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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW
ATLANTA, GEORGIA 30303-8909

APR 28 1998

4WD-FFB

Mr. Lance Laughmiller
Naval Facilities Engineering Command, Atlantic Division (Code 18235)
1510 Gilbert Street
Norfolk, VA 23511-2699

SUBJ: Operable Unit (OU) 1, Site 16 (Debris Pile), Time Critical Removal Remedial Action Report dated January 1998, for MCAS Cherry Point, Havelock, NC

Dear Mr. Laughmiller:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. EPA concurs that this document meets reporting requirements outlined within the MCAS Decision Process Document, Node R3, and requests that removal results and conclusions will be considered and documented in the OU 1 RI/FS planned for FY 99. The following comments are forwarded to be considered during finalization of this document and the upcoming OU1 RI/FS investigation efforts:

1. Page 1-3, Section 1.3: The statement that Lead concentrations from 163-708 mg/kg is within the acceptable risk range of 1×10^{-6} is inaccurate and should be corrected. Currently, Lead does not have a RfD; therefore, it is not known whether the referenced concentration presents an unacceptable carcinogen. Additionally, per EPA policy, a screening level of 400 mg/kg in soil has been established and should be the referenced for the purposes of this report. Post removal site conditions and summary of confirmatory samples will need to be considered or documented during planned OU1 RI/FS activities.

2. Page 3-3, Section 3.2.5: The report states that two spills occurred within the removal area, one of which required excavation. Section 4.4.1 references one spill of 1,500 gallons of decontamination wash water due to an open valve with confirmatory samples collected and outline within Table 4-4. Another spill was noted at oil water separators in Section 4.10. Are these the same spills referenced in Section 3.2.5? Table 4-4 shows backfill analytical results not spill response confirmatory sampling results? Please clarify in Section 3.2.5., the type of spills, where the spill occurred, constituents involved, summary of response and confirmatory sample results, if applicable, and any relevant fate and transport concerns. Any releases from these spills will need to be addressed and documented during the OU1 RI/FS workplan activities.

3. Tables and figures: Could not correlate sample results presented in tables 4.1 through 4.4 to figures presented in the attached Final Removal Action Inspection

Report dated 4 Mar 97 (attached or appended to the RAR). The legends and sample ID numbers are either missing or partially presented. Therefore, I could not correlate what areas were excavated/removed and location of confirmatory to the tables. Request that this information be clearly presented in the RI/FS workplan. Additionally, EPA recommends including clear and concise figures and tables that demonstrate results of the remedial/removal action accomplished in a logical and sequential manner in this final report as well as in all future Remedial Action Reports.

4. The draft report did not include any of the referenced appendices, therefore I could not distinguish if the CERCLA off-site rule requirements were considered and adhered too. Please ensure the appendices are included and the CERCLA off-site rule addressed in the final report.

5. Section 2.2.3 references the discovery of an old incinerator. Later in section 4.9 there is discussion concerning the demolition of a kiln. Is this the incinerator referenced in the Section 2.2.3? Is there any information pertaining to the use and materials incinerated in the kiln? Any potential releases from the kiln will need to be addressed during the planned OU1 RI/FS workplan activities.

If you have any questions, please contact me at (404) 562-8542.

Sincerely,

Jay V. Bassett
Senior Remedial Project Manager,
Federal Facilities Branch

cc: Linda Raynor, NCDENR
Bill Powers and Rachael Johnson, MCAS Cherry Point
Matt Cochran, Brown and Root
Steve Bivone, OHM

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