

Response to Comments
Draft Focused PA/SI
HPCA, POIA, and FC
MCB CamLej, North Carolina

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Introduction

The purpose of this document is to address comments on the Draft Focused Preliminary Assessment (PA)/Site Inspection (SI) for the Hadnot Point Construction Area (HPCA), Post Office Intersection Area (POIA) and Fitness Center (FC) site. The United States Environmental Protection Agency (USEPA) and the North Carolina Department of Environment and Natural Resources (NCDENR) provided the comments listed. The responses to comments are provided in bold.

United States Environmental Protection Agency Comments (dated September 23, 2010)

The EPA has completed its review of the above subject document, dated October 2009 and agrees with the conclusions and recommendations as presented. However, further assessment is required of the soil area located around MR08-IS056. Although the current evaluation of the data does not demonstrate a risk to human health and/or the environment, it leaves to question if the actual extent of contamination has been identified. Therefore, the soils located around this area should be included in the next sampling effort. Also, further assessment should occur at Exposure Units 4, 5, 7, & 8 to determine if land use restrictions may be required.

The recommendations of the Final Focused PA/SI for the HPCA, POIA, and FC will be revised to recommend further assessment of soils located around sample location MR08-IS056 in addition to further assessment of Exposure Units 4, 5, 7, & 8 to evaluate the need for land use restrictions.

North Carolina Department of Environment and Natural Resources Comments (dated December 9, 2009)

1. The Executive Summary on page iv and Section 5.2 discuss the NC Hazardous Waste Section Soil Screening Limits (NC HWS SSLs). The NC HWS Soil Screening Levels for protection of groundwater have been superseded by the attached Federal Remediation Branch (FRB) Target Screening Values. These new FRB Target Screening Values are based on the chemical specific data from the updated EPA RSL Tables. EPA Region IV sent notification on June 13, 2008 that the new EPA RSL Tables replaced the Region IX PRG Tables. However, the FRB Target Screening Values Tables were completed in October 2009. Therefore, these new FRB Target Screening Values have just now become available for application to site screening. Please replace the former NC HWS SSLs, used in this Focused PA/SI Report, with the attached updated FRB Target Screening Values. For all future work at NC Superfund Sites the attached FRB Tables should be used when determining soil screening values for risk screening. The NCAC 2L Groundwater Standards will be revised and updated in January 2010. The FRB Tables will be updated at that time to reflect the new NCAC 2L Groundwater Standards. Please make a note of it.

The Final Focused PA/SI for the HPCA, POIA, and FC will be updated to include the most recent regulatory criteria, including the USEPA Regional Screening Levels (RSLs) (May 2010), the North Carolina Soil Screening Levels (NC SSLs) (January 2010), and the North Carolina Groundwater Quality Standards (NCGWQS) (January 2010).

2. The second and third paragraph on page 4-3 discusses a missed seed item during DGM. The NC Superfund Section agrees that we need to thoroughly investigate this situation. The missed seed item brings doubt to the digital geophysical mapping (DGM) process. Please clarify. Was the missed seed item found?

It was concluded that either the seed item was not buried at the surveyed location or the coordinates were recorded incorrectly. Because all the other seed items were found, this was not determined to be a failure in the DGM process. An attempt was made to locate the seed item within a 1-meter radius of the recorded coordinates, but the seed item was not found. The DGM data was re-evaluated and no response was found at the surveyed location. Therefore, the failure was in the placement and/or recording of the location. The text will be updated to provide this clarification. The seed item may be located during an intrusive investigation which is planned under separate contract.

3. Risks that are associated with the Group 1 through Group 4 as discussed on pages 6-26 and 6-27 could be associated with a larger groundwater contaminant plume since these Groups are represented by only a few monitoring wells. However, as noted in the conclusions section, the risks were based on the maximum concentrations detected in each group and were not consistent or not high enough to create a risk in any of the area groundwater. Therefore, the groundwater in a larger plume would only decrease the observed maximum groundwater concentration and risk.

