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DEPARTMENT OF THE NAVY
NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
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IN REPLY REFER TO

5090
Code 1823/ME

15 DEC 1999

Ms. Kymberlee Keckler
Remedial Project Manager
U.S. Environmental Protection Agency
1 Congress Street
Suite 1100 (HBT)
Boston, MA 02114-2023

Dear Ms. Keckler:

SUBJ: RESPONSES TO USEPA COMMENTS OF JULY 28, 1999 REGARDING THE DRAFT WORK PLAN AND SAMPLING AND ANALYSIS PLAN FOR THE BASEWIDE GROUNDWATER OPERABLE UNIT REMEDIAL INVESTIGATION FOR THE NAVAL SUBMARINE BASE - NEW LONDON, GROTON, CT

Thank you for reviewing the Draft Work Plan for the Basewide Groundwater Operable Unit Remedial Investigation for the Naval Submarine Base - New London. The Navy's responses to your comments are attached.

If you have any other questions or comments please do not hesitate to contact me at (610) 595-0567 ext. 162.

Sincerely,

Mark Evans
Remedial Project Manager
By direction of the
Commanding Officer

Copy to:
Mr. Mark Lewis, CTDEP
Ms. Darlene Ward, NSB-NLON
Mr. Dave Cercone, Tetra Tech NUS - Pittsburgh

RESPONSES TO USEPA's JULY 28, 1999 COMMENT LETTER REGARDING THE JUNE 1999 WORK PLAN AND SAMPLING AND ANALYSIS PLAN FOR THE BASEWIDE GROUNDWATER OPERABLE UNIT REMEDIAL INVESTIGATION NAVAL SUBMARINE BASE - NEW LONDON, GROTON, CONNECTICUT

December 15, 1999

GENERAL COMMENTS (Cover Letter)

1. Cover Letter; p. ii; Fourth paragraph

Comment: The general approach of delineating potential contaminant plumes in overburden groundwater by "stepping out" from source areas with an array of temporary (direct push) well locations at Sites 3 and 7 is sound. This offers a better prospect of putting defensible bounds on the extent of plumes than does the placement of a few permanent wells in advance.

Response: Agreed. No further action is required to address this comment.

2. Cover Letter; p. ii; Fifth paragraph

Comment: The SAP makes repeated reference in both text (*e.g.*, p. 2-3, §2.3.1.1, ¶. 1) and tables (*e.g.*, Table 2-3) to the Target Compound List (TCL) for organics and the Target Analyte List (TAL) for inorganics. However, these lists do not appear to be provided explicitly anywhere in the document. It is noted that Tables 1-1 to 1-7 in the QAPP (Appendix C) show analytical detection limits for TCL/TAL constituents. Can it be assumed that all compounds or elements listed here are indeed to be analyzed in the program outlined in the WP/SAP, and that all compounds or elements to be analyzed in the program are included in these lists? These potential ambiguities should be clarified, perhaps most directly by providing the TCL and TAL explicitly within the document.

Response: The constituents provided in Tables 1-1 through 1-7 of the QAPP summarize the complete list of parameters to be analyzed for during the RI. TCL/TAL constituents are summarized in Tables 1-1 through 1-3 of the QAPP. The following changes will be made to address the ambiguity of the WP/SAP.

The following sentence will be added to the first paragraph on p. 1-39 of the WP/SAP.

> "...and water quality parameters. *It should be noted that the TCL and TAL constituents are defined in Tables 1-1 through 1-3 of the QAPP (Appendix C).* A limited number of permanent..."

The following footnote will be added to Table 1-1 and Table 2-2.

> *"The TCL and TAL constituents are defined in Tables 1-1 through 1-3 of the QAPP (Appendix C)."*

3. Cover Letter; p. ii; Sixth paragraph

Comment: The SAP proposes to collect data in support of evaluations of natural attenuation (NA) at several sites. EPA supports this effort as it is too often neglected until the Feasibility Study stage, and an opportunity has been missed. Additional parameters that should be considered to support the NA assessment include analysis for reduced manganese, which can be a significant indicator of anaerobic degradation (in some cases, more prevalent than reduced iron). In addition, the analyte list should include ethene as a possible end-member of the degradation of chlorinated solvents under reducing conditions. This could be dropped later in the monitoring program if it proves to be insignificant. Finally, analysis for dissolved hydrogen should be considered as an indicator of reductive dechlorination.

