



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

10/27/98-01515

October 27, 1998

Mr. Randy Jackson
Atlantic Division, Code 1822
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511-2699

Re: Draft Proposed Remedial Action Plan
NM Slag Pile
Naval Base, Norfolk

Dear Mr. Jackson:

I am providing comments on the initial draft Proposed Remedial Action Plan for the NM Slag Pile dated October 1998 so that we can discuss the document at the November 3 partnering meeting. EPA Regional Counsel has not yet completed their review of the document. Your letter of October 16, 1998 request final review comments by November 15, 1998.

1. General Comment on Groundwater - The PRAP addresses soil and sediment remediation but does not include groundwater. Unless the Navy intends to issue a separate ROD for the groundwater component of the remedy, groundwater remediation alternatives should be evaluated and the preferred alternative identified in the PRAP. A focused feasibility study for groundwater should also be included as part of the administrative record. Also, there are no references to surface water in the PRAP which is usually considered along with the stream sediment.

2. Section 1, Introduction and Purpose

First paragraph should read ...the Department of the Navy's (DoN) preferred remedial alternative...

Second paragraph should read (a)..The DoN and U.S. Environmental Protection Agency (EPA), with the concurrence of Virginia DEQ, will select a final remedy for Site 2 subsurface soil, sediment, and groundwater...(b)Delete the next sentence...The NBN Partnership Team...(c)Substitute Record of Decision for Decision Document in the last sentence.

Third paragraph-Recommend including Final Ecological Risk Assessment as part of administrative record.

Figure 1-1 - Identify I-64 and I-564 as a point of reference.

Figure 1-2 - Identify surface water drainage channels and general area where sediment removal will occur (See Figure 1-2 of Final EE/CA, June 1998).

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3. Decision Summary - Change "recommended" alternative to "preferred" alternative here and elsewhere in the document since recommended alternative is used in the ROD after opportunity for public comment.
4. Section 2.1. Site Description and History - First sentence of fourth paragraph should provide reference for classification of Site 2 as open space (probably NBN Land Use Plan).
5. Section 2.2.1.5. Feasibility Study - Last sentence of first paragraph should read ...The remedial alternatives evaluated and the preferred remedial alternative for Site 2 ...
6. Section 2.3.1. Source of Contamination - Recommend that the concentration range of lead in subsurface soil be included and the depth of ash beds below the subsurface be included.
7. Section 2.3.2. Description of Contamination - The description is too brief and does not indicate which contaminants are found in surface and subsurface soil, sediment, and groundwater, and does not identify the range of concentrations for the contaminants of concern. For example, the Feasibility Study indicated lead was detected at a maximum concentration of 9820 ppm in the subsurface soil, 3900 ppm in the sediment, and 71 ppb in unfiltered groundwater. Also, is contamination of surface water a concern?
8. Section 2.3.3. Contaminant Migration - Include a discussion of groundwater contamination and the link between soil and groundwater.
9. Section 2.4.1. Human Health Risks

Indicate if COPCs are compared with residential or industrial preliminary remediation goals.

Restate the present and future land use in the context of the risk assessment in paragraphs two and three rather than state the site is likely to remain industrial.

Recommend either including a table showing the cancer risk and Hazard Index for each risk scenario evaluated, or include as a discussion in the text.

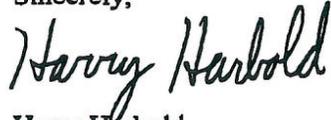
Include the standard paragraph which discusses EPA's standard cancer risk range and hazard index as established by the National Contingency Plan.

10. Section 2.5. Scope and Role of Response Action - This section should be rewritten in a format to indicate the RAO for each media and population exposed and to identify cleanup levels or goals for the remediation.
11. Section 2.8. The Selected Remedy - The title should be changed to The Preferred Alternative
12. Table 2-3 - Alternative 1, No Action, should include the present worth cost of conducting 5-year reviews.
13. Section 2.8.1 - The first two sentences should be deleted since the preferred remedial alternative will not be selected until after the PRAP is issued and opportunity for public comment. The long-term monitoring component is not clear. What is monitored?
14. Section 2.8.2 - The first sentence should be deleted since the preferred alternative has not been selected.

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15. A Preferred Alternative should be evaluated and selected for groundwater and surface water in Section 2.8.
 16. A Glossary should be included to describe terminology in the text.

Please contact me at 215-814-3203 if you would like to discuss these comments further.

Sincerely,



Harry Harbold
Federal Facilities Branch

cc: Devlin Harris, Virginia DEQ
Diane Bailey, Naval Base Norfolk