



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

SR-6J

December 2, 2020

Ms. Cheryl Vosburg
Executive Director
Kalamazoo River Watershed Council
1523 Riverview Drive, Suite A
Kalamazoo, MI 49004

RE: Request for information regarding Kalamazoo River sediment/soil PCB laboratory results

Dear Ms. Vosburg:

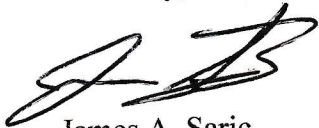
Thank you for your October 2, 2020 letter expressing the Kalamazoo River Watershed Council's (KRWC) concerns that Kalamazoo River sediment/soil PCB data, being collected as part of the Kalamazoo River Superfund Site effort, may be biased low. Your letter specifically mentions issues with laboratory analytical methodologies for calculating total PCBs and how this may impact achieving remedial goals. The KRWC also requested that a U.S. Environmental Protection Agency (EPA) representative attend a Watershed Council meeting.

On October 19, 2020, I participated in a KRWC meeting via conference call, and provided responses to your comments and answered additional questions. EPA has spent extensive resources and involved EPA regional and national chemists, TSCA experts, and national contaminated-sediment technical experts evaluating total PCB analysis using both congener versus aroclor analysis. EPA's position, with concurrence from all the above-mentioned experts, is that it is appropriate to continue to use aroclor data to make project decisions at this site and to use aroclor analysis to calculate total PCBs. EPA utilizes some PCB congener analysis at this site for surface water and young-of-year fish analysis, where low reporting limits are required. Superfund investigations using total PCB aroclor data have been ongoing at this site for more than 25 years. Since the data are used for evaluating past and future trends, continuing aroclor analysis for such evaluation is most appropriate.

As discussed on the call, to resolve potential issues with low bias of PCB sample results, EPA has worked with its regional chemists and quality assurance experts, the Responsible Parties' (RPs) laboratories, and the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to develop and implement a site-specific PCB analytical procedure for calculating total PCBs using aroclors. The site-specific PCB analytical procedure has been approved for use by PACE laboratories and is also being implemented by other RPs' laboratories and EPA's contractor. The use of the site-specific PCB analytical procedure should ensure consistency across all data sets and ensure that all remedial goals are being achieved.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Saric', written in a cursive style.

James A. Saric
Remedial Project Manager
SEMD Remedial Response Branch #1

cc: Dan Peabody, EGLE