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Brown & Root Environmental

A Division of Halliburton NUS Corporation

Foster Plaza VII
661 Andersen Drive
Pittsburgh, PA 15220-2745

(412) 921-7090
FAX: (412) 921-4040

C-49-03-6-097

March 12, 1996

Project Number 4513

Mr. Gary McSmith
Department of the Navy
Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street, Code 18234
Norfolk, Virginia 23511-2699

Reference: NAVY CLEAN CONTRACT N62472-90-D-1298

Subject: CONTRACT TASK ORDER NO. 190
MCAS CHERRY POINT, NORTH CAROLINA
DRAFT RESPONSE TO COMMENTS ON DRAFT FINAL REMEDIAL INVESTIGATION
REPORT
AND ON DRAFT FEASIBILITY STUDY/PRAP/ROD

Dear Mr. McSmith:

Brown & Root Environmental is pleased to submit these draft Responses to Comments on the MCAS Cherry Point OU3 Draft and Draft Final Remedial Investigation (RI) Report and the Draft Feasibility Study (FS)/PRAP/ROD. Copies have also been forwarded to each member of the Partnering Team responsible for report review (Renee Henderson, Gena Townsend, Linda Raynor, and Cindy Tschaepe).

The comments on the Draft RI were provided by Kevin Koporec of the USEPA (distributed to the Team by Gena Townsend on 11/1/95). Linda Raynor and David Lilley of the State of North Carolina provided comments on the Final RI (October 1995). The comments on the Draft FS/PRAP/ROD were provided by yourself, Gena Townsend of the USEPA, Orathai Gossage and Renee Henderson of the MCAS Cherry Point, Cindy Tschaepe of OHM, and Linda Raynor and David Lilley of the State of North Carolina.

As noted in the Response to Comments, several of the comments have raised issues that need to be discussed before the revisions to the documents can be completed. A brief discussion of each of these issues is provided below.

- **Land Use at Site 7**

The following questions need to be answered regarding land use at Site 7:

- The specific intended land use at Site 7 needs to be defined.
- Acceptable documentation of the intended land use at Site 7 needs to be determined
- The specific alternatives that need to be evaluated in the FS based on the intended land use need to be defined

The RI was prepared with the understanding that future residential use of Site 7 was a possibility, although a very slight one. In January 1996, George Radford of MCAS Cherry Point indicated that Site 7 would not be considered for future residential use, and probably would not be considered



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for future industrial use (i.e. Site 7 would remain vacant), because of its proximity to the Sewage Treatment Plant. In any case, a hypothetical future Residential Use Scenario must still be evaluated in the Baseline Human Health Risk Assessment. The current RI indicates that this exposure scenario, as well as the future Construction Worker Scenario, present unacceptable risks.

The RI can be modified to indicate that, even though the risks are unacceptable under these exposure scenarios, the Residential Use and Construction Worker Scenarios are not likely scenarios since Site 7 will most likely remain much as it currently exists (i.e., vacant). However, some documentation of the expected land use at Site 7 is required. The Base Master Plan is the document that could contain the language needed to restrict the land use at Site 7. It is Brown & Root's understanding that you are checking with the people at LANTDIV responsible for preparing the Base Master Plan as to the language that may be contained in the Base Master Plan. In addition, Linda Raynor is checking with attorneys for the State as to the language that would be acceptable to them, since there are no deeds to be restricted (normal procedure for controlling land use).

The State of North Carolina has indicated that, because of the presence of lead in the soil at Site 7 above 1,300 mg/kg (issue number 2), the acceptability of any remedial alternative is dependant on the projected land use at Site 7 (vacant - fence/institutional controls would be adequate, industrial/residential - additional remedial actions would be required).

It is Brown & Root's recommendation that the RI/FS be written with the intended land use at Site 7 continuing to be vacant (most probable use of the land at Site 7).

• **Lead Screening Level**

- The use of the 1,300 mg/kg level as a screening level for lead in soil in industrial settings needs to be decided.

