

2/2/06-04936

Capito, Bonnie P CIV NAVFAC Lant

From: Jackson, Rodger W CIV NAVFAC Lant
Sent: Monday, March 06, 2006 7:59 AM
To: Capito, Bonnie P CIV NAVFAC Lant
Subject: FW: PRAP comments OU6 Site 12

Attachments: Draft OU6 PRAP.pdf



Draft OU6
PRAP.pdf (634 KB)

CH PT AR

-----Original Message-----

From: Townsend.Gena@epamail.epa.gov [mailto:Townsend.Gena@epamail.epa.gov]
Sent: Thursday, February 02, 2006 15:18
To: GeorgeL100@aol.com; townsend.gena@epamail.epa.gov; jeffrey.christopher@usmc.mil;
Jackson, Rodger W CIV NAVFAC Lant; george.lane@ncmail.net; Doug.Bitterman@ch2m.com;
william.friedmann@ch2m.com
Cc: Brock.Martha@epamail.epa.gov
Subject: PRAP comments OU6 Site 12

comments embedded in .pdf

(See attached file: Draft OU6 PRAP.pdf)

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US EPA
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Summary of Comments on Proposed Remedial Action Plan

Page: 1

Author: gtownsen

Subject: Text Box

Date: 2/2/2006 15:16:27

 Final Comments from EPA. If there are any questions, I can be reached at 404 562-8538.
Gena Townsend, RPM

Author: gtownsen

Subject: Note

Date: 2/2/2006 13:40:55

 Verify that ICs would be needed for soil. The meeting discussions have always suggested that when the remedial action was completed, the area would be suitable for residential use. What is the justification for the industrial use designation?

Author: gtownsen

Subject: Note

Date: 2/2/2006 13:50:21

 "criteria" seems to invite question, "what criteria?"

Author: gtownsen

Subject: Cross-Out

Date: 1/17/2006 13:47:23



Author: gtownsen

Subject: Cross-Out

Date: 2/2/2006 13:49:03



Page: 2

Author: gtownsen

Subject: Note

Date: 2/2/2006 13:53:33

 Text should be added to clarify that Site 35 was remediated under the State's RCRA authority and is no longer a part of OU 6.

Author: gtownsen

Subject: Cross-Out

Date: 1/17/2006 13:53:31

 concurrently with an
investigation at Site 12

Author: gtownsen
Subject: Note
Date: 2/2/2006 13:58:31

Section 2.0. The bullets describing the first three-described principal features of OU6 invite the question, "where do these structures discharge?" Please address by adding "which discharges/discharged to . . ."

Author: gtownsen
Subject: Note
Date: 1/17/2006 14:20:42

This below included text should be included in the PRAP explaining the historical burn pits and that the existing contamination is a result of past practices. "The five historical burn pits described below and are labeled as A, B, C, D, and E on Figure 4 for reference.

- **Burn Pit A.** This burn pit is located furthest east of the five historical burn pits. Records indicate that the pit was used from 1964 to 1970 for fire fighting/crash-crew training. During the 1999 RI field activities a surface soil sample was collected at the approximate center of this former burn pit. Results showed no organic constituents exceeding screening criteria; however, iron and mercury were detected at concentrations greater than the North Carolina Soil Screening Levels (NC SSLs) and arsenic was detected at a

2-2

2-SITE DESCRIPTION/HISTORY

concentration greater than the USEPA Region III residential Risk-Based Concentration (RBC).

- **Burn Pit B.** This burn pit is located approximately 100 feet west of Burn Pit A (center of A to center of B). This burn pit was used for fire fighting/crash-crew training from 1978 to 1981. During the 1999 RI field activities a groundwater sample was collected from a permanent monitoring well located just south (less than 40 feet) of the approximate center of the burn pit. Results showed one detected organic compound (heptachlor epoxide) exceeding the Federal Maximum Contaminant Level (MCL). The results showed the inorganics aluminum, arsenic, iron, and manganese exceeding screening criteria. Of the inorganics exceeding screening criteria, aluminum, iron, and manganese exceeded the North Carolina 2L (NC 2L) groundwater standard.

- **Burn Pit C.** This burn pit is located approximately 100 feet west of the center of Burn Pit B and was utilized for fire fighting/crash-crew training during 1970. One surface soil sample was collected during the 1999 RI field activities. No organics exceeded screening criteria, although two inorganics (arsenic and iron) exceeded screening criteria.

- **Burn Pit D.** This burn pit is located approximately 200 feet west of the center of Burn Pit C and was in operation from 1978 to 1981 for fire fighting/crash-crew training. No previous sampling of soil or groundwater was conducted at the location of this former burn pit during the RI or previous investigations. This burn pit was the subject of the supplemental investigation activities described in this report.