Agreed.

4. The last paragraph on page 8-1 discusses subsurface soil in the last paragraph. This paragraph should be discussing surface soil. Please confirm that the conclusions and statements in this paragraph are based on surface soil data outside of Site UXO-08. I noted this at other sections of the report. Please recheck all areas and media in this regard.

The conclusions and statements in the last paragraph on page 8-1 are based on surface soil data. The document will be carefully checked to ensure that all data is referenced properly.

5. Page 8.3.2 on page 8-4 refer to the POIA. Please confirm that this is the result for the Fitness Center area and make appropriate corrections.

The results in Section 8.3.2 are based on the Fitness Center area. This site area mentioned in the paragraph will be revised. The document will be carefully checked to ensure that all data is referenced properly.

NCDENR Comments on the Ecological Risk Screening (dated February 1, 2010)

1. Sections 7.3.1, 7.4.1, and 7.5.1: The reason for the elimination of antimony and lead is that the concentrations are less than the USEPA Region 4 ESV. However, according to Region 4 contacts, this portion of their guidance is outdated and the Eco SSLs should be used.

The rationale for excluding antimony and/or lead as an analyte of potential concern based on comparison to the Region 4 ESV when EcoSSLs are available will be removed. The text in Sections 7.3, 7.4 and 7.5 will be updated to either reflect (1) the addition of these analytes to the list of analytes potentially posing risk or (2) the updated rationale explaining why the analyte does not have potential to pose risk.

For the Hadnot Point Construction Area (Section 7.3), antimony in surface soil will be added to the list of analytes that may pose risk to populations of receptors. Lead was already identified as an analyte that may potentially pose risk so no changes will be made to address lead.

At the Post Office Intersection Area (Section 7.4), while HQs for antimony in surface soil were both greater than one, the maximum detected antimony concentration (1.05 mg/kg) was only slightly greater than the maximum detected background value (0.9 mg/kg) suggesting that concentrations of antimony are likely representative of background. Additionally, the magnitude of exceedance based on the average antimony concentration was low. Similarly, the average lead concentration (30.1 mg/kg) was found to be within the range of background for lead in surface soils (maximum background = 38.5 mg/kg) suggesting that on

average, lead concentrations across the site are representative of background conditions. This will be added to the report.

At the Fitness Center (Section 7.5), while HQs for antimony in surface soil were both greater than one, the maximum detected antimony concentration (0.754 mg/kg) was within the background range for antimony in surface soils suggesting that concentrations of antimony across the site are representative of background. The average lead concentration (30.5 mg/kg) was found to be within the range of background for lead in surface soils (maximum background = 38.5 mg/kg) suggesting that on average, lead concentrations across the site are representative of background conditions. This will be added to the report.

2. Page 7-4, last paragraph: Please clarify that the LD50 of 2,250 mg/kg for mice was for the methylcyclohexane.

The text will be updated to indicate that the noted LD50 value is for methylcyclohexane.

3. Section 7.3.6: The detection frequency of methylcyclohexane in surface soil is listed as 115/304, or 38%. It should be removed from the list of compounds detected at a low frequency.

Methylcyclohexane and 4-Methyl-2-pentanone were both removed from the list of analytes in surface soil with low frequencies of detection.

4. Sections 7.4.4 and 7.5.4: Section 7.1.6, referenced in both these sections, was not included in this report. Please add.

This section call out should refer to Section 7.3.6. The text will be updated accordingly.

NCDENR Comments on the Human Health Risk Screening (dated February 2, 2010)

1. Tables 5.2 and 6.2: USEPA no longer recommends the adjustment of inhalation toxicity values based on body weight and inhalation rate. Please see *Risk Assessment Guidance For Superfund Part F* at <http://www.epa.gov/oswer/riskassessment/ragsf/index.htm> for clarification.

The HHRA will be revised in accordance with the *Risk Assessment Guidance for Superfund Part F*.