



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303

August 25, 2009

Ms. Jan Nielsen
NAVFAC Mid-Atlantic
OPNCEV
9742 Maryland Avenue
Norfolk, VA 23511

SUBJ: MCAS Cherry Point
Draft Final Supplemental Investigation
Operable Unit 1 – Site 17

Dear Ms. Nielsen:

The Environmental Protection Agency (EPA) has completed its review of the above subject document, dated July 2009. Once the risk assessment areas have been addressed (see attached comment), the document can be finalized.

If there are any questions, I can be reached at (404) 562-8538.

Sincerely,

Gena D. Townsend
Senior Project Manager

Enclosure

cc: George Lane, NCDENR
Jeff Christopher, MCAS Cherry Point

Comment

The purpose of this document was to evaluate data from the latest field investigation to determine if the PCBs and dieldrin concentrations remaining in the site media (soil and groundwater) are at levels that are protective of human health and the environment. The document accurately presented the data, however, there is a disconnect between the Risk Assessment and the Conclusion and Path Forward.

The Risk Assessment states “Exposure to shallow groundwater by future lifetime and child residents as potable use may result in unacceptable risks. The noncarcinogenic hazard to a child resident and CR to the future lifetime resident using the shallow groundwater as a potable water supply exceed USEPA acceptable levels for both RME and CTE evaluations. The noncarcinogenic hazard to a child resident is associated with dieldrin and the CR to the future lifetime resident is associated with both dieldrin and Aroclor-1260.”

The “Conclusion and Path Forward Section” mentions the installation/sampling of permanent wells and the sampling results for the contaminants of concern were non detect. However, it does not clearly explain how this effects the risk assessment.

Information should be added to the Uncertainty Assessment portion of the Risk Assessment that explains the most recent groundwater data was collected from temporary wells. It should also explain the uncertainty in collecting groundwater data in this manner; permanent wells were installed to verify the data and the data collected from this round of sampling did not identify any contaminants of concern. Therefore, to be stated in the Human Health Risk Summary, there is no unacceptable risk exposure to shallow groundwater by future lifetime and child residents.