

4/27/05-01380

MEMORANDUM

CH2MHILL

Response to USEPA's Comments on the Draft Proposed Plan for SWMU 12: Disposal Area Near NM-37 and SWMU 16: NM-37 Accumulation Area

TO: Mr. Todd Richardson/USEPA
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FROM: Holly Rosnick/CH2M HILL
DATE: June 2, 2005

This document responds to verbal comments from the United States Environmental Protection Agency (USEPA) on the Draft Proposed Plan for SWMU 12: Disposal Area Near NM-27 and SWMU 16: NM-37 Accumulation Area following the March 2005 NSN Partnering Meeting.

Comment

How was the site concentrations compared to the background levels (statistical comparison or direct comparison between site concentrations and upgradient concentrations)?

Response: The concentrations detected at the site were directly compared to the background UTL concentrations for native soil and determined to be at similar concentrations. Therefore, the text in the PRAP will be revised to read "Arsenic was detected in the soil at concentrations similar to or below the basewide background level based on a comparison of site concentrations to the background UTL concentrations."

Comment:

The table summarizing the human health and ecological risks incorrectly concludes that the site presents an unacceptable risk.

Response: The table in the PRAP has been revised to include the correct conclusions of acceptable risks for each media. Additionally, the table notes where the NSN Partnering Team made risk management decisions that supported the conclusions of the report that the inorganic concentrations were associated with background levels and that the pesticide detections were not associated with a CERCLA release.