Response: As recommended by the USEPA, soluble manganese [Mn (II)] and ethene will be added to the natural attenuation parameter list included in the WP/SAP. The appropriate changes will be made to the text and tables of the WP/SAP.

The September 1998 *EPA Technical Protocol for Evaluating Natural Attenuation of Chlorinated Solvents in Ground Water* indicates in Table 2.1 that dissolved hydrogen is an optional specialized analysis. In addition, the goal of the RI sampling and analysis is to determine if NA is occurring or not occurring and this parameter is not necessary to answer this question. Therefore, the Navy does not agree to add dissolved hydrogen to the analytical parameter list for the RI.

4. Cover Letter; p. iii; First paragraph

Comment: Figures 1-16 and 1-17 present the human health conceptual site model for surface and subsurface exposure. There have been a number of cases in which the figures are inconsistent with the information that is included in the text of the Work Plan. Various specific comments address some of these inconsistencies. A complete review of the text and figures should be conducted. Appropriate corrections should be made and/or additional information should be included in the text of the document for clarity

Response: Agreed. The text and figures of the draft WP/SAP will be reviewed and revised as necessary. The responses provided below for several specific comments address some of the inconsistencies.

SPECIFIC COMMENTS

1. p. 1-35, §1.4.1.3.2

Comment: EPA appreciates that this section recognizes the need to assess the mobility of inorganics and the possible role of anthropogenic activities (*e.g.*, solid waste disposal) on metals transport.

Response: Agreed. No further action is required to address this comment.

2. p. 1-35, §1.4.1.3.2

Comment: The text lists the water quality parameters to be measured for groundwater samples. The list includes the field parameters required by the USEPA Region I "low-flow" sampling protocol (see *U.S. Environmental Protection Agency Region I Low Stress (low flow) Purging and Sampling Procedure for the Collection of Ground Water Samples from Monitoring Wells*, July 30, 1996, Revision 2), which must be followed for all sampling associated with the basewide groundwater RI. (EPA notes that the protocol is mentioned elsewhere in the Work Plan, and is included in Appendix B, SOPs.) The WP/SAP should specifically commit to adherence to the low-flow protocol, particularly with respect to samples targeted at inorganics. A limited number of duplicate samples should be filtered and analyzed for TAL metals to ensure that geochemical transport interpretations are based on dissolved constituents.

Response: USEPA Region I "low-flow" sampling protocol is specifically mentioned in Section 2.5 of the WP/SAP on p. 2-17. Low-flow sampling techniques are also discussed in Section 2.5.2 on p. 2-19. Therefore, the Navy's commitment to following low flow sampling protocol to complete all groundwater sampling during the RI is already documented in the WP/SAP. Therefore, no changes to the WP/SAP are required.

Table 1-1 summarizes the number of samples to be collected during the RI and the analyses that will be completed on the samples. This table documents that approximately 24 out of 107 groundwater samples will be analyzed for TAL dissolved metals. Therefore, no changes to the WP/SAP are required.

3. p. 1-35, §1.4.1.3.2

Comment: The first paragraph notes a concern for mobilization of *natural* metals under *acidic* conditions resulting from landfill impact. While this is a significant issue, the mobility of metals is of broader concern, as well. Metals may be mobilized under *reducing* conditions, which can be a consequence of microbial activity associated not only with the former landfills, but also with degradation of fuels and other carbon sources within soils and aquifers basewide. Furthermore, the lead mobility concerns extend not only to that of natural origin, but also to that of anthropogenic origin.

Response: Agreed. The second sentence of the first paragraph of Section 1.4.1.3.2 will be amended as follows:

> "...a concern at NSB-NLON. *It has been hypothesized that two factors may be influencing the mobility of naturally occurring and/or anthropogenic metals in the soil and groundwater at NSB-NLON. Metals may be mobilized under reducing conditions, which can be a consequence of microbial activity associated with the former landfills (i.e., Area A Landfill), and also with degradation of fuels and other carbon sources within soils and aquifers at other sites at NSB-NLON.* Additional groundwater quality data..."

4. p. 1-36, §1.4.1.4.1

Comment: Water-level measurements are discussed to constrain the flow field on the base. Characterization of the spatial extent and magnitude of tidal influences is not mentioned. Is current understanding of this considered to be adequate?

