

Monaco, Lonnie J (EFANE)

From: Barry.Michael@epamail.epa.gov
Sent: Thursday, September 05, 2002 10:29 AM
To: aeasterd@eaest.com; clepagegeo@aol.com; claudia.b.sait@state.me.us;
monacolj@efane.navy.mil; fohnermr@efdnorth.navy.mil;
williamsa@nasb.navy.mil
Subject: site 7 rod parts 1 & 2 epa comments

Below are EPA comments to the site 7 revised (draft final) ROD
The part 1 comments are essentially the same as the ones sent on
8/22/02, but a reworded a little more formally.

The part 2 comments are editorial but address some of the substantive
comments to part 1. These were discussed by phone with EA on 30 Aug
2002.

Mike Barry
RPM, Federal Facilities
EPA-New England
617.918.1344

----- Forwarded by Michael Barry/R1/USEPA/US on 09/05/2002 09:55 -----

Michael Barry
08/22/2002 17:17 To: monacolj@efane.navy.mil
cc: aeasterd@eaest.com, clepagegeo@aol.com,
claudia.b.sait@state.me.us,
fohnermr@efdnorth.navy.mil,
williamsa@nasb.navy.mil
Subject: site 7 rod part 1

All comments regarding paragraph 2 after the bullets on page 1-2, in the
middle of the page:

1. It says that there is a high probability the Mn is due to background
and then goes on to say it does not pose a threat to HH&E. This is not
correct as Mn is above the MEG and secondary MCL. Wording to the effect
as this would be acceptable: either that it's not actionable, or just
say that if it's background, no remedial actions are necessary/required.

2. Unfortunately, the background data doesn't look the same to all
parties. It may also be possible that the Mn is naturally occurring but
was released/elevated due to past activities at the site and is slowly
resorbing and or diluting due to natural processes. If this is true it's
source would be both natural and site activities. This is a "mirror
image" of EPA's view regarding the Cd vis a vis the organic material.
This could be resolved as with the Cd, by referring to as from a
combination of natural and site sources.

3. Last sentence. The Navy's position is understood by EPA, but EPA
cannot concur to Navy opinion in a ROD, especially on the Declaration.
We understand this may be the real issue later, but perhaps another way
to say this is just to put "background" in front of the manganese. Most
would agree that if it is background manganese then no action is
justified under CERCLA. This would enable all to agree to the ROD and
future background issues can be resolved within the project team and the
ROD modified as appropriate. This situation, of course, anticipates that
Cd will decrease below the MCL of 5ppb and Mn will remain above the MEG
of 200ppb. (Note that the MCL of 50 is a secondary one).

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EPA Comments to site 7 revised (draft final) ROD, part 2.
Received, 29 Aug 2002. The substantive part of these comments is covered
in the comments to part 1 above. Editorial comments were discussed by

telephone with Al Easterday on 30 Aug 2002.

1. Comments center on pages 2-9/10, 2-22 and 2-30. In all three areas, the remedy and components are discussed. The text on pages 2-9 is new and should be copied and pasted to the other sections after resolution of comments.

2. Regarding text on page 2-9; second paragraph of 1st bullet. EPA can't concur with a Navy preference, but we can concur that a clean closure situation is preferred. The text could then go on to say that the Navy may execute a removal of the slightly contaminated soil under its authority in the future and submit a closure report for regulator's concurrence to remove the IC's by modifying the ROD. (use modify rather than amend as an ESD will be the likely document).

3. Page 2-29 section XI, 1st paragraph. Recommend deleting last sentence as it appears more detail is contained here before describing remedy components. This may be n/a after page 2-9 wording is inserted.

4. Page 2-30, 1 LTM; recommend say LTM will be implemented within 15 months rather than by end 2002. This may be n/a when page 2-9 text is substituted.

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LATE BREAKING ITEM?

5. EPA was under the impression all excavated soils were removed from site and the March 2002 Report was the final documentation of the removal. We are informed some soil was spread by Foster Wheeler per a July 2002 report. this should be documented in the ROD.

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(signed)
Mike Barry
RPM, Federal Facilities
EPA-New England
617.918.1344