

ABB

ASEA BROWN BOVERI

**ABB Environmental Services, Inc.**

2120 Washington Boulevard, Suite 300  
Arlington, Virginia 22204  
(703) 769-8166 FAX (703) 769-8182

N61331.AR.000423  
NSWC PANAMA CITY  
5090.3a

**TELEPHONE MEMORANDUM**

**PROJECT NO.:** 07593-01

**DATE:** September 21, 1995

**CLIENT:** SOUTH DIV

**PROJECT DESCRIPTION:** Panama City RFI

**BETWEEN:** Tracey Kauffman of ABB-ES; Arlington VA

**AND:** Craig Benedikt (USEPA)

**SUBJECT:** March 30, 1995 letter sent to EPA from FDEP pertaining to arsenic in soils

I called Craig to discuss the a letter from John Ruddell, Director of the Division of Waste Management at FDEP to Joseph Franzmathes, director of Waste management Division at the USEPA (dated March 30, 1995). John Mitchell brought to this letter to my attention because the letter pertains to risk levels of arsenic in soils. Yesterday, John pointed out that although this letter pertains to arsenic present in soils at the Wingate Road Landfill site in Fort Lauderdale, Florida, it clearly spells out FDEPs stance on risk associated with arsenic in soils .

Craig indicated that he interpreted the letter to read that FDEP understands that it may not be possible to clean-up sites to a level which does not pose a risk greater than  $1 \times 10^{-6}$ , but that one of three criteria must be met. He indicated that he got the impression from John that they were going to stand their ground on the arsenic issue at AOC 2 and that unless one of the three criteria are met, something will have to be done with the area where arsenic was detected.

He also stated that he believes this to be true for all our risk. He stated that he believes that FDEP will not buy off on explanations of how conservative our risk numbers are. I indicated that ABB-ES is currently working with FDEP on the 10-6 risk issue on another project and that we are following it closely.

I talked to Craig about a conversation that I had with B.K. yesterday. I indicated that B.K. and the facility would like a letter for their files that indicates that Craig received their letter stating their intent on missing the deadline for the Final RFI report. He indicated that he would write a letter to B.K. stating that the only enforceable CAMP deadlines are those for Draft reports. I indicated that during the October meeting, we will discuss a new delivery date and discuss revising the schedule in the CAMP. He said that would be fine.

Craig indicated that he will be out on vacation from September 30th to October 10th.

**DISTRIBUTION:**

Lissa Miller  
Project File