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NASJRB WILLOW GROVE
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MEMORANDUM REGARDING U S EPA REGION III COMMENTS ON RESPONSE TO
COMMENTS FOR DRAFT REMEDIAL INVESTIGATION REPORT FOR SITE 3 NASJRB
WILLOW GROVE PA
05/26/2011
U S EPA REGION III

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103

SUBJECT: Willow Grove
Draft RI – Site 3 Ninth Street Landfill
Rebuttal Response to Navy's Comment (Tox memo dated 3/2/11)

FROM: Linda Watson, Toxicologist
Technical Support Branch (3HS41)

TO: Lisa Bradford, RPM
Federal Facilities Section (3HS13)

DATE: May 26, 2011

I have reviewed the Navy's response to my comments (memo dated 3/2/11) in regards to the Draft RI – Site 3 Ninth Street Landfill and have the following comments to offer:

EPA toxicological comments in regards to the report text could not be verified since the Revised Draft reported submitted for review only included the Appendices A – L. Therefore, the following comments still apply although EPA does concur with the Navy's response:

1. Section 2.0 is not included in the report.
2. Section 6.6.1.1, Selection of Locations and Numbers of Samples, page 6-42, 2nd paragraphs. The sentence reads, "Two surface soil samples analyzed for dioxin (03SS04 and 03SS08) were collected from the baseball diamond during the Phase II Investigations in 1997." According to Figure 2-2, sample 03SS04 is NOT located near the baseball field but instead is located west on Unknown Anomaly 2.

RAGS D Table Rebuttal Response

3. Table 2.02. Soil to Groundwater. The identified Exposure Point column "Tap water Contact or Water Vapors at Showerhead" is incorrect. It should read "Soil impact to Groundwater."
4. Table 3.03. The reported statistics do not agree with the contaminant concentrations reported in Table 2.03. This table corresponds with Table 2.04. Please correct this error.
5. Table 6.02. Although the IUR for carbon tetrachloride is reported correctly in the table, it is not used to calculate risk. See Table 7.02RME.

6. Table 6.02. The IUR for aroclor-1254 has not been changed. The correct IUR should be 5.7E-04.
7. Table 7.27RME, 7.28RME. Based on the most recent RSL table chromium is now identified as a mutagen and must be evaluated as such.

The Navy's response to this comment could not be verified since page 6-33 was not included in the review submission.

If you have any questions regarding these comments, please contact me at X3116.

cc: Eric Johnson