Response: The Goss Cove Landfill site is the only site included in the Basewide Groundwater OU RI that has groundwater that is influenced by the tides. The influence of the tides on groundwater elevations at this site are well documented, but it would be prudent to be aware of this influence during future rounds of water level measurements. The following sentence will be added to Sections 1.4.1.4.1 and 2.5.1 of the WP/SAP.

> "Water-level measurements at the Goss Cove Landfill site, which has tidally influenced groundwater, will be taken at both high and low tides. The dual measurements will provide sufficient information to determine the influence of the tides on the site's groundwater elevations."

5. p. 1-37, top

Comment: Text may have been dropped inadvertently in editing this page.

Response: The following header and text were inadvertently omitted from the draft WP/SAP. The information will be included in the draft final version of the WP/SAP.

"1.4.1.4.2 Contaminant Fate and Transport

Site-specific contaminant fate and transport modeling may be required during the RI to determine downgradient exposure point concentrations for assessing risks and to predict the future extent of"

6. p.1-52, § 1.5.2.1.1

Comment: This section discusses the methodology for selection of chemicals of potential concern for human health in groundwater. The methodology proposed includes comparing detected values in both the filtered and the unfiltered groundwater sample from each location to screening criteria. Chemicals detected in both types of samples in excess of the screening criteria will be selected as

chemicals of potential concern. This procedure deviates from the typical procedure for selecting chemicals of potential concern (COPC) in groundwater. Typically, positive results from unfiltered groundwater samples only are compared to screening criteria and groundwater COPCs are selected on these exceedances only. To verify that this COPC screening procedure is appropriate for this facility, references citing the use of this screening methodology, or providing dates that this procedure was agreed to by EPA should be added to the text.

Response: This is the same methodology that was used in previous RIs for Naval Submarine Base - New London, Groton, Connecticut. The intent of using both unfiltered and filtered groundwater data in the COC selection process is to introduce an extra degree of conservatism in the COC selection process. The unfiltered analytical results should be higher than the filtered results for a particular inorganic compound, although in a few instances the filtered analytical results may be higher than the unfiltered analytical results. In these cases it is possible for the unfiltered analytical result to be below the screening criteria while the filtered analytical result exceeds the screening criteria. The methodology presented in the draft WP/SAP will retain a compound as a COC in cases when the filtered analytical result exceeds the screening criteria while the unfiltered analytical result is less than the screening criteria. This methodology ensures that all inorganic compounds detected at concentrations in groundwater exceeding the screening criteria are evaluated in the risk assessment. Therefore, the Navy does not propose to change the COC selection process.

7. p. 1-59, § 1.5.2.2.1

Comment: The text provides a description of the sources of information that will be consulted for toxicological information. While the text mentions various sources of toxicological data, it fails to include the EPA National Center for Environmental Assessment (EPA-NCEA) provisional values that have been developed. Typically toxicity values generated by NCEA may be used for chemicals which lack RfDs published in either IRIS or HEAST. The text should specify whether toxicity values generated by NCEA will be used or should state that the toxicity values from NCEA will not be used and provide a rationale.

Response: The second paragraph on p. 1-59 of the WP/SAP will be revised as follows:

> *"USEPA's Integrated Risk Information System (IRIS) database will be consulted as the primary source for CSFs. USEPA intends that IRIS supersede all other sources of toxicity information for risk assessment. If values are not available in IRIS, then annual Health Effects Assessment Summary Tables (HEAST) will be consulted, as well as the current EPA Region IX Preliminary Remedial Goals Table and the EPA's National Center for Environmental Assessment (NCEA). If no criteria are available from any of these sources, risks will not be quantified for these chemicals and potential exposures will be addressed in the uncertainty section of the risk assessment."*

The third paragraph on p. 1-61 of the WP/SAP will also be revised as follows:

> *"USEPA's Integrated Risk Information System (IRIS) database will be consulted as the primary source for RfDs. USEPA intends that IRIS supersede all other sources of toxicity information for risk assessment. If values are not available in IRIS, then annual Health Effects Assessment Summary Tables (HEAST) will be consulted, as well as the current EPA Region IX Preliminary Remedial Goals Table and the EPA's National Center for*

Environmental Assessment (NCEA). If no criteria are available from any of these sources, risks will not be quantified for these chemicals and potential exposures will be addressed in the uncertainty section of the risk assessment."

