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Subject: FW: NIROP Conference Call  
Date: Thursday, January 25, 1996 19:34:00 EST  
Attach: Headers.822  
Certify: N  
Forwarded by:

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FYI. Dave  
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From: Goeden, Helen [GWSRS]  
To: Douglas, David [GWSRS]; Betcher, John [GWSRS]; Ferrey, Mark [GWSRS]  
Subject: RE: NIROP Conference Call  
Date: Thursday, January 25, 1996 8:08AM

I have quickly gone through the documents you left and have one major area of concern. In Attachment 2 Response 5 - - . . . institutional controls as the sole remedy based on an industrial reuse scenario . . .

1) this assumes that the current contaminant levels do not pose an unacceptable risk to industrial workers and the only institutional control needed is restricted the land use to industrial (i.e., no additional controls are needed to limit exposure). I generated two industrial cleanup goal numbers - - 12 ppm was for current site conditions (i.e., restricting land use to industrial was all that was required) and 20 ppm for good vegetative cover (i.e., in addition to controlling land use controls would also be required to ensure that there was vegetative cover maintained). If the levels on the site are below 12 ppm we should not have a problem - - if they are not then institutional controls in addition to simply restricting land use to industrial may be required.

2) restricting the land use to industrial will NOT adequately address ground water contamination - - The OSWER guidance addresses land use only and does not address soil contamination impacts on ground water. The OSWER guidance acknowledges that ground water impacts may drive soil cleanup.

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From: Douglas, David [GWSRS]  
To: Goeden, Helen [GWSRS]; Betcher, John [GWSRS]; Ferrey, Mark [GWSRS]  
Subject: NIROP Conference Call  
Date: Wednesday, January 24, 1996 10:34AM

I will be putting the following in your in basket for preparation for the January 30th conference call:

1. An e-mail message from Scott Glass to me dated January 23;
2. Scott's January 10th letter to me cited in his e-mail message; and
3. EPA's Land Use Guidance document.

Please let me know if you have any questions or concerns before the conference call. Tom wants to discuss this package on Friday so please let

Let me know today or tomorrow if you have any questions or concerns. Thanks,  
Dave