison to applicable standards and guidelines; an overview of the investigations and risks assessments and a summary of their results; a revised Conceptual Site Model (CSM); and an assessment of the suitability of the data to serve as the basis for the Feasibility Study.

Please call or email me with any questions.