At the time the RI was written, there was no guidance to address either infrequent or frequent adult exposure to lead. Exposure to lead by children was quantitatively addressed using the USEPA Integrated Exposure Uptake Biokinetic (IEUBK) Model. The screening level of 1,300 ppm for industrial settings that has been indicated in the comments on the RI and the FS was received after the RI was submitted as Final in October 1995.

To incorporate the 1,300 mg/kg lead level would involve the revision of several sections of the RI and FS. Before the RI and FS can be revised, the potential land use issue for Site 7 needs to be resolved (issue number 1). Additional alternatives may also need to be added to the FS in response to the State's comments on the FS.

This level was obtained by the State of North Carolina in discussions with Kevin Koporec of the USEPA. It is Brown & Root's understanding that this value is being proposed by the Task Force within USEPA that is to develop a value for industrial settings. Brown & Root believes this value to be an unpublished value and, as such, Brown & Root is uncertain if it has undergone peer review, etc. Consequently, Brown & Root is reluctant to issue a RI/FS/PRAP/ROD based on this level being an action level for soil in an industrial setting. Brown & Root, therefore recommends that the 1,300 mg/kg level not be considered.



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- **Monitoring Requirements**

- The detail needed in the ROD for any continued monitoring at OU3 needs to be determined.

The State of North Carolina indicated in a telephone conference on March 6, 1996 their preference for monitoring requirements at Site 7. Monitoring requirements will need to be identified in the Final ROD (either generic or specific requirements). The specifics identified by the State include the following:

- Surface Water - Quarterly monitoring for 2 years for TAL metals, cyanide, and semivolatile organics. Methods of analyses are identified in 40 CFR 136.
- Sediments - Yearly monitoring for 2 years for TAL metals, cyanide, and semivolatile organics. May require elutriate methods (Linda Raynor thought they sounded like TCLP extraction and analysis. Will need to check with Dianne Reid.).
- Groundwater - Quarterly monitoring for 2 years for full TCL/TAL because of presence of compounds from all fractions in the previous groundwater samples.

The State has indicated that they will need to review the Sampling Plan (sample locations, methods, procedures, etc.). All methods will have to be selected such that the detection limits are below state standards, although this may not be possible for all parameters. Deborah Sawyer of the State of North Carolina indicated that bioassays may be required at a later date, depending on the results of the monitoring.

Brown & Root believes that these monitoring requirements are excessive. The flyash has been at the site for the last 50 years and is not expected to adversely impact the surface water, sediment, and groundwater. In addition, several of the parameters detected in the surface water and groundwater at OU3 have not been shown to be site related parameters. Therefore, Brown & Root recommends that the monitoring requirements be presented in generic form in the ROD.

- **New Risk Assessment Guidance from USEPA**

- It needs to be decided whether the new risk assessment guidance from USEPA should be used in revising the RI/FS.

Brown & Root received new the Risk Assessment Guidance from USEPA Region IV in February 1996. This guidance was dated November 1995, after the Final RI for OU3 was submitted. However, some of the comments received from Kevin Koporec of EPA at the November 1, 1995 Partnering Meeting (again, after the Final RI was submitted) allude to the information contained in the new guidance.



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If the comments from Kevin Koporec and/or the new guidance from EPA Region IV are incorporated into the RI, several changes will occur. The new guidance differs from the way the RI was prepared in the following areas:

- Comparison of site data to background data
- Including all carcinogenic PAHs as COPCs if any carcinogenic PAHs are retained as COPCs
- Assuming log normal distribution for all data (would require recalculation of some UCLs)

These differences would require that the list of COPCs be regenerated and if new COPCs are identified or UCL concentrations change, certain risk calculations will need to be redone. The cost to the project in terms of budget and schedule is expected to be approximately \$8,000/3 weeks.

However, it is Brown & Root's opinion that the final risk values will not change enough to alter the conclusions and recommendations provided in the RI and subsequently in the FS. Therefore, Brown & Root recommends that the new guidance not be incorporated into the revision of the OU3 RI or the OU2 RI, but that any subsequent documents be prepared using the new guidance.