8. Figure 1-16

Comment: Page 1-70 of the text presents a discussion of dermal contact with groundwater. In this section, it is stated that exposure to groundwater by the construction worker will be evaluated for the dermal exposure pathway. However, the figure indicates that the construction worker will only be evaluated for ingestion of groundwater. Please correct.

Response: Figure 1-16 will be revised to show that the exposure to groundwater by a construction worker will only be evaluated for the dermal exposure pathway.

9. Figures 1-16 & 1-17

Comment: The key at the end of the table indicates that solid dots represent potentially complete exposure pathways and hollow dots represent incomplete exposure pathways. However, the key does not indicate how to interpret the boxes that do not have either type of dot within them. This should be included in the key.

The figures refer to one of the receptors as the adult recreational user. However, the text does not refer to this receptor. It appears that, the exposure scenario for the older child trespasser (ages 6 to 16) is developed in the text. The discrepancy between the figures and text should be addressed.

The figures present each potential pathway for the future and adult resident as an incomplete pathway. However, Table 1-6 indicates that a number of these pathways will be quantitatively evaluated. The figure should be corrected, or additional information should be included.

Response: The key to Figures 1-16 and 1-17 will be revised to indicate that if a box is empty it indicates that the pathway is not applicable for the receptor and, therefore will not be evaluated.

The adult recreational user will be changed to an older child trespasser on Figures 1-16 and 1-17.

Table 1-6 does list all potential exposure pathways for the future resident as being incomplete. EPA may be referring to Table 1-5 that indicates that exposures to future residents will be evaluated for sites. A footnote will be added to Table 1-6 and Figures 1-16 and 1-17 stating that "Although all potential exposure pathways for the future resident are considered to be incomplete, exposures to future residential receptors are being evaluated at the direction of EPA and CTDEP to provide an indication of potential risks if the facility were to close and then be developed for residential use."

10. Table 1-6

Comment: The table presents a summary of exposure routes to be evaluated quantitatively. The table states that inhalation of air and dust from surface and subsurface soil will be evaluated for the construction worker scenario. However, this is not consistent with the information that is presented on Figures 1-16 and 1-17. The discrepancy should be addressed.

Response: Figure 1-16 does show that the air pathway will be evaluated for the construction worker exposed to surface sources. Figure 1-17 will be revised to include the air pathway for the construction worker exposed to subsurface sources.

11. p. 2-3, §2.3.1.2

Comment: EPA appreciates that the SAP states that data will be collected at Site 3 to support a metals fate and transport study.

Response: Agreed. No further action is required to address this comment.

12. p. 2-3, §2.3.1.2

Comment: The general approach of delineating potential plumes by "stepping out" with temporary, direct-push wells (*see* Fig. 2-2) is well conceived. It offers the flexibility to respond to what is found as the investigation proceeds, and (potentially) better spatial coverage than that obtained from a few permanent monitoring wells located by guessing the most likely areas of contamination.

Response: Agreed. No further action is required to address this comment.

13. p. 2-4, §2.3.1.2

Comment: The WP proposes a deep bedrock well south of the OBDA pond, near the foot of the dike. The deep well will allow assessment of the vertical gradient at this location, and allow for better control on the chemistry of deep groundwater that may have its origin upgradient in the vicinity of the Area A Wetland and Area A Landfill, flow downward, and then flow upward downgradient of the dike, recharging shallow groundwater from below, and ultimately discharging to surface water. This is a critical link in the coupling of surface water and groundwater (*see also* Fig. 2-2).

Response: Agreed. No further action is required to address this comment.

14. p. 2-4, §2.3.1.2

Comment: The WP refers to a Shelby tube sample to be taken from the boring for "...new monitoring well 3MW14S." Where will it be located? It is not shown on Figure 2-2, and the text does not describe it qualitatively. Well pairs 3MW14S/D through 3MW18S/D are listed in Table 2-1 (p. 5). Are these well designations associated with the permanent installations referred to in the

second paragraph on p. 2-4 ("... approximately two to three well clusters ... may be installed within each sampling area...")? These links should be clarified in the text (*see also* Fig. 2-2).

Response: Wells 3MW14S/D through 3MW18S/D are the permanent wells that may be installed during Phase 2 of the investigation. The well designations were included in the WP/SAP for contingency purposes. As mentioned on p. 2-4 in the second paragraph the need for and location of these well clusters will be determined after the results of Phase 1 of the investigation are evaluated.

