

## MEMORANDUM TO FILE

**TO:** KM File

**FROM:** Brian Rakvica

**DATE:** June 18, 2004

**CC:** Todd Croft, Jennifer Carr, Jeff Johnson

**RE:** KM Meeting – Site-Related Chemicals (SRC)

1. Brian met with Susan to review the SRC document she had submitted.
2. Brian reviewed the major points of the comment letter that he will be issuing including: discussion on the components of mixtures; discussion on how broad classes of chemicals and unknowns will be addressed; chemicals which were missed on the list; discussion of the fact that the document was very draft (the NDEP expects a best effort on the submittal – not a rough draft);
3. Also discussed was the project schedule. Brian indicated that if the entire project schedule is not realistic KM needs to reevaluate it and propose an amendment. The project schedule needs to be reasonable, however, it also must be achievable.
4. Discussed preliminary drafts. Brian indicated that he would try to review rough draft documents to point KM in the right direction, however, due to workload it will not be possible to do this in every case. Brian also indicated that the submitted document should be a finished product. This submittal contained many blanks and no explanation.
5. Discussed the idea of creating a trimmed down SRC list and an expanded explanation in text form and a detailed table showing components of compounds and degradation by-products.
6. It was noted that the screening levels probably should not be included in this document unless they are being used as a metric for a rough comparison to detection limits.
7. Discussed radionuclides and expectations versus what was submitted.
8. Discussed the PIP letter from Jennifer Carr. Susan indicated she had not seen the letter. Brian provided a copy.
9. Susan requested copies of the BMI and TIMET documents on SRC. Brian to provide by mail.
10. Discussed various typos throughout the document.
11. Brian asked if Susan had reviewed the 6/11/04 letters to her on the personnel document and the ECIA response. Susan indicated that she had not seen these yet.
  - a. Discussed the personnel document. Brian indicated that it was important to identify who the project team was so that NDEP could be assured that appropriate expertise was being applied to the project (with Superfund

experience). Susan indicated that they had not yet gotten to that point. Brian indicated that with the schedule that had been presented to NDEP it is necessary to have that team in place by now. If Susan needs time to get the team together she needs to revise the schedule as such and let NDEP know.

- b. Discussed the ECIA response and the fact that “comments noted” does not necessarily indicate concurrence or disagreement. Susan agreed. Brian indicated that if the NDEP’s comments were going to be addressed through future submittals that needs to be indicated in the response. “Comments noted’ does not provide any information.