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May 1, 2008

Ms. Isabel Rocha Rodrigues
Kentucky Avenue Site Project Coordinator
U.S. Environmental Protection Agency, Region II
Emergency and Remedial Response Division
290 Broadway, 20th Floor
New York, NY 10007-1866

Re: Responses to Additional Comments, Revised Remedial Investigation/Feasibility Study Work Plan, Koppers Pond, Kentucky Avenue Wellfield Site, Operable Unit 4, Horseheads, New York

Dear Ms. Rodrigues:

This letter responds to comments of the U.S. Environmental Protection Agency (EPA) forwarded by your electronic mail of April 28, 2008 regarding the Revised Remedial Investigation/Feasibility Study (RI/FS) Work Plan for Koppers Pond.

1. Section 4.0 Conceptual Site Model, Comment # 2, page 6: Please note that PAH metabolites can be assessed in bile, as per the abstract of "Biliary PAH metabolites and the hepatosomatic index of brown bullheads from Lake Erie tributaries," "Concentrations of PAH metabolites in bile of fish were positively associated with concentrations of PAHs in sediments, supporting the use of bile metabolites as a measure of PAH exposure." Please see the attached article for additional information:

We understand that EPA's comment was provided for our information and appreciate receipt of this article. No additional investigations beyond those currently described in the Revised RI/FS Work Plan are required.

2. Section 6.0 RI/FS Implementation, Comment # 5, page 9: The response should clearly indicate that composites will contain only the same type of fish; composites should not just be based upon the size of the fish.

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Up to 20 individual edible-size game fish samples (i.e., carp, largemouth bass, crappie, and sunfish) will be selected for analyses. Thus, game fish samples will not be composites. Any compositing would only be conducted for the samples of two size categories of forage fish/minnows, the results from which will be used in estimating food-chain exposures of higher trophic level ecological receptors. Different species of forage fish/minnows may be included in a given size category composite if needed to form an adequately sized sample for laboratory analysis. The number and species of forage fish/minnows contributing to composite samples will be documented in the field.

3. Section 6.0 RI/FS Implementation, Comment # 10, page 9: Please note that past sampling did not include AVS/SEM.

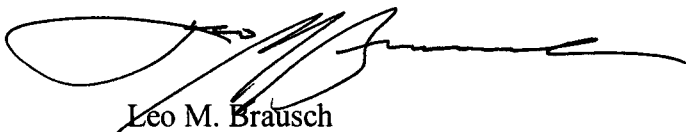
So noted.

4. New York State Department of Environmental Conservation, Comment # 3, page 11: Please note that in the event that concentrations exceed screening values, toxicity tests may be recommended regardless of AVS/SEM results.

So noted.

We trust these responses adequately address the comments raised by EPA. If you have questions regarding this submittal or related project matters, please do not hesitate to contact me.

Respectfully submitted,



Leo M. Brausch
Project Coordinator

LMB:

Attachment

cc: Koppers Pond RI/FS Group
P. D. Anderson
R. E. Keenan
J. H. Samuelian