

Brent, Thomas CIV NAVSURFWARCENDIV Crane, Code RP3-TB

From: Ramanauskas.Peter@epamail.epa.gov
Sent: Thursday, May 11, 2006 3:41 PM
To: Gates, William H CIV EFDSOUTH; Brent, Thomas CIV NAVSURFWARCENDIV Crane, Code RP3-TB
Subject: SWMUs 1 & 2 CMIP/SWMU 2 SB

Tom/Bill,

The May 2, 2006 email responses to comments are acceptable. No further comments on the SWMU 1 & 2 CMIPs.

I found errors in SWMU 2 SB as noted below. I am waiting to get some manganese info from Mario for SWMU 10.

- There is a problem with inconsistent use of units. For example, in the text on page 5, the MCS for Acid Orange 10 is reported as 150,000 mg/kg, while Table one reports it as 150,000 ug/kg.

- The left column on page 6 states that the objective of this corrective action is to monitor that acceptable contaminant concentrations are eventually achieved through natural processes. As stated before, we do not have natural attenuation occurring here. This should be changed.

Similarly, 'Other Considerations' on the same page refers to timeframes for achieving cleanup. 'Proposed Remedy and Rationale for Selection' on page 7 refers to contaminated groundwater and acceptable timeframes for remedy performance. What are those acceptable timeframes? This section also states that it is probable that organic contaminants will degrade naturally and monitoring data will ensure that LUCs remain in place until concentrations reach acceptable levels. To what monitoring does this refer? There are no GW detections and no degradation monitoring is proposed for dye material under the cap. This should be changed.

- Alternative 3 on page 6 notes that 31,000 cubic yards of material would require excavation. The October 28, 2004 Response to Comments states 19,000 cubic yards would require excavation. This needs to be corrected. Verify that the Alternative 3 cost accurately reflects excavation of this soil volume.

Pete