The second sentence of the second paragraph on p. 2-4 of the WP/SAP will be modified as follows to clarify this issue:

> "During Phase 2, approximately two to three well clusters, consisting of one overburden and one bedrock well each (e.g., 3MW14S/D through 3MW18S/D), may be installed within each sampling area to verify the migration of the VOC plume."

15. p. 2-4, §2.3.1.2

Comment: Please see cover letter regarding natural attenuation analytes.

Response: Please refer to the response provided for General Comment No. 3.

16. p. 2-5, §2.3.1.3

Comment: The SAP states that data collected at Site 7 (Torpedo Shops) will be used, in part to support a natural attenuation (NA) evaluation and a metals fate and transport study. The former is well motivated; these data are often too lacking when it is decided later to assess the importance of NA in reducing VOC contamination. The evaluation of degradation of chlorinated VOCs follows a previous EPA recommendation, driven in part, by the observation of DCE and vinyl chloride at 2DMW29S. The latter follows an earlier EPA recommendation, and is welcome.

Response: Agreed. No further action is required to address this comment.

17. p. 2-5, §2.3.1.3

Comment: As recommended by EPA in previous exchanges, ammonium perchlorate has been included in the analyte list for the Torpedo Shops sampling.

Response: Agreed. No further action is required to address this comment.

18. p. 2-5, §2.3.1.3

Comment: The description of planned and possible future activities for Site 7 leaves room for installation of one or two permanent monitoring wells in bedrock. However, it does not allow for the

possibility of installing permanent monitoring wells in the overburden aquifer. The language should be modified to allow for this possibility, if indicated by results from Phase I.

Response: Agreed. The text on p. 2-5 will be modified to indicate that one to two permanent overburden/bedrock monitoring well clusters may be installed during Phase 2.

19. p. 2-6, §2.3.1.3

Comment: The SAP states that "... one or two bedrock monitoring wells may have to be installed at Site 7." This is a positive response to a previous recommendation by the USEPA to evaluate potential bedrock groundwater contamination, given the thin overburden and downward gradients at the site. It is appropriate to defer locating the bedrock wells until possible contamination in the overburden is delineated, as proposed.

Response: Agreed. No further action is required to address this comment.

20. p. 2-6, §2.3.1.3

Comment: Please see cover letter regarding natural attenuation (NA) analytes.

Response: Please refer to the response provided for General Comment No. 3.

21. p. 2-6, §2.3.1.3

Comment: The last paragraph of this section states that a slug test will be performed in one overburden monitoring well, 7MW1. What is the nature and location of this well? Well 7MW1D is shown on Figure 2-3 in the southwest corner of Site 7, but Table 2-1 (p. 10) shows that this well is a bedrock well, as suggested by the designation "D." No well 7MW1 or 7MW1S (i.e., an overburden well) is shown on Figure 2-3. Please clarify.

Response: The monitoring well designation 7MW1 was a typographical error. The second sentence of the fifth paragraph on p. 2-6 will be changed as follows:

> "Slug tests will be performed in one overburden monitoring well (7MW3D) and one bedrock monitoring well (7MW4S)."

22. p. 2-6, §2.3.1.3

Comment: The text states, "The slug tests are necessary..." yet the bedrock well in which one of the slug tests is to be carried out is a contingency well, to be installed only if indicated by Phase II sampling. In the event that it is decided not to install new bedrock monitoring well, what steps will be taken to fill the data gap concerning the bedrock hydraulic properties? A contingency would be to perform the slug test in existing bedrock well.

Response: Please refer to the response provided for Specific Comment No. 21.

23. Figure 2-6

Comment: In Section 2.3.2.1: Please note that the location of groundwater sample 16TW4 (at the loading dock) is not labeled consistently with the other groundwater sample locations on this figure.

Response: Agreed. The label will be changed from "16TB8/TW4" to "16TB8/16TW4."

24. p. 2-8, §2.3.3.1

Comment: The EDSR concluded (p. 4-18, §4.1.7) that possible PCE contamination of bedrock groundwater has not been characterized adequately, and recommended that bedrock wells be installed at the site. However, no bedrock wells for this site are included in the WP/SAP. What has become of this issue? Characterization of bedrock groundwater beneath the site remains a data gap and should be addressed by this investigation.

