

1/29/07-05088

Capito, Bonnie P CIV NAVFAC Lant

From: Jackson, Rodger W CIV NAVFAC MIDLANT
Sent: Friday, March 09, 2007 3:21 PM
To: Capito, Bonnie P CIV NAVFAC Lant
Subject: FW: OU14, Site 90 Draft RI Comments

Attachments: OU14RIComments_0107.doc; OU14, Site 90 Eco.doc; OU14, Site 90 HHRA.doc



OU14RIComments_0107.doc (32 KB...



OU14, Site 90 Eco.doc (26 KB)



OU14, Site 90 HHRA.doc (27 KB)...

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

From: george lane [mailto:george.lane@ncmail.net]
Sent: Monday, January 29, 2007 9:54
To: jeffrey.christopher@usmc.mil; GeorgeL100@aol.com; townsend.gena@epa.gov; Kathryn.Tippin@ch2m.com; Acree, Melvin L CIV NAVFAC MIDLANT; Jackson, Rodger W CIV NAVFAC MIDLANT; william.friedmann@ch2m.com
Subject: OU14, Site 90 Draft RI Comments

Hi Team,

I have uploaded my comments to the Cherry Point website. The attached comments are from Dave Lilley and Sandy Mort.

See you soon,

George

Division of Water Quality

January 4, 2007

MEMORANDUM

To: George Lane
Environmental Engineer
SF, Federal Remediation Branch, DWM

Through: Cindy A. Moore
Supervisor, Aquatic Toxicology Unit, DWQ

From: Sandy Mort
Environmental Biologist, Aquatic Toxicology Unit, DWQ

Subject: Review of Draft OU14, Site 90 Remedial Investigation
Marine Corp Air Station, Cherry Point, NC

ATU has completed review of the draft OU14 RI document, focusing on sediment and surface water ecological risk assessment components. ATU agrees with the conclusions and recommendations presented regarding risks to potential ecological receptors. Although some limited habitat was identified in the area of concern, it is purposely maintained in a manner as to not facilitate habitation, both for the safety of the potential receptors and for human activity taking place in the study area. There is limited potential for significant ecological impacts, based on the observed contaminant concentrations in site media, potential natural attenuation in groundwater, and the potential for exposure to receptors.

Recommendations for additional information in the report include:

1. Note the location of Tank Farm A on a site map.
2. What was the basis for selection of the time frames used in the groundwater models to estimate chlorinated VOC impacts? Time frames included 49 to 200-years for the Upper Surficial Aquifer and 9-19 years for the Lower Surficial Aquifer in the BIOCHLOR model. Explain the decision process to select these as appropriate time frames for evaluation.

ATU appreciates the opportunity to participate in the on-going investigative process at Cherry Point MCAS. If you require additional input or explanation please do not hesitate to contact me or other ATU staff.

January 27, 2007

TO: George Lane

FROM: David Lilley

RE: Comments on the Screening Level Ecological Risk Assessment portions of the Draft OU14, Site 90 Remedial Investigation, Marine Corps Air Station, Cherry Point, NC November, 2006

1. It must be pointed out that the methodology used to exclude COPCs from evaluation after step 2 does not conform to state (NCDENR, 2003a) guidance. That being said, this appears to be a site with limited COPCs and limited complete exposure pathways. On this particular site, I do not see additional value in stopping after step 2 and producing another document equivalent to Section 8.5 of this document. The practice of combining the first portion of Step 3 with the screening level ecological risk assessment would most likely not be appropriate or accepted for other sites.
2. Section 8.7: Will there be continuing monitoring to ensure that the groundwater discharge does not increase surface water contaminant concentrations to problematic levels?

January 24, 2007

TO: George Lane

FROM: David Lilley

RE: Comments on the Human Health Risk Assessment portions of the Draft OU14, Site 90 Remedial Investigation, Marine Corps Air Station, Cherry Point, NC November, 2006

1. Appendix J, Tables 2.2 and 2.4: It is unclear to the reader why the Region 9 tap water RBCs were chosen as screening values for the inhalation route. The tables in EPA's Subsurface Vapor Intrusion Guidance, 2002, should be used.

2. A spot check of Appendix J, tables 2.1 and 2.3 revealed the following:

The Screening Toxicity Value for Methyl-tert-butyl ether should be 6.2 ug/L, not 0.62 ug/L.

The WQS for 1,1-dichloroethane is 70 ug/L, not 700 ug/L as listed.

The NC 2L standard for carbon tetrachloride is 0.269 ug/L, not 3 ug/L as listed on this table.

Please correct and double-check these tables for accuracy.

3. Appendix J.3, Table 2b: The title of this table should be changed to be consistent with Section 7.5.3, paragraph 1 (future industrial and future residential scenarios). The same for Tables 3b and 4b.