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**From:** Genovese, Robert (BP) [Robert.Genovese@bp.com]  
**Sent:** 8/11/2017 8:54:08 PM  
**To:** Kelly, Albert [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=08576e43795149e5a3f9669726dd044c-Kelly, Albe]  
**CC:** Falvo, Nicholas [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=424ac90ea7d8494a93209d14d37f2946-Falvo, Nich]; Miner, Robert [Robert.Miner@bp.com]  
**Subject:** East Chicago groundwater - USS Lead site

Kell,

I'm glad that we had the opportunity to discuss Montana Superfund sites earlier this week. I'm hopeful that, after many years of sustained effort and the commitment of substantial resources, Atlantic Richfield will be able to progress these Superfund sites to remedy completion with an appropriate legal release and EPA will be able to remove the sites from the NPL.

At the end of our meeting, we briefly discussed the USS Lead site in East Chicago. You asked me about AR's perspective on how to manage groundwater risk at this site. I'd like to share a few thoughts.

Environmental risks have three elements:

1. Harmful levels of contaminants
2. Pathway for transmission
3. Presence of biological receptors (people and wildlife)

Eliminating any one of these elements eliminates the risk.

You indicated that groundwater testing needs to be conducted in the East Chicago community. I don't know the condition of the groundwater. However, if groundwater has been impacted, then cleanup may be impractical given the extensive use of non-native fill material and one hundred years of heavy industrial activity throughout the area. Removing people also seems impractical given the large number of people currently living in the community. Furthermore, the presence of people in the community is not an issue if there is no exposure pathway for contaminants in groundwater to reach people. Communities in East Chicago use municipal water from Lake Michigan. Groundwater is not used for drinking or agriculture in East Chicago.

Eliminating exposure pathways has been a demonstrated method to manage environmental risks. This can be accomplished through an Institutional Controls (IC) program. The EPA and ITRC have published studies about the effectiveness of IC programs that are properly designed and implemented. Atlantic Richfield has utilized IC programs in communities to protect people from exposure to contaminants in groundwater. These programs can operate at the local, county or state level.

You mentioned a potential exposure pathway through basement sumps. Typically, a sump that collects water intermittently is handling recent rainwater and does not mobilize contaminants. If sumps are collecting groundwater continuously and pose a risk to exposure, then sampling the sump water would provide information to assess if there is a basis for concern. I believe that DuPont has conducted some evaluation of basement sumps in Zone 3 related to their RCRA corrective action activities. I do not have the details.

Let me know if you would like to discuss further. I would be happy to provide experienced people from Atlantic Richfield who could offer input to the EPA as the agency considers next steps to address concerns in the East Chicago community.

Best Regards,

# *Bob Genovese*

President

Atlantic Richfield Company

Email robert.genovese@bp.com

Phone **Personal Matters / Ex.**