- **Format of the PRAP and ROD**

- The format of the PRAP and ROD needs to be agreed upon.

EPA indicated in their review that the formats of the PRAP and ROD follow the formats for a PRP-lead site and not a Federal Facility. The guidance used by Brown & Root does not indicate a difference in the format of the PRAP and ROD.

MCAS Cherry Point indicated in their review of the PRAP and ROD that the latest guidance should be used. Brown & Root believe that the guidance used for the preparation of the PRAP and ROD was the most current guidance.

Copies of the cover pages of the guidance documents used by Brown & Root were sent to Gena Townsend of USEPA and Orathai Gossage of MCAS Cherry Point. Brown & Root is awaiting confirmation that the guidance used was indeed the correct guidance.

- **Size of Figures**

- The use of 11 x 17 figures in the documents needs to be re-discussed.

Several comments noted that the figures in the FS/PRAP/ROD were difficult to read. The figures originally developed for the RI were 24 x 36 inch plates. At the request of USEPA, these plates were reduced to 11 x 17 inch figures and both the plates and the figures were included in the RI. These 11 x 17 figures (reductions of the 24 x 36 inch plates) were then included in the FS/PRAP/ROD. One possible solution would be to incorporate the plates into the FS/PRAP/ROD (quickest solution). Another solution is to redraft all of the 11 x 17 inch figures, at a cost of approximately 3 weeks/\$8,000.

It is Brown & Root's recommendation that for all documents for OU3, that both the 24 x 36 inch plates and the 11 x 17 inch figures be included where appropriate. For all subsequent documents, only the 24 x 36 inch plates be included (11 x 17 inch figures could be provided only to those reviewers that request them)



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In order to meet the June 30, 1996 deadline for a signed ROD for OU3 at MCAS Cherry Point, the following schedule is being proposed:

Task Name	Approx Cal Days	Duration	Start	Finish
Revise RI/FS/PRAP/ROD (Contractor)	26	20d	March 11, 1996	April 5, 1996
Regulatory Review (LANTDIV, MCAS, USEPA, NC)	12	8d	April 5, 1996	April 17, 1996
Review Meeting (TEAM)	2	2d	April 18, 1996	April 19, 1996
Finalize and Produce RI/FS/PRAP/ROD (Contractor)	12	8d	April 19, 1996	May 1, 1996
Publish Announcement (Contractor)	1	1d	May 1, 1996	May 1, 1996
Public Meeting Preparation and Performance (TEAM)	15	11d	May 1, 1996	May 15, 1996
Public Comment Period	30	23d	May 1, 1996	May 31, 1996
Issue Responsiveness Summary and Final ROD (Contractor)	15	11d	May 31, 1996	June 14, 1996

The Review Meeting (not a teleconference) identified in the schedule would consist of the MCAS Cherry Point Partnering Team reviewing the documents together and resolving issues at that time. Based on the number of comments received on the RI/FS/PRAP/ROD and the time remaining, it is felt that this meeting is required to ensure that the documents are revised to everyone's satisfaction before the documents are produced for inclusion in the information repositories.



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A teleconference has been tentatively scheduled for 9:00 AM or 1:00 PM Friday, March 15, 1996 to discuss these issues, the draft responses to comments, and the schedule for the completion of the RI/FS/PRAP/ROD for OU3.

Please feel free to call me at (412) 921-8591 if you have any questions.

Sincerely,

Amy E. Hubbard For

Amy E. Hubbard
Project Manager

GLZ/tak

Enclosure

cc: Renee Henderson, MCAS Cherry Point (w/attachment)
Linda Raynor, NCDEHNR, (w/attachment)
Gena Townsend, USEPA, (w/attachment)
Cindy Tschaepe, OHM (w/attachment)
John Trepanowski, Brown & Root, Wayne (w/attachment)
Matt Cochran, Brown & Root, Pittsburgh, (w/attachment)
Daryl Hutson, Brown & Root, Pittsburgh, (w/attachment)
File: CTO 190