

September , 2004

Douglas L. Fisher
Environmental Affairs and
Safety Manager
Vernay Laboratories, Inc.
120 E. South College
Yellow Springs, Ohio 45387-1623

RE: Approval with Conditions EI 725 Report
Vernay Laboratories, Inc.
Yellow Springs, Ohio
OHD 004 243 002

Dear Mr. Fisher:

The United States Environmental Protection Agency (U.S. EPA) received and reviewed your responses to our June 18, 2004, comments on your Environmental Indicator (EI) Report for Human Health (CA 725), dated April 9, 2004. The U.S. EPA will be approving the EI Report and form for Human Health (CA 725) with conditions.

Our previous comment in regards to the subtraction of site-specific background levels from detected soil concentrations for inorganics in Question #2 on the EI CA 725 form has not been completely resolved by your response. At this time, it does not appear that Vernay Laboratories, Inc., eliminated any AOI's in Question #2 from further consideration in Questions #3 and #4. Screening procedures should still be done by comparing chemical concentrations that include both contaminant and background concentrations to risk based screening levels. The concern is that Areas of Interest (AOI's) may be eliminated from further consideration as a result of screening, when these AOI's should be carried through and further evaluated in Questions #3 and #4 of the EI form. The following condition will provide a solution and still provide us with the necessary information on all AOI's where there might be exposure issues:

- If Vernay Laboratories, Inc. subtracts out background for inorganics at AOI's in Question #2 (prior to risk based screening);
- Then Vernay Laboratories, Inc. will be required to provide us with a list of all AOI's where this subtraction of background was the driver for elimination of the AOI in Question #2 from further consideration in Questions #3 and #4; and
- If there are AOI's where this subtraction resulted in elimination of a specific AOI in Question #2, that we may require additional exposure information in order to make a determination on whether that AOI is an exposure concern.

The CA 725 Environmental Indicators Form for Human Health will be finalized based on the EI Report for Human Health dated April 9, 2004; U.S. EPA's comments dated June 18, 2004;

Vernay's Response to U.S. EPA's comments dated July 16, 2004; and the e-mail including further clarifications from Chris Buzgo, Environ Corp., dated August 24, 2004. Once the EI form is officially approved, signed, and dated a copy will be sent to you for your records.

The comments that highlight our policy on evaluating indoor air using appropriate health based screening levels for environmental indicator purposes and for site remedial decisions beyond the EI determinations has not changed. If you have any questions, please do not hesitate to contact me at 312-886-8093.

Sincerely,

Patricia J. Polston
Corrective Action Project Manager

cc: C. Olsberg, U.S. EPA, WMB
J. Morris, U.S. EPA, ORC
D. Contant, The Payne Firm

bcc: P. Polston