- **Burn Pit E.** This burn pit is the most westerly of the historical burn pits and was operated from 1978 to 1981 for fire fighting/crash-crew training. No previous sampling of soil or groundwater was conducted at the location of this former burn pit during the RI or previous investigations.

Author: gtownsen
Subject: Note
Date: 2/2/2006 14:02:49

Section 2.2. In the description of the Geoprobe Site Check, the text states that 350 yards of soil were "reportedly" excavated and disposed of onsite. The use of "reportedly" invites the inference that soil may not have been (1) excavated, (2) disposed of, (3) disposed of onsite, or (4) that the quantity may be incorrect.

Please eliminate the confusion by describing the facts as they are known. [remove the word "reportedly"]

Page: 4

Author: gtownsen
Subject: Cross-Out
Date: 1/17/2006 14:01:41



Author: gtownsen
Subject: Cross-Out
Date: 1/17/2006 14:01:54



Author: gtownsen
Subject: Cross-Out
Date: 1/17/2006 14:02:10



Author: gtownsen
Subject: Cross-Out
Date: 1/17/2006 16:27:06



The Preferred Alternative selected in the FS was Excavation and Offsite Disposal for soil and ICs with MNA for groundwater.

Author: gtownsen
Subject: Note
Date: 2/2/2006 14:12:02



Section 2.2. The last sentence does not mention the possibility for ICs for soil, whereas the first paragraph in Section 1.0 does. Please clarify. [Suggest removing the entire sentence. The FS should not select the remedy.]

Author: gtownsen

Subject: Note

Date: 2/2/2006 14:14:07

Section 3.3. Please revisit the statement that "there is no defined groundwater plume in the vicinity of Burn Pit E," as discussed at the January 18/19 meeting, and replace with a statement that the plume appears to be localized to the area immediately surrounding Burn Pit E, perhaps with an addition of the estimated size of the plume.

Author: gtownsen

Subject: Note

Date: 2/2/2006 14:17:13

Section 3.3. Please move the first three sentences of the last paragraph to the section describing site risk. The nature and extent of contamination is not really impacted by land use; rather the risk of that contamination may be impacted by current and future land use.

The last sentence incompletely describes the idea of principal threat waste. The soil layer, which is a logical candidate for PTW, should be addressed.

Author: gtownsen

Subject: Note

Date: 2/2/2006 15:04:23

Section 5.1 The last two sentences of this section suggest that future residential use may present an unacceptable threat and that COPCs were not carried forward as COCs because of the "unlikelihood" of residential use. This is not a valid position. Verify if the numbers were exceeded for surface soil residential use. If so, a LUC should be included that restricts the area for industrial. Another approach would be to add language and an explanation that identifies this as natural background for this area and does not require remediation. [the appropriate language will have to be drafted that should be included in this document and the ROD.]

Page: 7

Author: gtownsen

Subject: Note

Date: 2/2/2006 14:33:23

 Section 5. Please add a new subheading **"5.3 Other Site Risk"** or other title as appropriate.

Page: 9

Author: gtownsen

Subject: Note

Date: 2/2/2006 14:36:55

 Use the actual cost numbers in the table.

Author: gtownsen

Subject: Note

Date: 2/2/2006 14:39:41

 add in parenthesis "Land Use Controls (LUC)" to "Institutional Control" alternative. Within the body of the text the term "LUC" is used not "IC".

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Author: gtownsen

Subject: Note

Date: 2/2/2006 14:41:45

 Use the actual cost numbers in the table.

Author: gtownsen

Subject: Note

Date: 2/2/2006 14:40:53

 add in parenthesis "Land Use Controls (LUC)" to "Institutional Control" alternative. Within the body of the text the term "LUC" is used not "IC".

Page: 14

Author: gtownsen

Subject: Note

Date: 1/26/2006 16:25:06

If this site was evaluated for use as an industrial area, then LUCs should be applied to ensure that the site will remain industrial use with no residential/recreational use. Thus the sentence is correct and the strikeout can be removed. However, if industrial use is correct, then a LUC for soils should be added to the alternative descriptions to prevent residential/recreational use.

Author: gtownsen

Subject: Cross-Out

Date: 1/26/2006 16:20:31

As long as
the site use remains industrial,

Page: 15

Author: gtownsen

Subject: Note

Date: 1/17/2006 16:47:24

 correct public comment date to begin March 13 and end April 24.

Author: gtownsen

Subject: Cross-Out

Date: 1/17/2006 16:44:42

 January 25 to March 10, 2006,

Author: gtownsen

Subject: Note

Date: 1/17/2006 16:48:04

 correct date

Author: gtownsen

Subject: Cross-Out

Date: 1/17/2006 16:47:49

 March 13, 2006.