Response: Disagree. The final EDSR issued by Tetra Tech NUS in May 1999 does not advocate the installation or sampling of bedrock wells at this site. This recommendation changed from the one provided in the draft EDSR because the source of the PCE detected in the groundwater at the site was determined to be an upgradient, offsite source. The source was determined by the Connecticut Department of Environmental Protection during their Phase I/II Environmental Site Assessment of Fusconi Dry Cleaners. Fusconi Dry Cleaners has hired a consultant to assist them in addressing the PCE contamination. Therefore, the Navy will not conduct any further investigation of the PCE contamination because it is not a site-related contaminant.

25. p. 2-8, §2.3.3.1

Comment: Groundwater samples from the Goss Cove Landfill area should be analyzed for natural attenuation parameters, in that previous investigations suggest that PCE, likely from an upgradient source, is impacting bedrock groundwater. The potential for natural degradation of chlorinated VOCs reaching the site should be evaluated.

Response: Disagree. Please refer to the response provided for Specific Comment No. 24.

26. p. 2-9, §2.3.3.2

Comment: The map (Fig. 2-8) notes that well 15MW4S was destroyed, so that a monitoring point to this side of the SASDA is not available. The potentiometric maps (Drawings 3 and 4) suggest that this is an important, downgradient location relative to the site. However, in view of the lack of any exceedances for COCs at this well in previous sampling, this may not be a serious compromise to the characterization of site groundwater. Nevertheless, it is important to ensure that groundwater contamination does not exist downgradient of source areas (or former source areas) at the base.

Response: Comment noted. Monitoring well 15MW4S was destroyed and subsequently abandoned. Monitoring wells located within the Tank Farm site that are downgradient of the SASDA site will be sampled during the RI. The results from the sampling and analysis of these wells will provide some indication of whether contaminant migration is occurring.

27. p. 2-9, §2.3.3.3

Comment: The WP/SAP proposes to install two temporary wells adjacent to Building 33, the Solvent Storage Area. One is on the upgradient (east) side, and one is on the downgradient (west) side. In view of the historic use of the site for handling of chlorinated solvents, and in view of the size of the building (some 300 feet long), this "exploration" coverage is rather sparse. Any historic spills toward the northern or southern ends of the building could easily pass by the central location of 18TW2 (Figure 2-9). Boring 18TB4 should be expanded to include a temporary monitoring well, and at least one more temporary well should be installed to the south of 18TW2, downgradient of the building.

Response: The text and tables will be modified to indicate that a temporary well will be installed at 18TB4.

The location of 18TB2/18TW2 will be moved to the south-southeast by approximately 40 feet so that it is located adjacent to the center of the southern half of Building 33. By moving this well to a more centrally located position, it should be able to better detect contamination emanating from potential sources along the southern end of the building. The Navy does not believe that additional temporary wells should be installed to the south of the new location of 18TW2.

28. p. 2-10, §2.3.3.4

Comment: The text refers to a shallow monitoring well, 23MW02S, to be installed adjacent to well 23MW02D; this shallow well is also included in Table 2-1 (p. 19). Figure 2-10, however, shows a new well (red) adjacent to 23MW02D labeled 23MW05. No well with the latter designation is listed in Table 2-1. Is this a drafting error? Please check for consistency.

Response: Agreed. The label "23MW05" on Figure 2-10 is incorrect and is the result of a drafting error. The label will be corrected to "23MW02S."

29. p. 2-11, §2.3.3.4

Comment: Please see cover letter regarding NA parameters.

Response: Please refer to the response provided for General Comment No. 3.

30. p. 2-19, §2.5.2

Comment: The SAP states, "Groundwater samples collected for dissolved metals analysis will be dissolved in the field prior to preservation..." Should this read, "... will be *filtered* in the field...?" Please check.

Response: Agreed. The text will be changed as suggested.

31. p. 2-19, §2.5.2

Comment: Please see cover letter regarding NA parameters.

Response: Please refer to the response provided for General Comment No. 3.

32. Appendix E

Comment: The compilation of screening criteria includes the April 1999 updates to the USEPA Region III Risk Based Concentrations (RBCs), which includes changes to the values for Cr and Mn. This update is in accord to a request by EPA in previous reviews.

Response: EPA Region I has recently changed their COC selection process. They now recommend that EPA Region IX Preliminary Remedial Goals (PRGs) Table be used for the COC selection process instead of the EPA Region III Risk-Based Concentration (RBC) Table. Therefore, all references to EPA Region III RBCs will be changed to EPA Region IX PRGs in the WP/SAP.